



## Catalogue of Measures

### Zero Tolerance and Borderline Cases

Our supply chain is extensive. We produce our textile articles in a wide range of countries. The employees of our producers and suppliers play a central role on this.

In our risk analysis, we were able to define the following hazards for our production countries (the table lists the risks with the highest proportion), for this purpose, we analysed and evaluated information from sources of the Fair Wear Foundation, Ellen MacArthur Foundation as well as ILO, WHO and Clean Clothes Campaign.

	Working hours/ Overtime	Occupational Safety	Chemicals	Water Pollution	Greenhouse Emissions
Turkey	Excessive overtime		Textile dyeing and treatment with critical chemicals	Due to chemicals and industrialization	
India		No government enforcement available	Textile dyeing and treatment with critical chemicals	Freshwater shortage - 70% of water is polluted	Employees are exposed to air pollution that is life threatening
China	Migrant workers' overtime; violation of labor contracts; long working hours		Synthetic chemicals are released into freshwater; hazardous micro plastics are not degraded	Chemicals from the dye industry and hazardous wastewater	Factories produce soot, which has been linked to respiratory illnesses

To avoid these risks, we have implemented various measures and developed an evaluation system. We have divided violations of these topics into 2 areas.

#### 1. Zero Tolerance

These include prison labour, serious, life-threatening health and safety conditions, child labour and repeated or systematic abuse. Any violation respectively any report about a breach of contract will result in immediate contact with the supplier. If the allegation is confirmed, we will immediately declare the business relationship with the supplier terminated.

#### 2. Borderline Cases

The second point includes serious violations of employment, health safety or environmental issues, as well as combinations of these problems. In these cases, we will impose far-reaching sanctions on the contractor in question or exclude it from production altogether.

In the event that suppliers violate the requirements below, we have various options for action, which are listed below.

##### • Child Labour

We are committed to ensuring that our suppliers do not employ children, under the age of 15 or school-age children (ILO Conventions 138 and 182)

- Children must be taken out of the company immediately and accordingly taken to school at the supplier's expense.
- Suppliers shall hold discussions with parents to clarify the circumstances.
- Audit reports are regularly reviewed by us to determine whether there is appropriate monitoring for proof of age.

- **Discrimination against Minorities, gender-based Violence**

We believe that the human rights and freedoms of every individual must be respected and honored (ILO Conventions 100, 111, 158 and 159). Disadvantaged groups and minorities deserve our special attention. The following measures will be effective:

- Suppliers shall ensure that complaint management in the form of freely accessible forms is made available to all workers.
- Our suppliers are required to pay men and women the same remuneration for the same work.
- Audit reports shall be checked in regularly (BSCI Annex 4).

- **Forced Labour**

Our business partners may not employ forced labour. No employee may be forced to work (ILO Conventions 29 and 105). Employees may terminate their employment at their own free will. We verify this as follows:

- Review audit reports to determine whether there is appropriate monitoring, particularly on the issue of migrant workers.
- Suppliers regularly check work permits and provide us with this information at any time.
- The manufacturer creates a complaint form that can be made freely and anonymously available to all employees at any time.

- **Working Hours/ Overtime/ Living Wages/ Minimum Wages**

We ensure fair conditions for all employees, especially with regard to working hours and overtime. Our suppliers must adhere to ILO Conventions (116 and 161, Recommendation 135) for fair and transparent labor contracts and working conditions. Appropriate minimum and living wages must cover the living expenses of workers and their families in such a way that an adequate standard of living is possible. Employed workers in our supply chain must not suffer hardship in their daily lives. We ensure this through the following measures:

- The manufacturer certifies to us that they have established a method of remuneration based on the FLA (Fair Labor Association) and ensure compliance with legal minimum wages.
- We refer the manufacturer to tools such as Living Income Toolkit or Wage Indicator.
- We verify, especially through BSCI certifications, that when overtime is performed, it is done on a voluntary basis and that the rest breaks are respected.
- We plan production capacity with our suppliers and jointly monitor capacity utilization.

- **Occupational Health and Safety**

Employees in the factories must be protected from risks such as fire, accidents and toxic substances. We require our suppliers to have a management system for occupational health and safety that meets the norms of the international standard OHSAS 18001.

- Review of audit reports (BSCI) on occupational health and safety and Covid 19 training.
- Our suppliers are required to provide regular information on occupational health and safety trainings.
- Access to drinking water, provision of rest areas, and effective personal protective equipment for individual employees is required by us.
- We have developed an internal hygiene concept for Covid 19 (limitation of the number of people in the premises, home office possibilities, ventilation concepts, test series, disinfection and provision of masks).

## • **Chemical Management**

We prohibit any use of harmful and toxic chemicals in our textiles. Our guidelines are updated annually and we try to reduce chemicals already in the selection and production of the materials used.

- We work according to a MRSL list (Manufacturing Restricted Substances List), developed specifically for our products, which our supplier confirm.
- Our suppliers shall reduce the use of hazardous substances in the supply chain and ensure this through annual monitoring (our suppliers are GOTS, Oeko-tex and GRS certified).
- the use of per - and polyfluorinated chemicals (PFC's and FC's) APEOs (non-ionic surfactants), organoid compounds, azo dyes, chlorophenols, SCCPs (chlorinated kerosenes and chlorobenzenes) is not allowed for our products.

## • **Environmental Management/ Greenhouse Emissions/ Water Pollution**

Our suppliers shall strive to improve environmental conditions and demand the same from their suppliers. They are required to use natural resources responsibly, prevent pollution and continuously improve their environmental performance. Valid operating permits are a prerequisite for this.

- We expect our suppliers to have an environmental management system analogous to ISO 14001, including energy balances and regular measurements and monitoring of energy flows. A conversion to renewable energies is to be aimed at.
- Any waste water generated should be treated on site. We only accept suppliers who have appropriate systems in place and comply with local regulations. We recommend to have tests carried out by ZDHC.
- Uncontrolled air emissions are not permitted.
- Suppliers are required to provide training for their employees and suppliers to inform them about sustainability principles and measures.
- We try to use more and more recycled and sustainable materials (recycled polyester, Tencel, vegan leather and organic cotton).
- For production items, we use compostable individual packaging and sustainable fabric tape.
- Consolidating shipments by sea, air and ground reduces our carbon footprint.

## • **Environmental Management/ Braunschweig Site**

At cotton-n-more we are committed to renewable energies and try to reduce our CO2 footprint through various requirements. We have established the following guidelines:

- We save emissions by now having 80% of our customer meetings take place digitally.
- Many of our work processes are paperless. Invoices and also delivery bills are transmitted and archived digitally. We only use recycled paper.
- We avoid additional individual packaging by shipping our goods bundled in 10-pack poly bags packed in recycled cardboard boxes.
- Waste separation has been mandatory for years.
- Unnecessary heating costs are avoided.

## • **Complaint Management**

We have developed our own complaints management system for the employees of our suppliers in the individual production plants. Employees can contact us at any time via our homepage. We will analyze and process every complaint within 48 hours.

Depending on the severity of the complaint, we will get to the bottom of the objection ourselves or via stakeholders (NGOs) and initiate our measures defined above.

- **Responsible Sourcing Practices**

We are committed to responsible sourcing and procurement practices to eliminate overtime, forced labour, and unauthorized subcontracting. In doing so, we aim to pre-empt any negative impacts on the entire supply chain and have established the following measures within the company.

- a) We are committed to working with suppliers with whom we have long-term partnerships and who share our values and commitment.
- b) We give preference to suppliers who comply with sustainable labor standards and successfully reduce environmental impacts. We require appropriate certificates such as BSCI, GOTS, SEDEX, etc. as proof.
- c) We have developed a form for new suppliers to better evaluate them in advance according to our criteria and to check if they meet our standards.
- d) We support fair payment terms. All suppliers are paid by us in time.
- e) Problems with quality and deliveries can be minimized by using proven standard qualities on a recurring basis.
- f) We consider legally and collectively negotiated wages in our calculation and are constructive and cooperative with our suppliers.
- g) Late order changes are to be avoided and cancellations are not intended.
- h) An appropriate collection framework planning enables an effective production planning of our suppliers, so that we can avoid peaks and lows.
- i) Termination of the cooperation is to be implemented immediately only in serious cases. A continuation of the business relationship takes place in dialogue.
- j) Our purchasing department commits itself to act according to these principles and to support our suppliers in the implementation of these principles.

18th November 2021



---

date, signature of Marc Kuhn, managing director