

Debenhams Supplier Code of Conduct Policy

1. Introduction

- Debenhams will only engage with reputable suppliers and factories to ensure that when our consumers purchase goods from Debenhams, they can be sure that they have been produced under acceptable conditions.
 - “Acceptable conditions” means lawfully, through fair and honest dealing, without exploitation of the people employed within the factories and organisations who produce the products, which must at all times be, produced in decent working conditions and with regard to the environment.
 - The Code is a statement of the minimum requirements, which must be met in order to trade with Debenhams. The Factory Set Up Approval process is verified by independent third party Social Ethical Compliance and Technical audits with on-going monitoring of each manufacturing site.
 - The Code is designed to be ethical, achievable, auditable, global and to promote the on-going development of Debenhams’ sources of supply.
 - The Code applies to all suppliers of goods to Debenhams including any involved in outsourced processes, referred to as ‘sub-suppliers’.
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2. Legal Requirements

- The provisions of the Code constitute minimum and not maximum standards, and the Code must not be used to prevent companies from exceeding these standards.
 - Companies applying the Code are expected to comply with national and other applicable local laws and where the provisions of law and the Code address the same subject, to apply that provision which affords the greater protection.
 - The provisions of the Code are not an exhaustive list.
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3. Employment is freely chosen

- There is no forced, bonded or involuntary prison labour.
 - Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.
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4. Freedom of Association

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Suppliers must have confidential procedures which allow worker representation for any issue concerning the labour standards referred to in the Code and which will enable protection for all workers and participation by workers who may be vulnerable, such as women and adolescents.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

5. Working Conditions are Safe and Hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 - Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
 - Access to clean toilet facilities and to portable water and if appropriate, sanitary facilities for food storage shall be provided.
 - Accommodation, where provided, shall be clean, safe and meet the basic needs of the workers.
 - The company observing the Code shall assign responsibility for health and safety to a senior management representative.
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6. Employment of children

- Child labour shall not be used and there shall be no new recruitment of child labour.
- Companies shall develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing Child labour. This will enable him or her to attend and remain in education until they reach adulthood.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- The policies and procedures relating to employment of children shall conform to the provisions of the relevant International Labour Organisation (ILO) standards.

The following are the definitions to be used for the above:

'Child': Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.

'Young Person': Any worker over the age of a Child as defined above and under the age of 18.

'Child Labour': Any work by a Child or Young Person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the Child's or Young Person's education, or to be harmful to the Child's or Young Person's health or physical, mental, spiritual, moral or social development.

7. Fair wages are paid

- Wages and benefits paid for a standard working week, within the legal working hours limit and meet a minimum national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.
 - Deductions from wages such as disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.
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8. Regular employment is provided

- To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.
 - Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour only contracting, home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
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9. Working hours are not excessive

- Working hours comply with national laws and benchmark industry standards, which affords the greater protection to the workers.
 - In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period or where allowed by national law, two days off in every 14 day period.
 - Overtime shall be voluntary, not exceed 12 hours per week, shall not be demanded on a regular basis, appropriate safe guards are taken to protect the workers safety and shall always be compensated at the national premium rates.
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10. Modern Slavery Act

- The Modern Slavery Act was introduced in March 2015 to combat slavery and human trafficking. Debenhams Prohibits and has a zero tolerance to all forms modern slavery throughout our global organisation, operations and supply chains. The term Modern Slavery is used to encapsulate slavery, servitude, child labour, forced compulsory labour as well as human trafficking.
 - You must at all times comply with our Human Rights Policy and all applicable law and regulation regarding slavery, human trafficking and compulsory labour practices, including the Modern Slavery Act and maintain a complete set of records to trace the supply chain of all goods and services provided.
 - You will operate with us on the basis of full transparency in this regard, declaring to us immediately if you become aware of or have reason to suspect there are any forms of human rights abuses in your supply chain and using reasonable endeavours to assist us with any audit or investigation we undertake with regard to slavery or our reporting requirements under applicable law and regulation.
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11. Labour Providers

- Where suppliers make use of labour providers in their supply chain, they shall be fully transparent and apply due diligence to meet the provisions of the code to comply with the national and other applicable local laws.

12. Disciplinary practices and Discrimination

- No harsh or inhumane treatment is allowed. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.
- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

13. Monitoring, Inspection and Assessment

Suppliers must provide details of the factory producing the goods, which must be made at the approved factory (as per the Factory Set Up Approval Process) and be correctly named on the purchase order.

Senior management of suppliers must be appointed with responsibility for ensuring that:

- All their component, raw material suppliers and outsourcing contractors are aware of and shall comply with this Code.
- Records shall be kept and made available to evidence that notification of this Code has been given and regular reviews and auditing have been undertaken. Suppliers must ensure that Debenhams are provided with all information necessary to allow implementation and verification of compliance with the Code.

Access to the factory premises shall be allowed to Debenhams staff and their representatives for the purpose of monitoring, inspecting, assessing and auditing the implementation of the Code at all times, announced or unannounced.

14. Sub-Contracting

- Subcontracting is not permitted and is defined as the manufacturing of product in an unknown unapproved factory.
- The use of a non-approved factory is in breach of the Supplier Code of Conduct and Conditions of Trading.
- All purchase orders must be raised to the correct approved Factory at all times.
- For production purposes if an existing supplier requires more factories, then they need to follow the new Factory Approval Process, after Strategic Approval has been given.

Outsourcing

- Factories used for the out-sourcing of ancillary components of the goods are acceptable for processes which are not part of the main manufacturing process, these include: hand embroidery, printing, dying/finishing (i.e. mills), laundries, sub-component suppliers e.g. zips, electrical components. These outsourced facilities must at all times be compliant with our Environmental & Chemical Policy
- All of these outsourced facilities must be declared to the third party audit company and Debenhams at all times, by recording in the factory compliance Workbook.

15. Environment

- Suppliers must manage all waste that they generate in accordance with local laws or in such a way as to avoid harm to the environment or the local population.
Suppliers must comply Debenhams Environmental policies

16. References

The Code of Conduct has been drawn up with reference to the International Labour Organisation Conventions and Recommendations, Modern Slavery Act 2015 and ETI (Ethical Trading Initiative) Base Code.

ILOC 1	Hours of Work (Industry) Convention, 1919
ILOC 26	Minimum Wage-Fixing Machinery Convention, 1928
ILOC 29	Forced labour Convention, 1930
ILOR 85	Protection of Wages Recommendation, 1949
ILOR 87	Freedom of Association & protection of the Right to Organise Convention 1948
ILOC 95	Protection of Wages Convention, 1949
ILOC 98	Right to Organise and Collective Bargaining Convention, 1949
ILOC 100	Equal Remuneration Convention, 1951
ILOC 105	Abolition of Forced Labour Convention, 1957
ILOC 111	Discrimination (Employment and Occupation) Convention, 1958
ILOC 131	Minimum Wage Fixing Convention, 1970
ILOC 138	Minimum Age Convention, 1973
ILOR 146	Minimum Age Recommendation, 1973
ILOC 155	Occupational Safety and Health Convention, 1981
ILOR 164	Occupational Safety and Health Recommendation, 1981
ILOC 181	Private Employment Agencies Convention, 1997
Article 32	UN Convention on the Rights of a Child
ETI Base Code	Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015