

TOPSHOP Code of Conduct

We respect and promote the Universal Declaration of Human Rights and the International Labour Organisation (ILO) core conventions and other relevant conventions and principles. We seek to apply both the letter and the spirit of all applicable local laws and promote continuous improvement in our operations. We hold ourselves and our suppliers to these standards. We apply the Jo-In code as our base code. In case there is a difference between the local applicable law and the code then we apply the higher of these two standards. We undertake to trade only in products that have been manufactured under decent working conditions. To that end we will implement our base code in our factories and agree to put sufficient and effective efforts into ensuring that the code is followed by our contractors, subcontractors, suppliers, and licensees. The methodology we will use to implement the code could change significantly as we and others learn about leading practices. We will endeavour to adjust our implementation to reflect these changes and work to adopt any other changes in leading practices. We fully subscribe to the concept of the "living wage". The sustainable implementation of the "living wage" is beyond the influence of one single brand or company. Until a sustainable implementation solution for the living wage is available we will apply "prevailing wage" or a "negotiated wage" if such is available. This will be at least the local legal minimum wage. We will also continue to support and participate in multi-stakeholder initiatives which endeavour to find a solution to the sustainable implementation of the "living wage".

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

(Relevant ILO conventions are: No. 87, 98, 135 and 154 - Relevant ILO Recommendation 143)

The right of all workers to form or join trade unions of their choice and to bargain collectively shall be recognised and respected. We recognise the trade union(s) of the workers' choice. We adopt a positive approach towards the activities of trade unions and an open attitude towards the organisational activities of workers. No worker, or prospective worker, shall be subject to dismissal, discrimination, harassment, intimidation or retaliation for reason of union membership or participation in trade union activities. We ensure that workers' representatives have free access to all workplaces to carry out their representation functions and shall not, without justification, impede access for union organisers to employees.

FORCED LABOUR

(Relevant ILO conventions are: No. 29 and 105 - Relevant ILO Recommendation: No. 35)

Forced labour, that is any work or service exacted under the threat of penalty or for which the person concerned has not offered himself or herself voluntarily including prison and bonded labour, shall not be used. Workers shall not be required to lodge 'deposits' or identity papers with their employer and shall be free to terminate their employment after reasonable notice. Workers shall be free to leave the factory at all times and the freedom of movement of those who live in employer controlled residences shall not be restricted.

CHILD LABOUR

(Relevant ILO conventions are: No. 138 and 182 - Relevant ILO Recommendation No. 146 and 190)

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher. We establish, document, maintain, and effectively communicate to personnel and other interested parties policies and procedures for remediation of children found to be working in situations which are prohibited by the ILO Convention No. 138 and Convention No. 182. We provide adequate, financial and other, support to enable such children to attend and remain in education until no longer a child. We do not expose young workers under the age of 18 to situations in or outside of the workplace that are likely to jeopardise their health, safety or morals. This includes night work.

NON-DISCRIMINATION

(Relevant ILO conventions are: No. 100, 111 and 183 - Relevant ILO Recommendation: No. 90 and 111)

We do not engage in or support discrimination in hiring, remuneration, access to training, promotion, discipline, termination of employment, retirement or any other terms of employment based on race, colour, sex, religion, political opinion or affiliation, national extraction or social origin, caste, marital status, sexual orientation, pregnancy, family responsibilities, trade union activities or membership, disability or age. We do not interfere with the exercise of the rights of workers to observe tenets or practices, or to meet needs relating to, on race, colour, sex, religion, political opinion or affiliation, national extraction or social origin, caste, marital status, sexual orientation, trade union membership, disability or age. Women and men shall receive equal remuneration for work of equal value, equal evaluation of the quality of their work and equal opportunities to fill all positions open. No behaviour that is sexually coercive, threatening, abusive or exploitative, including gestures, language and physical contact, shall be allowed. The right of all individual men and women to decide freely the number, spacing and timing of their children, to attain the highest standard of sexual and reproductive health and to make decisions concerning reproduction free of discrimination, coercion and violence shall be fully respected. Pregnancy tests will not be a condition of employment, nor will they be demanded of employees. Workers will not be forced or pressured to use contraception. We provide appropriate services and accommodation to women workers in connection with pregnancy, childbirth and nursing. Workers shall have all entitlements and protection provided in national law and practice with respect to maternity. Workers taking maternity leave shall be entitled to return to their employment on the same terms and conditions that applied

to them prior to taking leave and they shall not be subject to any discrimination, loss of seniority or deduction of wages. While an individual is absent from work on maternity leave, we do not give her notice of dismissal or give her notice of dismissal at such a time that the notice would expire during such absence.

WAGES

(Relevant ILO conventions are: No. 95 and No. 131. Relevant ILO Recommendations are: No. 131 and 135)

Workers shall have the right to a living wage. Wages and benefits paid for a standard working week shall, as a floor, always comply with all applicable laws, regulations and industry minimum standards and shall be sufficient to meet basic needs of workers and their families and provide some discretionary income. The level of wages and benefits will be reviewed on a regular basis. Freedom of collective bargaining will be respected. Deductions from wages shall not be made for disciplinary purposes, nor shall any deductions not provided for by national law be permitted without the express written permission of the worker concerned. All workers shall be provided with written and understandable information about their employment conditions, including wages and benefits, before entering employment. The particulars of their wages shall be provided to the workers concerned for the whole pay period each time they are paid. Remuneration shall be rendered either in cash or cheque form, in a manner convenient to workers. Wages and other benefits shall be paid on a regular and timely basis.

WORKING HOURS

(Relevant ILO conventions are: No. 1)

We comply with applicable laws and industry standards on working hours, whichever offers greater protection. The regular workweek shall be as defined by law but shall not exceed 48 hours. Workers shall be provided with at least one day off after each six consecutive days of work, as well as public and annual holidays. All overtime work shall be voluntary, shall not be demanded on a regular basis, shall be reimbursed at least at such a premium rate as required by law and under no circumstances shall exceed 12 hours per employee per week. In those countries where a premium rate for overtime is not legally required, workers shall be compensated for overtime at a premium rate at least one and one half of their regular hourly compensation rate.

HEALTH AND SAFETY

(Relevant ILO conventions are: No. 155 - Relevant ILO Recommendation 164)

We provide, bearing in mind the prevailing knowledge of the industry and of any specific hazards, a safe, hygienic and healthy working environment and shall take adequate steps to prevent accidents and injury to health arising out of, associated with or occurring in the course of work, by minimising the causes of hazards inherent in the working environment. Men and women workers shall not be exposed to hazards, including glues and solvents, which may endanger their reproductive health. We appoint a senior management representative who will be responsible for the health and safety of all workers, and be accountable for the implementation of the Health and Safety elements of this code. We establish a safety and health cooperation committee with worker representative participation. All workers shall receive regular and recorded health and safety training, and such training shall be repeated for new and reassigned workers. A worker shall have the right to remove herself or himself from imminent serious danger. We establish systems to detect, avoid or respond to potential threats to the health and safety of all workers. We provide, for use by all workers, access to potable water and clean toilet facilities, and, when necessary, suitable facilities for food storage. We ensure that accommodation, where provided, is clean, safe, and meets the basic needs of the workers.

EMPLOYMENT RELATIONSHIP

Work performed must be on the basis of a recognised employment relationship established through national law and/or practice. The obligations to workers 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, subcontracting or homeworking arrangements or through apprenticeship schemes where there is no real intent to impart skills or to provide regular employment. Nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

ABUSE

Every worker will be treated with dignity and respect. We do not engage in or tolerate the use of corporal punishment, mental or physical coercion, threats of physical abuse, unusual punishment or discipline, sexual or other harassment, intimidation and verbal abuse. Such conduct shall give rise to disciplinary or other action in accordance with established procedures

IMPLEMENTATION OF THE CODE OF CONDUCT

An implementation system is a necessary, integral and inseparable part of a Code of Conduct. We will introduce an implementation and management system for the Code of Conduct for our suppliers and ourselves. The elements of this implementation system shall include a commitment to the Code of Conduct and communication thereof, a management system, internal monitoring, worker education and training, independent verification, a complaints mechanism and public reporting.

We will work toward the verification of the standards in the code and commit that contractors, subcontractors, suppliers, or licensees, who demonstrably fail to comply with one or more of the standards laid down in the Code, take appropriate measures to ensure that the situation is improved. If necessary, the offending party shall be sanctioned by cancellation of its contract. We agree to independent verification of our compliance with the Code.

REVIEW

To measure our compliance and the compliance of our suppliers, we will conduct ongoing assessments and reviews of facilities. We will require full and open access to the facilities and operations involved in our business. Employees must have the opportunity to notify us anonymously on any violations of standards at a workplace and they must not receive any retribution for this action. We will make information on our compliance programme available publicly.

CONTINUOUS IMPROVEMENT

We will continually improve our programme by seeking feedback and input from our suppliers and through stakeholder dialogue.