

Ethical Sourcing Policy

1. Purpose

The aim of this policy is to provide expectations and disciplines regarding Geared Up Culcha's (GUC) ethical standards in conducting its business affairs.

2. Policy Scope/Coverage

This policy applies to all GUC personnel, stakeholders, and supply chain partners. GUC's Ethical Sourcing Policy applies to all facilities that produce goods or provide services for GUC. GUC is committed to sourcing products and services in an ethical and responsible manner, and considers the welfare of workers, their health and safety, business integrity, potential environmental impacts and animal welfare issues.

3. Background

In 2019, GUC was asked by Qantas to ensure that our supply chain partners and manufacturing partners were Supplier Ethical Data Exchange (Sedex) compliant in regards to a particular project we were supplying them products for. It was the first client to ask for this compliance and therefore the beginning of our Sedex compliance journey and a more deeper exploration of our own Ethical Sourcing practices.

4. Policy Statement

GUC will endeavour to ensure that all products from suppliers and/or manufacturers who operate outside of Australia are monitored and reviewed for meeting compliance standards and regulatory requirements, demonstrable by our supplier audit procedures. GUC encourages suppliers to adopt behaviours, procedures and practices that go beyond the minimum requirements set out in this Policy.

5. Commitment

GUC is committed to sourcing products and services in an ethical and responsible manner, and considers the welfare of workers, their health and safety, business integrity, potential environmental impacts, and animal welfare issues.

GUC is committed to ensuring both our business and our suppliers meet the highest standards in ethical, responsible, and sustainable conduct and corporate social responsibility. This policy is focused on People, Health & Safety, Community and Marketplace.

GUC has an unwavering commitment to ensuring that our suppliers adopt ethical sourcing practices by confirming supplier policies in relation to ensuring there is no Child Labour or Modern Slavery and there is respect for the fundamental principles and rights at work.

6. Social Compliance Audits

Social compliance refers to how a business treats its employees, the environment, and their perspective on social responsibility. To ensure that our suppliers and manufacturers meet standards of social compliance, it may be necessary to conduct a social compliance audit directly via checklist or through Sedex and other ethical sourcing compliance organisations.

Whilst GUC encourages suppliers to adopt behaviours, procedures and practices that go beyond the minimum requirements set out in this Policy. GUC is a small medium enterprise and has minimal influence on our international suppliers and manufacturers.

7. Our Marketplace and Ethical Sourcing

Consideration of the impact a business makes on the environment and the communities in which we operate. This concern also extends to the environmental and social conduct of our Supplier Partners. We do not support profiting from unauthorised labour or exploitation of any kind, and we ensure all international suppliers comply with the set humane international standards for manufacturing in compliance with ISO 9001:2008 for total quality management and including; Child Labour, Modern Slavery, Harassment and Harsh or Inhumane Treatment, Wages and Benefits, Working hours, Freedom of Association, Safe Working Conditions, Discrimination, Working Hours, Migrant Workers, Animal Welfare, Environment, Management Systems, Documentation and Policies

8. Child Labour

8.1. Suppliers must not use child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential and that is harmful to their physical, moral, and mental development.

8.2. Suppliers must be able to verify the age of all workers to ensure no child labour is used. All suppliers shall comply with the minimum legal working age in the country in question or by the ETI clause 4, whichever is higher.

8.3. Suppliers must accept the principles of remediation of child and under age workers, and where such labour is discovered, suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.

9. Modern Slavery

9.1. Suppliers must comply with all applicable anti-slavery and modern slavery laws and must not engage in any modern slavery practices, including using forced, bonded, involuntary labour or human trafficking.

9.2 Suppliers must comply with all modern slavery reporting requirements stipulated by applicable modern slavery laws. Suppliers must confirm in writing that they have complied with all relevant reporting requirements and provide any other information or evidence of such reporting to GUC on request.

9.3 Suppliers must not be convicted or investigated in relation to any practice that amounts to modern slavery practice or be publicly named by any organisation alleging the Supplier has engaged in modern slavery practices.

9.4. Suppliers must ensure that employment is freely chosen, workers can leave their employment after reasonable notice, freedom of movement is respected, and workers are not required to lodge deposits or identity papers with suppliers.

9.5. Suppliers must procure (so far as is reasonably practicable) that its officers, workers, employees, agents, sub- contractors and any other persons who perform services for or on behalf of it in connection with the relevant supply arrangements with GUC comply with the above.

9.6 Suppliers must immediately notify the Geared Up Culcha (accounts@gearedupculcha.com.au) upon becoming aware of any incident, complaint, or allegation that the Supplier or any entity in its supply chain has engaged in modern slavery.

10. Harassment and Harsh or Inhumane Treatment

10.1 Workers must be treated with dignity and respect by suppliers and by other workers

10.2 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

11. Wages and Benefits

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

11.2. All workers must 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 that are paid.

11.3. Deductions from wages may only occur with the express written permission of the worker concerned.

11.4. Deductions from wages for disciplinary measure are not permitted.

11.5. Wages are to be paid in a timely manner.

12. Working Hours

12.1. Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours in any 7-day period, as per ETI clause 6.4 and 6.5.

12.2. Workers must have at least one day off in 7 days or two days off in every 14 days.

12.3. Overtime must be voluntary, must not be excessive or demanded on a regular basis and must be compensated as prescribed by local laws.

12.4. Record keeping on hours worked must be accurate, complete and transparent at all times.

13. Freedom of Association

13.1. Suppliers acknowledge that workers have a right to freedom of association and to bargain collectively.

13.2. Workers have the right to join or form trade unions of their choosing and suppliers are required to adopt an open attitude towards the activities of trade unions and their organisation activities.

13.3. Where the right to freedom of association and collective bargaining are restricted under local laws, suppliers must not hinder the development of alternative means of independent and free association and bargaining.

14. Safe Working Conditions

14.1. Suppliers must provide plant and systems of work that are safe, hygienic and without risk to health to workers including evidence of:

14.1.1. safe fire, structural and electrical safety, plant, or systems of work; and

14.1.2. adequate, unlocked, accessible, and clearly marked emergency exits.

14.2. Suppliers must provide workers with a safe and clean working environment, taking into consideration the prevailing knowledge of the industry and of any specific hazards.

14.3. Workers must receive adequate and regular safety training relevant to their role/s.

14.4. Personal Protective Equipment (PPE) must be supplied and worn by workers where required. Workers must be trained in the use of PPE.11.5. Safeguards on machinery must meet or exceed local laws.

14.5. Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.

14.6. Workers must have access to clean toilet facilities, clean drinking water and where appropriate hygienic facilities for food storage and preparation.

14.7. Workers have the right to refuse to perform work that is unsafe or in an unsafe environment

15. Discrimination

15.1. Suppliers must ensure there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on personal characteristics such as race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any personal beliefs or values.

15.2. Suppliers must ensure that they provide an environment where their workers can perform their duties without distress or interference caused by harassment or any other inappropriate workplace behaviour.

16. Regular Employment

16.1. To every extent possible, work performed must be on the basis of a recognised employment relationship established through national law and practice.

16.2. Workers who have a regular employment must receive entitlements relating to labour and social security laws and regulations.

16.3. Suppliers must not use labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or use apprenticeship schemes (where there is no genuine intent to impart skills, or provide regular employment), to avoid providing the entitlements in clause 12.2.

17. Migrant Workers

17.1 Whether employed directly by a supplier or through third party agents/contractors, migrant workers must:

17.1.1 be employed in accordance with relevant local laws including local immigration laws;

17.1.2. receive the same entitlements as local workers as stipulated by local laws; and

17.1.3. be subject to all principles under this Policy

17.2 Any commission and other fees due to a third party agent or contractor in connection with employment of a migrant worker must be paid by the employer/supplier.

17.3 The employer/ supplier must not require a migrant worker to surrender personal identity documents, withhold identity documents or restrict worker's access to their identity documents under any circumstances. Personal identity documents include but are not limited to passports, identity papers, travel documents, and other personal legal documents.

17.4 All migrant workers must be provided with clear unambiguous information about their contract for employment, employment conditions, wages and their written contract for employment in their native language. If a worker is illiterate, the contract for employment must be explained in their native language.

17.5 Employers/suppliers must ensure that the written contract of employment complies with all applicable local laws and regulations.

18. Environment

18.1. Suppliers must comply with local and national environmental laws and regulations, ensuring no impact on the health of the local environment and community.

18.2. Suppliers must use reasonable endeavours to comply with international standards on environmental protection.

18.3. For paper and timber products (for resale, excluding packaging materials), suppliers must provide Forest Stewardship Council (FSC), Programme for Endorsement of Forest Certification Scheme (PEFC), or otherwise agreed chain of custody documentation for the source of paper and / or timber used in products sold to GUC.

18.4. Conflict Materials: GUC supports compliance with the United States (US) Dodd Frank conflict minerals legislation and is committed to responsible sourcing of these minerals, namely tin, tantalum, tungsten and gold. Suppliers are expected to undergo due diligence within their supply chain if these minerals are used in the manufacture of GUC products from both source of supply and smelting. Suppliers will not be approved if they cannot demonstrate source of supply and/or are sourcing raw materials originating from the relevant conflict countries.

18.5. Asbestos: All suppliers warrant that such products are free from asbestos (in other words, that such products have no asbestos content).

18.6. Restriction and Banned Substances: GUC requires suppliers to comply with European Union (EU) Registration, Evaluation, Authorisation and Restriction of Chemical Substances (REACH) regulations set for restricted and banned substances of high/very high concern to protect our customers wearing our products and those making our products for us.

18.7. Sandblasting: The use of sandblasting as a treatment on any of our products is banned.

18.8. Uzbekistan Cotton: GUC Suppliers must attest to the fact that they and their sub suppliers do not (knowingly) source cotton fibre produced in Uzbekistan.

19. Animal Welfare

19.1 Suppliers must ensure that animals used in the course of producing goods or services are treated in accordance with the “Five Freedoms for Animal Welfare”, as defined by the Royal Society for the Prevention of Cruelty to Animals (‘RSPCA’)

19.2 Mulesing - In circumstances where mulesing is necessary for the long-term welfare of the animal, it is to be performed in a manner that minimises the impact of the procedure.

20. Management Systems, Documentation and Policies

20.1. Suppliers must ensure appropriate documentation, evidence; processes and systems are in place and continually developed to ensure effective ethical management practices.