



Smiggle Pty Ltd | ABN 53 100 379 226
457 St Kilda Road, Melbourne, VIC, 3004, Australia | smiggle.com

Smiggle Supplier Ethical Code of Conduct

Smiggle Pty Ltd (**Smiggle**) is committed to respecting and implementing the highest standards of labour, environment, and ethical conduct across our supply chain. Our suppliers are required to ensure safe working conditions, treat workers with dignity and respect, and implement environmentally responsible practices.

This Smiggle Supplier Ethical Code of Conduct (the **Code**) sets out our minimum requirements for doing business with Smiggle. Suppliers are to refer to Smiggle auditing procedure document for detailed information on supplier auditing requirements.

Smiggle Principles

Smiggle's values are crucial to our business and fostering a strong culture within our teams. Our core values are:

- Live for the customer
- Act with integrity
- Proactively achieve results
- Collaborate for success
- Achieve cost efficient outcomes
- Deliver product excellence

With this in mind, we expect that the suppliers we collaborate alongside, align with these values and are committed to ethical business practices in all their operations.

The Code is based on internationally recognised human rights, as set out in the United Nations' Universal Declaration of Human Rights, and the International Labour Organization's (**ILO**) Declaration on Fundamental Principles and Rights at Work, and Core Conventions. Smiggle is committed to operating based on the United Nations Guiding Principles on Business and Human Rights (UNGPs). We require our suppliers to operate in accordance with the requirements of our policies, and in compliance with all applicable laws and regulations. Where there are differences in national law and the requirements of this Code, suppliers are expected to adhere to the more stringent of the standards.

Smiggle has zero tolerance for forced labour and modern slavery which is defined by the ILO as "*all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily*"¹. Indicators of forced labour include abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, and excessive overtime².

Compliance with this Code

We require our suppliers (direct and indirect), contractors, subcontractors, service providers and all other business partners to comply with the requirements of our Code. Suppliers must communicate the expectations of Smiggle to their own suppliers, and ensure these requirements are cascaded down the supply chain.

We expect our suppliers to have robust management systems in place to ensure the protection of workers, surrounding communities and the environment. This includes having defined policies and procedures, and designated personnel for implementation. Processes must be implemented to manage all the issues highlighted in this code.

¹ ILO Forced Labour Convention No. 29, 1930

² ILO Indicators of Forced Labour, 2012



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Smiggle commits to working with our suppliers on continuous improvement to meet our requirements and safeguard workers' rights and the environment. Smiggle will verify compliance against this code through our compliance monitoring processes, which may include but not limited to third-party audits (both semi-announced and unannounced), worker interviews, and site inspections. If a supplier is unable or unwilling to demonstrate compliance with this Code, then trading arrangements between Smiggle and a supplier may be suspended or terminated.

Requirements

1. No Child labour

Suppliers must not employ workers below at least 15 years of age, the applicable minimum legal age for employment, or the applicable age for completing compulsory education, whichever is highest. Any workers under 18 must be exempted from working overtime, nightshifts, or engaging in any hazardous work.

2. No Forced labour and human trafficking

All work conducted in factories used by Smiggle should be voluntary. Suppliers shall not traffic persons, or use any form of slave, forced, bonded, indentured or prison labour. This includes the transportation, harbouring, recruitment, transfer, receipt or employment of persons using any means of threat, force, coercion, abduction, fraud or exploitation. Suppliers must ensure that there is no deception regarding worker's employment conditions, wages, housing, or the identity of the employer. Workers must be free to terminate their employment at any time without penalty or punishment, providing that notice is provided to the Supplier as per their employment contract terms.

The payment of recruitment fees or other similar fees to secure employment by workers is strictly prohibited. If such fees are found to have been paid by workers to the supplier or through any third parties, those fees shall be repaid by the supplier within 30 days of discovery. Smiggle is aligned with the definition of recruitment fees and related costs stipulated by the ILO³.

3. Anti-Discrimination

Suppliers shall not discriminate both in recruitment and employment practices. Workers shall not be discriminated against based on age, disability, ethnicity, caste, gender identity, marital status, national origin, migration status, political affiliation, race, religion, sexual orientation, language spoken, union membership, or any other personal characteristics. All employees must have equal access to opportunities including hiring, salary, benefits, career advancement, training, or allocation of work. Suppliers must not require pregnancy or medical tests, except where required by applicable laws, regulations for workplace safety, and shall not discriminate based on test results.

Suppliers must ensure that vulnerable workers, such as migrants or women, are protected from abuse and exploitation, and are provided with support services to reflect their status.

4. Freedom of association and the right to collective bargaining

Workers must have freedom of association, including the right to join or form organisations of their own choice, and to bargain collectively. This should be without interference, discrimination, or any retaliation. In areas where the right to freedom of association and collective bargaining is restricted by law, suppliers must facilitate the development of other means for independent and collective bargaining, such as through a democratically elected worker committee. Workers must be aware of

³ 'General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs', International Labor Organization, 2019



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who their elected representatives are, and there must be no interference or obstruction of meetings and negotiation by the Supplier.

5. Freedom of movement

Suppliers must not withhold worker's original identification and travel documents, or personal valuables. Suppliers must not impose unreasonable restrictions of movement within the workplace premises, or in supplier-provided accommodation.

6. Harassment, abuse, and inhumane treatment

All workers must be treated with respect and humanely. Suppliers must ensure that their workplaces are free of harassment and abuse. Workers shall not be threatened or subjected to any harassment, abuse, or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion or abuse, and sexual harassment. The imposition of fines or penalties as disciplinary measures is strictly prohibited.

Suppliers must enforce a non-retaliation policy that allows workers to raise their concerns about workplace conditions without fear of retribution or termination.

7. Regular employment and employment contracts

All use of temporary and outsourced labour shall be within the limits of the local law. Suppliers should work to maximise the use of regular employment. They must limit the use of labour hire, contracting, sub-contracting, home-working arrangements, or apprenticeship schemes to ensure labour regulations are not subverted.

Suppliers shall ensure that workers' contracts communicate the conditions of employment in the workers' native language. All workers must have the legal right to work in the receiving country. All workers must sign an employment contract.

Suppliers must ensure that the same contract terms are signed by workers in both the sending and receiving country, and no additional terms are to be imposed after the employment contract has been signed unless explicitly required by law. Where new terms are introduced, the supplier must ensure that they are fully understood and accepted by workers and included as an addendum to their existing contract.

8. Wages and benefits

Suppliers must meet all legal requirements relating to wages and benefits. Wages must equal or exceed the legal minimum wage, or local industry benchmark, whichever is higher. Employees must be compensated for overtime at a premium rate exceeding the regular hourly compensation rate, or in line with legal requirements. Suppliers must provide any allowances, bonuses and benefits as required by law and/or employment contract.

Suppliers must communicate the pay structure and pay periods to all workers through their employment contracts in their native languages. Wages must be paid in a timely and consistent manner. Suppliers must provide workers with an itemised payslip which clearly details working hours and any deductions. Wage deductions shall not be used as a disciplinary measure. In the event that a worker resigns or is terminated by the Supplier, the worker must have their last salary paid to them within 30 days of completing their notice period, or by the next payment cycle, whichever date is earliest.

Smiggle encourages its suppliers to pay workers a living wage. Workers have the right to compensation for a regular working week that meets their basic needs and provides a level of



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discretionary income. Smiggle is committed to working alongside suppliers in conjunction with global partnerships over time, which will work towards closing the living wage gap overtime.

9. Working and Living Conditions

Working and living conditions must be safe, hygienic, and well ventilated. Supplier facilities must be regularly maintained. Where accommodation is provided to workers, this must be clean, safe, provide reasonable living space and adequate sleeping, living, and sanitary facilities. Within worksites, suppliers shall provide workers with clean sanitary facilities which are reasonably accessible. All sanitary facilities must provide workers with privacy. Potable water must be provided onsite. Where suppliers provide dining, food preparation and storage facilities, these must be sanitary and maintained in accordance with legislation for food safety.

10. Working hours

Workers must not be required, except in emergencies or unusual situations, to work more than 60 hours per week, including overtime, or the local legal requirement, whichever is less. A regular working week shall not exceed 48 hours. Workers must have at least 24 consecutive hours of rest every seven days. All overtime must be voluntary and cannot exceed 12 hours per week. Overtime must not be requested on a regular basis and must be compensated at the legal premium rate.

11. Health and Safety

Suppliers must provide and maintain a safe and hygienic working environment, supported by a robust health and safety management system. Suppliers must obtain and maintain all required health and safety permits. Hazards must be identified and assessed, and workers must be provided with appropriate and well-maintained personal protective equipment free of charge. Workers must be provided with ongoing occupational health and safety training, and educational materials about associated risks in a language that they understand. Training and maintenance records for health and safety documents must be maintained in line with document retention procedures, for a minimum of 12 months. Suppliers must designate a senior management representative with oversight and accountability for health and safety.

Pregnant and young workers must not work in high-risk areas, and hazards associated with their work assignments must be minimised. Workers must have the right to voluntarily refuse unsafe work, and to report unhealthy working conditions. Suppliers must provide all required and appropriate workers compensation in the event of injury or fatality.

Suppliers must ensure facilities and dormitories have sufficient marked emergency exits, which are unlocked and kept free from obstruction. Emergency lighting must be provided throughout the facility. All safety and medical equipment, including firefighting equipment and first aid/medical supplies, must be available in sufficient numbers for the workforce, maintained, and easily accessible to workers. Emergency evacuation drills must be conducted regularly and recorded. Worker representatives from each shift must be trained in first aid and firefighting techniques. Refresher training should be conducted periodically.

12. Environment

Suppliers shall comply with all required environmental regulations and ensure that they have all necessary permits and comply with government reporting requirements. The supplier must implement an environmental management system including at minimum, an environmental risk assessment, designation of responsibility, and procedures for reporting environmental concerns without fear of retaliation. Emissions and discharge of pollutants and waste is to be minimised and eliminated at the



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source. Suppliers must implement a systematic approach to identify, manage, reduce and safely dispose of or recycle both hazardous and non-hazardous waste.

Suppliers must implement a wastewater treatment procedure, which meets the discharge requirements of local laws. A systematic approach to prevent contamination of stormwater must be deployed to prevent illegal discharges from entering storm drains, public water supply, or community bodies of water. Routine monitoring must be conducted and recorded for wastewater and stormwater management.

There must be defined chemical handling procedures, and workers must be trained on them and the hazards of chemical exposure. Suppliers must comply with Smiggle's chemical restrictions, as described in the 'Restricted Substances List' and must prohibit the use of banned chemicals during manufacturing, as described in the 'Manufacturing Restricted Substances List'. Chemicals and hazardous substance storage areas must be safe and maintained, with clear labelling of all containers.

Suppliers shall set targets and monitor their progress to reduce the consumption of natural resources such as fossil fuels and water, and reduce hazardous substances, through conservation, re-use, recycling and other measures. Suppliers must identify and reduce air emissions and air pollutants from their operations. Routine monitoring must be completed to assess the efficiency and performance of emission controls. Suppliers must measure and manage Greenhouse Gas (GHG) emissions resulting from their operations. Suppliers should aim to reduce emissions through conservation, use of renewable energies and other strategies.

Measures must be implemented to control, monitor and reduce noise that is generated by supplier facilities and operations that impact boundary noise levels.

13. Animal Welfare

Smiggle is committed to the humane treatment of animals, and strictly prohibits animal cruelty of any form. Suppliers are required to check with their designated Smiggle contact on the use of banned fibres. We support the use of third-party certified materials where animal welfare is prioritised.

14. Bribery and Corruption

Smiggle suppliers are required to be honest and forthright in their dealings with Smiggle and any appointed representatives. Suppliers must not engage in any form of corruption, bribery, fraud, extortion, or embezzlement to obtain an unfair advantage. Suppliers must comply with all applicable anti-corruption laws and regulations both nationally and internationally. The giving and accepting of gifts is strictly prohibited. Gifts include items such as cash, entertainment, gift cards, discounts, and other non-business-related activities. Suppliers must have a process in place to investigate allegations of bribery and corruption and report any violations to this policy.

15. Management Systems

Suppliers must be transparent with their policies, processes, documents and records applicable to their operations and agreements with Smiggle. All records provided to Smiggle representatives must be complete, accurate and kept up to date. Suppliers must ensure that their employees clearly understand the policies and processes in place. The supplier must allow Smiggle representatives and agents unrestricted access to their facilities, workers for interview, and records at all times, even if unannounced. Forgery of records or undue influence over workers during the audit process is prohibited.



16. Unauthorised subcontracting

Unauthorised subcontracting is strictly prohibited. Suppliers must only use approved facilities for the production of Smiggle goods. Written authorisation must be obtained from Smiggle for use of any subcontractors, and all facilities involved in direct manufacturing must be disclosed prior to the start of production. Penalties may apply to suppliers who subcontract Smiggle product to unapproved factories.

17. Grievance Mechanisms

Suppliers must provide their employees with an anonymous grievance mechanism such as a phone or text hotline, for them to report any workplace complaints and issues. Suppliers shall ensure that grievances are kept confidential, and strictly prohibit any retaliation. Suppliers must have a process in place to investigate grievances raised and communicate the outcomes of remediation to workers in a timely manner. Smiggle supports the implementation of operational factory level grievance mechanisms that should follow the UNGP's effectiveness criteria:

- Legitimate
- Accessible
- Predictable
- Equitable
- Transparent
- Rights-compatible
- A source of continuous learning
- Based on engagement and dialogue

Contact Point

For questions regarding this Code, other policies of Smiggle or to report breaches against this Code, please contact ethicalsourcing@smiggle.com.

Please provide us with a signed copy of this Code to acknowledge your commitment to this Code. You should also obtain a signed copy of the Code from each of your supply chain vendors, and then provide these to Smiggle.

Name of supplier:

(Insert full company name)

Signed by or for the supplier:

Signature of Authorised Representative & Company Stamp if not signing electronically

(Print name of Authorised Representative)

(Position / Title of Authorised Representative)

(Date signed)