

Responsible Business Conduct Wibra

Epe, July 2020

At Wibra, we believe it is important to purchase products and the materials they are made of, with respect for people, animals and the environment and to care for our entire supply chain. We aim for long-term relationships with our business partners, not only because this enables us to make the most beautiful products, but also out of concern for the people involved in the production process. We don't have factories of ourselves but cooperate with selected business partners. In cooperation we wish to develop sustainable products that are produced with minimal environmental impact and under good working conditions. Where necessary, we work on improvement. We consider it important to communicate clearly and unequivocally about our sustainability policy.

Buyers discuss timely with suppliers what needs to be produced and in what timeframe. In doing so, we take into account the duration of production, purchase of materials, transport distance and method. We always discuss what's possible and try to find solutions if it doesn't fit. In this way we try to avoid excessive working hours. Suppliers can make use of subcontractors that have been approved by us in advance. Below you will find an overview of the criteria that form the basis for the care that we want to observe when working with our suppliers.

Wibra has a responsible purchasing policy based on social and environmental criteria for the supply chain based on international standards, conventions and guidelines. Working in compliance with all applicable laws and regulations on human rights, the environment and product safety is of great importance, but international standards are leading whenever they are more stringent.

We ask all our suppliers and subcontractors, from raw material to end product, to support us in our Responsible Business Conduct and to work according to the standards below. Only in cooperation can we achieve our goals of improving the social conditions under which production takes place, reducing our impact on the environment and improving lives.

Where, for any reason, compliance is not possible, please let us know so we can find a solution.

1. Our common responsibility – Due Diligence

Under the UNGPs¹ and OECD Guidelines², enterprises bear a responsibility for preventing and reducing any adverse impact on people and the environment by their own operation or business relationships in the production or supply chain. This means acting in an ethical and transparent way that contributes to the health and welfare of society. This is the baseline for our Due Diligence Policy integrated in our corporate responsibility program.

¹ The UN Guiding Principles on Business and Human Rights are a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. <http://www.ungpreporting.org/>

² The OECD Guidelines for Multinational Enterprises are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards. <http://www.oecd.org/corporate/mne/>

Wibra supports the Conventions of the International Labour Organisation (ILO) and expects suppliers to act in accordance with the conventions of the ILO. These conventions are, along with the relevant UN Declarations and the OECD guidelines, the basis for our responsible business conduct.

We have identified nine specific themes by mutual agreement and in discussion with stakeholders which currently merit the priority attention of enterprises in the garment and textile sector operating in the Netherlands in terms of international responsible business conduct. These themes are, in no particular order:

- Child labour;
- Forced labour;
- Discrimination and gender;
- Freedom of association;
- Living wage
- Safety and health in the workplace;
- Water pollution and use of chemicals, water and energy;
- Raw materials;
- Animal welfare.

Based on the ILO and OECD guidelines for the garment and footwear industry, we added,:

- No Sexual harassment and sexual and gender-based violence (SGBV) in the workplace
- Working hours
- Ethical trade, no bribery and corruption
- Grievance mechanism

We will do our Due Diligence and give particular attention to these themes and we expect this from our suppliers as well. This means that, with regard to these themes, suppliers will identify any possible adverse impact in the supply chain, set specific objectives and take measures which are suitable in the light of the insights resulting from their Due Diligence process.

We ask our suppliers to inform us about any possible risk regarding human rights violation, animal abuse and environmental hazards related to our products to cooperate to minimalizing these risks. In order to identify these risks, we have created a questionnaire which you will find attached; we kindly ask you to fill this out and return it to us.

Our buying behaviour:

We are part of the value chain and therefore we want to take our responsibility regarding sourcing and buying. It is very important to inform us when our buying behaviour does not support the international social and environmental standards set below. We work according to the following buying strategy.

We will:

Forecasting:

- particularly ask for long-term contracts to increase predictability and stability. This will also enable suppliers to plan for investments in machinery, equipment and human resources.
- work on a stable planning.
- share forecast and purchasing plan with our supplier and, if possible, book capacity.
- allow to start production early for NOOS styles.
- communicate changes in your forecast/purchasing plan on time.

Product development:

- provide clear technical specs and requirements.
- ask our supplier for feedback on new developments.
- review our sampling process with efficiency in mind.
- work with photo's/online video when possible or consider virtual prototyping.
- supply a target price for the product.

Price negotiation:

- get insight in price calculations and the production process.
- calculate in cooperation with our supplier how to get the best quality for the best price.
- consider material cost, labour, transport, testing, audits and the profit for the supplier.

Payment conditions:

- pay on time.
- pay what we agreed on.

Order placement, production, lead time

- We have a time & action plan with deadlines for all parties involved (buyer and supplier).
- We agree on realistic lead time.
- We make an agreement on late style/order changes .
- We work on understanding the local and cultural differences.

From our suppliers and subcontractors we expect:

Social compliance:

- to participate in a social compliance initiative.
As Wibra is a member of amfori BSCI, we prefer our suppliers to also participate in this initiative. However, we will also accept audits from other initiatives like SA8000, SMETA, FWF, WRAP and GOTS.

For garment and textile suppliers in high-risk countries that are not yet participating in any social compliance initiative, we will request a BSCI audit. For more information on amfori BSCI see <https://www.amfori.org/content/amfori-bsci>.

- to share with us their valid social audit report.
- to make and implement a corrective action plan on findings of the audit.
To help suppliers implement improvements, they can participate in BSCI training courses on various themes.
When a supplier systematically fails to implement the improvements suggested in the audit report without a valid reason, this can be a reason to end the business relationship.

Production locations:

- to communicate where an order will be produced and which subcontractors will be involved.
Unless this information is shared with us, an order is NOT final.
- to discuss with us whenever moving production to another facility is intended, indicating the reason for this. This allows Wibra to adjust her purchasing process if this would lead to undesirable changes in production planning.

Negative impact:

- to advise whenever Wibra's buying procedure has a negative impact on the operation of suppliers and/or their workers and to discuss what is needed to remediate.
- to set up a complaints mechanism for employees.
To this end, the grievance mechanism of Amfori BSCI can be called upon.

Bangladesh Accord:

As a logical consequence of our goal to achieve a safe and healthy workplace for employees in Bangladesh, in 2013 Wibra signed the Bangladesh Accord. This contains agreements on independent monitoring of the safety of the many textile factories in the country, and on public reporting thereof. In 2018, we also signed the (Bangladesh) Transition Agreement, to ensure that work on improving construction and fire safety in Bangladesh's garment industry continues. The aim of the Transition Agreement is to gradually work towards an official handover of all activities of the Bangladesh Accord to the Government of Bangladesh.

In Bangladesh, Wibra only works with factories that participate in the improvement plans of the Agreement. At these factories, independent inspectors carry out checks and issue orders for improvements in order to increase safety in the workplace.

For more information see: <https://bangladeshaccord.org/>

2. Social & Environmental Compliancy

The Responsible Business Conduct aims to attain compliance with certain standards. Supplier companies, in addition, must ensure that the responsible business conduct is also observed by subcontractors involved in production processes of final manufacturing stages. Within the scope of options for action and appropriate measures, supplier companies have to aim at the implementation and reporting of the following criteria in a development approach. Wibra declares that we will only work with subcontractors³ that are prequalified through the same rigorous processes to those used for direct contractors. Approved subcontracts may be reviewed on a semi-regular (e.g. annual) basis to remain approved. Workers of those subcontractors should have access to grievance mechanisms, similar to those of direct contractors. We will in no case work directly with subcontractors and only ask for transparency to know where our products are made and to be able to ask questions regarding social and environmental conditions.

2.1 Social Compliancy

Beneath you will find the most important ILO conventions related to human rights at the workforce.

Prohibition Child Labour and working conditions of young workers

ILO Conventions 10, 79, 138, 142 and 182 and Recommendation 146.

Wibra will not accept child labour under any circumstances. An employee must be at least 15 years old (or 14 years where national law permits). Suppliers and business associates must take measures to ensure that they do not accept underage workers. If Wibra discovers that a child is working in a factory, unless factory management immediately terminates the child's employment and takes appropriate measures to make a positive change in the child's situation, this will be reason for terminating the business relationship.

There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour. Young workers in the age of 15-18 shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals. Children and young persons under 18 shall not be employed at night or in hazardous conditions.

³ subcontractor = a person or firm being that is appointed by the main contractor, to carry out work or deliver services, labour or materials as part of a larger project.

Where young workers are employed, business partners should ensure that their work is not likely to be harmful to their health or development; their working hours do not prejudice their attendance at school, their participation in vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programs.

Business partners shall set the necessary mechanisms to prevent, identify and mitigate harm to young workers; with special attention to the access young workers shall have to effective grievance mechanisms and to Occupational Health and Safety trainings schemes and programmes.

Child Labour Due Diligence Bill

By signing this RBC you take part in our Due Diligence Policy and you approve that you will do anything you can to identify, prevent and if necessary address the issue of child labour in our supply chain.

We need to comply with the Dutch Law on Child labour Due Diligence on combating child labour in global supply chains, that is in force as of January 2020. Dutch companies and their supply chain business partners will have to declare that they have addressed the issue of child labour in their supply chains. This law requires companies to identify, prevent and if necessary address the issue of child labour in their supply chains. We ask our suppliers to cooperate and be transparent about subcontractors and subsuppliers and possible risks within the supply chain of our products so we can cooperate in combating child labour. Risk studies show that the severe risks are mainly at cotton farming and wet processing (like spinning mill) stage.

Wibra needs to be informed in high risk situations, for example when cotton comes from countries or facilities where forced labour is required and so the risks on child labour occurs. Ask your suppliers about their social management systems, latest audit reports or certifications like WRAP, SA 8000, Fair Trade, GOTS, Better Cotton or Organic Content Standard, or any other standard that entails child labour.

No Forced and Compulsory Labour and Disciplinary Measures

ILO Conventions 29 and 105.

There shall be no use of forced, including bonded or prison, labour. All forms of forced labour, such as lodging deposits or the retention of identity documents from personnel upon commencing employment, are forbidden as is prisoner labour that violates basic human rights.

Employees must be treated with respect and dignity. We do not accept work in which there is physical and/or mental punishment.

Employees must be free to leave the factory at any time and the freedom of movement of those living in residences run by the employer is not restricted.

No Discrimination

ILO Conventions 100, 111, 143, 158, 159, 169 and 183.

Employees should only be hired because of their suitability to perform the work in question and no discrimination shall be tolerated in hiring, remuneration, access to training, promotion, termination or retirement based on gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other characteristic or circumstance.

Women and men shall receive equal pay for work of equal value, equal assessment of the quality of their work and equal opportunities to perform all jobs. Employers shall provide appropriate facilities and accommodation for female employees in connection with pregnancy, childbirth and breastfeeding.

No Sexual harassment and sexual and gender-based violence (SGBV) in the workplace

Our business partners are encouraged to adopt a zero-tolerance policy on sexual and gender-based violence and strict measures against sexual harassment in its own operations. The enterprise should articulate its expectations of suppliers and other business partners to likewise adopt a policy on sexual harassment and sexual and gender-based violence. Enterprises are encouraged to include the following in their internal policies

- a commitment to foster an environment at work free from harassment, bullying and violence
- clear consequences for breaking the enterprise's standards
- a commitment to hear grievances, to provide a "reprisal-free" complaints mechanism (e.g. operational-level-grievance mechanism) and to maintain the confidentiality of workers or employees who raise complaints

Freedom of Association and the Right to Collective Bargaining

ILO Conventions 11, 87, 98, 135 and 154

The right of all workers to form and join trade unions and bargain collectively shall be recognised. Employees must be free to join a trade union without the risk of threats, or punishment.

The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate the development of alternative forms of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions.

Payment of a living wages

ILO Conventions 26 and 131

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and be sufficient to meet basic needs of workers and their families and to provide some discretionary income. Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.

Employees must be paid regularly and on time and shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period.

Legally binding employment relations

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 arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment. Younger workers shall be given the opportunity to participate in education and training programmes.

Working Hours

ILO Conventions 1 and 14 and ILO Recommendation 116.

Working hours shall comply with applicable laws and industry standards. Employees may not be required to work more than 48 hours per week on a regular basis and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

Safe and healthy working conditions

ILO Convention 155

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. If the risk of accidents and injuries is inherent to the work to be carried out, this risk will be minimised by providing regular health and safety training for the workers.

Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.

If accommodation is provided to workers, it must be clean, safe and meet their basic needs.

No Sandblasting:

Wibra does not accept the sandblasting process being used for our products, since this is affecting the health of workers.

Ethical trade: no Bribery and corruption

Enterprises should consider the good practices put forth in the OECD Good Practice Guidance on Internal Controls, Ethics and Compliance, which include:

- Strong, explicit and visible support and commitment from senior management to the company's internal controls, ethics and compliance programmes or measures for preventing and detecting bribery, including the bribery of foreign public officials;
- A clearly articulated and visible corporate policy prohibiting bribery, including the bribery of foreign public officials; and
- Oversight of ethics and compliance programmes or measures regarding bribery, including the bribery of foreign public officials, including the authority to report matters directly to independent monitoring bodies such as internal audit committees of boards of directors or of supervisory boards, is the duty of one or more senior corporate officers, with an adequate level of autonomy from management, resources and authority.

Grievance mechanism

Wibra needs a commitment to hear grievances from workers, to provide a “reprisal-free” complaints mechanism (e.g. operational-level-grievance mechanism) and to maintain the confidentiality of workers or employees who raise complaints.

Wibra currently uses the grievance mechanism of Amfori BSCI. In this online complaints mechanism on Amfori's website, both individuals and organisations can file a complaint if they feel that they have been harmed by the activities of Amfori. The Amfori secretariat will continuously review and improve the complaints mechanism where necessary. We ask Amfori to make employees aware of their rights and the availability of this online complaints mechanism.

2.2 Environmental Responsibility

Wibra wants to keep its ecological footprint as small as possible. We therefore want to be aware of the most important environmental impacts of our own activities and those carried out on our behalf, so that we can take appropriate measures to prevent any negative impact on society and the environment. We expect our suppliers and business relations to be aware of and comply with applicable local and national environmental laws and regulations. They must hold all mandatory environmental permits.

We ask suppliers to have procedures and standards for the use of water and energy, handling and disposal of chemicals and other dangerous materials, waste management, emissions and effluent treatment. The procedures and standards must meet the following international guidelines and legal requirements.

No use of Energy of Non-renewable Sources and Minimising Greenhouse Gas (GHG) Emissions

Suppliers shall keep records of the current energy sources and emissions and reduce the use of energy of non-renewable sources. Targets will be set to work with green energy sources and thus reduce emissions to air.

The consumption of energy of non-renewable origin is one of the main causes of greenhouse gas emissions. The production of textile and garments is an energy intensive process. Measuring GHG emissions is a critical first step to reducing the carbon footprint of an enterprise's activities. It helps an enterprise to assess its impact on the climate and to design cost-effective emission reduction plans.

- Establish an energy management plan at the site-level that includes company-wide coordinated measures for energy management. We ask our suppliers to measure, report and minimise their energy consumption and GHG wherever possible.
- Also, we do encourage our suppliers to:
 - make use of renewable energy sources like solar, wind or hydroelectric power;
 - research and use technologies which use less energy, like LED lighting;
 - implement best available techniques (BAT) as defined by Best Available Techniques Reference Documents for the sector or sub-sector;
 - implement energy efficiency measures (e.g. energy conservation technology, optimisation of steam generation and pressurised air, waste heat recovery from waste water and waste gas, process optimisation, etc.);
 - implement energy conservation measures (e.g. implementation of energy saving through improvements in the process and reaction conditions);
 - increase efficiencies and quality so as to reduce need for re-processing due to failures;
 - install and operate accurate meters and/or measuring software as a fundamental step to benchmarking performance and to initiating efficiency improvement.

Clean waste water and reduced water footprint

The supplier shall measure water use and determine whether it can source from water stressed areas responsibly – for example, by promoting water efficiency and/or reducing process dependence on fresh water amongst its suppliers. Waste water must be treated and tested before releasing to the environment. The supplier shall comply to national waste water legislation.

Throughout the production of textiles, a lot of water is used. In general, most water is used for cotton cultivation (2/3 or more of the total volume). Textile processing uses far less water but causes most water pollution. This puts great pressure on the availability and the quality of water in areas where cultivation and processing take place. Water use, the source and waste water in the wet processing also deserves serious attention, because of the local pollution impact.

- We ask our suppliers to deliver a (waste) water policy, testing procedure and/or a copy of one of the standards named in the annex. We ask our suppliers to provide, (LCA) data on water, energy and chemicals and emissions. Use the ZDHC (Waste Water) guidelines and the Unido water calculator: <https://watercalculator.dnvgl.com/Home/Form>.
- We wish to be informed about the water source (rain, groundwater, lake, etc).
- We would like to offer suppliers more information on a cleaner production process through the ZDHC, OECD guidance or MODINT Factsheets which we could provide to you.
- We ask our suppliers to discuss with us if water-saving production techniques are available.

No hazardous Chemicals

No hazardous chemicals shall be used in processing stage and released in water or air. Employees shall be protected and equipped with the right safety measures and appropriate training. Chemicals shall be stored and labelled accurately.

Chemicals are used everywhere in the production of goods. Apart from the pesticides and fertilizers in the natural fibre production, the 'big' issue, mainly in the textile production chain, is the use of chemicals in bleaching, dyeing, printing and finishing and how it effects workers, water and air effluents.

- Design phase: The base of the use of chemicals lies in the design choices. We ask our business partners to inform us if any design decision leads to the use of hazardous chemicals.
- Manage and report production phase: From there it is important for our company to know which specific chemicals are used (chemical inventory) and how they are used in the processing. The use of harmful chemicals during these stages of production could affect the environment and the workers and may leave traces in the final product and thus appear to the consumer. We ask our suppliers to discuss with us if hazardous substances can be replaced by more environmentally friendly alternatives or if water-saving production techniques are available.
- Make a Chemical Risk assessment:
An environmental or human health risk assessment includes hazard identification, hazard characterisation, exposure assessment and risk characterisation.

The first two steps are regarded as the process of hazard assessment. The methodology of the environmental risk assessment should align with OECD guidance. See OECD Environmental Risk Assessment Toolkit: <https://www.oecd.org/env/ehs/risk-assessment/environmental-risk-assessment-toolkit.htm>.

The methodology of the health risk assessment should align with the World Health Organisation guidance. See International Programme on Chemical Safety, WHO Human Health Risk Assessment Toolkit: Chemical Hazards. Health risks are also addressed in Module 5, Occupational Health and Safety.

From Restricted Substances List (RSL) to a Manufacturing Restricted Substances List (MRSL)

In order to limit and control the use of chemicals, our garment and textile suppliers must comply with the Wibra Restricted Substances List (RSL), which is attached as an appendix to this Code of Conduct. Wibra will carry out random control tests.

The restricted substances list (RSL) in the annex is intended to inform our suppliers on international (upcoming) regulations restricting or banning the use of chemicals in apparel products including accessories attached to garments for example zip fasteners, buttons, etc. and packaging materials. The RSL takes most of the world's regulations into account (incl. REACH, POP), as well as harmful chemicals listed by NGO's.

- We ask our garment and textile suppliers to purchase materials without harmful substances. We ask you to sign for our RSL and later on for our MRSL. Please inform your fabric- or yarn supplier about the RSL, including a risk matrix where chemicals are related to certain raw materials and processing steps and inform Wibra about test results based on risk assessments. Wibra will randomly test products on chemical compliancy.
- If the supplier buys directly from chemical agencies make sure these have a Corporate Responsibility Management System.
- Step by step we will work together with our suppliers to eliminate hazardous chemicals out of products as well as production processes. Please use the (ZDHC)MRSL (https://www.roadmaptozero.com/mrsl_online) and share it with your wet processing partners. It is there to provide suppliers with a harmonised approach to managing chemicals during the processing of raw materials into the ready made fabric within our supply chain. The MRSL achieves this by providing a clear list of priority chemicals and specifying the maximum concentration limit of each substance within commercial chemical formulations. Wibra will introduce its own MRSL based on ZDHC in the coming year.
- We ask our garment and textile suppliers to inform us about wet processing management (of subsuppliers) to eliminate hazardous chemicals from our products, to keep a chemical inventory and to work with Material Safety Data Sheets for workers. Inform us when you/subsuppliers cooperate with ZDHC, SAC (Higg Index) or Amfori BEPI or when holding certificates like bluesign or OEKO-TEX STeP (see included questionnaire in the annex).
- Implement best available techniques (BAT) as defined by Best Available Techniques Reference Documents for the sector or subsector. See Integrated Pollution Prevention and Control, Best Available Techniques Reference Document for the Textiles Industry, 2003).

Valid Processing Standards

A valid health OEKO-TEX® Standard 100 product certificate covers most of the legal requirements of this RSL. Processing standards, like GOTS, bluesign or STeP (or similar) are of higher value. These standards, that you find in the annex, make sure that that no harmful chemicals are used in processing.

- When commercially acceptable, we ask our garment and textile suppliers to work as much as possible with one of the following or similar standards and to provide us with a copy of the scope and transaction certificates.
- It is important to work with accredited audit organisations (e.g. accredited by textile exchange.)

Raw Material Policy

Wibra wants to lower the impact of her raw materials. E.g. Cotton is one of the most polluting fibres and very important for our collections, therefore we want to work with the better, low impact options.

- We ask our suppliers to keep records on the content and source of our raw materials and to reuse waste materials as much as possible.
- We expect our garment and textile suppliers to source for sustainable or preferred raw materials (indicated in the annex) and offer alternatives to conventional materials.
- It is important to measure, reduce and reuse material waste where possible.
- We ask our suppliers to offer available sustainable raw materials and to use/ask for one of the standards in the annex or a similar standards and to provide us with a copy of the scope and transaction certificates or other proof of compliancy.

Hereunder listed standards and certifications, related to sustainable raw materials like organic- or recycled cotton, aim to reduce the impact during cultivation and/or processing of textile fibres. The standards and certifications cover the fibre production phase which impacts water-, chemical- and energy use, effluents and possibly labour conditions. They do not cover the finishing substances used, e.g. dyes that are included in the processing standards.

Valid raw material certifications

The in the annex listed standards and certifications, related to sustainable raw materials like organic cotton, aim to reduce the impact during cultivation and processing of textile fibres. The standards and certifications cover the fibre production phase that has impact on water, chemical and energy use and labour conditions. They do not cover the finishing substances used, e.g. dyes that are included in the processing standards.

- We ask our garment and textile suppliers to use one of the standards listed in the annex, or a similar standards and to provide us with a copy of the scope- and transaction certificates.

Animal welfare

We ask suppliers of wool, leather, down and feathers and any other animal derived fibre:

- To prevent, reduce and eradicate animal suffering in the production or supply chain.
- To provide animal welfare guarantees when products of animal origin are used.

- To follow below provision guidelines that prescribe that animals in our supply chain must have:
 - Freedom from Hunger and Thirst - by ready access to fresh water and a diet to maintain full health and vigour.
 - Freedom from Discomfort - by providing an appropriate environment including shelter and a comfortable resting area.
 - Freedom from Pain, Injury or Disease - by prevention or rapid diagnosis and treatment.
 - Freedom to Express Normal Behaviour - by providing sufficient space, proper facilities and company of the animal's own kind.
 - Freedom from Fear and Distress - by ensuring conditions and treatment which avoid mental suffering.

Endangered Species Policy

Wibra does not accept any raw materials from any endangered species as listed on the IUCN Red List, as critical endangered, near threatened, endangered, extinct in the wild, or vulnerable on the IUCN Red List⁴.

Therefore, suppliers must provide animal welfare guarantees when products of animal origin are used.

Wibra does not accept real exotic animal skins (e.g. snake, alligator, crocodile, lizard, ostrich).

Fur / Animal hair (e.g. Cashmere, Angora, Mohair)

Wibra does not accept animal fur of animal hair other than wool.

Leather

Real leather and suede from sheep, pigs, goats and cattle reared for meat production & synthetic leather are accepted. All other leather variations are NOT permitted!

- We prefer leather processed through facilities rated by Gold, Silver, Bronze by the Leather Working Group or facilities STeP by OEKO-TEX certified.

Down Feathers Policy

Wibra does not accept down/feathers from live-plucked birds and from force fed birds. Wibra only accepts down/feathers from meat production and prefers down/feathers that are certified to the Textile Exchange Responsible Down Standard.

- Our business partners must submit a declaration or certificate guarantee that all Down filled garment/items are Non-live plucked down.

⁴ IUCN Red List: Union for Conservation of Nature's Red List of Threatened Species has evolved to become the world's most comprehensive information source on the global conservation status of animal, fungi and plant species. <https://www.iucnredlist.org/>

Wool & Mulesing Policy

We endorse the International Wool Textile Organisation- standards for animal welfare and demand that the Five Freedoms for Animal Welfare must be respected. Mulesing is a surgical procedure carried out on (mainly Merino) sheep to prevent flystrike.

- Wibra only accepts wool from sheep that have not been mulesed and prefers wool that is certified according to the Textile Exchange Responsible Wool Standard. Recycled wool, certified according to the Recycled Wool Standard could be a solution to prevent mulesing.

Man-made Cellulosic Fibres Policy

Wibra does not accept products (Viscose, Rayon, Modal and Lyocell) deriving from illegally logged sources, ancient and endangered forests, as listed in the IUCN Red list as critical endangered, near threatened, endangered, extinct in the wild, or vulnerable. Wibra prefers sustainably certified wood products (e.g. FSC).

Packaging

Since plastic is non-biodegradable, recycling it is a part of global efforts to reduce plastic in the waste stream, especially the approximately eight million metric tonnes of waste plastic that enter the earth's ocean every year. Soft plastics are also recycled during the manufacturing process of plastic goods such as polyethylene film and bags.

- We ask our supplier to actively research and offer options that are a better choice for the environment: reusable, recycled and/or reduction of packing materials.

Plastic

- We ask our suppliers to use preferred plastics for our products and packaging like PVC free, recycled (PET) plastics and biodegradable plastics (see GRS certification) of e.g. PLA (corn sugars).

Cardboard

- We ask our suppliers to use recycled or FSC/PEFC certified cardboard. We aim to only use cardboard and paper packaging which consists of 100% recycled paper fibre.

Waste reduction

- We ask our suppliers to reduce (raw) material waste as much as possible and preferably join a recycling program (packaging waste, material cutting waste etc.)

3. Management System, Monitoring, documentation, verification

The supplier shall define and implement a management system to ensure that the requirements of the Responsible Business Conduct can be met. Management is responsible for the correct implementation and continuous improvement by taking corrective measures, as well as the communication of the requirements of the RBC to all employees and subcontractors. It shall also address employees' concerns of non-compliance with this RBC. Wibra will be informed about non-compliances and follow up.

- If the buying behaviour of Wibra impacts the compliancy to this RBC we will be informed immediately.

The following documents should be provided. If not possible, please provide us with sufficient information to prove the origin and impact of our products.

Social Compliancy:

- An up-to-date overview of all subcontractors;
- Company Policy on social compliancy;
- The latest valid social audit report;
- A regular update of the Corrective Action Plan (CAP).

Environmental Compliancy:

- If available: Management system on water, chemicals, energy and emissions;
- Information on memberships, assessments and/or certifications that proof sustainability efforts;
- If applicable, all specific information related to paragraph 2.2.

The requirements in the Responsible Business Conduct (RBC) are requirements that we want to achieve together. These are our common goals. We are open for discussion if suppliers are not capable to meet these requirements.

We are certain that many of our suppliers have even higher demands themselves. Therefore, we want you to provide us with the relevant certifications and reports to confirm this.

By signing this RBC statement, you commit yourself to it.

The undersigned hereby confirms that:

We have read the Responsible Business Conduct (RBC) and accept the terms required of us as suppliers and will inform and cooperate with our subcontractors and sub suppliers working on products of Wibra. We will inform Wibra and discuss non-compliances and the issues involved in their product's supply chain.

For Wibra:

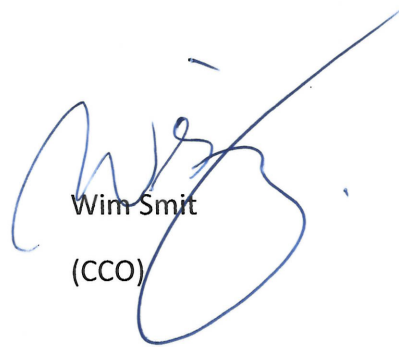


Jeroen Markink

(Head of Buying and Sourcing)



Bas Durjsens
(CEO)



Wim Smit
(CCO)

For Supplier / Subcontractor:

Date:

Name:

Position:

Signature: