

Code of Conduct

Introduction

At Tom Wood (hereafter Tom Wood), we promote fair working conditions and environmental standards throughout our supply chain. We cooperate closely with our suppliers and business partners in pursuit of this aim. Accordingly, we have prepared this Code of Conduct to illustrate our expectations and collaboration necessities with suppliers and business partners alike to achieve a more transparent and sustainable supply chain.

By signing the Code of Conduct, suppliers comply to practices based on the conventions of the International Labor Organization (ILO) and the UN Universal Declaration of Human Rights. Tom Wood will routinely assess the adequacy and effectiveness of this Code.

Principles

Tom Wood's suppliers are to supply goods and services that are produced in compliance with the Code of Conduct. Moreover, the suppliers are to communicate the Code of Conduct to their sub-suppliers, and to monitor implementation.

A supplier must be able to document compliance with the Code of Conduct at Tom Wood's request. Such documentation may take the form of self-declaration, follow-up meetings, and/or inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Tom Wood wishes to inspect.

All production units shall be open to audits at any time if requested by Tom Wood. In the case where we require an audit of the facility, we may be represented by an independent third-party auditing company of our choice.

In the event of non-compliance being detected during the supplier visits, Tom Wood is willing to engage in a constructive dialogue with suppliers to develop and implement action plans with appropriate time scales for implementation and improvements to be achieved.

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Tom Wood does not operate with a passed/failed policy and terminating a business relationship will only be the last instance. However, Tom Wood will not conduct business with a supplier if compliance with the terms of this Code of Cooperation is deemed impossible and the supplier shows no willingness or ability to improve. If the supplier is willing to work with us on continuous improvements, Tom Wood is also willing to work with the supplier.

When selecting new suppliers, their implementation of proper management systems ensuring support of human rights, worker safety and the protection of the environment will be of highest priority.

Requirements relating to own practice

Tom Wood will continuously work to improve our policies and practice to enable our suppliers to be able to comply with our Code of Conduct.

Neither Tom Wood nor any of its employees shall ever offer or accept illegal or unlawful monetary gifts or other forms of remuneration to secure business-related or private benefit, or benefit for customers, agents, or suppliers.

Tom Wood and Tom Wood's suppliers shall avoid partners that operate in countries subject to international boycott by the United Nations and/or Norwegian Authorities.

Requirements to Supply Chain Conditions

This Code of Conduct is founded on key UN and International Labor Organization conventions and documents. National laws shall be respected, and where the provisions of law and this Code of Conduct address the same subject, the most stringent shall apply.

1. Forced and compulsory labor (ILO Conventions Nos. 29 and 105)

1.1 There shall be no forced, bonded, or involuntary prison labor.

1.2 Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

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2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.

2.2 Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

3. Child Labor (UN Convention on the Rights of the Child, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

3.1 The minimum age for workers shall not be less than 15 and comply with

- i) the national minimum age for employment, or;
- ii) the age of completion of compulsory education, whichever of these is higher.

3.2 There shall be no recruitment of child labor defined as any work performed by a child younger than the age(s) specified above.

3.3 No person under the age of 18 shall be engaged in labor that is hazardous to their health, safety, or morals, including night work.

3.4 Policies and procedures for remediation of child labor prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

3.5 To ensure compliance of these principles set forth by ILO, all suppliers must sign the Tom Wood Child Labor Policy.

4. Discrimination (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women)

4.1 There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination, or retirement based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

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4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds, e.g., marriage, pregnancy, parenthood, or HIV status.

5. Harsh or Inhumane Treatment

5.1 Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

6. Health and Safety (ILO Convention No. 155 and ILO Recommendation No. 164)

6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. 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 minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

6.2 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

6.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

6.4 Accommodation, where provided, shall be clean, safe, and adequately ventilated, and shall have access to clean toilet facilities and potable water.

6.5 Relevant first aid equipment must be made available to all workers, and where legally required a doctor/nurse should be available during working hours.

6.6 All local laws regarding fire safety must be upheld, and all facilities producing god Tom Wood must as a minimum install adequate warning systems, fire safety equipment and well-marked exits and escape routes.

6.7 Suppliers shall ensure that electrical installations are in line with local law and does not pose a threat to fire safety.

6.8 Fire drills must be Conducted on an annual basis.

6.9 Suppliers shall ensure that safety precautions regarding the use, storage and handling of chemicals are taken.

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6.10 All chemicals and hazardous materials must be safely handled, transported, and disposed of according to law.

6.11 Workers should be trained in handling chemicals and should always be provided sufficient protective equipment when handling these.

6.11 Dormitories, kitchens and dining rooms must also adhere to the required health and safety as well as fire safety precautions.

7. Wages (ILO Convention No. 131)

7.1 Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs.

7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.

7.3 Deductions from wages as a disciplinary measure shall not be permitted.

7.4 Pay slips are to be signed and provided to the respective worker.

8. Working Hours (ILO Convention No. 1 and 14)

8.1 Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.

8.2 Workers shall be provided with at least one day off for every 7-day period

8.3 Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e., that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.

8.4 Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

9. Regular Employment

9.1 Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided using short-term contracting (such as contract labor, casual labor, or day labor), sub-contractors or other labor relationships.

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9.2 All workers are entitled to a contract of employment in a language they understand.

9.3 The duration and content of apprenticeship programs shall be clearly defined.

10. Marginalized Populations

10.1 Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

11. Environment

11.1 Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas emissions in production and transport. The local environment at the production site shall not be exploited or degraded.

11.2 National and international environmental legislation and regulations shall be respected, and relevant discharge permits obtained.

12. Anti-Corruption (UN Convention against Corruption)

12.1 Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers, or employees of any such party or government officials.

12.3 All Tom Wood suppliers should establish adequate processes to avoid corrupt practices. Such processes should be in with the United Nations Convention against Corruption.

13. Chemicals (ILO Convention No. 170)

13.1 Suppliers must comply with the latest version of Tom Wood Chemical Restrictions.

13.2 Suppliers must follow the requirements on documentation concerning Substances of Very High Concern (SVHC-list) in articles imported to the EU.

14. Animal Welfare

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14.1 Tom Wood products derived from animals should be produced with the highest regard to the welfare of the animals. Suppliers should ensure that animals are treated according to animal welfare laws and international recommendations.

14.2 We ask all appropriate suppliers to sign our Animal Welfare Policy upon embarking on a business relationship with Tom Wood.

15. Management systems of suppliers

The management system is key to the implementation of the Code of Conduct. Tom Wood emphasizes the importance of suppliers having systems that support such implementation. Tom Wood's expectations in this regard are summed up in the following measures:

- The supplier should make a centrally placed employee responsible for the implementation of the Code of Conduct in the supplier's business.
- The supplier must make the Code of Conduct known in all relevant parts of its organization.
- The supplier must obtain Tom Wood's consent prior to outsourcing production or parts of production to a sub-supplier/contractor if this has not been agreed in advance.
- The supplier must be able to give an account of where goods ordered by Tom Wood are produced.
- Suppliers shall maintain appropriate records to demonstrate compliance with the requirements of this Code of Conduct. Records shall be made available to Tom Wood upon request.
- In the event of non-compliance being detected during supplier visits, both parties will engage in a constructive dialogue to develop and implement action plans with appropriate time scales for implementations and improvements to be achieved. Our aim is to build long term relationships with our suppliers and wish for dialogue to be transparent and productive between both parties.

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TOM WOOD ANIMAL WELFARE POLICY

Tom Wood does not allow animals to be harmed in the name of fashion.

Animals used for our products must not be exposed to pain but treated with dignity and respect according to animal welfare laws and international recommendations.

We require our suppliers to work with us to increase traceability in our supply chain to decrease the distance to animal farms.

The killing of animals must always be using the quickest and the least painful method available.

Transportation of animals must always be following local legislation and ensure that animals are not travelling long distance and are ensured enough space and access to food and water during the transportation.

The Five Animal Freedoms must be followed:

- Freedom from Hunger and Thirst
 - By access to fresh water and diet to maintain health and strength.
- Freedom from Discomfort
 - By providing an appropriate environment including shelter and a comfortable resting area.
- Freedom from Pain, Injury or Disease
 - By preventing them from getting ill or injured and making sure the animals are treated if they do.
- Freedom to express Normal Behavior
 - 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.

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Banned animal-derived materials or treatments of animals

The following animal-derived products or practices are banned in Tom Wood products:

Endangered Species:

- Tom Wood does not sell products that derives from animals appearing on either of these lists:
 - o The International Union for the Conservation of Nature (IUCN)
 - o The Convention of International Trade in Endangered Species (CITES).

Fur:

- Tom Wood does not use fur in any of our products.

Leather:

- Tom Wood condemns the process of live skinning and live boiling and we require our supplier to guarantee that this process is not practiced anywhere in our supply chain.
- We do not accept leather from areas where endangered forests are cut down to make room for farms.

Angora wool:

- Since we are unable to ensure that the rabbits are being ethically treated in our supply chain, the use of angora wool has been banned for Tom Wood products.

Down:

- Tom Wood does not allow live plucking of birds for their downs and feathers.

Wool:

- Tom Wood does not accept wool from new-born animals or aborted animals (e.g., Karakul)

Mulesing:

- Tom Wood condemns the practice of mulesing and we require our supplier to guarantee that this method is not practiced when sourcing Merino Wool.

Responsible treatment

When sourcing below mentioned animal-derived materials, you must ensure that the animals are treated according to our animal welfare policy.

Mohair wool:

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- Tom Wood does not allow the mistreatment of the Mohair goats during shearing of their wool. We are working on sourcing certified mohair wool and we support the development of such a certification.

Downs:

- Tom Wood only use feather or downs from birds that have been bred for the food industry, but not for producing Fois Gras.

Wool:

- Ensuring a good treatment of the animals when sheering of wool, is essential to Tom Wood. To ensure this, we require our suppliers to work with us to increase traceability in our joint supply chain.

Leather:

- We only accept the use of leather from animals that have been bred for the food industry. Animals should be treated according to our animal welfare policy, to ensure this, we require our suppliers to work with us to increase traceability in our joint supply chain.

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TOM WOOD CHILD LABOUR POLICY

In accordance with our Code of Conduct, Child Labor is not allowed throughout our entire supply chain.

Definition of a child:

The definition of a child, is a person under the age of 15. Unless country regulations stipulate a higher age, in which case the higher age shall apply.

Definition of a young worker:

The definition of a young worker, is any worker from 15 (or 16) year of age until 18 years of age.

The requirements:

Suppliers must ensure that Child Labor is not present in our supply chain.

- Tom Wood does not accept any form of employment of children below the minimum age mentioned above.
- The factory must have proper hiring systems in place to prevent children from working at the factory. Records of age verification must be always kept.
- If the factory is providing childcare facilities, they must ensure that the children remain at that area and never enter production areas.
- Young workers should only perform light work, which does not encompass working with dangerous chemicals, heavy lifting, or dangerous machinery.
- Young workers should not be subjected to work that can be harmful to their health or physical, mental, spiritual, moral, or social development.
- Tom Wood must be informed immediately if *confirmed* child labor is detected.
- If child labor is detected at the production units, the supplier is requested to make sure that proper measures in the *best interest of the child* are taken and below Child Labor Policy shall apply.

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In case of Child Labor:

In cooperation with the supplier a satisfactory solution, taking into consideration the child's age, social situation and education must be found.

Any measures taken should always aim to improve, not worsen, each child's situation.

If children are to be replaced from improper working, then the factory should continue to pay the wages to the child until it reaches the legal age for working. If possible, a member of the child's family should be offered the position and paid a minimum wage. This is to secure a stable private economy of the child and its family.

If the child has finished primary school, the child should be offered education that supports the child's further development until it reaches the legal age for working, after which the child should be offered the job again on the same terms as other workers in the factory.

Tom Wood reserves the right to involve non-governmental organizations with the purpose of driving the process to secure the child's future.

If supplier refuses to cooperate in implementing this policy after child labor has been confirmed, we will terminate all business with said supplier.

However, if the opposite, we will continue our cooperation with the supplier and help to ensure, that a child is not hired into the factory again.