AllSaints Studios, 15-17 Jack's Place, 6 Corbet Place, London, E1 6NN

Code of Conduct and Ethical Sourcing Policy

AllSaints Code of Conduct and Ethical Trading Initiative

Violations of these Code of Conduct principles or the Key Policies will be appropriately remedied at the cost of the facility. AllSaints reserves the right to take necessary measures to ensure future compliance with these Code of Conduct Principles and the Key Policies. Failure to comply with these Code of Conduct Principles or the Key Policies may ultimately result in termination of the relationship between AllSaints and the Authorised Facility.

As a supplier to our brand, we want to ensure you are equally vested when it comes to ethical trading and our commitment to the implementation of the ETI base code. The ETI base code applies to AllSaints as a business in addition to all of our suppliers and their subcontractors. It is AllSaints' belief that employee's rights cannot be compromised and therefore we will actively work with the Supplier's management teams to help to implement the necessary changes without disruption. The provisions of this Code constitute the minimum and not the maximum standards all suppliers must meet in order to do business with AllSaints.

By signing the Code of Conduct you confirm that you and your business adhere to its principles and practices. We are counting on your partnership and transparency to bring about a supply chain with the highest ethical standards.

Laws and Regulations

AllSaints Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate.

Environmental Standards

We strive to do business with Suppliers who share our concern for and commitment to preserving the environment. At a minimum, Suppliers must comply with all applicable local environmental laws and regulations where they do business.

Raw Materials

For raw materials which are associated with a high risk of modern slavery or human rights violations we require our Suppliers to source such materials responsibly and to be able to provide evidence that there is no such connection between any such materials and the aforementioned violations.

For cotton specifically we expect suppliers to be able to provide the regional data of <u>any</u> cotton sourced from China. We also expect our Suppliers to be able to provide data to demonstrate the

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absence of cotton sourced from the region of Xinjiang. This information must be linked by documentation from raw material to our PO's upon request.

More guidance and information on how to source ethically and provide evidence can be found within our <u>cotton sourcing policy</u>.

Banned/prohibited materials

AllSaints suppliers must not use or incorporate any banned or prohibited materials as outlined by AllSaints in goods produced for the brand. For guidance on banned and prohibited materials please refer to our <u>Animal Welfare Policy</u>.

No Subcontracting Without Prior Approval

AllSaints Suppliers must not engage any subcontractor to perform any work for AllSaints products without AllSaints written approval, and only after the sub-contractor has agreed to work to the AllSaints Code of Conduct and Ethical Trading Initiative by signing the relevant policies as instructed by AllSaints' ESG and Supply Chain management Platform, Origin at the time of their onboarding. It is the responsibility of the Supplier to ensure that all subcontractors sign the AllSaints Code of Conduct via our online platform, Origin, on an annual basis.

More guidance and information on how to correctly onboard a new subcontractor can be found within our <u>Supplier and Factory Approval Process</u>. By signing this policy you agree to adhere to the process outlined within.

Communication

AllSaints Suppliers must communicate this Code of Conduct to all workers, supervisors and management.

Monitoring and Auditing

It is a mandatory requirement that all tier 1 manufacturing sites responsible for creating AllSaints products must have a valid social audit in order to do business and continue to do business with AllSaints. A valid social audit is deemed generally to be an audit that has been conducted within the last 12 months by a verified third party organisation. Audits are also only considered valid if they have been conducted as either a semi announced or unannounced audit. Announced audits will not be accepted. Suppliers must maintain on-site documentation necessary to demonstrate compliance with the code and allow AllSaints representatives full access to production facilities, worker records and workers for confidential interviews in connection with monitoring visits.

More guidance and information on audit requirements and processes can be found within our <u>Social</u> <u>Audit Requirements</u>. By signing this policy you agree to adhere to the process outlined within.

Traceability and Transparency

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At AllSaints, we want to help to improve working and environmental conditions at all facilities that we are working directly within. We require all Suppliers to work with us to trace and disclose information about our complete mutual supply chain facilities through our social mapping tool, Origin. We will require all profile holders on Origin to ensure their information is correct and accurate by updating their profile promptly and, if required, ensuring to update the ESG team of any planned changes and securing the appropriate approval as outlined in our <u>Supplier and Factory Onboarding Approval Process</u> before making any changes. By signing this policy you agree to adhere to the process outlined within.

We reserve the right but are not limited to publishing the following data from our supply chain as part of our public-facing Supply Chain Map. Any expansion of public disclosure will be communicated to suppliers in advance:

- Facility name
- Facility address
- Number of workers
- Gender split
- Worker committees and/or unions

In addition to publishing this information as part of our external Supply Chain Map, we reserve the right but are not limited to uploading your facility name within the Open Supply Hub, which is working towards a goal of more sustainable, equitable outcomes for the most vulnerable communities affected by the retail sector.

AllSaints Code of Conduct Based on ETI Base Code

1. Employment is freely chosen

- 1.1. There is no forced, bonded or involuntary prison labour.
- 1.2. Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

- 2.1. Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2. The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 2.4. Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

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3. Working conditions are safe and hygienic

- 3.1. A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. 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 minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 3.2. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 3.5. The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labor shall not be used

- 4.1. There shall be no new recruitment of child labor. For the avoidance of doubt, there shall also be no use of child labor, whether new or existing, in respect of any AllSaints products.
- 4.2. Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.
- 4.3. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4.4. These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

- 5.1. Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2. All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and

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about the particulars of their wages for the pay period concerned each time that they are paid.

5.3. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

- 6.1. Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.7 below, whichever affords the greater protection for workers.6.2 to 6.7 are based on international labour standards.
- 6.2. Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
- 6.3. All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 6.4. The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 6.5. Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6.6. Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.*
- 6.7. Workers shall be entitled to be fairly compensated and have no restrictions to accessing all nationally allowed holiday as well as other entitled leave maternity, paternity, sick and other national leave as per local law.

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*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced."

7. No discrimination is practised

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

- 8.1. To every extent possible work performed must be on the basis of recognised employment relationships established through national law and practice.
- 8.2. 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, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

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

Appendices

Child: Any person less than 15 years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

Young Person: Any worker over the age of a child as defined above and under the age of 18.

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