

# STUDIO ANNELOES

## Code of Conduct

Studio Anneloes, July 2024

At Studio Anneloes we care for our products, the materials, and the complete supply chain related to our carefully designed and produced collections. As an international garment producer in the world, it's our job to pursue a sustainable and profitable industry. We aim for long-term relations with our business partners to manufacture and co-create the most beautiful product, but also to take care of the people involved. We want to get insight into the social and environmental impact of our products and work on improvement where needed. Transparency of production places and circumstances is of great importance.

Studio Anneloes 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 if they are more stringent.

We ask all our suppliers and subcontractors, from raw materials to products, to support us in our corporate responsibility program and to work according to the standards below.

### 1. Our common responsibility – Due diligence

Under the UNGPs<sup>1</sup> and OECD Guidelines<sup>2</sup> enterprises bear 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 ethically and transparently that contributes to the health and welfare of society. This is the baseline for our Due Diligence policy integrated into our corporate responsibility program.

Studio Anneloes supports the Conventions of the International Labour Organisation (ILO) and expects suppliers to act by the conventions of the ILO. These conventions are, along with the relevant UN Declarations and the OECD guidelines, the basis for our Code of 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 textile sector in terms of the international Code of Conduct (Code of Conduct). These themes are, in no particular order:

1. Discrimination and gender;
2. Child labour;
3. Forced labour;
4. Freedom of association;
5. Living wage;
6. Safety and health in the workplace;
7. Raw materials;
8. Water pollution and use of chemicals, water, and energy;
9. Animal welfare.

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<sup>1</sup> 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/>

<sup>2</sup> 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 Code of Conduct in a global context consistent with applicable laws and internationally recognized standards. <http://www.oecd.org/corporate/mne/>

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We added, based on the ILO and OECD guidelines for the textile industry:

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

We will do our due diligence and give particular attention to these themes, and we expect this as well from our suppliers. This means that, about these themes, suppliers will identify any possible adverse impact in the supply chain, set specific objectives, and take measures that are suitable in the light of the insights resulting from their due diligence process. We ask you to inform us about any possible risks regarding human rights violations, animal abuse, and environmental hazards related to our products to cooperate in minimising these risks.

## **Our buying behaviour**

We are part of the value chain and therefore we want to take 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:

### Forecasting:

We will particularly ask for long-term relationships to increase predictability and stability. This will also enable suppliers to plan for investments in machinery, equipment, and human resources.

We will:

- Work on stable planning.
- Share forecast and purchasing plan with our supplier and, if possible, book capacity.
- Allow to start production early for NOS styles (NOS = Never Out of Stock)
- Communicate changes in our 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 photos/online video when possible or consider digital prototyping
- Supply a target price for the product

### Price negotiation:

- Get insight into price calculations and the production process
- Calculate in cooperation with our supplier and get help 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 as per agreement
- Pay what we agreed on order placement, production, and lead time
- We have a time & action plan with deadlines for all contributors (buyer and supplier)
- We agree on realistic lead time
- We agree on late style/order changes
- We work on understanding the local and cultural differences

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## 2. Social & Environmental Compliance

The Code of Conduct aims to attain compliance with certain standards. Supplier companies, in addition, must ensure that Code of Conduct is also observed by subcontractors involved in the production processes of the final manufacturing stages. Within the scope of options for action and appropriate measures, supplier companies must aim at the implementation and reporting of the following criteria in a development approach. Studio Anneloes declares that we will only work directly with subcontractors<sup>3</sup> that are prequalified through the same rigorous processes as those used for direct contractors. Approved subcontractors may be reviewed on a semi-regular (e.g. annual) basis to remain approved. Workers of those sub-contractors should have access to grievance mechanisms, like those of direct contractors. We 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 Compliance

Below are the most important ILO conventions related to human rights on the work floor.

#### *Prohibition Child Labour and working conditions of young workers*

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

There shall be no use of child labour. "The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years." "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.

Where young workers are employed, business partners should ensure that the kind of 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 training schemes and programs.

#### *Child Labour Due Diligence Bill*

By signing this Code of Conduct 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 ask our suppliers to cooperate and be transparent about sub-contractors and sub-suppliers 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.

The Studio Anneloes sustainability team 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 of child labour occur. 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.

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<sup>3</sup> Subcontracting to third parties is a fairly common practice at many stages of the product supply chain. Subcontracting enables an enterprise to respond quickly to short lead times and changes in orders, to specialise in certain tasks. Outsourcing, however, can also decrease transparency in the supply chain and has been demonstrated to increase the risk of human rights and labour abuses and environmental impacts in higher-risk contexts. Therefore, the due diligence measures that Studio Anneloes should take to mitigate these risks should be increased. Source: OECD due diligence guide

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## ***Prohibition of Forced and Compulsory Labour and Disciplinary Measures*** ILO Conventions 29 and 105.

There shall be no use of force, 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.

## ***Prohibition of Discrimination*** ILO Conventions 100, 111, 143, 158, 159, 169 and 183.

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' organizations including unions, political affiliation or opinions, sexual orientation, family responsibilities, marital status, or any other condition that could give rise to discrimination.

## ***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 their 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 recognized and follow the local labour laws of the countries. The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means 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.

## ***Wages and benefits*** ILO Conventions 26 and 131.

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet the 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 shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period. Overtime work shall be compensated at the premium rate as is legally required. Compensation must be provided at least monthly and should be provided without illegal or inappropriate deductions or penalties. Studio Anneloes strives to work towards the payment of a Living wage as per the available standards set based on the supplier's location and country of origin, for which we expect the cooperation of our suppliers.

## ***Working Hours*** ILO Conventions 1 and 14 and ILO Recommendation 116.

Hours of work shall comply with applicable laws and industry standards. In any event, workers shall not regularly be required to work more than 48 hours per week and shall be provided with at least one day off every seven days. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded regularly, and shall always be compensated at a premium rate.

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## *Safe and healthy working conditions ILO Convention 155.*

A safe and hygienic working environment shall be provided, and best occupational health and safety practices shall be promoted, bearing in mind the prevailing knowledge of the industry and any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and ensure that a safe and hygienic work environment is provided. Effective regulations shall be implemented to prevent accidents and minimize health risks as much as possible. Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer are strictly prohibited.

## *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 using 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 allowed to participate in education and training programs.

## *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 includes:

- Strong, explicit, and visible support and commitment from senior management to the company's internal controls, ethics, and compliance programs or measures for preventing and detecting bribery, including the bribery of foreign public officials.
- An articulated and visible corporate policy prohibiting bribery, including the bribery of foreign public officials; and
- Oversight of ethics and compliance programs 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 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*

Studio Anneloes 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.

## **2.2 Environmental Responsibility**

Suppliers should assess the significant environmental impact of operations and establish effective policies and procedures that reflect their environmental responsibility. They will seek to implement adequate measures to prevent or minimize adverse effects on the community, natural resources, and the overall environment.

Studio Anneloes asks 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 at least the minimum legal requirements.

## **No use of energy from non-renewable sources and minimising Greenhouse Gas (GHG) emissions**

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

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The consumption of energy of non-renewable origin is one of the main causes of greenhouse gas emissions. The production of textiles 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.

- We encourage you to 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 minimize their energy consumption and GHG wherever possible.
- Also, we encourage our suppliers to make use of renewable energy sources like wind- and solar energy. We ask our supplier to research and use technologies that use less energy, like LED lightning.
- Implement best available techniques (BAT) as defined by Best Available Techniques Reference Documents for the sector or sub-sector 3<sup>4</sup>.

Implement energy efficiency measures (e.g. energy conservation technology, optimization of steam generation and pressurized air, waste heat recovery from wastewater and waste gas, process optimization, etc.)

- Implement energy conservation measures (e.g. implementation of energy saving through improvements in the process and reaction conditions)
- Increase efficiencies and quality to reduce the 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.

## Limitations to water use and clean wastewater

The supplier should 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 freshwater amongst its suppliers. Wastewater should be treated and tested before releasing it into the environment. The supplier should comply with national wastewater 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 quality of water in areas where cultivation and processing take place. Water use, the source, and wastewater 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. We ask our suppliers to provide (LCA) data on water, energy chemicals, and emissions. Use the ZDHC (Wastewater) guidelines and the Unido water calculator: <https://watercalculator.dnvgl.com/Home/Form>.
- We want 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 or OECD guidance which we could provide to you.

## No hazardous Chemicals

No hazardous chemicals shall be used in the 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 natural fibre production, the 'big' issue, mainly in the textile chain, is the use of chemicals in bleaching, dyeing, printing, and finishing and how it affects workers, water, and air effluents.

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<sup>4</sup> <https://eippcb.jrc.ec.europa.eu/reference/>

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- 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 our company needs 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 be harmful to the environment and the workers and may leave traces in the final product and thus appear to the consumer.
- We highly suggest you make a Chemical Risk assessment: An environmental or human health risk assessment includes hazard identification, hazard characterization, exposure assessment, and risk characterization.

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<sup>5</sup>.

The methodology of the health risk assessment should align with the World Health Organisation guidance. See International Program on Chemical Safety, WHO Human Health Risk Assessment Toolkit: Chemical Hazards<sup>6</sup>. Health risks are also addressed in Module 5, Occupational Health and Safety.

## Restricted Substances List (RSL)/ Manufacturing Restricted Substances List (MRSL)

The Studio Anneloes Restricted Substances List (RSL) 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 NGOs.

- We ask our suppliers to purchase materials without harmful substances. Please inform your raw material supplier about the RSL and risk matrix where chemicals are related to certain raw materials and processing steps and inform Studio Anneloes about test results based on risk assessments.
- If the supplier buys directly from chemical agencies, ensure it is firm with a CR management system (CR = Corporate Responsibility).
- Make use of the (ZDHC) MRSL ([https://www.roadmaptozero.com/mrsl\\_online](https://www.roadmaptozero.com/mrsl_online)). It is there to provide suppliers with a harmonized approach to managing chemicals during the processing of raw materials into the readymade 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.
- We ask our suppliers to inform us about wet processing management (of sub-suppliers) 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/sub-suppliers cooperate with ZDHC or Amfori BEPI.
- 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<sup>7</sup>.

## Valid Processing Standards

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

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<sup>5</sup> <https://www.oecd.org/env/ehs/risk-assessment/environmental-risk-assessment-toolkit.htm>

<sup>6</sup> [https://www.who.int/ipcs/methods/harmonization/areas/ra\\_toolkit/en/](https://www.who.int/ipcs/methods/harmonization/areas/ra_toolkit/en/)

<sup>7</sup> [https://eippcb.jrc.ec.europa.eu/reference/BREF/txt\\_bref\\_0703.pdf](https://eippcb.jrc.ec.europa.eu/reference/BREF/txt_bref_0703.pdf)

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- When commercially acceptable, we ask our suppliers to work as much as possible with one of the above or similar standards and to provide us with a copy of the scope and transaction certificates.
- It is important to work with accredited audit organizations.

## Raw Material Policy

Studio Anneloes wants to lower the impact of its raw materials.

- We ask our suppliers to keep records on the content and source of our raw materials
- To source for sustainable or preferred raw materials and offer alternatives to conventional materials.
- It is important to measure, reduce, and reuse material waste where possible.
- We ask our suppliers to use one of the certifications and standards and to provide us with a copy of the scope- and transaction certificates.

## Animal welfare

We ask suppliers of wool, silk, 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 the below provision guidelines where animals are concerned in our supply chain:
  1. Freedom from Hunger and Thirst - by ready access to fresh water and a diet to maintain full health and vigor.
  2. Freedom from Discomfort - by providing an appropriate environment including shelter and a comfortable resting area.
  3. Freedom from Pain, Injury, or Disease - by prevention or rapid diagnosis and treatment.
  4. Freedom to Express Normal Behaviour - by providing sufficient space, proper facilities, and the company of the animal's kind.
  5. Freedom from Fear and Distress - by ensuring conditions and treatment that avoid mental suffering.

## Endangered Species Policy

Studio Anneloes does not accept any raw materials from any endangered species as listed on the IUCN Red List<sup>8</sup>, as critically endangered, near threatened, endangered, extinct in the wild, or vulnerable on the IUCN Red List. Therefore, suppliers must provide animal welfare guarantees when products of animal origin are used. Studio Anneloes does not accept Real exotic animal skins (incl. snake, alligator, crocodile, lizard, and ostrich).

**Down Feathers Policy** - Studio Anneloes does not accept Down/Feathers from live-plucked birds and force-fed birds. Studio Anneloes 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 garments/items are Non-live plucked down.

**Man-made Cellulosic Fibres Policy** - Studio Anneloes 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 critically endangered, near threatened, endangered, extinct in the wild, or vulnerable. Studio Anneloes prefers sustainably certified wood products (e.g. FSC)

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<sup>8</sup> 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. See <https://www.iucnredlist.org/>



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**Packaging** - Since plastic is non-biodegradable, recycling 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 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 (GRS certified) or biobased plastics. In case of recycled for example use rPE, rPP or rPET, all others should be avoided.

**Cardboard** - We ask our suppliers to use recycled or FSC-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 & Code of Ethics

The supplier company shall define and implement a management system to ensure that the requirements of the Code of 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 Code of Conduct to all employees and subcontractors. It shall also address employees' concerns of non-compliance with this Code of Conduct. Studio Anneloes will be informed about non-compliance and follow-up. If the buying behavior of Studio Anneloes impacts the compliance to this Code of Conduct we will be informed immediately.

The requirements in the Code of Conduct are requirements that we want to achieve together. These are our common goals. We are open to discussion if suppliers are not able to meet these requirements. We are certain that many of our suppliers have even higher demands of themselves. Therefore, we want you to provide us with the relevant certifications and reports to confirm this.

By signing this Code of Conduct statement, you commit yourself to adhering to the highest standards of ethical conduct as outlined in our Code of Ethics, which serves as the foundation for this Code of Conduct.

Use this link <https://www.studioanneloes.nl/reports-policies/> for the latest version of our Code of Ethics.

The undersigned at this moment confirms that:

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

Signatures

CEO Studio Anneloes  
Name: Jurriaan van 't Hoff

Supplier/Subcontractor  
Name:



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Date: