



SUPPLIER CODE OF CONDUCT

The provisions of this Code of Conduct constitute minimum and not maximum standards, and this Code of Conduct should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Code of Conduct address the same subject, to apply that provision which affords the greater protection. This Code of Conduct aligns with the ETI Base Code and The ILO Indicators of Forced Labour.

1. COMPLIANCE WITH LOCAL LAWS

- We expect our suppliers to be in full compliance with the laws and regulations in the countries where they operate

2. EMPLOYMENT IS FREELY CHOSEN

- There is no forced, bonded or prison labour.
- Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.
- There shall be no restriction of movement, including the locking of facility doors.
- There shall be no deliberate isolation of workers, including confiscation of mobile phones or other means of communication. There shall be no prohibition of contact with family, friends, or seeking help.

3. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

- Where the right to freedom of association and collective bargaining is restricted by law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

4. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 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.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

5. CHILD LABOUR SHALL NOT BE USED

- There shall be no recruitment of child labour.
- Rapha does not endorse the use of child labour in its manufacturing processes.

6. LIVING WAGES ARE PAID

- 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.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 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. Wages shall not be withheld systematically and deliberately as a means to compel workers to continue working for the employer.

7. WORKING HOURS ARE NOT EXCESSIVE

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. 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.

8. 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. There shall be no abuses of vulnerability, including of workers who lack knowledge of the local language or belong to minority ethnic groups.

9. REGULAR EMPLOYMENT IS PROVIDED

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 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.

10. 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.

11. ENVIRONMENTAL PROTECTION

- We expect our suppliers to comply with all relevant laws and regulations regarding the protection and preservation to the environment.

12. BUSINESS INTEGRITY

- There shall be no improper advantage sought, including the payment of bribes, to secure the delivery of goods to Rapha.

13. COMMUNICATION AND SUPERVISION

- Suppliers shall co-operate fully with any member of Rapha or 3rd parties appointed by them to carry out audits, which monitor compliance with the observance of this code. Suppliers shall provide these supervisors access to the necessary documentation and means to ensure this process.