



Main Procedures

Social Compliance

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Introduction

The TOM TAILOR GmbH is a fast-growing fashion company with an increasing international presence. Its approach to business includes a well-balanced human resources policy and maintaining relationships with business partners along the entire value chain based on a foundation of trust. TOM TAILOR places great emphasis on decent, safe and fair working conditions at its supplier's operations, on reducing its environmental footprint in the production and procurement process and in its stores as well as on high product quality.

The principle of sustainable governance is a core component of the business policy of the TOM TAILOR GmbH.

Social compliance is there for a mandatory requirement for the business relationship with TOM TAILOR GmbH.

TOM TAILOR GmbH is an active member of [amfori](#). The company is committed to the amfori [BSCI Code of Conduct \(CoC\)](#) and [Terms of Implementation \(ToI\)](#) to drive the improvement of working conditions in the global supply chain.

Scope

The TOM TAILOR GmbH wants to ensure compliance in the supply chain with the regulations of working conditions, as set out in the amfori BSCI Code of Conduct. Below procedures therefore apply to all suppliers of products sold to the TOM TAILOR GmbH, irrespective of their method of sourcing.

This includes suppliers and subcontractors of:

- Garments
- Accessories
- Shoes
- Bags
- Jewellery

Handled by:

- Own Sourcing Offices (TTS), Direct Suppliers
- Importers / Licensees

Supplying to:

- TOM TAILOR GmbH

In general, all following rules and procedures are valid for suppliers, which will become / are the business partners of the TOM TAILOR GmbH.

The actual monitoring activities for new and existing suppliers (e.g. the Initial Factory Assessment (IFA), the amfori BSCI Audits, Regular Factory Visits, and Health & Safety Checks) are done at the level of the production sites. (In some cases, the supplier and the production site are the same, but in other cases the supplier is using different production sites.)

Basic rules and expectations:

- Continuous improvement on Social Compliance performance is expected from business partners and production facilities, who should strive for “A” in the amfori BSCI audits through avoiding recurrence of any issues and building more robust social compliance management system in line with the amfori BSCI Code of Conduct and Terms of Implementation. In driving the Social Compliance performance of TOM TAILOR supply chain, an amfori BSCI audit result “C” will be considered as conditional approval only on a case by case basis.
- Before a business relation with TOM TAILOR GmbH could start,
 - Business partners should commit to the amfori BSCI Code of Conduct, familiarise themselves with the amfori BSCI procedures, and the amfori BSCI System Manual.
 - Business partners should sign the “Terms of Implementation for Business Partners”, while production facilities are requested to sign the “Terms of Implementation for Business Partners to be involved in the amfori BSCI monitoring process (Producer)”,
 - Copies of amfori BSCI audit reports should be presented to TOM TAILOR CSR Management as part of the document submission in the approval procedure.
- All active production sites and subcontractors (producing for TOM TAILOR GmbH) of a supplier need to be audited per amfori BSCI protocol by accredited auditing companies.
- All active Business partners and production facilities should be open to visits by TOM TAILOR CSR global team which will be with / without prior notice.
- The Business partner should nominate a responsible person for ensuring proper and effective implementation of the amfori BSCI Code of Conduct and Terms of Implementation at the production sites and at the subcontractors producing for TOM TAILOR GmbH, including on-time audit scheduling, drafting and submitting remediation plan, and attending capacity building workshops by amfori Academy.
- All amfori BSCI audits should be “Semi-announced”, i.e. audit date(s) is unknown but with an agreed audit window (minimum four weeks agreed and disclosed).

System Overview

The TOM TAILOR GmbH is committed to implement the principles of amfori BSCI into its supply chain. amfori BSCI is not a certification scheme. It offers a step-by-step approach that helps our suppliers to implement the Code of Conduct gradually.

This manual is developed to give a clear guidance on how the amfori BSCI Code of Conduct can be implemented into the supply chain processes and which rules should be followed.

General Rules

1. Code of Conduct

- Every supplier and its production sites must sign the amfori BSCI Terms of Implementation of the Code of Conduct prior to starting a business relationship with TOM TAILOR GmbH.
- The Code of Conduct is included in the general framework agreement (General Instructions) for suppliers. A Declaration of Acknowledgement will be collected by CSR Management and then filed in PLM database by Masterdata

2. Internal Reporting

- amfori BSCI audit reports of suppliers will be received by CSR Management of TOM TAILOR GmbH, for review and taking further actions together with Social Compliance Officers and the respective suppliers.
- Alerts and/ or necessary actions will be sent and/ or highlighted by CSR Manager to Social Compliance Officers, respective Country Manager(s), Global Sourcing Manager, and Global Sourcing Director.
- CSR Manager will share an aggregated report of the Social Compliance status of suppliers' monthly to the following persons:
 - Country Managers
 - Global Sourcing Manager
 - Global Sourcing Director

3. External Communication

- All partner, customer or media requests, or information of media or NGO research concerning Corporate Social Responsibility topics have to be forwarded to CSR@tom-tailor.com, topics on Supply Chain Social Compliance have to be forwarded to sourcing.CSR@tom-tailor.com for further actions.

- Communication with supplier on Social Compliance topic will be done via Social Compliance Officers of respective countries, and CSR Manager, tilky.wang@tom-tailor.com.

4. Supplier Qualification

Suppliers to TOM TAILOR GmbH, who do not yet achieve the requested Social Compliance performance (amfori BSCI audit “A”), have the possibility to apply for a special qualification programme by external consultants. The request should be sent to the CSR Manager, tilky.wang@tom-tailor.com.

5. Database Entry

- All necessary information about the Social Compliance performance of suppliers will be integrated in the TOM TAILOR GmbH PLM and Supplier Scorecard, as well as reflected on the [amfori BSCI platform](#).
- The following documentation should be sent to the CSR Manager, tilky.wang@tom-tailor.com:

	Who sends it?	When?	Database
Supplier general data	TTS Office/ supplier	Prior to sourcing relationship	PLM / amfori BSCI platform
Initial Factory Assessment Report	TTS Office/ supplier	Prior to sourcing	PLM database
amfori BSCI audit reports	CSR Officers/ suppliers/ amfori BSCI platform	Upon audit report uploaded to the amfori BSCI platform	PLM database
Remediation plans	CSR Officers/ suppliers	Within 60 days after audit	amfori BSCI platform
Health & Safety Check	CSR Officers	Quarterly	TTS SharePoint

Procedures

1. New Suppliers and Factories

Aim and Purpose

TOM TAILOR GmbH wants to start a business relationship only with those suppliers who do respect decent working conditions. Therefore, in addition to business case approval, every new supplier has to undergo a preliminary check, the Initial Factory Assessment (IFA) process, before such supplier can be officially registered on our supply chain database for order placement.

Scope

All new suppliers, who wish to establish a business relationship with TOM TAILOR GmbH.

Responsibilities

- Suppliers
- CSR Officers
- Sourcing Offices
- CSR Management

Procedure

A. Direct Suppliers:

- Submission of supplier and factory(ies) information and due diligence information per the IFA for review
- Submission of amfori BSCI audit report(s) of the production factory(ies)
 - RSP should be taken by any linked participants, i.e. not “Orphan”, on amfori BSCI Platform
 - The audit result should be valid, i.e. at least 6 months from expiry
 - Minimum audit result of “B”
 - “C” will be considered as conditional approval only on a case by case basis
- Submission of signed amfori BSCI Tol documents
- TOM TAILOR GmbH reserves the right to conduct Onsite Assessments per IFA prior to business relation establishment.

B. Importers / Licensees:

Please see the “Procedures – 9. Importers / Licensees” (P. 20).

C. Suppliers managed by TOM TAILOR Sourcing Offices (Upon business case is approved by Global Sourcing Manager):

- Collection and submission of documents are required as for A. Direct Suppliers
- CSR Officer conducts onsite assessment per the IFA checklist as part of the approval process.
- IFA onsite assessment report is sent to CSR Manager, tilky.wang@tom-tailor.com, for review and comment.
- The results of the IFA onsite assessment and Finance Credit Check determine the further steps:
 - “Acceptable”: The supplier is approved for on-boarding.
 - “Marginal”: The supplier can only be granted conditional approval on case by case basis
 - “Failed”: The supplier is rejected for on-boarding; the supplier may correct the findings and can re-apply for another Initial Factory Assessment after 3 months.
- Information of approved suppliers (as “Acceptable” or “Marginal”) will be sent to Masterdata for official registration in the TOM TAILOR GmbH PLM.
- For suppliers that are new to amfori BSCI, respective factory profile on the amfori BSCI Platform will be established for initial amfori BSCI audit arrangement (see details from “Procedures – 2. amfori BSCI audit” (P. 7)).

Remark: In addition to amfori BSCI result “C”, suppliers/ factories will be granted only “Conditional approval” with possible scenarios as following:

- Crucial non-compliances (NC) noted in the IFA onsite assessment even scored as “Acceptable”
- Potential risks identified per amfori BSCI audit report even the result is A or B, e.g.
 - Underpayment of wages
 - Transparency issues/suspected double bookkeeping
- Factory is not yet amfori BSCI audited

2. amfori BSCI Audit

Aim and Purpose

The amfori BSCI audit is a core element of the TOM TAILOR GmbH Social Compliance System, in accordance with the audit cycle to monitor the performance of supplier production sites, and their adherence to the amfori BSCI Code of Conduct (i.e. TOM TAILOR GmbH Code of Conduct).

Scope

All active suppliers registered on TOM TAILOR GmbH PLM

Responsibilities

- Suppliers
- CSR Officers
- CSR Management
- amfori BSCI auditing companies

Procedure

1. Initiation: First amfori BSCI audit for new supplier and/or factory (only applicable for suppliers managed by TOM TAILOR Sourcing Offices) (See Procedure “1. New Suppliers and Factories”)
 - Newly approved supplier with factory(ies) (or existing supplier with newly approved factory(ies)) having no valid amfori BSCI audit report(s), should go for such audit within 6 months (180 days) from the official registration date (on PLM), i.e. latest acceptable audit window as four weeks counting back from the 180th day, e.g. Factory A was set up on PLM system on 8 Dec, 2020, latest date to complete the amfori BSCI audit will be 6 Jun, 2021, and hence the latest acceptable audit window will be from 9 May to 6 Jun, 2021
 - CSR Officers should communicate with suppliers/factories on the audit arrangement when:
 - RSP is held by TOM TAILOR GmbH:
 - Supplier informs CSR Officers of a preferred audit window no later than 3 months upon PLM registration.
 - Audit request will be made per agreed and given information via amfori BSCI Platform

- RSP is held by other amfori participants
 - Supplier informs CSR Officers whether audit is arranged, and shares the audit window
 - Regardless of who the RSP holder is, supplier should ensure the audit is arranged on semi-announced basis and should be completed within the set timeline
2. Full/ Follow-up Audit for active suppliers, with TOM TAILOR GmbH as the RSP holder:
 - Supplier informs CSR Officers of preferred audit window at least 6 weeks prior to expiry date of current amfori BSCI audit.
 - The latest acceptable audit window for planning as:
 - Full audit: 4 weeks from expiry date, i.e. if Factory B's audit expires on 6 Feb, 2021, the new Full audit window could start from 6/7 Feb and end on 6 Mar, 2021
 - Follow-up audit: 4 weeks before expiry date, i.e. if Factory C's audit expires on 14 Mar, 2021, the Follow-up audit window should start from 14 Feb and end on 14 Mar, 2021; should audit window could only starts after 14 Feb, 2021, Factory C should go for Full audit instead
 3. CSR Management requests a semi-announced audit for the supplier in the amfori BSCI platform.
 4. An external, accredited amfori BSCI auditing company should be appointed to carry out the amfori BSCI audit at the supplier production sites.

Information about the accredited amfori BSCI auditing companies can be found via the following link: <https://www.amfori.org/content/enabling-partners#auditing>.
 5. The amfori BSCI audit report is uploaded to the amfori BSCI platform by the external auditing company, which is accessible by linked amfori Participants (e.g. CSR Officers and CSR Manager of TOM TAILOR GmbH), and factory profile user(s).
 6. CSR Management sends new amfori BSCI audit reports on a regular basis to Masterdata for uploading to the PLM database. CSR Officers and CSR Management review the report and take respective follow-up actions with suppliers and necessary parties according to following guideline:

Audit Result	Combination per performance areas (PA)	Remediation Plan	Next Audit Arrangement	Action from CSR Management
A – Outstanding	Minimum 7 PA rated A No PA rated C, D or E	Not particularly requested; Factory should work on improving repeated findings if any	From Full Audit: new Full Audit after two years to kick-start a new audit cycle;	Accepted for on-boarding in general; Maintain “Approval” status; Regular monitoring by CSR Officers
B – Good	Maximum 3 PA rated C No PA rated D or E		From Follow-up Audit: valid till end of the audit cycle, new Full Audit to be arranged	
C – Acceptable	Maximum 2 PA rated D No PA rated E	To be submitted on amfori BSCI Platform no later than 60 days from the audit date * Any critical finding related to H&S should be addressed within one month from the audit date to CSR Management	From Full Audit: valid for one year, Follow-up audit should be arranged to show improvement soon; From Follow-up Audit: depending on the expiry date to the audit cycle end date, another Follow-up Audit or new Full Audit should be arranged	As “Conditional Approval” only; status can be changed upon new audit result received; Regular monitoring by CSR Officers
D – Insufficient	Maximum of 6 PA rated E	To be submitted on amfori BSCI Platform no later than 30 days from the audit date	Depending on the findings, Follow-up audit should be arranged and conducted within 2-6 months to improve the result	Rejected for on-boarding; Sanction Procedure to be initiated; Escalated to all responsible stakeholders (Global Sourcing Director, Global Sourcing Manager and respective Country Managers, Senior Manager Buying)

Remark: amfori BSCI accepts valid SA8000 certificate from factories to waive the audit. Yet, for suppliers of TOM TAILOR GmbH, all should go for amfori BSCI audit with effective from Dec 2017, i.e. new suppliers/factories to be introduced with valid SA8000 certificate should agree to go for amfori BSCI audit upon successful registration; for existing suppliers/factories, no SA8000 certificate will be accepted as waiver for amfori BSCI audit.

Please refer to Circular “Change of General Instructions – Chapter M”, dated 13 Jun 2018.

3. Follow-up by Tom Tailor

Aim and Purpose

The improvement of suppliers with regards to Social Compliance performance and management is an essential aspect to TOM TAILOR GmbH. Therefore, TOM TAILOR GmbH offers regular support to the suppliers between audits and assessments through follow-up measures.

Scope

All active suppliers registered on TOM TAILOR GmbH PLM

Responsibilities

- Suppliers
- CSR Officers

Procedure

As soon as a supplier is approved (or “conditionally approved”) and successfully registered on TOM TAILOR PLM system with “active” status, the CSR Officer communicates with supplier and visits the place(s) of production regularly under the following guideline:

Conditions	Visit frequency	Responsible persons
a. IFA onsite assessment completed, not yet amfori BSCI audited	Bi-weekly calls/ meetings/ visits for audit preparation and corrective action follow-up	Supplier and/or factory CSR team – ensure factory management is committed to the programme, maintain good condition and social compliance management system status, be driver for enhancing social compliance performance in the supplier/factory; CSR Officer of respective country office – maintain communication and monitoring/auditing for the supplier/factory, provide consultancy and support for continuous improvement, complete audit reports (to supplier and CSR Management), and provide respective visit plans and Quarterly Reports (to be sent on 30 th of each 3 rd month) for CSR Manager;
b. amfori BSCI result = A	At least one unannounced assessment with TOM TAILOR Social Compliance Checklist in every 12 months before expiry date; A visit at least 3 months before the amfori BSCI should be arranged	
c. amfori BSCI result = B		
d. amfori BSCI result = C	At least three to four visits (including one unannounced assessment with TOM TAILOR Social Compliance Checklist) in every 12 months; Visits/ calls/ meetings should be arranged in accordance with the corrective action progress; A visit at least 3 months before the amfori BSCI audit should be arranged	

Conditions	Visit frequency	Responsible persons
e. Remediation plan development and review (for IFA onsite assessment, Social Compliance Check, Special Check, and amfori BSCI audit)	Immediate communication with supplier/factory after the assessment(s); Submission of remediation plan and evidence per the guidelines given in “Procedures – 2. amfori BSCI Audit” (P. 9) after the audit Progress to be reviewed and reported at least on a quarterly basis	CSR Manager – oversee the supply chain status and work with CSR Officer to ensure all timelines and KPIs are met, support CSR Officers and suppliers/factories to drive continuous improvement, provide consultancy and support to suppliers/factories
f. amfori BSCI result = D	Weekly calls/meetings/ visits for reviewing corrective action progress	Supplier and/or factory CSR team – take immediate actions to ensure issues are solved within agreed timeframes and improvement must be achieved in the follow-up audits;
g. Special visits based on needs (e.g. health and safety checks, child labour screening during summer, risk screening, and media exposure cases, etc.) *	Unannounced checks on special topics will be carried out every 3-6 month or in any time of the year depending on the focus areas (additional visits to the regular ones per conditions set above); Follow-up visit within 3-6 months to confirm on improvements (can be arranged in conjunction with the regular visits per conditions set above)	CSR Officer of respective country office – maintain close monitoring with supplier/factory, ensure improvements happen in supplier/factory; CSR Manager - escalate/alert to responsible stakeholders (including Global Sourcing Director, Global Sourcing Manager and respective Country Managers, where appropriate), work with supplier/factory, CSR Officer and Sourcing Team for resolutions in case
h. Direct suppliers, and Importers / Licensees	Unannounced checks on random basis	Supplier CSR responsible – ensure factory management is committed to the programme, maintain good condition and social compliance management system status, be driver for enhancing social compliance performance in the supplier/factory; CSR Management – arrange random unannounced checks on need basis

Remarks: Sanction procedures (P. 12-15) may be initiated with the following situations noted during the follow-up process:

- Zero Tolerance issues/ Repeat finding(s) noted during the follow-up visits
- Urgent Cases

4. Sanction 1: No Cooperation

Aim and purpose

It is the explicit aim of TOM TAILOR GmbH to support all suppliers, so that they can achieve a better working environment. However, consequences have to be applied if a supplier does not cooperate to fulfil the social requirements of TOM TAILOR GmbH. This procedure aims at motivating a supplier to adhere to the Social Compliance regulations of TOM TAILOR GmbH and sets the steps required to sanction a supplier.

Scope

For suppliers whom TOM TAILOR GmbH CSR Management holds their RSP:

- New suppliers, who failed to hand in an application for an amfori BSCI initial audit within the agreed timeframe.
- Existing suppliers, who failed to hand in an application for an amfori BSCI audit (new Full audit or Follow-up audit) or a remediation plan within the agreed timeframe.

Responsibilities

- Supplier
- CSR Officers
- CSR Management
- Respective Country Manager
- Global Sourcing Manager
- Global Sourcing Director

Procedure

A. New suppliers – If a new supplier that is on-boarded without a valid amfori BSCI audit (new to amfori BSCI or audit expired) fails to inform TOM TAILOR GmbH of an amfori BSCI audit window/date, the following steps shall apply:

1. 1st warning letter (cc to respective Country Manager and Global Sourcing Manager): no later than 3 months after Initial Factory Assessment
2. 2nd warning letter (cc to respective Country Manager and Global Sourcing Manager): no later than 4 months after Initial Factory Assessment
3. Sourcing ban (cc to respective Country Manager and Global Sourcing Manager): no later than 5 months after Initial Factory Assessment

The sourcing ban may be lifted upon this supplier/factory, once an amfori BSCI audit is arranged/has been conducted, or a resolution plan is provided and agreed.

- B. Active suppliers – If an active supplier fails to inform TOM TAILOR GmbH of a date for an amfori BSCI audit arrangement (Full/Follow-up audit), the following steps shall apply:
1. 1st warning letter (cc to respective Country Manager, Global Sourcing Manager, and Global Sourcing Director): no later than 8 weeks prior to amfori BSCI audit expiry
 2. 2nd warning letter (cc to respective Country Manager, Global Sourcing Manager, and Global Sourcing Director): no later than 6 weeks prior to amfori BSCI audit expiry
 3. 3rd warning letter (cc to respective Country Manager, Global Sourcing Manager, and Global Sourcing Director): on the day of amfori BSCI audit expiry
 4. Sanction meeting: 7 days after amfori BSCI audit expiry, including:
 - i. CSR Management (organizer)
 - ii. Respective Country Manager
 - iii. Global Sourcing Manager
 - iv. Global Sourcing Director
 5. Result of this discussion should be the decision on further steps. The default should be reducing orders up to a ban of the supplier for new orders.

The sourcing ban may be lifted once a new amfori BSCI audit is arranged/conducted, or a resolution plan is provided and agreed.

- C. Active suppliers – If an active supplier fails to send TOM TAILOR GmbH a remediation plan after 60 days after amfori BSCI audit (by email and/or via amfori BSCI platform), the following steps shall apply:
1. 1st warning letter will be sent, cc to CSR Management and respective Country Manager
 2. Remediation meeting 30 days after 1st warning letter will be arranged, including:
 - i. CSR Management (organizer)
 - ii. CSR Officers
 - iii. Respective Country Manager
 3. Result of this discussion should be the decision on further steps. The default should be provision of remediation plan/evidence, or new audit schedule to show improvement actions taken.

5. Sanction 2: No Improvement

Aim and purpose

It is important that suppliers work on the improvement of working conditions. TOM TAILOR GmbH uses various means in supporting suppliers to do so. Suppliers who are not showing an acceptable level of improvement should be motivated and pressured to comply with the regulations set by TOM TAILOR GmbH.

Scope

- All suppliers, which have received a “D” result in the amfori BSCI audit for the second time consecutively.
- All suppliers, who clearly state unwillingness to make necessary improvements either during a follow-up visit or during an unannounced check.

Responsibility

- Supplier
- CSR Officers
- CSR Management
- Respective Country Manager
- Global Sourcing Manager
- Global Sourcing Director

Procedure

A. For suppliers with consistent amfori BSCI “D”

1. After first amfori BSCI audit “D”: CSR Management sends out a warning letter to the supplier (cc to CSR Officers, respective Country Manager, and Global Sourcing Manager), reminding them of imminent sanctions if no improvement is seen in the next audit.
2. After second amfori BSCI audit “D”: CSR Management calls a “sanction meeting” with:
 - i. CSR Officer
 - ii. Respective Country Manager
 - iii. Global Sourcing Manager
 - iv. Global Sourcing Director

3. During this meeting, it will be determined, whether:
 - i. A prolonged grace period (e.g. because the tasks to fulfil are time consuming to achieve) can be granted according to the Remediation Plan,
 - ii. Sourcing sanctions (e.g. reduction of orders, ban) should be applied, and/or
 - iii. Final consequences, if the supplier still fails to show improved audit result in a following audit (e.g. ban of the supplier for production).
4. The procedure can be stopped, and sourcing sanctions can be lifted once the supplier achieves an amfori BSCI audit result "C" or above.

B. For suppliers stating unwillingness to improve:

1. CSR Management calls a "sanction meeting" with:
 - i. CSR Officer
 - ii. Respective Country Manager
 - iii. Global Sourcing Manager
 - iv. Global Sourcing Director
2. During this meeting, it will be determined, whether:
 - i. A prolonged grace period (e.g. because the tasks to fulfil are time consuming to achieve) can be granted,
 - ii. Sourcing sanctions (e.g. reduction or orders, ban) should be applied, and/or
 - iii. Final consequences, if the supplier fails to show improved audit result in a following audit (e.g. ban of the supplier for production).
3. The procedure can be stopped, once the supplier has corrected the necessary improvement within agreed timeframe.

6. Urgent Cases or Zero Tolerance Protocol

Aims and Purpose

Urgent cases are called on when a situation is found to pose a threat to health and safety both to the life of workers and to the reputation of TOM TAILOR GmbH. This Urgent Case procedure aims at securing a rapid coordination and appropriate response to the threat on hand.

Scope

- All suppliers of TOM TAILOR GmbH
- All sourcing channels of TOM TAILOR GmbH

Responsibility

- Supplier
- CSR Management
- Respective Country Manager
- Global Sourcing Director
- Board of Directors

Procedure

- If a situation is detected (irrespective if by a CSR Officer, Non-Social Compliance staff, local groups or journalists) that meets the criteria for an urgent case, CSR Management (tilky.wang@tom-tailor.com) should be contacted immediately.

Examples of such situations may include, but not limited to the below list:

- A fire or a collapse of a TOM TAILOR GmbH production site.
 - Forced labour and child labour (human trafficking, exploitative child labour) found/suspected in a TOM TAILOR GmbH production site. Please also refer to “Procedures – 7. Child Labour” (P. 17-18).
 - An imminent risk and a critical threat to the health and safety or life of workers (e.g. chemical accident, sandblasting).
 - An abuse in any form, which may be sexual, physical or mental in nature, and must form part of the management style of the supplier, i.e. part of the day-to-day management of the factory. Systematic abuse would not include isolated actions, criminal acts, or one person who abuses power.
 - Death of workers on the production floor and/or mass fainting.
 - A journalist gaining unauthorized access to a production site of TOM TAILOR GmbH.
- After analysing the facts, CSR Management decides whether Urgent Case Procedure needs to be initiated.
 - If the Urgent Case Procedure is initiated, CSR Management will inform the following persons immediately:
 - Board of Directors
 - Global Sourcing Director
 - A meeting/call with relevant parties will be organized within 24 hours to decide on further steps, such as:
 - The situation should be thoroughly analysed by experts (internally or externally) on the spot, so that all facts are on hand.
 - Possibilities to resolve the situation should be researched, including the involvement of local stakeholders and the amfori BSCI.

- As a guideline, initial activities should be carried out no later than 48 hours after the incident.
- As a general rule, TOM TAILOR GmbH will always try to negotiate and liaise all parties involved in the incident.

7. Child Labour

Aim and Purpose

TOM TAILOR GmbH takes a clear stand against any form of child labour. TOM TAILOR GmbH strives to ensure and protect the current and future health and well-being of disapproved and illegitimate child labour and aims at avoiding future child labour cases by all possible means.

Scope

- All suppliers of TOM TAILOR GmbH
- All sourcing channels of TOM TAILOR GmbH

Responsibility

- Supplier
- CSR Officer
- CSR Management
- Respective Country Manager
- Global Sourcing Director

Procedure

Scenario A) If an underage worker is detected by a CSR Officer of TOM TAILOR GmbH:

- Analyse the situation in detail to be sure it is a case of an underage worker. During the interview with the underage worker, document the identity and means to contact him/her.
- State clearly to supplier/factory management that the underage worker needs to be removed from the premises but that the remuneration must continue until further notice.
- Stress that there cannot be any repressions against the underage worker nor against any of his/her family members.
- After the visit to the supplier, contact CSR Manager (tilky.wang@tom-tailor.com) on the same day. It should include information about the age, name, contact details and picture of the underage worker in your report.
- Arrange for a meeting with the latest on the next day, possibly on the factory premises. If so required, arrange for a medical doctor to verify the age of the worker concerned,
 - *If the worker is above legal working age, no further steps need to be taken → end of procedure.*

- *If the worker is below the legal working age*, CSR Officers will enquire and find out what is the most suitable solution for the individual (e.g. continue school, vocational training, etc.).
- Get the Supplier's Management commitment to:
 - Continue remuneration of the children until the completion of working age every month;
 - Pay to finish the school education;
 - Offer the underage worker a position after completion of education.
- Send a report of this visit to CSR Manager (tilky.wang@tom-tailor.com), including:
 - Wishes of the individual (e.g. continue school, vocational training);
 - Possibilities to offer the educational trainings;
 - Costs for monthly remuneration;
 - Written approval to take over the costs (management signature).
- CSR Management will start the "Procedures – 6. Urgent Cases or Zero Tolerance Protocol" (P. 15-17).
- As a default, any supplier not meeting the financial responsibility for an identified underage worker will be blacklisted and no more orders can be either placed or shipped out. In these cases, TOM TAILOR GmbH will assume financial responsibility for the concerned worker.

Scenario B) If an underage worker is suspected by Non-Social Compliance staff of TOM TAILOR GmbH:

- Do not mention the case during the visit.
- Do not speak to the suspected worker.
- After the visit to the supplier, contact CSR Manager (tilky.wang@tom-tailor.com) on the same day to report your suspicion of possible underage labour.
- CSR Manager will inform the respective CSR Officer or an external party
- Either a CSR Officer should carry out a visit to the supplier or an external party accompanied by a medical doctor the next day
- Investigation and further steps will be carried out as described in Scenario A.

8. Subcontractors of Suppliers

Aim and purpose

Even though there is no direct business link between TOM TAILOR GmbH and the business partners of a supplier, TOM TAILOR GmbH seeks the improvement of working conditions in all factories that participate in the production of TOM TAILOR GmbH goods. It is therefore important that TOM TAILOR GmbH gains both transparency and information over the working conditions of subcontractors of TOM TAILOR GmbH suppliers.

A subcontractor is in this context defined as a production site located outside the registered address of the supplier where the product takes shape and who performs production steps on behalf of the supplier. This includes but is not limited to printing, tanning, embroidery, dyeing, washing, knitting and linking, and assembling.

Scope

This procedure applies to all TOM TAILOR GmbH suppliers and their business partners (sub-suppliers).

Responsibilities

- Supplier
- CSR Officer
- CSR Management

Procedure

- Suppliers have to disclose regularly all their subcontractors producing for TOM TAILOR GmbH including information about the existing social compliance performance:
 - If a supplier denies disclosing the subcontractors during the Initial Factory Assessment, the supplier will not be onboarded
 - If a supplier denies disclosing the subcontractors upon request by TOM TAILOR GmbH, a sanction meeting will be scheduled
- CSR Officers will collect the information about the subcontractors and may randomly visit them for verification
- If there is no valid amfori BSCI report, a valid FLA, SMETA or SEDEX (or other third-party social compliance audit report(s) / system certification(s)) could be provided for review, the "Procedures – 2. amfori BSCI Procedure" (P. 7-9) applies to the garment assembling subcontractors' as to suppliers.

- The follow-up procedure will be defined according to the risk level of the subcontractor by the CSR Management.
- The sanction process will be applied as stipulated in “Procedures – 4. Sanction 1: No Cooperation” (P. 12-13) and “Procedures – 5. Sanction 2: No Improvement” (P. 14-15). The TOM TAILOR GmbH supplier is held responsible for any failures found at the subcontractor facility.

9. Importers / Licensees

Aim and Purpose

TOM TAILOR GmbH has a reduced control over the sourcing strategies via Importers / Licensees. Still, the maintenance of good working conditions is important for products manufactured in their associated factories. This procedure therefore aims to ensure that either Importers / Licensees assume their responsibility individually, or with the help of TOM TAILOR GmbH.

Scope

TOM TAILOR GmbH Importers / Licensees

Responsibilities

- Importers / Licensees
- Buying Department / Licence Department
- CSR Management

Procedure

- Before the start of a business relationship, importers / licensees are informed about requirements of the amfori BSCI. CSR Management will arrange the official registration in the TOM TAILOR GmbH PLM system
- All importers / licensees are requested to present a valid amfori BSCI audit report for all their used production sites or factories, with at least “C” rating. Otherwise, no production for TOM TAILOR GmbH should start
- In driving the CSR performance of Tom Tailor GmbH supply chain, amfori BSCI audit result “C” will be considered as conditional approval only and will be reviewed on a case by case basis. Business partners are expected to present audit results with a minimum audit result of “B”.
- Sanctions, if necessary, will be carried out against the importer / licensee, not the individual factory.

Restriction of Production Methods and Materials

1 Animal Hair

- For materials made of animal hair, TT only accepts hair from living and domesticated animals including (but not limited to) cow, buffalo, yak, horse, goat and pig.
- No hair from vulnerable or endangered species may be used.
- TOM TAILOR GmbH does not accept Alpaca Wool, Angora Hair, Cashmere Wool or Mohair Wool.

2 Down and Feathers

- TOM TAILOR GmbH only accepts down or feathers that are certified according to the 'Responsible Down Standard'.
- TOM TAILOR GmbH does not accept down from live plucked birds.
- TOM TAILOR GmbH only accepts down, feathers and decoration feathers taken from slaughtered birds bred for meat production.
- No down or feathers from vulnerable or endangered species must be used.
- All down and feathers must be sterilized according to EU standard EN 12935.
- The usage of feathers or downs of ducks and/ or geese originating from the production of 'Fois Gras' is prohibited.

3 Fur

- TOM TAILOR GmbH does not produce, buy or sell products made of real fur.
- TOM TAILOR GmbH does not produce, buy or sell products made of real Persian Lamb.

4 Leather and Skins

- TOM TAILOR GmbH only accepts products made of leather or skin from cows, buffalos, sheep, goats, fish or pigs that have been bred for meat production. No leather or skin products of vulnerable or endangered species must be used. A certificate of origin must be presented for all leathers or skins used.
- For every other animal species, TOM TAILOR GmbH has to receive a proof, containing the Latin name and the region of origin, that the pelt is a by-product of the food industry.
- TOM TAILOR GmbH does not sell real exotic animal leather or skins, including but not limited to snake, alligator, crocodile, lizard and ostrich.
- TOM TAILOR GmbH does not allow cow leather originating from India due to poor transport conditions.
- Wastewater from the tanneries used for TOM TAILOR GmbH products must be treated at a wastewater treatment plant. Tanneries must ensure effluent is compliant with the legal requirement before discharge.

5 Shell

- TOM TAILOR GmbH does not allow shell products originating from endangered species.

6 Uzbek Cotton

- TOM TAILOR GmbH does not allow the usage of Uzbek Cotton.

7 Wool

- The country of origin of all wool supplied, has to be declared to TOM TAILOR GmbH.
- Only wool from farms which adheres to the “Five Freedoms of Animal Welfare” will be accepted.
- TOM TAILOR GmbH does not accept mulesing and wool harvested from animals treated by this method.
- Tom Tailor GmbH does prefer the usage of RWS-certified wool. If not applicable, a non-mulesed / non-ceased wool declaration must be provided.
- Wool originating from Australia must be provided with:
 - certificate of origin,
 - declaration as non-mulesed wool or non-ceased mulesed wool,
 - supporting documentations from the wool processors or concerned parties where applicable.

8 Sandblasting

- To ensure the health and well-being of the workers and finally the complete stop of sandblasting in the garment industry, TOM TAILOR GmbH has banned the use of sandblasting.
- There are alternative ways to achieve the same used look.

**COMMITMENT TO COMPLYING WITH TOM TAILOR GMBH
MAIN PROCEDURES SOCIAL COMPLIANCE**

I hereby confirm that:

1. We have received, read and thoroughly understood the **TOM TAILOR GmbH's Main Procedures Social Compliance**.
2. We acknowledge that compliance with the TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** is a contractual obligation and undertaking, accordingly, to meet the requirements per the most up-to-date version in all orders of the TOM TAILOR GmbH.
3. We undertake to disclose and formally demand TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement implications to the whole supply chain of production including but not limited to production facilities, sub-contractors, sub-processors and wet processing units, etc. relevant entities.
4. **TOM TAILOR GmbH:**
 - a. Reserves the right to check the compliance with TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement regarding any facilities, at any time, and/ or at any stage of the production or distribution processes.
 - b. Reserves the right to cancel any order for any goods where non-compliance with TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement was noted.
 - c. Reserves the right to cancel or destroy, or to order destruction of the goods subject to the cancelled order, subject to the fact that the cancellation of the relevant order shall entail the non-existence of the obligation to pay any sum whatsoever for the goods being produced in facilities failing to comply with TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement.
 - d. Holds the Supplier as solely responsible for any and all damages caused by the facilities failing to comply with TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement.
 - e. Reserves the right to stop business with the Supplier whenever the cases of non-compliance to the TOM TAILOR GmbH's **MAIN PROCEDURES SOCIAL COMPLIANCE** requirement occurs.

Place, Date:

Name and position of the signatory in bold letters:

Name of the Company in bold letters:

Signature, Company stamp:
