



CODE OF CONDUCT

It is the intention of Airwair International Ltd to conduct its business to the highest possible standards of business behaviour, within the laws of the countries in which it operates.

Airwair International intends only to work with reputable suppliers and manufacturers and endeavour to ensure that all products are produced lawfully and without any exploitation of the people producing them.

Our code of conduct is designed to be ethical, auditable and achievable and to promote the development of Airwair International suppliers. It is our intention to work with suppliers to help them achieve the required standards.

It is the responsibility of each supplier to issue this code to suppliers at the next stage down in the supply chain and to actively engage with them to ensure that the standards are met.ⁱ

For any suppliers using labour agents to provide workers, it is the responsibility of the supplier to ensure that reputable agents are used and that those agents are meeting the standards laid out below.

The provisions of the code constitute minimum and not maximum standards; all suppliers should strive to exceed the standards.

1. Employment is freely chosenⁱⁱ

- I. The use of any form of forced labour in the production of Dr Martens products is prohibited. This includes all forms of prison labour, indentured labour and bonded labour.
- II. Employees are not required to lodge deposits, identity papers or any other documentation with their employer. Employees are free to leave their employment after giving reasonable notice.

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

- I. Dr Martens recognises the rights of all employees to join or form trade unions of their own choosing and to bargain collectively. Employees also have the right to choose not to join a trade union.
- II. All suppliers must adopt an open attitude towards the activities of trade unions and their recruitment of members.
- III. Employees' representatives must not be discriminated against and are to be allowed access to the workplace to carry out their roles.
- IV. Where the rights of freedom of association and collective bargaining are restricted under local law, the employer must support an equivalent means of independent representation for employees.

3. Working conditions are safe and hygienic



- I. All suppliers must provide a safe and hygienic working environment (subject to any specific hazards intrinsic to the job). Hazards must be minimised, as far as is reasonably practical, in order to prevent accidents and damage to health.
- II. Employees must receive health and safety training on recruitment and subsequently, at regular intervals during employment.
- III. Employees are to be provided with access to clean toilet facilities and drinking water. Where appropriate, hygienic facilities for food storage are to be provided.
- IV. Any accommodation provided must be clean, safe and meet the basic needs of employees.

4. Child labour shall not be used

- I. There is to be no recruitment of child labour. "Child" means any person under 15 years of age, unless national or local law stipulates a higher mandatory school leaving or minimum working age, in which case the higher age must apply.
- II. If any incidence of child labour is identified at a supplier, the supplier shall ensure that all children are transferred to quality education until they are no longer children.
- III. No one under 18 years of age is to be employed at night or in hazardous work or conditions.

5. Living wages are paid

- I. The wage and benefits paid must be at or above national minimum legal levels or industry benchmark levels (whichever are higher). Wages must always be sufficient to meet basic needs and to provide some discretionary income for the employee.
- II. Before entering employment, employees must be provided with written, understandable information on the basis and calculation of their wages and any deductions. Employees must also receive an understandable payslip with each payment.
- III. No deductions are to be taken from wages as a disciplinary measure. No other deductions can be made without the express permission of the employee, unless required by law.
- IV. Training or apprenticeship wages, pre-employment fees, deposits or other practices that lower an employee's pay are not allowed.
- V. Employees must be paid a premium rate for any overtime hours worked; this rate must be no lower than local law.

6. Working hours are not excessive

- I. Working hours must comply with national laws or benchmark industry standards; whichever afford greater protection. Employees should not be required to work more than 48 hours per week on a regular basis.
- II. Total working hours (including overtime) must not exceed 60 hours in a given week or 12 hours in a given day.
- III. Employees must receive one day off per week.



IV. All overtime must be voluntary.

7. No discrimination is practised

- I. There is to be no discrimination in recruitment, wages, access to training, promotion, termination or retirement on any basis unrelated to the ability to do the job. This includes race, caste, national origin, religion, age, disability, sex, marital status, union membership and political affiliation.

8. Regular employment is provided

- I. As far as possible, work is to be performed on the basis of a regular employment relationship established through national law and practice.
- II. The supplier must not attempt to avoid the normal obligations of employer to employees under labour or social security laws and regulations by replacing the regular employment relationship with any of the following:
 - Labour-only contracting
 - Sub-contracting
 - Home-working
 - Apprenticeship schemes with no real intent to impart skills or provide regular employment
 - Excessive use of short-term contracts of employment

9. No harsh or inhumane treatment is allowed

- I. Physical abuse or discipline, verbal abuse, the threat of physical abuse, sexual or other harassment and other forms of intimidation are not permitted and not practised.

ⁱAdditional guidance for scope of responsibility

Airwair International Ltd will work directly with all nominated 2nd tier suppliers, so for example finished goods suppliers do not need to pass any policies onto Airwair nominated tanneries, outsole suppliers etc but would need to pass relevant policies onto any suppliers they source from independently of Airwair.

ⁱⁱ Additional guidance for suppliers on what constitutes modern slavery/forced labour.

Modern slavery is a term used to encapsulate both offences in the UK's Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the act, which can be found at:

<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>



<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

Definition of Slavery and Servitude

Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Forced or compulsory labour is defined in international law by the ILO's Forced Labour Convention 29 and Protocol. It involved coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of penalty and for which the person has not offered him/her self voluntarily.

Definition of Human Trafficking

An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation. The meaning of exploitation is set out here: <http://www.legislation.gov.uk/ukpga/2015/30/section/3/enacted> Recent figures from the UK National Crime Agency (NCA), show that the most prominent exploitation type recorded for potential victims first exploited as a child (where this is known), was labour trafficking.

Behaviour constituting modern slavery

Identifying potential victims of modern slavery can be a challenge because the crime can manifest itself in different ways. There is a spectrum of abuse and it is not always clear at what point, for example, poor working practices and lack of health and safety awareness seep into instances of human trafficking, slavery or forced labour in a work environment. However, businesses have a responsibility to ensure that workers are not being exploited, that they are safe and that relevant employment (include wage and work hour), health and safety and human rights laws and international standards are adhered to, including freedom of movement and communications.



CSR Code of Conduct Statement of Acknowledgement

We acknowledge receipt of the Airwair International code of conduct. We confirm that we have read and that we understand the code and will actively strive to ensure that its standards are met in our production sites, those of our 2nd tier suppliers, as well as by any labour agents we use .

Supplier.....

Name.....

Signed.....

Position.....

Date.....

Statement of acknowledgement valid until 31st December 2016