



Homeworking Policy

2021 Edition



About Pentland Brands Ltd

Pentland Brands Ltd is the brand management division of Pentland Group Limited.

Our brands include Berghaus, Canterbury of New Zealand, ellesse, Endura, KangaROOS, Mitre, SeaVees, Speedo and Red or Dead. We are the UK licensee for Kickers and in a joint venture with Lacoste.

Contents	
Section	Page Number
Introduction	4
Homework Definitions	5
Our Commitment	6
Supplier and Partner Responsibilities	7
Working Together	8
The Use of Intermediaries	9
Contacts	9

Introduction

This policy communicates our position towards homeworking in our supply chains and provides our supply chain partners with guidance in delivering our expectations.

Homeworkers exist in our supply chains and we are supportive of this. The majority of homeworkers are women who are balancing paid work with domestic and family responsibilities; few have practical alternatives, and homeworking provides a valuable income stream for them and their families.

Homeworkers often lack visibility in supply chains and are generally employed informally, leaving them in a vulnerable position. The income of many homeworkers often does not reach legal minimum wage and they have no security of employment.

We are committed to sustaining homeworkers' employment and making their work as regular as possible, while contributing through our purchasing practices to improved rights, income, and working conditions.

For any queries, feedback, disclosures or whistleblowing please contact corporate.responsibility@pentland.com

Homework Definition

Our definition of homework is based upon the International Labour Organisation (ILO) Convention (1996, C177, Article 1) which promotes the equality of treatment between homeworkers and other wage earners.

The term homework means work carried out by a person, to be referred to as a homeworker:

- 1 in their home or in other premises of their choice, other than the workplace of the employer;
- 2 for remuneration;
- 3 which results in a product or service as specified by the employer, irrespective of who provides the equipment, materials or other inputs used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker* under national laws, regulations or court decisions.



*In practice, homeworkers working in global supply chains are producing goods to company specifications. They do not have 'the degree of autonomy and of economic independence necessary to be considered an independent worker', and so they are clearly homeworkers covered by the ILO definition

Our Commitment

Pentland Brands is committed to:

- 1** Communicating our position on homeworking throughout our company and to all relevant business partners.
- 2** Ensuring that the presence of homeworkers in our supply chains will not lead to the relocation of work or cancellation of orders.
- 3** Working with our suppliers for the sustainable improvement of labour conditions for homeworkers in our supply chains, establishing clear timeframes for action, and involving homeworkers and/or their representatives in this process.
- 4** Engaging, where appropriate, with other brands and relevant non-governmental organisations in the sustainable improvement of labour conditions for homeworkers in our supply chains.

Supplier and Partner Responsibilities

We expect our suppliers and partners to:

- Adopt a shared policy of acceptance of homeworking and commitment to improving homeworkers' labour conditions where these do not meet those set out in the ILO Convention on Homeworking (1996, C177, Article 4) and Our Standards.
- Communicate this policy to all those in the supply chain below them, including intermediaries and homeworkers themselves.
- Work with us to identify where homeworking occurs in their supply chains and disclose this information to us.
- Where homeworking is present, work with us to develop an action plan for improving labour conditions for homeworkers if they are found to be below those set out in international labour standards and Our Standards, and to involve homeworkers and/or their representatives in this process.

Working Together

We are committed to working with suppliers to identify homeworking and improve working conditions for homeworkers. This may involve different measures, depending on the context.

These measures include:

- 1 Mapping homeworkers against current records including name, proof of age and address etc.
- 2 Developing systems to guarantee payments to homeworkers, such as passbooks and payslips
- 3 Providing training and information to homeworkers about their rights and entitlements under this policy and an accessible grievance mechanism.
- 4 Enabling enrolment in statutory social systems or equivalent private provisions.
- 5 Developing a work quota system to provide more regular work and deter subcontracting.
- 6 Providing training and information to any intermediaries such as agents on their responsibilities and entitlements as distributors of homework.
- 7 Providing access to key health and safety equipment, such as potable water, and lighting applicable to work detail.
- 8 Providing direct employment for homeworkers.

The Use of Intermediaries

The use of intermediaries is common practice in homework supply chains.

It is the responsibility of suppliers and partners to:

- Establish transparency of supply chain between the supplier and the homeworker, understand all tiers of intermediaries and disclose this information to Pentland Brands.
- Establish a pre-qualification system for intermediaries that are involved in the contracting of work to homeworkers. Intermediaries should be compliant with national law.
- Establish internal protocols for the outsourcing of work to homeworkers (e.g. verification that intermediaries handling the work have been prequalified, tracking of pieces and payments made)
- Establish contractual relationships with intermediaries stipulating expectations including:
 - Keeping a record of all homeworkers.
N.B. All working members of a family should be recorded as homeworkers.
 - Keeping a record of the quantity of work distributed and payments made.
 - Keeping a record of any social security or health insurance benefits being provided to homeworkers.
- Provide training to intermediaries on their legal obligations and Pentland Brands' standards (as stated in this policy and Our Standards)

For the purpose of this policy, 'Intermediary' is defined as any person(s) or organisation not directly employed by the supplier who is involved in the sourcing of homeworkers, distribution or collection of homework or other roles contributing to the completion of work by homeworkers in the Pentland Brands supply chain.

Contacts

We encourage feedback on any of the content in this document.

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