



Pentland Brands Ltd.

Licensee Sourcing Manual

2021



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Welcome

Respect for people and the environment has long been at the heart of our business. We strive to do the right thing, not the easy thing and make all our decisions in good conscience. As a licensee of Pentland Brands, doing business the right way is undoubtedly a priority for you too.

So, it's important that we work together to achieve standards of production that we can both be proud of.

This document will guide you through the five key principles of licensee sourcing and outline our expectations around how you conduct business with your suppliers and through your supply chains. Licensees are ultimately responsible for ensuring they have a sound understanding of the five principles, leading to the effective management of corporate responsibility in their supply chains.

If you have any questions, please contact the Pentland Brands Corporate Responsibility (CR) team at _____

1. [Select factories that comply with Our Standards](#)
[Our Standards](#) and specifically the Code of Conduct within it, require that all factories engaged in producing Pentland branded products meet and maintain minimum labour standards across 10 priority areas. Licensees are required to only select and use factories that meet these standards.
In order to demonstrate the factories used meet Our Standards, licensees must submit a social audit report for each Tier 1 factory used to manufacture Pentland branded products.
2. [Give full, up to date visibility of factories.](#)
Licensees are required to provide Pentland Brands with visibility and transparency of **all** Tier 1 factories used to manufacture Pentland branded product (and any subcontracted sites or homeworking operations where Tier 1 production is taking place).

Licensees should avoid over declaring their factories. Licensees must promptly advise the Corporate Responsibility team if they have stopped placing orders at a factory or have no intention of using it in the next 12 months.
The factory will be set to inactive until production restarts.
3. [Gain factory authorisation from Pentland Brands before starting production.](#)
Before production begins at any factory, the Licensee must obtain factory authorisation from Pentland Brands.

This will be sent by email from the Corporate Responsibility team to the Licensee following a full document review.

4. [Ensure no harmful chemicals or restricted materials are used.](#)
Licensees are required to have systems in place to ensure compliance with [Pentland Brands Restricted Substance List](#) and the Ethical materials policy.

This includes ensuring visibility of all product components and having a chemical testing program that covers high risk components and materials.

5. [Ensure genuine product in the marketplace.](#)
Pentland Brands uses security labels on all products to guarantee product quality and authenticity.

All Pentland branded products must have security labels supplied by Avery Dennison attached.

Labels are only sent to the site of production that has been approved by the Corporate Responsibility team. Where there are no labels on product, the product is deemed counterfeit and will be seized.



Principle 1.0

Select factories that
comply with Our Standards



1. Select factories that comply with Our Standards

We have standards and policies in place to protect workers in our supply chain and reduce the environment impact of material and processes, which are publicly available at our [website](#) , including but not limited to:

- Our Standards
- Child labour and young worker policy
- Migrant worker policy
- Homeworking policy
- Responsible Exit policy
- Restricted Substances List

Our Standards sets out what we expect from our employees, partners and suppliers. It includes guidance on how to do business ethically, with integrity and respect for people and our planet.

All new licensees are expected to sign our CR Charter, which indicates they have read and agreed to adopt and implement Our Standards in their ways of working or have their own policies that reflect equivalent or similar standards.

It is the responsibility of all licensees to cascade these standards through their supply chains, ensuring that those involved in the manufacture of Pentland branded product understand our expectations.

Our Standards is available in 16 languages, including Bengali, German, Spanish, French, Indonesian, Italian, Japanese, Khmer, Korean, Portuguese, Sinhala, Thai, Vietnamese, Simplified Chinese and Traditional Chinese. To request a copy, please contact corporate.responsibility@pentland.com.



Ethical trade

We're committed to doing business ethically. The Code of Conduct in Our Standards (Section D) reflects the Ethical Trade Initiative (ETI) base code and the International Labour Organisation (ILO) Conventions.

This Code provides the minimum standards suppliers should provide their workers, and should be exceeded where possible.

In applying it, licensees, suppliers and manufacturers of our brands must comply with national and other applicable laws and, where the provisions of the law and this Code address the same subject, apply the provision that gives workers the greater protection.

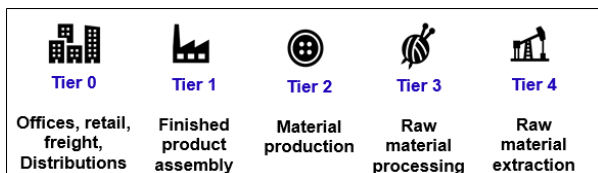
1. Select factories that comply with Our Standards continued

Minimum standards of compliance

The Licensee Sourcing Policy relates to Tier 1 factories, which are defined as factories which manufacture or assemble branded product, for salesman sampling or retail purposes.

In order to demonstrate the factories used meet Our Standards, licensees must submit a social audit report for each Tier 1 factory used to manufacture Pentland branded products.

We follow the supply chain Tier definition defined by the Sustainable Apparel Coalition (SAC). The supply chain tiers are defined by manufacturing process as below.



Tier 1 factory includes:

- 1) The finished product factories that manufacture or assemble branded products, for salesman sampling or retail purposes.
- 2) The subcontracted factories that are involved in Cutting, Stitching or Assembly processes which produce items with brand name or logo on.

Production types

Brand logos

For factories manufacturing any branded products or components that have any kind of branding on, audits may be required – please contact the Corporate Responsibility team, at

Unauthorised production at Tier 1 level

Any Tier 1 sites that have not been authorised by the Corporate Responsibility team will be classed as unauthorised sites of production. This will render the Licensee in breach of contract and subject to Legal proceedings.

Beyond Tier 1

Whilst Pentland Brands only asks for visibility of Licensee's Tier 1 factories and processes, it is the Licensee's responsibility to ensure factories further down the supply chain are mapped (fabric mills, raw material processing etc) receive copies of Our Standards, and meet our minimum standards of compliance.

Modern Slavery

Modern slavery is a prevalent issue within modern supply chains, with apparel and footwear industries showing increased risk, based on their dependency on low-cost labour.

At Pentland Brands, we recognise that we are in a high risk industry, and we are committed to minimising the risk of instances of modern slavery in the work that we do.

The UK government has introduced a provision in the Modern Slavery Act 2015 that requires any business that supplies goods or services, and has an annual turnover of £36million, to produce a statement setting out the steps they have taken to address the risks of modern slavery in their own business and their supply chains.

As such, Pentland Brands must report annually on how modern slavery risk is being addressed in its supply chain, which can be found [here](#).

The report contains information on how Modern Slavery will be addressed within our licensed business.



Modern Slavery continued

The Ethical Trading Initiative use 'modern slavery' as an overarching term to describe:

Human trafficking

A process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

Forced labour

Any work or services which people are not doing voluntarily and which is exacted under a threat of some form of punishment.

Bonded labour

Work demanded as a means of repayment of a debt or a loan.

Slavery

A situation where a person exercises (perceived) power of ownership over another person.

Licensees' responsibility regarding Modern Slavery

All Licensees have a responsibility to mitigate all forms of exploitation in their supply chains and having an awareness of Modern Slavery and the risks will support this.

One way of ensuring a company is minimising exploitation is through the implementation of [Our Standards](#), which set out our expectations in terms of doing business ethically, with integrity, and with respect for our people. These standards should be applied alongside national and other relevant legislation, to give workers the greatest protection from exploitation.

Licensees are encouraged to both cascade [Our Standards](#) through their supply chains, and interrogate all details when selecting factories.

Social audits go some way in uncovering indicators of modern slavery - if any indicators are identified in the social audit, the Corporate Responsibility team will require the support of the Licensee to investigate further with the factory.



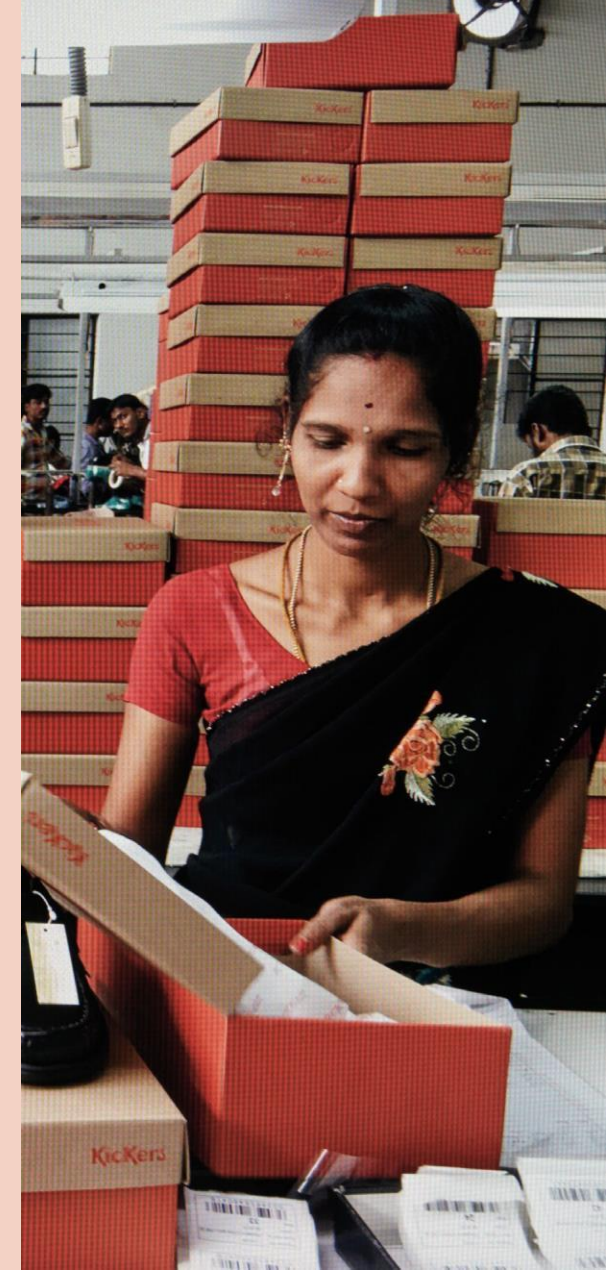
Potential indicators of Modern Slavery

When reviewing audits, Licensees should be aware that evidence of one or more of the following indicators may mean that the Corporate Responsibility team will need the Licensee to seek further information from the factory.

- + **Poor recruitment practices**
The use of third-party recruiters can be high risk if the factory has no clear understanding of whether employment has been agreed formally or informally.
- + **High numbers of migrant workers**
Migrant workers often face inequalities in the labour market and can be vulnerable to exploitation. Where the number of migrant workers is high, and migrant workers originate from high-risk countries as indicated on the [Global Slavery Index](#), the risk of Modern Slavery is increased.
- + **Documents withheld**
In order to restrict movement, victims of Modern Slavery may have their passports or other identification documents taken away, to restrict their movement. Instances where they are held by factory management for 'safekeeping' will require further investigation by the Licensee and the Corporate Responsibility Team.
- + **Lack of employment contracts**
Lack of employment contracts can mean that workers have no formal agreement in place with regards to their pay and their hours. Where there are no contracts, employment status is unofficial, which can be an indicator of Modern Slavery.
- + **Excessive overtime with no days off**
Excessive overtime hours, coupled with no days off, can be viewed as conditions tantamount to Modern Slavery and will require further investigation by the Corporate Responsibility team.

Principle 2.0

Give full, up to date
visibility of factories



An introduction to social audits

Licensees are required to submit regular social audit reports for all Tier 1 factories used to manufacture Pentland branded products. If the prospective factory does not have an existing social audit, a new one is required.

What is a social audit?

Social audits are assessments and ongoing monitoring of working conditions in manufacturing environments.

These are carried out by third-party audit providers, who speak the local language.

Following the audit visit, the auditor will write the report and share it with the factory.

What are auditors looking for?

Auditors will be looking for compliance with the following key issues as part of the audit:

- + Employment is freely chosen.
- + Freedom of association and the right to collective bargaining are respected.
- + Working conditions are safe and hygienic.
- + Child labour shall not be used.
- + Living wages are paid.
- + Working hours are not excessive.
- + No discrimination is practised.
- + Regular employment is provided.
- + There is no harsh or inhumane treatment.
- + No unauthorised subcontracting permitted.



Samples

Social audits are not required for factories producing development samples or prototypes.

Social audits will be required at the point where salesman samples (SMS samples) or bulk orders are placed.

Paying for social audits

Audits should be budgeted for as part of a Licensee's product development costs, and paid for by the Licensee.

Give full, up to date visibility of factories continued

Stages of a social audit

Depending on size and audit format, audits will usually take 1-2 days, and will be made up of the following stages:

- 1. Opening meeting with factory management**
The auditor will explain the purpose of the visit and the agenda for the day.
- 2. Tour of factory with factory management**
The auditor will be taken around the factory to review working conditions, noting down any key observations.
- 3. Interviews with workers**
The auditor will conduct individual interviews with workers to understand working conditions in the factory.
- 4. Document review**
The auditor will review documentation supplied by the factory, such as: HR policies, payroll, and employment contracts.
- 5. Closing meeting with factory management**
The auditor will present their findings to factory management and discuss how to remediate issues found.



Accepted social audits

This table outlines Pentland Brands' requirements in terms of:

- + Accepted audit formats.
- + Accepted audit providers.
- + Accepted time frames within which the audit should have been conducted.

Audit Format	Acceptable Audit Providers	Audit Date
Pentland Audit	Bureau Veritas (BV)	Last 12 months
Better Work	Better Work approved auditors	Better work cycle
SMETA (SEDEX Members Ethical Trade Audit)	Conducted by APSCA accredited auditors.	Last 12 months
BSCI* (Business Social Compliance Initiative)	BSCI approved auditors	BSCI Cycle
SLCP (Social & Labour Convergence Program)	SLCP approved assessors (Step 1 + 2 must be applied)	Last 12 months

*Supplementary information may be required. Please contact the [Corporate Responsibility team](#) if you have any queries regarding the table of accepted audits.

Factory ratings and
social audit validity periods

The Pentland Brands CR team will review the submitted social audit report and grade each finding with a compliance classification. The overall factory CR rating will be a cumulative score, assigned as Red, Orange, Yellow, or Green, which will dictate the audit validity period.

Finding Compliance Classification	Factory CR Rating	Audit Validity Period
Zero Tolerance	Red	0 month
Critical	Orange	12 months
Minor	Yellow	18 months
No issue	Green	24 months

The above validity period does not apply where a factory has submitted a report that is part of a program with its own validity period, such as BSCI. In this case, Pentland Brands will follow the suggested audit validity.

Quarterly production reports

Every quarter, the Corporate Responsibility team will share an active factory report with all licensees.

The purpose of this report is to provide licensees with a status update of all factories producing Pentland products, in order for the licensee to verify the following:

- 1. The factory list is up to date.
- 2. Pentland Brands has a valid, in date audit for all factories.

It is the responsibility of the licensee to revert back to the Corporate Responsibility team within 5 working days of receipt of the report with any updates regarding expired and imminent audits, and any factories that are no longer active.

Zero Tolerance issues

Zero Tolerance issues are a severe violation of Our Standards or local laws which present a very serious or imminent risk to the worker's safety and life, or which constitutes flagrant workers' human rights violations.

Zero Tolerance issues are not acceptable to Pentland Brands and new purchase orders will be halted until all Zero Tolerance issues are resolved.

Clause	Zero Tolerance
Management Systems and Code Implementation	<ul style="list-style-type: none"> • Factory operating without legal business licence • Withholding true records, manipulation/ falsification of factory records • Access to factory, dormitory, workers or documentation denied
Employment is Freely Chosen	<ul style="list-style-type: none"> • Controlled access from site / Withholding travel documents /Restrictions on returning home • Original copies of government issued documents retained by factory • Charge workers for recruitment or placement fees or agency service fees / transport fees/ training fees • Use of bonded labour - unreasonable interest rates / unreasonable evaluation of services provided • Use of financial deposits • Use of involuntary prison labour • Terminating or disciplining workers who refuse to work overtime
Freedom of Association and Collective Bargaining	<ul style="list-style-type: none"> • Worker's legal rights to associate freely or to join unions or employment committees are denied • Workers representatives are discriminated against or are unable to carry out their functions
Working Conditions Are Safe and Hygienic	<p>Management / Training</p> <ul style="list-style-type: none"> • Children allowed on factory production area <p>Fire Safety</p> <ul style="list-style-type: none"> • Electrical installation presenting imminent risks to workers' life, e.g. exposed wiring, naked wiring, etc. • Fire alarm system not fitted throughout entire facility or fire alarms not working or not accessible • Insufficient unblocked/unlocked emergency exits

Clause	Zero Tolerance
Working Conditions Are Safe and Hygienic continued	<ul style="list-style-type: none"> Only 1 exit per floor in workplaces or dormitories Lack of basic fire safety equipment No applicable structural integrity certificate/inspection where it is observed there is an immediate risk of building and constructions for workers health and safety <p>Chemicals</p> <ul style="list-style-type: none"> Use of banned substances by Pentland Brands or National Laws <p>Worker Health</p> <ul style="list-style-type: none"> Air quality test reports show high levels of pollutants in the air (exceeding legally permissible limits) <p>Accommodation</p> <ul style="list-style-type: none"> Restricted liberty in dormitories including unreasonable curfews/ dormitory rooms are locked from the outside at night Areas of dormitory building used for production and/or storage of hazardous materials Production or material warehouse and dormitory buildings are attached
Child Labour Shall Not Be Used	<ul style="list-style-type: none"> Use or recruitment of workers younger than 15, or higher if required by law, either on or off the books
Living Wages Are Paid	<ul style="list-style-type: none"> Illegal fines or monetary penalties used as a form of disciplinary action affecting the basic wage No pay record for any sampled months Pay or piece rate earnings less than statutory minimum wage Payment or part payment of wages is delayed for more than 1 legal pay period
Working Hours Are Not Excessive	<ul style="list-style-type: none"> Average workweek hour > 72 hours in a month of any sampled months (for 25% or more of sampled workers) Daily working hours exceed 13 hours No one day off in a month in the sampled months (any workers)

Clause	Zero Tolerance
Working Hours Are Not Excessive continued	<ul style="list-style-type: none"> No time records available for review. <p>Workers are not allowed to take any entitled leave, e.g. annual leave, sick leave, maternity leave</p>
No Discrimination is Practised	<ul style="list-style-type: none"> Lack of equal pay (basic wage) for equal work Mandatory pregnancy testing except when required by law Unfair dismissal or abuse of vulnerable workers: cover pregnant workers, migrant workers, homeworkers / members of trade unions Verifiable incidents of discrimination based on race, gender, religion, ethnicity, sexuality, nationality or personal beliefs
Unauthorized subcontracting is not permitted	<ul style="list-style-type: none"> Unauthorised sub-contractors used for Pentland production (cutting, sewing and linking processes only) Refusal to provide OR non-disclosure of subcontractor details used for Pentland product
No harsh or inhumane treatment is allowed	<ul style="list-style-type: none"> Physical punishment, sexual harassment, extreme verbal abuse, intrusive searches
Entitlement to Work	<ul style="list-style-type: none"> No or invalid right to work documentation
Environment	<ul style="list-style-type: none"> Asbestos found in factory in high risk/high traffic areas but condition not monitored or safely maintained Improper discharge of hazardous waste with significant impact to worker or community, e.g. Discharge of untreated industrial effluent to water body
Bribery	<ul style="list-style-type: none"> Attempts to bribe company representatives

Principle 3.0

Gain factory authorisation
from Pentland Brands
before starting production



The Factory authorisation process

Pentland Brands has an obligation to its shareholders to maintain full visibility of the factories being used to make Pentland branded product. This obligation is shared with Licensees.

Before beginning production at Tier 1 sites, the steps outlined here must be followed. Failure to do so will render the Licensees in breach of contract, and subject to legal proceedings.

01 Documents submitted

The Licensee submits an accepted social audit and Factory Profile Form to the Corporate Responsibility team.

02 Document review

The Corporate Responsibility team will review the social audit and Factory Profile Form.

03 Issue severity level and factory rating assigned

The social audit is rated Red, Orange, Yellow or Green based on the cumulative score of compliance classifications given to each finding. The cumulative score dictates the audit's length of validity.

Factories will not be authorised to use if any Zero Tolerance (Red) issues are found. In these instances, the CR team will contact the Licensee to discuss potential corrective measures.

04 Factory added to database

The CR team will add the factory to the Fair Factories Clearing house (FFC) database and generate a factory account and code. The factory will be set to 'active' on the database when authorised for production.

05 Security labels and exporter authorisation

Once the factory has been activated on FFC, the CR team will share the FFC factory code with Avery Dennison, who will create an account for the factory to order and receive security labels.

For factories in China that use separate exporter companies to export production, the CR team will request the exporter details to be added to the China Customs Whitelist.

06 Factory authorised for production

The Corporate Responsibility team will send a factory authorisation email to the Licensee with the factory name, factory code (used to order labels), factory rating and next audit date.

To authorise a factory that has been deactivated, the above will need to be completed again.

Factory authorisation can take between 3-6 weeks, particularly approaching peak production.

Principle 4.0

Ensure no harmful
chemicals or restricted
materials are used



Ensure no harmful chemicals
or restricted materials are used

Pentland Brands requires
that its products are
manufactured with regard
for the safety of consumers
and factory workers,
and with consideration
for the wider environment.

Poor chemical management in
the supply chain may result in:



Health impact on consumers

Hazardous chemicals in consumer products can have a range of effects from minor rashes to major reactions and longer term impacts from extended exposure.



Health impact on workers

Even if levels of hazardous chemicals in finished products is low, workers involved in the manufacturing process will be exposed to large volumes of the hazardous chemical on a daily basis. This can have serious health implications.



Environmental damage

Poor management of hazardous chemicals in the supply chain can have a significant impact on the environment and communities local to the factories e.g. dumping of chemical waste in local rivers.

Restricted substances

provides details of potentially harmful substances that are restricted by Pentland and applies to all products sold under the name of any of the Pentland family of brands.

The RSL is aligned to that of the AFIRM group and provides minimum standards that should be exceeded where possible. In applying it, suppliers must comply with national and other applicable regulations in both manufacturing and distribution territories. Where the provisions of the law and this RSL address the same chemical, Licensees should apply the provision that gives the greater protection.

Licensees are required to have systems in place to ensure any Pentland branded products placed on the market comply with the Pentland Brands' RSL (or an equivalent RSL approved by Pentland Brands).



Licensee obligations
in relation to restricted
substances include,
at a minimum:

- + Distributing copies of the most recent RSL through the Licensee supply chain, making all parties aware of the need to demonstrate ongoing compliance.
- + Maintaining full visibility of all components within a product, and their composition.
- + Running a testing program which provides evidence of a product's compliance with the RSL.
- + Submitting written requests for approval to Pentland Brands for the use of specific chemicals that require additional permissions (these are highlighted in the RSL).



Ethical materials policy

Materials used must comply with Pentland Brand's [Ethical materials policy](#). Licensees are required to have processes in place to ensure compliance.

Pentland's brands reserve the right to have their own, more stringent requirements additional to this policy.

Licensee obligations include:

1. Distributing copies of the policy through the Licensee supply chain, making all parties aware of the need to demonstrate ongoing compliance.
2. Maintaining full details of any animal based materials used in Pentland branded product, including the species of animal used.
3. Seeking evidence and relevant certification to ensure that any materials used in Pentland branded product meet Pentland Brand's requirements.

Preferential ethical material sourcing

- + Leather and skins should be preferentially sourced from tanneries awarded medal ratings by the
- + Down and feathers should be preferentially certified to the
- + Sustainable cotton should be preferentially sourced. This can include: certified regenerative; organic; recycled, and
- + Wool should be preferentially certified to the

Pentland Brands' involvement

Pentland Brands reserves the right to:

Request information with regards to chemical testing or product safety programmes, and request additional testing where insufficient information is provided at cost to the Licensee.

Make additional requirements for particular ranges or products, including mandating the use of RDS, bluesign® or Oeko-tex® approved materials.

Sustainable Apparel Coalition (SAC)

We know most of our environmental footprint is associated with our supply chain.

To help manage and reduce this, Pentland Brands is a member of the SAC.

The SAC has developed the Higg Index; a suite of self-assessment sustainability tools developed to help facilities measure social and environmental supply chain impacts in a standardized way.



It is not currently a requirement for our Licensee partners to engage in the Higg Index.

However, if you are already working on your supply chain sustainability, or are keen to begin your sustainability journey, we want to acknowledge your efforts and invite you to participate in the Higg Index.

Currently, we are helping facilities adopt two Higg modules;

- Facility Social & Labour Module (Higg FSLM) to assess social impact and improve working conditions for supply chain workers.
- [Higg Facility Environmental Module \(Higg FEM\)](#) to assess environmental performance and make improvements that reduce negative sustainability impacts.

Get started with the Higg Index on <https://howtohigg.org/>.

Please contact the Pentland CR team for more information.

Higg Facility Modules:

Higg FEM

The Higg FEM standardizes how facilities measure and evaluate their yearly environmental performance.

This tool provides a clear picture of the environmental impact that a manufacturer and its facilities are having upon the environment, and the world, as a whole.

The Higg FEM helps manufacturers, brands, and retailers identify and prioritize opportunities for performance improvements.

Higg FEM Assesses:

- Environmental Management System
- Energy Use & Greenhouse Gas Emissions
- Water Use
- Wastewater
- Emissions to Air
- Waste Management
- Chemicals Management

Higg FSLM

Brands, retailers, and manufacturers of all sizes can use the Higg FSLM to assess social and labour conditions for the workers who produce billions of consumer goods each year.

The Social & Labour Convergence Program (SLCP) Data Collection Tool is fully integrated into the Higg FSLM. FSLM uses the questions from the SLCP Data Collection Tool.

On the Higg platform, the scored FSLM helps improve social and labour conditions for supply chain workers while reducing audit fatigue for factories around the world.

Higg FSLM Assesses:

- Recruitment and Hiring
- Working Hours
- Wages and Benefits
- Worker Treatment
- Worker Involvement
- Health and Safety
- Termination
- Management Systems
- Above and beyond

Product safety and Product packaging

Licensees must ensure their products meet the relevant product safety legislation, which is particularly important in the manufacture of children's products and electrical products.

Failure to meet market requirements may result in customs or consumer groups forcing recalls or blocking a product from market, leading to financial losses for the Licensee and the brand.

Product packaging

The Licensee should also ensure that they are taking steps to reduce the environmental impact of point of sale, product and shipping packaging.

These include:

1. Minimising the quantity of packaging.
2. Preferentially sourcing recycled or [Forest Stewardship Council \(FSC\)](#) certified paper based products.
3. Where plastic packaging are used, preferentially sourcing products containing recycled content.
4. Communicating how to reuse, recycle or dispose of the packaging responsibly.
5. Ensuring packaging meets requirements on restricted substances contained within the [AFIRM Packaging RSL](#) and for any given market. Packaging must not compromise the ability of products to meet restricted substances regulations.
6. Ensuring awareness of, and compliance with, local market requirements regarding packaging and packaging waste.
7. Ensuring that any desiccant sachets used in packaging comply with anti-microbial guidelines.

Pentland Brands may mandate the use of specific materials
e.g. recycled cardboard for particular product ranges.

Principle 5.0

Ensure genuine product
in the marketplace by
using security labels
supplied by Avery Dennison



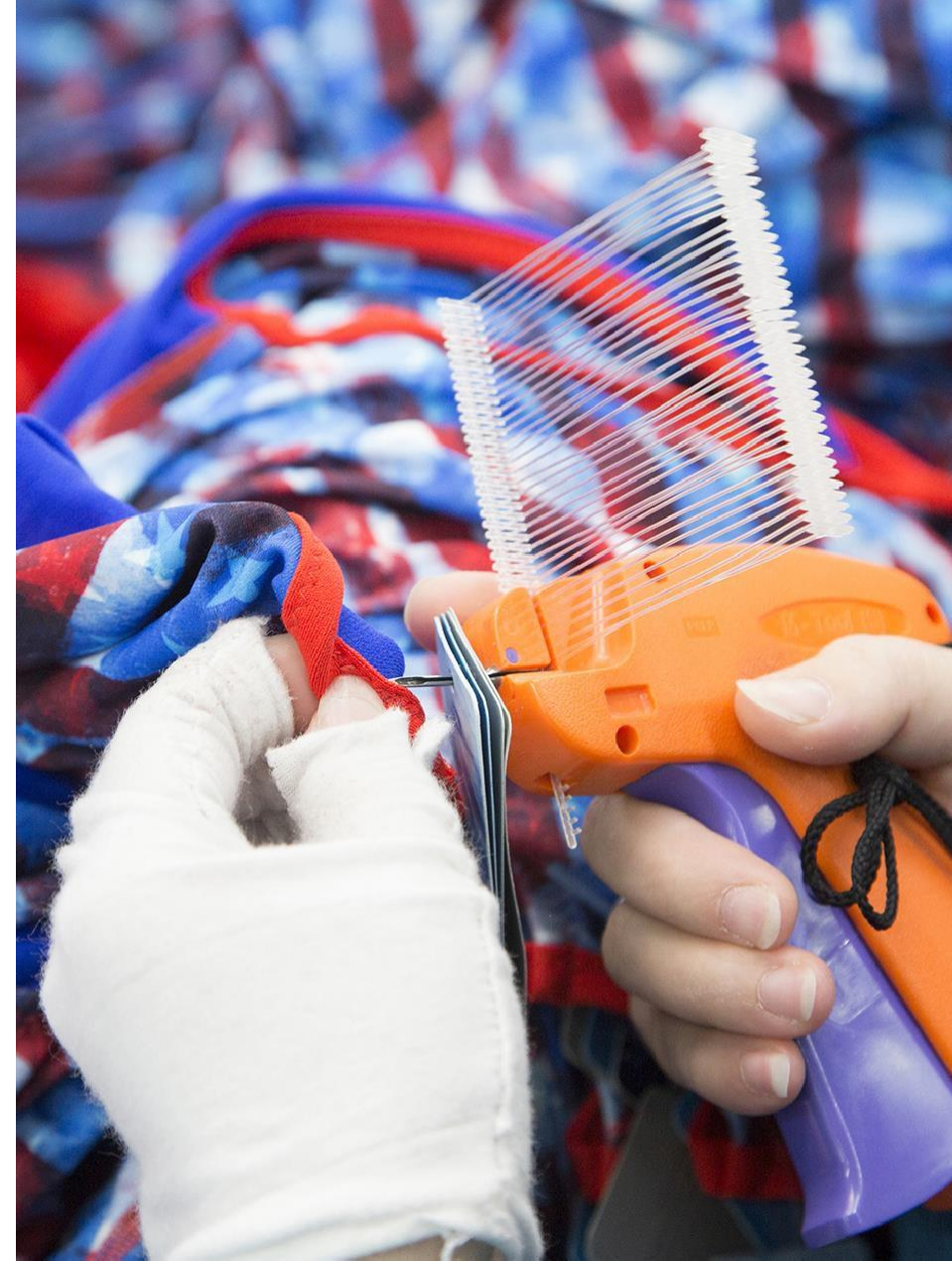
Ensure genuine product in the marketplace

To protect both the brand and consumers, all Pentland branded product must be labelled with security labels sourced from Avery Dennison.

Security labels allow Pentland Brands to ensure that product is genuine, and that it has been manufactured at factories that the Corporate Responsibility team have been made aware of.

Once factories are authorised for production, labels must be ordered by Licensees via the Avery Dennison (AD) web ordering system (unless we allow manual ordering in exceptional circumstances).

Please see the **Avery Dennison – Vendor Information Pack** to find out how to order and attach security labels to product.



Customs and law enforcement

Pentland Brands' Legal Team work closely with customs authorities to enable identification of counterfeit product, or product manufactured at unauthorised sites.

In order to ensure that genuine product passes through Customs without issue, the following steps must be followed:

Ensure that all Tier 1 factories are authorised for production

Factories can only receive labels once they are authorised for production by the Corporate Responsibility Team. Pentland Brands' Legal Team share lists of factories authorised to produce Pentland branded product with customs authorities globally. Any factories that do not feature on the list but are found to be producing Pentland branded product will have their goods seized by customs at a cost to the Licensee, if the Licensee is found to be complicit.

Ensure that all products have security labels attached

Labels will only be sent to factories that have been approved for production. Any steps by the factory to tamper with or divert the end destination of the labels will be considered a breach of contract. Any product identified as Pentland branded product that does not have security labels attached will be seized and treated as counterfeit product, at cost to the Licensee. Law enforcement will also seize product in retail or warehouses without security labels.



Exporters

If a factory uses exporters to deliver goods, the factory must be named on shipping documents to ensure a smooth transit through customs.

If an exporter cannot name the factory on shipping documents, please contact the Corporate Responsibility Team immediately.

Document List

Our standards, policies, and reports

[Our Standards](#)

[Pentland Brands Modern Slavery Report](#)

[Pentland Brands Restricted
Substance List \(RSL\)](#)

[Ethical Materials Policy](#)

Audits and factory approvals*

[Factory Profile Form](#)

[Exporter authorisation
Form](#)

Security labels*

[Avery Dennison
– Vendor Information Pack](#)

External links

[ETI](#)

[ILO](#)

[Global Slavery Index](#)

[AFIRM](#)

[Leather Working Group](#)

[Responsible Down Standard](#)

[Forest Stewardship Council](#)

*Please request the latest copies of these documents from your Pentland Brands contact or corporate.responsibility@pentland.com











Pentland Brands

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To find out more about CR at Pentland Brands,
please contact

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