



## Cover Letter

At Norrøna Sport AS (hereafter referred to as Norrøna) we promote decent working and environmental standards in our supply chain. We cooperate closely with our suppliers and business partners in pursuit of this aim. Accordingly, we have prepared this Code of Conduct to illustrate what we expect of our suppliers and business partners. The Code of Conduct covers human rights, workers' rights, corruption and protection of the environment.

We consider ourselves as a responsible member of the global community, and our obligation is to ensure that our business is run in a socially responsible manner. The business relationship between Norrøna and its suppliers is based on mutual respect, and all parties shall upkeep a good and constructive dialogue throughout the process.

Norrøna is a member of the Ethical Trading Initiative Norway (ETI Norway), a membership organisation for private and public enterprises and organisations. ETI Norway is a resource centre and an advocate for ethical trade practices. Norrøna reports annually to ETI Norway. This report is made publicly available.

Our goal is to use our influence to work for respect for human rights both within the company and towards our business partners, and we aim to continuously improve policy and practise that supports suppliers in complying with this Code of Conduct.

# Code of Conduct

## Principles

Norrøna's suppliers are to supply goods and services that are produced in compliance with the code of conduct. Moreover, the suppliers are to communicate the code of conduct to their sub-suppliers, and to monitor implementation.

A supplier must be able to document compliance with the code of conduct at Norrøna's request. Such documentation may take the form of self-declaration, follow-up meetings, and/or inspections of the working conditions at production sites. The supplier will be obliged to name and provide contact information for any sub-supplier that Norrøna wishes to inspect.

Norrøna believes in co-operation and in cases of non-compliance with the requirements, we are willing to work with our suppliers, other clients to the supplier and/or other competent parties to prepare a plan for reaching the standards of this Code of Conduct. Remediation must take place within a reasonable period of time. The contract will only be terminated if the supplier remains unwilling to remedy the breach following repeated enquiries and if corrective action is not taken within the agreed limit.

## Requirements relating to own practise

### Favouring of producers and producing countries

Norrøna will, when choosing suppliers, in addition to other competitive aspects, consider the supplier's corporate social policy. Fulfilment of social criteria is considered a competitive advantage, and will be taken into consideration when choosing suppliers and vendors.

### Boycott of individual countries

Norrøna will avoid buying from partners that operate in countries subject to international boycott by the United Nations and/or Norwegian Authorities.

### Corruption and bribery

Neither Norrøna, nor any of its employees, shall ever accept the offer, gift or acceptance of a bribe in any form including kickbacks, on any portion of a contract payment, or the use of other routes or channels to secure business-related or private benefit, or benefit for customers, agents or suppliers.

## Requirements to supply chain conditions

Norrøna's Ethical Trade Principles are founded on key UN and International Labour Organization conventions and documents. National laws shall be respected, and where the provisions of law and IEH's ethical trade principles address the same subject, the most stringent shall apply.

### 1. Forced and compulsory labour (ILO Conventions Nos. 29 and 105)

- 1.1 There shall be no forced, bonded or involuntary prison labour.
- 1.2 Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

## **2. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)**

2.1 Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, or obstruct, the formation of unions or collective bargaining.

2.2 Workers representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

2.3 Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

## **3. Child Labour (UN Convention on the Rights of the Child (ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)**

3.1 The minimum age for workers shall not be less than 15 and comply with

- i) the national minimum age for employment, or;
- ii) the age of completion of compulsory education,

whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.

3.2 There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.

3.3 No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work.

3.4 Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.

## **4. Discrimination**

### **(ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination against Women)**

4.1 There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

4.2 Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.

## **5. Harsh or Inhumane Treatment**

5.1 Workers shall be treated with respect and dignity. Physical abuse or punishment, or threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

## **6. Health and Safety**

### **(ILO Convention No. 155 and ILO Recommendation No. 164)**

6.1 The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

- 6.2 Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.
- 6.3 Access to clean toilet facilities, to potable water and, if appropriate, sanitary facilities for food storage shall be provided.
- 6.4 Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.
- 6.5 Access to clean eating areas shall be provided. If the factory provides food for its workers, the canteen, in which the food is stored and prepared, must be located separately from the production area and also be clean and in a good condition.

## **7. Wages**

### **(ILO Convention No. 131)**

- 7.1 Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income.
- 7.2 All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- 7.3 Deductions from wages as a disciplinary measure shall not be permitted.

## **8. Working Hours**

### **(ILO Convention No. 1 and 14)**

- 8.1 Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 48 hours.
- 8.2 Workers shall be provided with at least one day off for every 7 day period.
- 8.3 Overtime shall be limited and voluntary. Recommended maximum overtime is 12 hours per week, i.e. that the total working week including overtime shall not exceed 60 hours. Exceptions to this are accepted when regulated by a collective bargaining agreement.
- 8.4 Workers shall always receive overtime pay for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.

## **9. Regular Employment**

- 9.1 Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided through the use of short term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.
- 9.2 All workers are entitled to a contract of employment in a language they understand.
- 9.3 The duration and content of apprenticeship programmes shall be clearly defined.

## **10. Marginalized Population**

- 10.1 Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

## **11. Environment**

- 11.1 Measures to minimize adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimizing pollution, promoting an efficient and sustainable use of resources, including energy and water, and minimizing greenhouse gas

emissions in production and transport. The local environment at the production site shall not be exploited or degraded.

11.2 National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.

## **12. Corruption**

12.1 Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

## **13. Animal Welfare**

13.1 Norrøna is strongly against mistreatment of any animals. Ethical aspects such as traceability, sustainability, safety, animal welfare, and labour and farm conditions shall be taken into account when choosing suppliers of animal fibres.

13.2 Leather products shall be manufactured using only the skins of utility animals such as pigs, sheep, goats and cows, where the animals have been originally slaughtered for the meat market.

13.3 Down shall be picked from dead birds only which are by-products from the food industry.

13.4 Only fur from animals being hunted in a humane manner shall be used, and never from animals raised in cages in the fur farming industry.

13.5 The use of unethical and inhumane production processes such as mulesing is prohibited.

13.6 Norrøna is against animal testing and encourages all business partners to follow our policy on this matter.

## **14. Management systems of suppliers**

The management system is the key to the implementation of the code of conduct. Norrøna emphasises the importance of suppliers having systems that support such implementation. Norrøna's expectations in this regard are summed up in the following measures:

- The supplier should make a centrally placed employee responsible for the implementation of the code of conduct in the supplier's business.
- The supplier must make the code of conduct known in all relevant parts of its organisation.
- The supplier must obtain Norrøna's consent prior to outsourcing production or parts of production to a sub-supplier/contractor, if this has not been agreed in advance.
- The supplier must be able to give an account of where goods ordered by Norrøna are produced.

## **14. Monitoring, auditing and external verification**

Norrøna reserve the right that we, or representatives appointed by Norrøna will have free access to the production plant, with or without prior notification. Such representatives must document a signed approval from Norrøna.

Norrøna will establish systems for reporting and independent verification. Audit standards and methods will be carried out in accordance with Norrøna Code of Conduct, SA8000 or other applicable standards.

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Manufacturer stamp

Norrøna Sport AS

## **Appendix 1 Health and Safety – Work Environment and Other Applicable Facilities**

1. The factory shall have an assigned person with health and safety responsibility.
2. Medical kit shall be available at production site within a reasonable distance and each floor or work shop shall have at least one medical kit. In each factory location there shall be a person trained in basic first aid.
3. The factory shall have routines for handling serious injuries requiring outside medical attention.
4. There shall be sufficient numbers of fire extinguishers in the premises. Fire extinguishers and fire hoses shall be maintained and in proper working order. They shall be easily visible and accessible to all workers.
5. The factory shall have a sufficient number of exits for an emergency, and these shall remain unlocked and free from obstruction in case of a fire or other emergency situation.
6. Machines shall have satisfactory safety devices which are properly maintained.
7. Workers shall be equipped with personal safety gear at no personal cost; this includes ear protection in areas with high noises.
8. The lightening must be sufficient so as to ensure a safe working environment.
9. Factories shall have proper ventilation, windows, fans, air conditioning and/or heating in all workplaces, so that the circulation, ventilation and temperature requirements are met.
10. The factory shall ensure the noise level is acceptable and the lightening adequate.

## **Appendix 2 Dormitory facilities**

1. Dormitories shall be single sex unless premises for families are available.
2. Workers shall have their own single beds or sleeping pads. The space for each worker must be in compliance with local laws.
3. Everyone shall have their own lockable storage facility for clothes and personal belongings in relation to their sleeping area.
4. There must be a sufficient number of toilets and showers (single sex). These must be maintained, easily accessible, safe, hygienic and located separately from the dormitories. There shall be washing facilities within reasonable distance.
5. Fire extinguishers shall be in proper working condition and maintained. They shall be easy visible and accessible for all workers. There shall be sufficient number of exits, and these shall remain unlocked and free from obstruction in case of a fire or other emergency situation.
6. There shall be proper ventilation, windows, fans and/or air conditioning/heating apparatus in all dormitories so as to ensure proper circulation, ventilation and temperature.
7. Those living on the premises must be able to come and go as they please in their own time, within reasonable limits due to security and comfort.
8. Cost for the workers using the dormitories shall be reasonable according to the standard of the premises and salary.
9. The dormitories shall have adequate lighting.
10. Washing facilities shall be available for worker living on the premises.