

# Thankyou's Code of Conduct

At Thankyou, we consider business ethics as a fundamental principle of our operation and existence. We believe that the conduct of business with all employees, customers, consumers, suppliers, agents and all others shall be on an honest, fair and equitable basis. We are committed to ensuring that the laws of each country are obeyed, and our obligations to the society are honoured by being economical, intellectual, and environmentally friendly to each community and nation in which the company operates.

For this reason, we have developed Thankyou's Code of Conduct in line with the Ethical Trading Initiative (ETI Base Code) and International Labour Organization (ILO), to set the expectations for responsible business conduct for our own business, and all business partners and suppliers we engage with. In addition, we have developed a Responsible Sourcing Policy which sets out the detailed compliance requirements for our suppliers to ensure they are meeting the Code of Conduct.

As a result, we expect all Thankyou Group's authorised suppliers and partners to fully comply, at a minimum, with the following 12 principles in this Code of Conduct.

## **Principle 1 - Legal and Ethical Business Practices**

- 1.1 Thankyou Group's authorised suppliers/partners must fully comply with all applicable laws of the countries in which they are located, including all laws, regulations and rules relating to wages, working hours, employment, labour, health and safety, the environment, and immigration.
- 1.2 Thankyou Group's authorised suppliers/partners must act in an ethical manner, ensuring that corruption in all its forms, including extortion and bribery, is not permitted within their supply chain.
- 1.3 Thankyou Group's authorised suppliers/partners must be able to verify the legal entitlement of their employees to work in the country of employment.
- 1.4 Thankyou Group's authorised suppliers/partners must provide and maintain an effective grievance mechanism channels for workers to raise issues without fear of retaliation.

**Principle 2 - Child Labour**

2.1 Thankyou Group prohibits child labour to be used in the production of their products, even when local laws and customs permit such a practice. As defined by the International Labor Organization, child labour is defined as any employment undertaken by a child which is aged younger than 15, or at an age younger than the age for completing compulsory education, where such age is higher than 15. Child Labour is also defined as any work which deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. It refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and
- interferes with their schooling by:
  - depriving them of the opportunity to attend school;
  - obliging them to leave school prematurely; or
  - requiring them to attempt to combine school attendance with excessively long and heavy work.

2.2 Thankyou Group's authorised suppliers/partners must observe and adhere to all legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions. This includes no children being employed at night or working in hazardous conditions.

**Principle 3 - Forced Labour**

3.1 Thankyou Group's authorised suppliers/partners will not use involuntary or forced labour - indentured, bonded or otherwise.

3.2 Employment must be freely chosen.

3.3 Workers must be free to leave their employment after reasonable notice has been given.

3.4 Employees must not be required to lodge identity papers or deposits with suppliers/partners.

**Principle 4 - Wages and Benefits**

- 4.1 Thankyou Group's authorised suppliers/partners must compensate their employees and contractors fairly by providing compensation packages comprising of wages and benefits that, at the very least, comply with legally mandated minimum standards or the prevailing industry wage, whichever is higher. Over time, our partners commit to paying wages that will meet employees' basic needs and provide some discretionary income.
- 4.2 Thankyou Group's authorised suppliers/partners shall provide legally mandated benefits to all workers.
- 4.3 Thankyou Group's authorised suppliers/partners must fully compensate all workers for overtime according to local law. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 4.4 Thankyou Group's authorised suppliers/partners must provide all workers with clear and understandable information about their employment conditions in respect to wages, before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.
- 4.5 Thankyou Group's authorised suppliers/partners must not make deductions from wages for disciplinary measures. Deductions may only occur with the express written permission of the worker concerned.

**Principle 5 - Hours of Work**

- 5.1 Thankyou Group's authorised suppliers/partners must ensure employees' hours worked shall not exceed the lesser of (a) the legal limitations on regular and overtime hours in the jurisdiction in which they manufacture or (b) 48 hours per week excluding overtime. The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 5.2 below.
- 5.2 In the event of an extraordinary business circumstance (the supplier/partner must show evidence of the cause of the exceptional circumstances, such as unexpected production peaks, accidents or emergencies), overtime may exceed 48 hours in a 7 day period if it is allowed by national law, allowed by the collective agreement freely and fairly negotiated, and appropriate safeguards are taken to protect workers health.
- 5.3 Thankyou Group's authorised suppliers/partners must inform all workers at the time of hiring if mandatory overtime is a condition of employment.

**Principle 6 - Freedom of Association and Collective Bargaining**

- 6.1 No employees working within Thankyou Group's authorised suppliers/partners' supply chain shall be subject to harassment, intimidation or retaliation in their efforts to freely associate or bargain collectively.
- 6.2 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

**Principle 7 - Health and Safety**

- 7.1 Thankyou Group's authorised suppliers/partners must provide their employees with a clean, safe and healthy work environment, designed to prevent accidents and injury to health and safety in the course of their work (must meet or exceed local law).
- 7.2 Thankyou Group's authorised suppliers/partners must receive regular and recorded health and safety training for all workers.
- 7.3 Thankyou Group's authorised suppliers/partners must supply safe and clean toilet facilities, access to safe water and sanitary facilities for all workers. The provision of these facilities must satisfy local law at minimum (inclusive of adequate ratios of water, sanitation and hygiene facilities in relation to worker population).
- 7.4 Thankyou Group's authorised suppliers/partners must have implemented Occupational Health & Safety policies & procedures which are enforced and monitored by a senior management representative.

**Principle 8 – Non-discrimination**

- 8.1 Thankyou Group's authorised suppliers/partners may not discriminate on the basis of race, age, colour, national origin, gender, religion, sexual orientation, disability, political opinion, or social or ethnic origin.

**Principle 9 - Harassment**

- 9.1 Thankyou Group's authorised suppliers/partners must treat all employees with respect and dignity and may not subject any workers to corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

**Principle 10 - Women's Rights**

- 10.1 Thankyou Group's authorised suppliers/partners must ensure that women workers will receive equal remuneration, including benefits, equal treatment, equal evaluation of the quality of work, and equal opportunity to fill all positions open to male workers.
- 10.2 Pregnancy tests will not be a condition of employment, nor will they be demanded of any worker.
- 10.3 Workers who take maternity leave (of a duration determined by local and national laws) will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits.
- 10.4 All workers will not be forced or pressured to use contraception.
- 10.5 All workers will not be exposed to hazards including glues and solvents, that may endanger their safety, including their reproductive health.
- 10.6 Thankyou Group's authorised suppliers/partners shall not deny women workers access to appropriate services and accommodation in connection with pregnancy that would otherwise be ordinarily available to them.

**Principle 11 - Worker Residence (Dormitory)**

- 11.1 Dormitories and residencies of Thankyou Group's authorised suppliers/ partners must be a clean, safe and healthy residence environment.
- 11.2 The dormitory design must provide adequate privacy, security and freedom of movement for all occupants.
- 11.3 Dormitory facilities must comply with all applicable, legally mandated standards in the countries in which they are located.

**Principle 12 - Environment**

- 12.1 Thankyou Group's authorised suppliers/partners must comply with the laws and regulations relating to environmental protection in the countries in which they operate, as a minimum.
- 12.2 Facilities should have policies and procedures in place to ensure environmental impacts are minimised with respect to energy, air emissions, water, waste, hazardous materials and other significant environmental risks.
- 12.3 Thankyou Group's authorised suppliers/partners are obliged to comply with determined actions that will make substantial improvements in environmental performance as well as the requirement that each Facility puts on and enforces of their suppliers/partners and sub-contractors.

Thankyou supports open and transparent working relationships, where concerns can be safely voiced. We encourage all our stakeholders to raise concerns with Thankyou and other key stakeholders where they observe or suspect adverse impacts on people, communities or environment within Thankyou's supply chain.

For more detailed information and requirements for Suppliers to comply with this Code of Conduct, please refer to Thankyou's Responsible Sourcing Policy.