



**STORMBERG**

# **Code of Conduct Stormberg AS**

# Code of Conduct

Stormberg is one of Norway's most selling brands for clothing, equipment and shoes for outdoor and hiking activities. Through focusing on design and practical solutions, Stormberg is developing outdoor clothing, equipment and shoes that allows the whole family to be well equipped for small and big adventures in all types of weather.

We are an enterprise with a strong focus on environmental issues and social responsibility. We have a mission of making the world a better place. Due to this, 1 % of our profit is set aside for humanitarian issues and community projects. Sustainability is a part of Stormberg's DNA and it is reflected in our business strategies, our values and in our daily practices. We care about people, and we want to run a company with as little negative influence on our environment as possible.

## Introduction

In Stormberg AS (hereafter referred to as Stormberg) we strongly believe in running a social responsible business. It is therefore vital for us to take responsibility for all our actions.

Stormberg became a member of Ethical Trading Initiative in Norway (EH), in September 2002, as the first of outdoor clothing retailers in Norway. Stormberg reports to EH on an annual basis regarding our work on ethical trade. All these reports are openly available on our website.

This Code of Conduct is based on, and reflects our commitment to respect and promote, internationally agreed standards. This includes the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

We promote decent working and environmental standards in our supply chains. We cooperate closely with our suppliers and business partners in pursuit of this aim. In order to make our position clear to our suppliers, our own staff, and all other stakeholders, we have prepared this Code of Conduct. The Code of Conduct covers fundamental requirements for human rights, labour rights, ethical and environmental requirements, and anti-corruption in all our daily practices, including all our supply chains.

## Principles

The business relationship between Stormberg and its suppliers is based on mutual respect, and all parties should upkeep a good and constructive dialogue in pursuit of this Code of Conduct.

We at Stormberg expect our suppliers to supply goods and services that are produced in compliance with this code of conduct. We further expect our suppliers to communicate the requirements of this Code of Conduct to their sub-suppliers and to monitor their work towards compliance with the requirements.

## Requirements relating to own practice

Our goal is to use our influence to work for respect for human rights, ethical trade and sustainable production processes, both within the company and towards our business partners. Stormberg shall contribute to continuous training for key personnel and its business partners regarding the goals and principles of this Code of Conduct.

Stormberg will, when choosing suppliers, consider ethical and environmental criteria. Fulfilment of these criteria is considered a competitive advantage.

Stormberg, and all Stormberg's employees, do not accept any offers or any illegal or unlawful monetary gifts, or any other form of remuneration, in order to secure a business related or private benefit.

Stormberg and Stormberg's suppliers shall avoid partners that operate in countries subject to international boycott by the United Nations or boycott by Norwegian Authorities.

Stormberg will continuously evaluate and improve our own policies and practices in order to facilitate suppliers and sub-suppliers compliance with this Code of Conduct. We will do this in dialogue with our suppliers and other stakeholders.

## Requirements to Supply Chain Conditions

The Suppliers of Stormberg should continuously work for the production of goods and services to take place in compliance with the below mentioned internationally recognised and defined standards.

As a general rule, the Suppliers must also ensure that their sub-suppliers comply with these standards. Contract workers, day labourers and casual workers of the Suppliers or sub-suppliers must be included in this work as well.

Under certain political and/or cultural circumstances it may prove difficult to comply with certain standards or to obtain the identities of or contact with all subcontractors. Under such circumstances, one may choose an alternative and appropriate approach.

Suppliers are required to reach the primary goals of this Code of Conduct within a reasonable timeframe and this will, as a rule, be a prerequisite for further trading with Stormberg. Failure to improve the conditions will lead to considerations from Stormberg as whether to end the business relationship with the respective Supplier. This will happen only when repeated requests from Stormberg are ignored and/or upon failure to prove promised improvements.

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

- There shall be no forced, bonded or involuntary prison labour.
- 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. Union Rights and the Right to Collective Bargaining** (*ILO Conventions Nos. 87, 98, 135 and 154*)

- 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, obstruct, the formation of unions or collective bargaining.
- Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.

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

- The minimum age for workers shall not be less than 16 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.

- There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- No person under the age of 18 shall be engaged in labour that is hazardous to their health, safety or morals, including night work, or that is damaging to their education.
- 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*)

- There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 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** (*UN Covenant on Civil and Political Rights, Art. 7*)

- 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*)

Working conditions shall at a minimum comply with national occupational health and safety regulations, and with international standards where domestic regulation is insufficient or unspecified.

- The working environment shall be safe and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- There shall be access to clean toilet facilities in sufficient number and to potable water. If appropriate, sanitary facilities for food storage shall be provided. Break areas (such as a canteen) must be located separately from the production area and be clean and in a good condition.
- Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.
- The factory shall ensure that the noise level is acceptable. The lighting must be sufficient to ensure a safe working environment.
- There shall be proper ventilation, windows, fans, air conditioning and /or heating in all workplaces, to meet circulation, ventilation, temperature and moisture requirements.
- Each factory are required to have sufficient first aid equipment, which shall be clearly marked and available for all workers. An adequate number of persons skilled in first aid shall be present during working hours. There shall be routines for handling serious injuries requiring outside medical attention.
- Suppliers shall secure protective measures to ensure the safety and health of pregnant workers and new mothers. This includes temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children. This may also include temporary adjustments of working hours. Factories shall provide new mothers with breast-feeding breaks and facilities.
- Machines shall have appropriate and functional safety devices which shall be maintained on a regular basis. Safety instructions relevant to the machinery shall be available in an understandable language.
- Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.
- Responsibility for health and safety shall be assigned to a management representative. Active cooperation between management and workers, and/or their representatives, is essential to develop and implement systems for ensuring a safe and healthy work environment. This may be achieved through the establishment of Occupational Health and Safety Committees.
- Workers shall be equipped with appropriate personal safety equipment (PPE) free of charge. Training shall be provided on proper use of such equipment. Areas where PPE is needed are clearly marked.
- 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.
- Risk areas and potential hazards shall be clearly marked by warning signs in appropriate languages with pictograms, if possible.



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

- 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.
- All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- Deductions from wages as a disciplinary measure shall not be permitted.

## **8. Working Hours** (*ILO Convention No. 1 and 14*)

- 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.
- Workers shall be provided with at least one day off for every 7 day period
- 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.
- 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** (*ILO Convention No. 95, 158, 175, 177 and 181*)

- 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.
- All workers are entitled to a contract of employment in a language they understand.
- The duration and content of apprenticeship programmes shall be clearly defined.

## **10. Marginalized Populations** (*UN Covenant on Civil and Political Rights, art. 1 and 2*)

- 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**

- Production of Stormberg clothes and sourcing of raw materials must not, in the shorter or longer term, harm the local or global environment in any way that directly or indirectly threatens people's health, environment or safety.
- 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 environmental harmful chemicals, fossil fuel, waste, and other contributors to environmental damage or greenhouse gas emissions in production and transport.

- The local environment at the production site shall not be exploited or degraded. National and international environmental legislation and regulations shall be respected and relevant discharge permits obtained.
- Stormberg's List of Chemicals shall be respected for all Stormberg products.

## **12. Corruption**

- 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**

- Stormberg discountenance and will not allow any kind of animal abuse in the source for raw materials or in the production of Stormberg products. Animals shall be treated according to regulations and humanely, and materials derived from animals shall be a by-product of food production. Animals shall never be subjected to harsh or cruel treatment. Stormberg is against animal testing and encourages all business partners to follow our policy on this matter.

### Mulesing

Stormberg does not accept mulesing, a procedure performed on Merino sheep in order to prevent fly strike. This kind of treatment shall not occur in Stormberg's supply chain with regards to the production of Stormberg wool products. Stormberg does not accept clips as an alternative to mulesing.

### Fur

Stormberg discountenance and will not allow any use of fur, neither from animals nor synthetic fur, in the production of Stormberg products.

### Leather products

Leather products shall be manufactured using only the skins of utility animals such as pigs, sheep, and cows, where the animal is slaughtered for the purpose of meat production.

### Down

Down used in Stormberg's products should be picked only from dead birds, slaughtered for the purpose of meat production. Stormberg does not accept plucking or harvesting of feathers or down from live birds or feathers or down from force-fed birds. All down or feathers used in Stormberg's products should be certified in accordance with Responsible Down Standard (RDS).

### Transport

Animals that are transported shall be treated in accordance with the latest version of the European Convention for the protection of animals during international transport and the Council regulation on the protection of animals during transport. This means, for example that:

- transportation must be carefully planned in order to minimize transportation times.
- only healthy animals may be transported, no sick or pregnant animals.

- during transportation, water, feed and rest shall be offered to animals at suitable intervals in appropriate quality and quantity with regard to their species and size.
- transportation of live animals should be replaced by the transportation of germ cells or carcasses wherever possible.

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

The management system is key to the implementation of the code of conduct. Stormberg emphasises the importance of suppliers having systems that support such implementation. Stormberg'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 Stormberg'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 Stormberg are produced.

### **Implementation**

Both in cases where the minimum standards cannot be met immediately, and in cases where these are already met, the supplier should work to continuously improve production conditions.

The supplier shall strive to first communicate the primary goals to all subcontractors, then report on relevant social aspects concerning the subcontractors' businesses, and demand that the primary goals are met by subcontractors within a realistic time frame.

Subcontracting of whole or part of the main order to another factory is strictly forbidden without prior consent from Stormberg. The Supplier is obliged to inform Stormberg about any sub-contractors in due time prior to production start.

### **Monitoring, reporting and independent verification of social responsibility**

Suppliers to Stormberg must report annually on their progress and discrepancy in the work to implement the primary goals and improvement of social conditions. Additional theme-based surveys may also be carried out. Stormberg will give further guidance concerning the reports and their format.

Our Suppliers must allow Stormberg, or those authorized by Stormberg, unrestricted access to its facilities and to all relevant records at all times, whether or not prior notice is provided. The supplier will be obliged to name and provide contact information for any subcontractors that Stormberg wishes to inspect.



Stormberg 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.

## **Notifications and complaint mechanism**

Stormberg wishes to be notified if conditions arise where Stormberg's supply chain is connected with a negative impact on workers' rights or basic human rights.

Notification can be made in writing to the following address:

*Stormberg, Avenyen 40, N-4636 Kristiansand, NORWAY*

Notifications can also be sent digitally by e-mail: support@stormberg.no with the subject field "Notification".

Complaints about the practice of Stormberg's Codes of Conduct can be made in writing to the following address:

*Stormberg att. chairman Steinar J. Olsen, Avenyen 40, N-4636 Kristiansand, NORWAY*

Complaints can also be sent digitally to chairman Steinar J. Olsen at steinar@stormberg.no

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*Date*

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*Supplier name*

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*Name*

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*Signature*

Company Stamp:

This commitment should be signed and returned to Stormberg latest by \_\_\_\_\_