

OVERLAND FOOTWEAR COMPANY LTD

SOURCING CODE OF CONDUCT

At Overland, our people are at the heart of everything we do. We are very proud of the culture we have built at Overland, this not only includes the people in our stores and head office, but also the craftsmen and suppliers in our supply chain. We are committed to conducting our business in a responsible and fair manner, and want to ensure that the people in our supply chain are treated with respect and dignity.

Our Sourcing Code of Conduct has been based on internationally agreed standards set out by the [Ethical Trading Initiative](#) and the [International Labour Organisation](#) (ILO). The Code outlines the minimum standards we expect of our suppliers and applies to all factories, agents, sub-contractors, and material/component suppliers who make or supply any products/services to Overland.

MONITORING

Overland is responsible for ensuring compliance with the principles laid down in this Code of Conduct. The supplier may be subject to a third-party audit to ensure all standards are upheld. Suppliers must make sure that the Code of Conduct is read and understood by all workers in their facility, and is viewable at all times by all employees. Regular checks and clear records are to be kept to monitor compliance – at least once annually.

BUSINESS INTEGRITY

1. Legal Requirements

In addition to our Code of Conduct standards, we expect suppliers to comply with all relevant local and national laws and regulations in which they operate.

2. Anti-Corruption and Bribery

Overland expect all suppliers to conduct their business ethically and with integrity, without the use of corrupt practices, including bribery or any other practice that is unlawful or encourages non-compliance. Suppliers shall introduce an anti-bribery and anti-corruption policy in all areas of business, with which compliance is expected.

LABOUR PRACTICES

3. Employment is Freely Chosen

The supplier is strictly prohibited from using any form of forced labour. This includes the use of prison labour, indentured labour, bonded labour, or any labour obtained through human trafficking or slavery. All work must be conducted on a voluntary basis.

Suppliers are prohibited from removing identity documents or withholding wages from any person, in order to prevent workers from leaving at will, and employees should be free to leave their employer after reasonable notice.

4. Child Labour

The use of child labour or the exploitation of children is strictly prohibited. Workers shall be at least 15 years of age, or meet the minimum age established by local laws, whichever is greater. Suppliers must maintain

accurate records of all employees and proof of age. Young workers, between the ages of 16-18 years of ages shall not be employed in hazardous conditions or on overnight shifts, and must adhere to local laws that apply for work performed by people under the age of 18.

If children are found working in the supply chain, the supplier must implement a remediation plan, and contact the Overland team immediately. We expect our suppliers to develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable the child to attend and remain in appropriate education until they are no longer a child.

5. Non-Discrimination

All workers in our supply chain deserve to be treated fairly and equally.

Suppliers shall not discriminate in recruitment or employment practices including, hiring, remuneration, access to training, promotion, termination or retirement, based on race, skin colour, nationality, caste, religion, physical or mental disability, gender, sexual orientation, marital or maternity status, political opinions, union membership or age.

6. Freedom of Association & Collective Bargaining

All workers have the right of association, to join or form trade unions and participate in collective bargaining of their choosing, without harassment, interference or retaliation.

Where these rights are restricted under law, the supplier shall not hinder workers efforts in the development of alternative means for independent association and bargaining.

7. Worker Treatment

Every person in our supply chain deserves to be treated with respect and dignity. We will not accept any harsh or inhumane treatment of any worker in our supply chain, including corporal punishment and other forms of coercion, discipline, abuse and harassment, whether psychological, sexual or physical.

8. Contract Workers

Sub-contracting – which is manufacturing processes carried out by another facility, or from domestic premises (home working) - must be declared to Overland when an order is placed. Written permission must be granted by Overland before this order is commenced. It is our supplier's responsibility to ensure that any sub-contractor undertaking work on Overland products has read and understood this Code.

9. Compensation

All employee wages and benefits must be paid in accordance with local laws, promptly and in full. Wages and benefits must meet or exceed the minimum required by local laws or the prevailing industry standard, whichever is higher.

As a company we support the Living Wage and encourage our suppliers to meet Living Wage benchmarks. Wages should be enough to meet basic needs of employees, such as nutritious food, housing, healthcare, clothing, transportation, energy, water, childcare, education, and to provide some discretionary income.

Any overtime work must be paid at a premium rate.

Any deductions from wages as a disciplinary measure will not be permitted, without the expressed permission of the worker concerned.

10. Hours of Work

Working hours in all facilities should not exceed 48 hours of work in any consecutive 7-day period.

Employees shall be entitled to one day of rest every seven-day period. All overtime should be voluntary and shall not exceed 12 hours per week, and compensated at a premium rate.

11. Regular Employment

Our suppliers must ensure their workers are employed on the basis of negotiated, legal, written contracts and must provide a copy to the worker in a language they can understand. This document should include information such as wages, benefits, payment terms, leave entitlement and notice period.

Obligations of employment shall not be avoided through the use of contracting, sub-contracting or apprenticeship arrangements, where there is no intent to provide regular employment.

ENVIRONMENT PRACTICES:

12. Safe & Healthy Workplace

All suppliers must provide safe and healthy workplaces for all employees, in compliance with local laws. Adequate steps shall be taken to prevent any accidents or injury to the employees' health, due to an activity related to work.

A safe and healthy workplace should include; adequate provision of light, heat and ventilation, access to safe drinking water, and clean toilet and food preparation facilities. Suppliers should provide personal protective gear to all workers.

Documented assessment of all risks and hazards in the facility that may impact the health and safety of the workers shall be conducted regularly. Health and safety risks to include are; risk of exposure to noise, dust, chemicals, fire, machinery, equipment, electrocution and the structural integrity of the facility.

Ongoing training of health and safety risks and prevention should be carried out by the supplier on a regular basis.

13. Protection of the Environment

Protection of the environment is of great importance. Overland expect all our suppliers to respect the environment and, at a minimum, abide by all applicable local and national environmental laws and regulations.

Overland also encourages suppliers to make efforts in reducing waste, maximising recycling and to manage and reduce their environmental impacts, including energy use, air emissions, chemical use and discharge, water use and water discharge.

Overland does not condone any form of cruelty towards animals and is committed to only using leathers that are a by-product of the meat industry.

COMPLAINTS PROCEDURE

Any complaints or information on violations on this Code of Conduct can be reported directly to Overland Footwear Company Ltd – please email Buyingstaff@overlandfootwear.co.nz.

Overland guarantee that they will not take any disciplinary measures against the person filing the complaint.

SUPPLIER DECLARATION

The senior management of the Supplier agrees to ensure compliance with this Code and to work with Overland Footwear Company Ltd over a reasonable time to meet their obligations under this Code.

Company Name:	
Factory Name:	
Authorised Signature:	
Printed Name of Signee:	
Title of Signee:	
Email of Signee:	