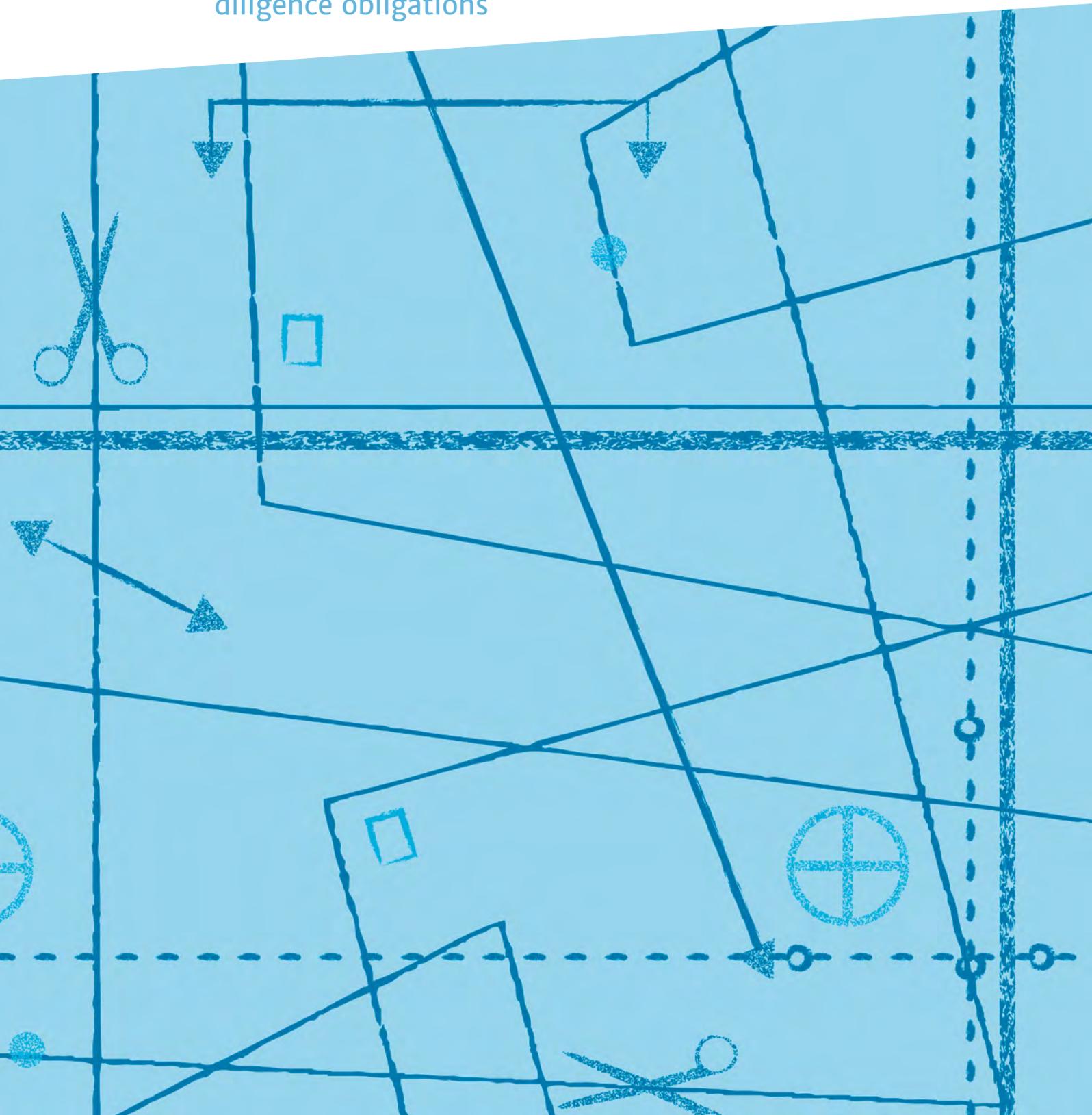


Developing and implementing your own policy

Understanding and meeting due
diligence obligations

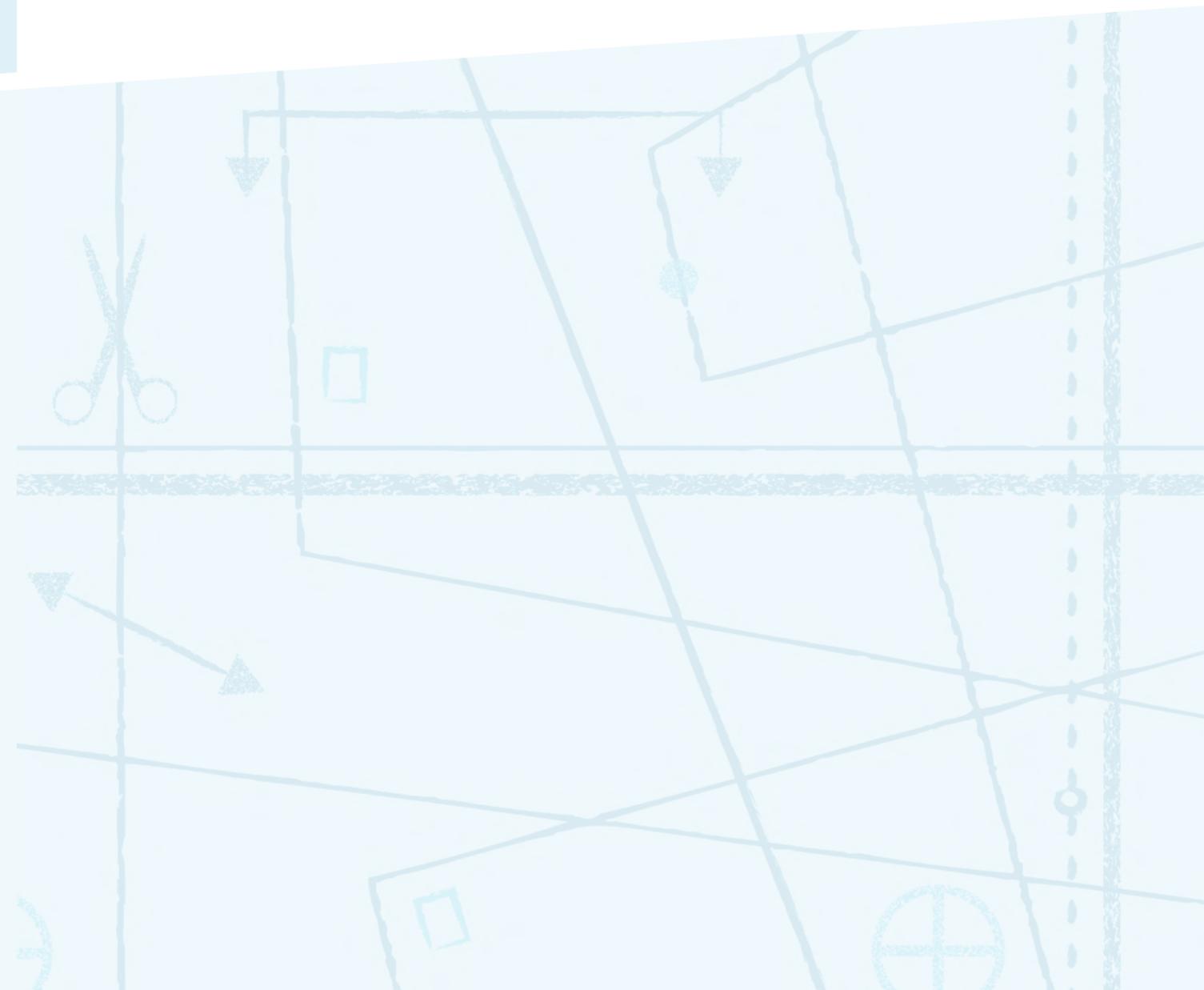


Preface

By committing to abide by and implement basic social, environmental and compliance standards, your organisation communicates goals and expectations not only to its employees but also to business partners and producers. At the same time, your organisation undertakes to implement specific targets aimed at improving sustainability in its own operations and in the supply chain. This guideline provides step-by-step guidance on how you can develop and implement such a commitment by your organisation in the form of a policy. Various real-life examples illustrate the approaches you can take.

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1 Introduction

From 2018 on, brands, retail companies, producers and the German Federal Government are called upon to observe and implement specific social and environmental standards by adopting a range of mandatory targets:

- All business partners and producers must be required to comply with the Partnership's social goals. This can be achieved, for example, in the form of a code of conduct or as an integral part of the contractual terms and conditions (2018).
- A written undertaking on new wool must be published that also includes a position against mulesing (2018).
- The Partnership's MRSL or a recognised alternative including accompanying information must be communicated to all business partners and producers for implementation and inclusion in the supply chain (2018).
- A wastewater standard also must be communicated to all business partners and producers (2019).¹

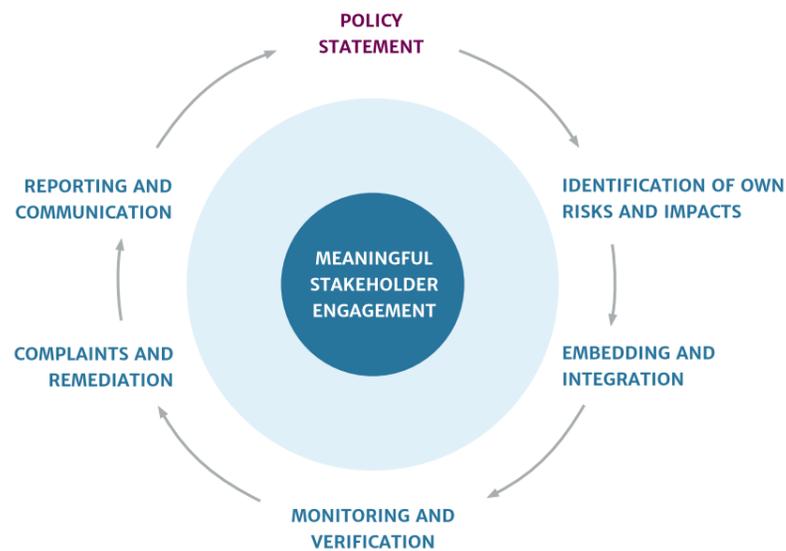


FIGURE 1: ELEMENTS OF THE DUE DILIGENCE PROCESS

In addition, it is recommended that brands, retailers, producers and the German Federal Government ban unauthorised subcontracting by business partners and producers.

This guideline provides starting points to help developing and implementing a responsible corporate management policy in your organisation and address the specific requirements described here.

1.1 What is a policy?

Through a policy

- your organisation undertakes to meet fundamental social, environmental and compliance standards.
- your organisation communicates targets and expectations both internally and to the supply chain.
- your organisation commits itself to implementing these targets.

Depending on the organisation, such a commitment can be made in the form of a statement, a voluntary agreement, a code of conduct, a guideline or specific requirements. These diverse forms are summed up here under the generic term 'policy'. Irrespective of their form, the core of every policy consists in identifying superordinate, guiding and specific targets designed to guide actions to improve sustainability in your own operations and/or the supply chain.

1.2 What is the purpose of having your own policy?

Developing and publishing a responsible corporate management policy generally provides a good opportunity to

- raise awareness within your own organisation about human rights, social and environmental standards and social and environmental risk management;
- demonstrate to external stakeholders that your organisation is taking its responsibility to comply with international standards and requirements seriously;
- sensitise your management and executive board to the issues mentioned;
- clearly identify the next steps for implementing and embedding human rights due diligence processes in your company.

2 Assistance for companies

In the following you will find starting points from which you may be able to develop and implement a policy for your organisation. The first part will illustrate what to be mindful of when developing a policy based on three key questions. The second part contains examples of policies of other companies for illustration. The third part describes how you can anchor the policy in your own processes.

2.1 Developing your own policy

What format should the policy have?

First, a suitable format for your policy is to be selected. You should take into account 1) to whom the policy should apply and 2) whether all requirements should be combined into a single policy or defined through various separate policies.

In some cases, organisations decide to combine the requirements applying to their employees, subsidiaries and the supply chain into a single policy. Examples include the Code of Ethics of H&M² and the Human Rights Policy of Marks and Spencer³. Depending on the addressee or thematic focus, however, various separate policies may also apply in an organisation. Tchibo, for example, has set out social, environmental and compliance expectations for its own employees in its internal Code of Conduct⁴, but has defined requirements for the supply chain in its Social and Environmental Code of Conduct for Business Partners⁵.

What content should the policy include?

The next step is to decide on the content to be included in the policy. You should ensure that the policy contains social, environmental and compliance standards that are relevant to your organisation and that it communicates corresponding expectations internally and externally. The ILO Core Labour Standards⁶ and the Universal Declaration on Human Rights⁷ may provide guidance when selecting the content. The Partnership's goals, which are also based on international standards and which your organisation has adopted when it joined the Partnership, are also a good guide. It is particularly important to take into account the goals that are binding from 2018. They require your organisation to cover specific themes and requirements in your own policy (see above).

The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector also provides a good overview of the content of a company's own policy. It recommends that a policy should

- contain an voluntary agreement regarding your activities.
- cover all social, environmental and compliance topics that are addressed in the OECD Guidance.
- address in greater detail how your company intends to address certain sector-specific risks (e.g. child labour, use of hazardous chemicals, employment of homeworkers) and to what standards your organisation is committed in these cases.
- contain an commitment to implement due diligence processes aimed at managing the most important risks in your own enterprise and in the supply chain.
- oblige your organisation to involve (affected) stakeholders in the context of due diligence processes.
- in the case of brands, retailers or other purchasers: include an commitment on responsible procurement practices in order to prevent negative impacts from your own procurement processes.

If the policy imposes requirements on the supply chain, it should

- define expectations on business partners and producers all along the supply chain, including licensees, intermediaries, subcontractors, etc.
- set conditions for outsourcing to homeworkers and the use of manual labour if this is relevant to your organisation's business model.
- formulate expectations as to how subcontractors are to be involved resp. define in what cases it is (not) permitted to subcontract work to third parties.⁸
- describe how complaints about your business activity and the activities of business partners and producers can be directed to your organisation and demonstrate how these will subsequently be addressed.⁹

As a general principle, please bear in mind: The goals and contents of your policy should be determined in accordance with your organisation's specific business model and the associated risks and potential impacts. In practice, also the structure and design of a policy often take different forms as well. We have compiled the most important elements of a policy for business partners and producers for you in the annex. These elements provide a good overview of the components that typically make up a code of conduct for partners in the supply chain. Additional publications and sources that help you develop the policy can be found [here](#).

Who should be involved in developing the policy?

In order for a policy to be accepted and unfold its effects within your organisation, it is important that all affected internal and external stakeholders pull together as one. The company management and other affected units (e.g. procurement, corporate development, communications) should therefore be involved early on when the policy is developed in order to jointly define the contents. Based on this, effective communication is another factor for a successful policy. A policy should be communicated to all affected parties – the company's employees, business partners and producers – and published on your own website.

2.2 Policies. Examples

In the following you will find selected excerpts of policies relating to various aspects of sustainable supply chain management which you can use to guide the drafting of your own documents. The first part contains examples that apply exclusively to suppliers and business partners. The second part lists examples that are directed at various readers.

2.2.1 Policies for suppliers and business partners

Combination of social, environmental and compliance themes

C&A, Code of Conduct for the Supply of Merchandise¹⁰

➤ The Code of Conduct for the Supply of Merchandise ('the Code of Conduct') describes what C&A expects from suppliers regarding legal compliance, labour practices, environmental performance, and anti-corruption.<<

Guideline on subcontracting

Patagonia, Supplier Workplace Code of Conduct¹¹

➤ XIV. SUBCONTRACTING: Patagonia does not permit subcontracting without our prior written approval. All salesman-sample and bulk production orders must be placed within facilities that have been pre-approved by Patagonia, without exception. Direct suppliers are required to continuously monitor approved subcontractors and sub-suppliers for social and environmental responsibility using standards that meet or exceed our Code and Benchmarks.<<

Requirement that suppliers respect human rights and introduce appropriate due diligence processes

Adidas, Workplace Standards¹²

➤ The adidas Group is committed to respecting human rights and will refrain from any activity, or entering into relations with any entity, which supports, solicits or encourages others to abuse human rights. The adidas Group expects our business partners to do the same, and where there is any perceived risk of a violation of human rights to duly notify us of this and of the steps being taken to avoid or mitigate such a breach and, where this is not possible, for the business partner to provide for the remediation of the adverse human rights impact where they have caused or contributed to this.<<

Scope of validity beyond tier 1 of the supply chain

Patagonia, Supplier Workplace Code of Conduct¹³

➤ Requirements in this Code apply to the whole supply chain, including sub-suppliers, sub-contractors and farms. Standards equally apply to permanent, temporary, and agency workers, as well as piece-rate, salaried, hourly paid, legal young workers (minors), part time, night, and migrant workers.<<

Focus on suppliers' continuous improvement

H&M, Sustainability Commitment H&M Business Partner¹⁴

➤ H&M's requirements and expectations for these issues are explained in the Specifications section of this Commitment. For each issue there are two levels of sustainability performance; 'Fundamental — Refers to performance in line with internationally agreed standards, applicable UN and ILO Conventions as well as national legislation, and where there is discrepancy between requirements the one that offers the greatest protection for workers, the environment and animal welfare shall apply. Compliance with fundamental requirements is expected of all H&M Business Partners. 'Aspirational — Refers to performance that goes beyond legal responsibility and international standards at Fundamental level to advance sustainable impacts of Business Partners' own operations, as well as contributing to addressing social and environmental concerns outside their own operations.<<

Reference to grievance mechanism to report purchaser's irresponsible business practices

Hanesbrands, Global Standards for Suppliers¹⁵

- Hanesbrands strongly encourages any supplier who feels pressured to violate the law or Hanesbrands' Global Standards for Suppliers by a Hanesbrands employee or another supplier to contact Hanesbrands' Business Practices Office immediately. Call the Hanesbrands Resource line at +1-888-303-7522 or e-mail Business.Practices@hanesbrands.com.<<

Dealing with specific social or environmental risks

ASOS, Child Labour, Remediation and Young Worker Policy¹⁶

- 1.1. This Policy is intended to help all organisations that are involved in the manufacture or supply of goods to ASOS, collectively known as Suppliers, understand the steps they need to take to protect Children and to ensure compliance with the International Labour Organisation's Conventions 138 and 182 relating to Child Labour. ASOS' Suppliers are responsible for the implementation of this policy.<<

Patagonia, Migrant workers employment standards and implementation guidance¹⁷

- The standards are divided into three parts reflecting the employment cycle of a worker:
 - Before Employment – standards that should be met before and during the recruitment process and before a worker arrives at the Supplier's facility
 - During Employment – standards that should be met throughout the duration of the worker's employment at the Supplier's facility
 - After Employment – standards that should be met after the worker's employment ends.<<

John Lewis, Homeworker Policy¹⁸

- John Lewis recognises that the lack of visibility in the supply chain and their irregular employment status, makes homeworkers a vulnerable group. They often face conditions that fall below minimum standards laid down by international and national legislation. This normally translates into irregular work, low pay, and often unsafe working practices. We believe that the first step towards reducing the vulnerability of these workers is to acknowledge their presence in our supply chain and being open and positive towards home working.<<

Marks & Spencer, Environmental and Chemical Policy for Textile Processing¹⁹

- In addition to an MRSL, the policy also describes the implementation approach and responsibilities for implementation and contains templates for drafting inventories.<<

2.2.2 Policies for various addressees

Scope of application of the policy and linkage with codes of conduct

Coca-Cola, Human Rights Policy²⁰

- The Human Rights Policy applies to Coca-Cola HBC, the entities that it owns, the entities in which it holds a majority interest, and the facilities that it manages. The Company is committed to upholding the principles in this Policy. Our Supplier Guiding Principles apply to our suppliers and are aligned with the expectations and commitments of this Policy.<<

Focus on sector-specific risks and implementation in the company

H&M, Human Rights Policy²¹

- Due to the nature of our business we are focusing our efforts on human rights related to labour conditions. We also focus on women's rights and the right to water, as these are areas of specific importance to our industry. H&M does, however, recognise that other human rights may become greater priorities over time and we will regularly review our focus areas. (...) Our commitment to operating with respect for human rights is reflected in company policies and procedures. In order to integrate human rights considerations into the management of our business, human rights due diligence is part of our risk assessment for new production and sales markets. For existing production and sales markets, H&M will regularly evaluate human rights related risks and conduct human rights impact assessments on high-risk markets.<<

Dealing with legal conflicts

Tchibo, Code of Conduct²² (for its own employees)

- We know that the ethical standards as expressed in local regulations vary from country to country. If the regulations contained herein or international law and conventions differ from local regulations, the stricter regulation shall apply.<<

Dealing with specific social or environmental risks and themes

H&M, Harassment Policy²³

It is H&M's policy to prohibit harassment in the workplace or in any work related setting. In short, H&M has a "zero tolerance" policy towards harassment.<<

H&M, Animal Welfare Policy²⁴

In addition to a general commitment to fundamental animal welfare principles, the policy addresses the following themes that are of relevance to the company:

- Animal hairs
- Wool
- Fur
- Exotic animal skin
- Animal testing

BizNGO, Model Chemicals Policy for Brands and Manufacturers²⁵

Template that can be used for developing a company's own policy in the field of chemicals.

H&M, Material Ethics Policy²⁶

In addition to a general commitment to fundamental social and environmental themes in raw materials procurement, the policy addresses the following themes that are of relevance to the company:

- Wood based products and other forest materials
- Man-made cellulosic fibres
- Bio-based materials and bioplastics
- Palm oil
- Silk
- Shell and pearl
- Other (e.g. a voluntary agreement not to use sandblasted jeans)

Translation into simple language

Adidas, Group Code of Conduct²⁷

Many decisions are routine, but sometimes we might witness a situation where making the right decision may be difficult. To help you get it right, test, test and test again by taking a moment to ask yourself five simple questions:

- What am I being asked to do? – Find out exactly.
- Is it legal? – You don't have to be a legal expert, but you do have to know when to ask.
- Is it consistent with the Group's commitment to integrity? – Understand the difference between what the Group is entitled to do and what is actually right to do.
- Would my family and friends be happy about my choice? – If not, it's probably the wrong thing to do and could be illegal or damaging to our reputation.
- What is my instinct telling me? – If you are uncomfortable, seek advice.<<

Reference to grievance mechanisms

Centrica, Group Human Rights Policy

If you have concerns about any instance of malpractice, human rights abuses or discrimination, you have a responsibility to raise them through the confidential 'Speak Up' helpline at the earliest possible opportunity. See the Group 'Speak Up' Policy: Public Interest Disclosure for further information.<<²⁸

2.3 Implementing the policy in your organisation

In itself, a policy does not guarantee effective implementation of social, environmental or other objectives. Studies demonstrate that merely sending out codes of conduct to suppliers in past years has not made a significant contribution to improving working conditions in the textile factories surveyed.²⁹ This shows: Unless corresponding implementation structures are put in place, developing a policy means high costs as well as enormous administrative effort and ultimately brings little to no improvement. So what can be done to implement a policy effectively?

In general, what is required are clear responsibilities and integration into internal processes, for example through:

- Embedding the policy in operational procedures – for example by incorporating it in contractual terms – to make it clear that failure to comply with the policy will result in sanctions.
- Training and communication measures that ensure that the addressees of the policy understand its contents and know how they may have to adapt procedures and decision-making processes.
- Periodic audits of implementation and, where necessary, updates to the policy in response to new risk areas and themes.

2.3.1 Embedding policies in processes. Examples

Below we have compiled starting points and real-world examples for the further implementation of policies.

Creating incentives and responsibilities

GSCP, Reference tool on Supply Chain Social Performance Management Systems³⁰

The chapter 'Internal Organisation' of the GSCP Reference Tool contains detailed instructions on how to implement Social Compliance Policies in your organisation (p. 6–32).

Incorporating the policy into contractual terms

Lululemon Athletica, Supply Agreement³¹

29. CODE OF CONDUCT: Supplier acknowledges that it has received a copy of and had reviewed lululemon athletica's code of conduct, a copy of which is attached as Appendix B hereto. Supplier understands this code of conduct and will strictly comply with its terms and any amendments thereto provided by lululemon athletica from time to time hereafter. Supplier will require and certify that all of its suppliers, contractors, subcontractors, employees and vendors that manufacture or assemble the Products or components of the Products comply with this code of conduct. Supplier will post this code in all areas where work is performed for lululemon athletica and will train employees on their rights and obligations defined by this code of conduct. Supplier will maintain such documents and records as are necessary to demonstrate compliance with this code of conduct and will make such documents and records available to lululemon or its agents upon request. In addition to any other remedies it may have under this Agreement, lululemon athletica may terminate this Agreement and any Purchase Order if Supplier violates this code of conduct or breaches the provisions of this Section 29.<<

Communication and training materials – focus on your own employees

- Training materials, webinars and training courses offered by the Partnership for Sustainable Textiles to implement the Partnership's goals (relevant information can be found [here](#) in bundled form).
- The ZDHC Academy offers various webinars and training courses on sustainable chemicals and wastewater management for brands and retailers as well as suppliers.³²
- The FWF 'Basic health and safety checks for CSR staff' guidelines contain advice and checklists for health and safety checks in factories, for example for quality control personnel (for the phase between formal audits).³³
- The FWF website wellmade provides compact training materials for workers in various functions and case studies on possible ways to manage dilemmas in the procurement process.³⁴
- The publication 'Designing Effective Human Rights Training Aligned with the Corporate Responsibility to Respect in the UN Guiding Principles on Business and Human Rights' of the UN Global Compact provides information on the design, formats and possible contents of human rights training.³⁵

Communication and training materials – focus on suppliers

- The PUMA handbooks on ‘Environmental Standards’, ‘Chemical Management’, ‘Social Standards’, and ‘Occupational Health and Safety’ provide suppliers with specific instructions on how to implement the standards set out in the Puma Code of Conduct.³⁶
- The Tchibo Detox Supplier Handbook gives suppliers specific instructions on how to develop and implement a chemical management that is in line with Tchibo’s Detox approach.³⁷
- The ZDHC Wastewater Guidelines contain instructions and provisions for improving the wastewater management of suppliers in the textile supply chain.³⁸
- The C&A Supporting Guidelines on the use of home-working arrangements formulate detailed requirements for outsourcing to home workers by suppliers (Appendix 3 of the Supporting Guidelines for the C&A Code of Conduct).³⁹
- The Patagonia ‘Migrant workers employment standards and implementation guidance’ helps suppliers implement the standards listed (including a template for CoCs, checklists for recruitment agencies).⁴⁰

2.3.2 Verifying implementation. Examples

Adidas has developed key performance indicators for suppliers to audit their own workplace standards. The indicators enable Adidas to review both the implementation of the standards and the effectiveness of their own monitoring measures (Adidas, 2016 Sustainability Progress Report, from p. 70).⁴¹

Annex: Elements of a code of conduct for suppliers and business partners – based on current examples of implementation

1

Objective and scope of application of the code of conduct

Introduction: Presenting your company & its sustainability strategy

Where appropriate, provide a brief introduction to your company and its social and environmental sustainability strategy.

Frame of reference: national and international requirements

- Be specific about your company’s commitment to respect and implement relevant international and national requirements, such as its commitment to respect human rights and implement due diligence processes.
- For example, name the international and national social, environmental and compliance standards and requirements on which the code of conduct is based.
- Explain how with possible conflicts/discrepancies between international and national requirements is dealt with.

Expectations & addressees

Define your general expectations of suppliers and business partners. Clearly specify to which business partners the code applies (e.g. importers, licensees or business partners all along the supply chain) and how your business partners and producers must implement the code. This also includes provisions on subcontracting.

2

Specific requirements for business partners and producers

Selecting relevant social, environmental and compliance themes

- Address social, environmental and other aspects that are essential for you and that are relevant to the production processes and must be observed by business partners and producers. If internationally accepted standards exist for the specified aspects, these should be indicated in the corresponding passages in the code of conduct for suppliers (e.g. relevant ILO conventions).
- Include basic themes such as legal requirements, prohibition of child labour and forced labour, as well as specific themes that represent a particular risk (for potentially affected parties) in your business relations, such as homeworkers, migrant workers, handling of hazardous chemicals, etc.

Requirements for a corresponding management system

Here you describe to what extent you require your business partners and suppliers to introduce a corresponding management system to implement the code of conduct for suppliers. Define what minimum requirements you place on such a system, for example with respect to responsibilities, defining processes, documentation, etc. You should attach particular importance to effective grievance mechanisms for the workers of your business partners and producers.

3

Monitoring and, where appropriate, complaints mechanisms

Monitoring: reviewing the requirements

- Describe how you verify compliance with the code of conduct and explain to what extent you request your suppliers' cooperation in this respect.
- Where appropriate, explain how you will support suppliers in the practical implementation of the requirements and in making continuous improvements (for example through training).
- Define a clear escalation process for breaches or cases in which your suppliers/business partners fail to cooperate with you.

Grievance mechanism: reporting breaches

- Explain what grievance mechanisms and channels are available for the employees of the business partners and producers within the company or externally to report breaches of the code of conduct or corruption/unfair business practices, and when breaches can and/or must be reported.
- Briefly outline the functioning of the complaints mechanism you use (e.g. how affected persons access the mechanism, the process/procedure following the receipt of a complaint, responsibilities, etc.).

4

General

- Date of adoption of the code of conduct for suppliers.
- Where applicable, department, name and position of the representatives of the company who have signed the code of conduct for suppliers.

Footnotes

- 1 Minimum is Appendix 38/ZDHC Foundational (conventional parameters/STeP by OEKO-TEX (Minimum Requirements) or national legislation, if more stringent.
- 2 <http://sustainability.hm.com/en/sustainability/commitments/be-ethical/anti-corruption.html>
- 3 <https://corporate.marksandspencer.com/documents/plan-a-our-approach/mns-human-rights-policy.pdf>
- 4 <https://www.tchibo-nachhaltigkeit.de/servlet/cb/955050/data/-/TchiboCodeofConduct.pdf>
- 5 <https://www.tchibo-nachhaltigkeit.de/servlet/cb/955044/data/-/CodeofConductforSuppliersinEnglish.pdf>
- 6 <http://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.html>
- 7 <http://www.un.org/depts/german/menschenrechte/aemr.pdf>
- 8 See also recommended goal for unauthorized subcontracting
- 9 OECD Guidance for Responsible Supply Chains in the Garment and Footwear Sector, p. 34-35.
- 10 http://www.c-and-a.com/uk/en/corporate/fileadmin/user_upload/Assets/2_Sustainability/2.3.1/CoC_German.pdf
- 11 https://www.patagonia.com/on/demandware.static/Sites-patagonia-us-Site/Library-Sites-PatagoniaShared/en_US/PDF-US/Patagonia_COC_English_02_13.pdf
- 12 https://www.adidas-group.com/media/filer_public/11/c7/11c72b1bb6b2-4fe7-bob9-59c7242143e9/adidas_group_workplace_standards_january_2016_en.pdf
- 13 https://www.patagonia.com/on/demandware.static/Sites-patagonia-us-Site/Library-Sites-PatagoniaShared/en_US/PDF-US/Patagonia_COC_English_02_13.pdf
- 14 http://sustainability.hm.com/content/dam/hm/about/documents/en/CSR/Sustainability%20Commitment/Sustainability%20Commitment_en.pdf
- 15 <http://hanesforgood.com/content/uploads/2013/07/GlobalStandardsforSuppliers-English.pdf>
- 16 <https://www.asosplc.com/~media/Files/A/Asos-V2/documents/corporate-responsibility/asos-young-worker-and-child-labour-policy.pdf>
- 17 http://patagonia.typepad.com/files/migrant_worker_employment_standards.pdf
- 18 https://s3-eu-west-1.amazonaws.com/www.ethicaltrade.org/files/shared_resources/jl_homeworker_policy.pdf?k_uSGOhT5_kYjPj9juquqGEKE_7rTv
- 19 <https://corporate.marksandspencer.com/file.axd?pointerid=7680a7ffdecf4ef38e52cd91828d5904>
- 20 <https://coca-colahellenic.com/en/about-us/policies/human-rights-policy/> https://ch.coca-colahellenic.com/media/2882/01_-human-rights-policy-2016_german.pdf (German)
- 21 <http://sustainability.hm.com/en/sustainability/downloads-resources/policies/policies/human-rights-policy.html>
- 22 <https://www.tchibo-nachhaltigkeit.de/servlet/cb/955050/data/-/TchiboCodeofConduct.pdf>
- 23 <http://sustainability.hm.com/en/sustainability/downloads-resources/policies/policies/harassment-policy.html>
- 24 <http://sustainability.hm.com/en/sustainability/downloads-resources/policies/policies/animal-welfare-policy.html>
- 25 <https://www.bizngo.org/info/model-chemicals-policy>
- 26 <http://sustainability.hm.com/en/sustainability/downloads-resources/policies/policies/material-ethics-policy.html>
- 27 https://www.adidas-group.com/media/filer_public/f5/79/f5794aa8-514a-4463-8756-c1c496c124a0/coc_english_2016.pdf
- 28 https://www.centrica.com/sites/default/files/about_us_-_our_policies/centrica_policy_human_rights.pdf
- 29 <http://www.emeraldinsight.com/doi/abs/10.1108/IJOPM-10-2012-0467>
- 30 <http://www.theconsumergoodsforum.com/download-gscp-reference-tools-social-performance-management-systems>
- 31 <https://www.sec.gov/Archives/edgar/data/1397187/000119312513253430/d534167dex101.htm>
- 32 <http://www.roadmaptozero.com/academy/>
- 33 <https://www.fairwear.org/resource/health-safety-check-csr-staff/>
- 34 <http://www.wellmade.org/>
- 35 <https://www.unglobalcompact.org/library/4781>
- 36 <http://about.puma.com/en/sustainability/standards/handbooks>
- 37 <https://www.tchibo.com/servlet/cb/1199382/data/-/TchiboDetoxSupplierHandbook.pdf>
- 38 http://www.roadmaptozero.com/fileadmin/Pictures/ZDHC_Wastewater_Guidelines.pdf
- 39 http://materialimpacts.c-and-a.com/fileadmin/user_upload/materialimpacts/CoC_Guidelines.pdf
- 40 http://patagonia.typepad.com/files/migrant_worker_employment_standards.pdf
- 41 https://www.adidas-group.com/media/filer_public/08/7b/087bf055-d8d1-43e3-8adc-7672f2760d9b/2016_adidas_sustainability_progress_report.pdf



**Partnership for
Sustainable Textiles**

Partnership for Sustainable Textiles

c/o Deutsche Gesellschaft für
Internationale Zusammenarbeit (GIZ) GmbH
Friedrich-Ebert-Allee 36
53113 Bonn

As at July 2018

+49 228 4460 3560
mail@textilbuendnis.com
www.textilbuendnis.com