

JOHN LEWIS PARTNERSHIP RESPONSIBLE SOURCING CODE OF PRACTICE

Introduction

The partnerships we have with our suppliers help us to offer our customers over 350,000 product lines in John Lewis, from fashion and furnishings to household goods, and around 18,000 high quality food products in Waitrose.

In sourcing these products from many different countries, we aim to uphold internationally agreed standards of labour, and we expect our suppliers to treat workers fairly, honestly and with respect for their basic human rights and well being.

Our aim is to build lasting relationships with suppliers and we have always recognised that our responsibility extends to their employees and suppliers. As a result, we have worked with our suppliers for many years to help them build sustainable businesses, commercially, ethically and environmentally, and to provide long-term, satisfying employment.

Robust policies and procedures and strong relationships with our suppliers are essential if we are to continue to source our products responsibly. Our Responsible Sourcing Code of Practice sets out the Partnership's expectations of suppliers on issues such as pay, working hours, child labour, worker rights and representation.

In building long term relationships with our suppliers, we seek to work with companies who share our values and who are prepared to commit themselves to meeting the requirements of this Code. We are committed to working with suppliers to support necessary improvements but we may also take action if suppliers are not prepared to work collaboratively to drive improvements.

We believe that the application of our Code enables real and practical steps to be taken towards improving social conditions in those locations involved in the production of the goods we sell.

A handwritten signature in dark ink, appearing to read "Charlie Mayfield".

Charlie Mayfield
Chairman, John Lewis Partnership

Application of the code

The provisions of this Code constitute minimum and not maximum standards. It should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable law. Where the provisions of law and this Code address the same subject, the provision which affords the greater protection should be applied.

Workers are defined as those employed on a temporary or permanent basis, as well as workers that are employed either directly or indirectly.

Suppliers of our own brand products are expected to ensure that they meet the requirements of this Code of Practice. Suppliers of branded goods are expected to have noted the requirements and to have established similar arrangements.

(A) Implementation of Code Requirements

- i) Suppliers are expected to establish management systems for delivering compliance to this Code, and maintain records demonstrating compliance. An individual in a senior management position should be appointed to ensure compliance with the Code.
- ii) Suppliers are expected to communicate and ensure compliance of this Code across all workers, suppliers and any out-workers or sub-contractors engaged in their supply chain,. Suppliers should also provide means for workers to report or discuss non-compliances confidentially.
- iii) Suppliers shall comply with all applicable national laws in the countries in which they operate and all relevant ILO conventions. Where these standards differ, the standard that provides workers with greater protection will prevail.
- iv) Suppliers shall comply with all relevant John Lewis Partnership policies.

Reference: *ILO Conventions 81 (Labour Inspection).*

(B) Employment of Children and Young Workers

- i) Children under the age of 15 shall not be recruited or employed, unless the local minimum age for work or mandatory schooling specifies a higher age or if International Labour Organisation (ILO) developing country exemptions apply. Children must not be exploited or denied education, and their health and safety must be protected. Children may participate in activities which culturally involve the whole community over a limited period of time.
- ii) Children and young people under 18 shall not be expected to work at night or carry out activities that are potentially hazardous or injurious to their health and development.

- iii) If under age workers are found working, the supplier involved will be expected to cease the practice and provide remediation. This should include support for the child to attend and remain in education until the national minimum working age, or 15, or mandatory schooling age which ever is longest is reached. Suppliers shall clearly document and communicate their policies for dealing with under age children, even if there are no known children employed.

Reference: *ILO Conventions 138 and 182, Recommendation 146 (Minimum Age), Recommendation 190 (Worst Forms of Child Labour).*

(C) Forced Labour

- i) There shall be no forced, bonded or involuntary labour of any description.
- ii) Suppliers shall allow their workers the right to leave after giving reasonable notice, and with due regard to relevant domestic legislation.
- iii) Workers shall not be required to lodge deposits or I.D. papers unless it is a legal requirement to do so. In all circumstances these must be returned promptly upon cessation of employment.

Reference: *ILO Conventions 29 and 105, Recommendation 35 (Forced and Bonded Labour).*

(D) Health, Safety and Hygiene

- i) Every effort shall be made to provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps should be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work. Suppliers should, as far as is reasonably practical, minimise the causes of hazards inherent in the working environment. Procedures must be in place to deal with serious injuries.
- ii) Suppliers must complete fully documented risk assessments of their sites and accommodation provided, and regularly monitor risks posed to workers' health and safety.
- iii) Suppliers are expected to assign a senior management representative to be responsible for health and safety issues. Suppliers should set up procedures to consult with workers to seek their contribution in assessing the site's health and safety and in developing health and safety standards.
- iv) No worker shall be employed in potentially hazardous conditions without receiving adequate health and safety training and supervision. Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers. Records of health and safety training must be available for inspection. Individual workers must be able to demonstrate their understanding of the job and the ability to perform it to at least the minimum standard required by their employer.

- v) Suppliers shall provide adequate, climatically appropriate personal protective equipment and safety equipment free of charge to their workers.
- vi) Workers shall be provided with free access to potable water, clean toilet facilities, sanitary facilities for food storage and (if appropriate) washing facilities.
- vii) Where provided, accommodation shall be safe, clean and meet the basic needs of workers. Secure storage facilities should be provided. Suppliers should provide a range of mixed gender, segregated and family accommodation as appropriate for the number of workers housed.
- viii) Where management provides dedicated transport for the movement of workers to, from, or within the workplace, these shall conform to the minimum standards set down in the appropriate national transport legislation. In the absence of such legislation, the management shall make every reasonable effort to minimise risk to the workers whilst transporting them.
- ix) Food, beverages, domestic goods and accommodation offered for sale to workers shall be at price levels no higher than those prevailing nationally or locally.

Reference: *ILO Convention 155 & Recommendation 164 (Occupational Safety & Health), ILO Convention 190 & Recommendations (Safety and Health in Agriculture).*

(E) Freedom of Association and Worker Representation

- i) Suppliers shall recognise and respect the rights of workers to freely join associations (such as workers councils, trade unions and workers associations) which can collectively represent their interests. Employers shall not interfere with or attempt to dominate or control such bodies, nor discriminate against workers choosing to belong to them.
- ii) Suppliers shall respect the rights of such workers' associations to represent their members, and to bargain collectively as defined and interpreted by the ILO and national legal framework.
- iii) Where the right to freedom of association and collective bargaining is restricted under national law, suppliers should facilitate, and not hinder, the development of parallel means of independent and free association and bargaining. In such circumstances, suppliers are encouraged to share with their workers information which will affect working conditions, and enable effective mechanisms for consultation

Reference: *ILO Conventions 87 and 98. Also relevant are Convention 135 and Recommendation 143 (Workers' Representatives), and Convention 154 (Collective Bargaining).*

(F) Equality of Treatment

- i) There shall be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on (but not limited to) gender, age, disability, national origin, race, marital status, sexual orientation, political opinion, union (or non-union) membership, religion, or caste unless provided for in domestic legislation.
- ii) Workers must not be expected to perform duties incompatible with their physical or mental abilities.

Reference: *ILO Conventions 100 and 111, Recommendations 90 and 111 (Equal Remuneration, Discrimination (Employment and Occupation)), ILO Conventions 122 (Employment Policy), ILO Convention 159 & Recommendation 168 (Vocation Rehabilitation & Employment/Disabled Persons).*

(G) Discipline

- i) Physical abuse or discipline, the threat of physical abuse, verbal abuse, harassment or other forms of intimidation are not acceptable.
- ii) Disciplinary and grievance procedures shall be clearly documented and communicated to all workers. All disciplinary measures of a serious nature shall be recorded, including evidence that the worker knew what they were accused of and were given the right to put across their point of view.

(H) Working Hours

- i) Workers shall not be expected to work in excess of 48 hours per week or less if there is a lower national limit or an agreed industry norm.
- ii) Overtime shall be voluntary, limited to no more than 12 hours per week above full time, and not requested on a regular basis, it shall be paid at a premium rate or in accordance with national legislation.
- iii) There shall be proper provision for rest and sleep. Breaks, holiday allowance and rest periods shall be in full accordance with national law. Individual workers shall have on average at least one full day's rest per 7 days or the equivalent if shift work is involved.

(I) Wages

- i) Wages and benefits shall be at least fully comparable with locally benchmarked industry norms or national legal requirements, whichever is higher. Wages shall always be sufficient for basic needs whilst still providing some discretionary income.
- ii) Before entering into employment, workers should be informed as to the payment process. Wages shall be paid directly to the workers in the form of cash or cheques or into the

workers' nominated bank account, at the agreed intervals and in full. Information relating to wages shall be available to workers in an understandable form.

- iii) No deductions from wages, other than those required by national law, shall be permitted without the agreement of the worker concerned. Deduction from wages for disciplinary purposes shall not be permitted.

Reference: *ILO Convention 131 and 90.*

(J) Regular Employment

- i) All workers shall be provided with simple, written contracts which must detail the terms and conditions of their employment. Employers should ensure workers understand their contract of employment, through verbal or written means, and such provisions should take account of the different languages spoken by workers.
- ii) Suppliers must not employ workers on repeated temporary contracts or apprenticeship schemes merely to avoid paying wages and other benefits given to permanent workers. Suppliers are encouraged to offer continuity of service and security of employment to workers with good work records where appropriate.
- iii) Where suppliers make use of labour providers, they shall take measures to ascertain the conditions of employment of workers, and shall endeavour to ensure that, in respect of those working on their premises, the labour provider is complying with the standards set out in this Code and any additional relevant domestic legislation.
- iv) Suppliers shall encourage workers to participate in all state benefit schemes, especially sickness, maternity, injury, and retirement pensions. They shall offer advice to do so, if needed.
- v) Suppliers must take effective steps, which are at least in compliance with the requirement or recommendations of government and/or local labour authorities, to avoid the employment of workers who do not have the legal right to work.

(K) Environment

- i) Suppliers shall seek to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local, national and international laws and regulations.
- ii) Suppliers shall make practical efforts to minimise the use of energy, water and raw materials: where possible these resources shall be renewable.
- iii) Suppliers shall make practical efforts to minimise solid waste and effluent and dispose of it in a safe, efficient, and environmentally responsible manner.
- iv) Suppliers shall avoid contamination of the local environment and ensure that air, noise and odour levels are within nationally defined limits.
- v) Suppliers shall minimise chemical use and abide by international, national and sector specific Codes of Practice for the use, handling and disposal of pesticides and chemicals.

(L) Animal Welfare (if applicable)

- i) Companies shall be aware that the John Lewis Partnership has separate protocols to which it expects its suppliers to comply, in order to ensure high standards of animal welfare in the rearing of livestock. These protocols also contain guidance for the humane transportation of livestock and restrictions on the use of animal testing.
- ii) Where animals are used as beasts of burden, (for example, in ploughing), they shall be treated humanely, and allowed to live free of hunger, thirst, fear, distress, pain, injury or disease.