

Integrity Policy

Schone Kleren Campagne / Clean Clothes Campaign

The SKC/CCC foundation wants to create a safe and healthy work environment for its employees. The following instruments have been established to enable such an environment;

1. Code of Conduct:

a set of rules that outline the responsibilities of all Employees, Consultants, Interns and Volunteers

2. Integrity Complaints Committee (ICC):

deals with complaints regarding the Code of Conduct and investigates matters that were submitted through the external Whistle-Blower arrangement

3. Complaint procedure:

an internal process, outlining how a complaint can be submitted to the ICC

4. External Counsellor:

this person, also called “vertrouwenspersoon”, acts as a contact and support person for Employees, Consultants, Interns and Volunteers that would like to lodge a complaint.

5. Whistle-blower reporting point:

This instrument is meant for external parties to the SKC/CCC foundation and for employees with a complaint and who would like to remain anonymous.

The HR Coordinator is the focal point for Integrity related issues and ensure that complaints lodged by Employees, Consultants, Interns and Volunteers will follow the process as described under 3. Below follows an explanation of each of the above-mentioned instruments.

1 Code of Conduct

The SKC/CCC foundation feels a great sense of responsibility towards its aim to structurally improve working conditions and to support the empowerment of manufacturing workers in the global Garment and Sportswear industries. This CoC sets general standards that will be upheld.

The Code of Conduct (CoC) is elaborated for the SKC/CCC Foundation and is applicable to the staff it employs, including Consultants, Interns and Volunteers, at the two coordinating bodies of the CCC network; the International Office (IO) and the Dutch Coalition (SKC).

At the SKC/CCC foundation there is a strong felt need to act with integrity and to respect each other as well as all partners we are working with. To illustrate the importance of this, a CoC has been established, a set of rules outlining the responsibilities and proper practices. The CoC is not only an essential source of guiding information, it is also a reflection of the nature of the organization and what it stands for. It includes regulations on professional conduct and identifies who to turn to and how to act when facing a question related to compliance with policies and procedures.

First of all, employees need to know what is expected of them and they should feel comfortable to speak freely about any issues. Secondly, for external purposes, it is crucial to create a culture of trust with our partners. The SKC/CCC foundation expects that employees will act responsibly and, when in doubt, shall not hesitate to raise concerns or ask questions with respect to ethics and integrity. Employees who raise concerns in good faith are respected for their honesty.

Respect in the workplace

The SKC/CCC foundation endeavours to provide a welcoming and safe work environment in which there is trust and all people are treated with dignity and respect. It is important that we treat others fairly and respectfully, as we would want to be treated ourselves. We strive to uphold open and honest communication and to protect our employees from discrimination and harassment. This applies to conduct in the workplace and in work-related activities,

including any office, premises or location in which work activities are conducted, where the SKC/CCC foundation related business or social activities (including social events such as parties, team events and social outings) take place, or where conduct has an impact on the workplace or workplace relations. Our standards for conduct cover the interactions with not only co-workers, but also with our partners, members and associates and any other party or person the organisation has dealings with.

Equal Opportunity, Diversity and Non-Discrimination

The SKC/CCC foundation values diversity of people as an organizational strength, and is committed to the promotion of diversity, inclusion and equality. The SKC/CCC foundation strives to sustain an environment free from discrimination, where employees are regarded with dignity and treated equally on the basis of their capability and contribution.

Discriminatory behaviours and practices undermine people's skills and potential and are unacceptable.

We recruit, select and train our people solely on the basis of merit, experience, qualifications, achievements, performance and other job-related criteria, without discrimination or concern for race, religious belief or affiliation, nationality, social or ethnic origin, colour, sex, sexual orientation, union membership, gender identity or expression, age, health condition, marital status, political orientation, physical or mental disability or any other legally protected status.

Harassment-free workplace

The SKC/CCC foundation considers providing a work environment that is safe, secure and free of danger, harassment, and violence to be one of its core responsibilities as a good employer. All forms of physical, verbal, non-verbal or psychological harassment or other behaviour that may be regarded or perceived as threatening, abusive, degrading or humiliating are prohibited and will not be tolerated. Assistance by the SKC/CCC foundation is not provided in return of any service or favour from others.

The SKC/CCC foundation will act against any form of corruption and against the promise, provision or acceptance of bribes.

We will prevent relationships and behaviour that are exploitative, abusive or corrupt in any way, and no sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or any other reason) are allowed, recognizing the inherent unequal power dynamics involved, and that such behaviours can undermine the integrity and credibility of our work.

Sexual harassment also includes verbal, visual or physical conduct of a sexual nature or the circulation of sexually oriented pictures, cartoons, jokes or other materials, which create an intimidating, hostile or offensive working environment. A person's intention or motive in displaying certain behaviour is not relevant; what matters is if a person in the given circumstances can reasonably feel offended, humiliated and/or intimidated by such behaviour.

Safeguarding confidential information

Safeguarding the confidential information of the SKC/CCC foundation, as well as any confidential information entrusted to us by others including personal data (e.g. employee, partner and supplier data), is important to our success and the preservation of our reputation. The foundation manages our information assets in compliance with applicable privacy laws. All employees and representatives of the SKC/CCC foundation have the responsibility to respect and maintain the confidentiality of this information.

While you may use confidential information as needed to perform your job, you are responsible for protecting that information from improper/unauthorized disclosure, misuse, theft or accidental disclosure.

Reporting misconduct or irregularities

Any suspected or actual violation of the CoC, a Policy, procedure or of any applicable law, including any received complaints or concerns regarding such a (potential) violation, must be reported to the Integrity Complaint Committee (ICC) or the External Counsellor (vertrouwenspersoon). Reporting concerns and asking questions is fundamental to following the CoC and allows the foundation to address the concerns and to correct the problem.

Investigation

The SKC/CCC foundation takes all reports of suspected or alleged misconduct seriously and will review, evaluate and investigate in a fair and impartial manner and will take appropriate corrective and preventive action. The foundation respects and protects the rights of all employees, including any employee who is the subject of a complaint. To this end, all reported suspicions or allegations against employees will be duly investigated and verified before any action is taken. When appropriate, feedback on the outcome of the investigation is communicated to the person making the complaint or the report. (More information is available under 4.1 The process of lodging a complaint).

Confidentiality

When you submit a question or a report, it will be handled in a confidential manner, with limited disclosure to enable the SKC/CCC foundation to conduct a full investigation of the alleged violation, to carry out appropriate disciplinary or corrective actions, or to meet legal requirements. You may choose to remain anonymous and address your complaint through the external Whistle-blower reporting point.

However, the foundation strongly encourages you to identify yourself as otherwise the ability to investigate the matter may be diminished, and we may not be able to fully address your concerns.

Non-retaliation

The SKC/CCC foundation encourages its employees to come forward with any work-related questions or concerns about any specific activity at the workplace. There will be no retaliation against any employee who raises a concern or submits a report in good faith.

2 The Integrity Complaint Committee (ICC)

The SKC/CCC foundation considers itself responsible for the conduct of the people it employs. Consultants, volunteers and Interns are also required to adhere to the CoC when working or participating in activities on behalf of SKC/CCC. The organisation is open to all complaints relating to the CoC and investigates all well-founded suspicions of misconduct. The Integrity Complaint Committee (ICC) is established to handle internal complaints concerning the violation of the Code of Conduct and to handle complaints lodged through the external Whistle-blower reporting point.

General

Both internal and external parties have the right to submit a complaint directly to the ICC, the External Counsellor or through the Whistle-blower reporting point.

Everyone involved in the handling of a complaint has a duty of confidentiality with respect to any information that comes to their attention during the course of the complaint's procedure.

Appointment and composition ICC

- The Board establishes an Integrity Complaints Committee (ICC).
- Members of the ICC will be selected among the employees, Board members and consultants for a period of two years.

- ICC consists of a chairperson and at least two other members, appointed by the Board. At least one (1) of the members should be a woman. There will be also two (2) back-up members appointed.
- The External Counsellor is not eligible to be appointed as the chairman or a member of the ICC.
- The ICC may temporarily be enlarged with co-opted members with certain expertise to investigate a complaint. They may or may not be affiliated with the SKC/CCC foundation.

- **Duties**

The Integrity Complaints Committee investigates complaints and subsequently submits its advice to the Board, who will take a final decision on the matter.

- **Authority**

The Committee is authorised to obtain information from all employees at the SKC/CCC foundation. It can request access to any documents and correspondence that it deems relevant to the assessment of the complaint. The Committee may consult experts who may or may not be affiliated with the SKC/CCC foundation.

- **Accountability**

The ICC will provide the Board with an annual account of its activities which will form part of CCC's Annual Report. The ICC members and any experts who were consulted have a duty of confidentiality with respect to any information that comes to their attention during the performance of their duties.

- **Subsequent procedure**

The Board will render its judgement within two weeks of receiving the advice of the ICC and notify the complainant and the defendant in writing. The ICC's advice will be enclosed with the judgement.

- **Non-retaliation of parties involved**

The submission of a complaint pursuant to these regulations may not result in any direct or indirect disadvantage to the complainant, except where the complainant has not acted in good faith. The same also applies to witnesses, experts, the External Counsellor and the ICC members.

- **Unforeseen circumstances**

The Board will decide on any cases not provided for in these regulations.

- **Final provisions**

These regulations take effect on 1st of July 2019 and these regulations will be published on the internal digital HR workspace. The advice of the ICC and the judgements of the Board on all (anonymous made) complaints investigated as from 1st of July 2019 will be published on this workspace after the procedure has been completed.

3 The process of lodging a complaint

1. For lodging a complaint, the External Counsellor can act as a point of contact with the ICC and advise and support the complainant (Employee, Consultant, Partner, Associate, Intern or Volunteer). She can also investigate with the complainant if the problem can be solved in a discussion between the complainant and the defendant, for example through mediation and/or through referral to experts. When both complainant and the defendant agree, mediation by a mediator is possible.

With the complainant's consent, the External Counsellor notifies the Chairperson of the ICC of the request for mediation.

The complainant can also lodge a complaint in writing directly to the Chairperson of the Integrity Complaints Committee (ICC).

2. If mediation or another solution is not possible, the written complaint is sent to the Chairperson of the ICC. The ICC will assess the admissibility of a complaint based on at least the following criteria:

- a clear description of the known or suspected violation of the CoC by one or more specified employees;
- the relevant written documents or other evidence;
- a statement of the complainant's name, position and contact details;
- the Board can ask the ICC to investigate a complaint without knowing the identity of the complainant.

3. Within two weeks after receiving the complaint, the ICC communicates in writing to the complainant as to whether the complaint is admissible or not. If the complaint is found to be admissible the ICC gives the defendant the opportunity to inspect the complaint and, if desired, within one week, submit a written response.

4. The ICC investigates the complaint and is authorised to obtain information from all employees at SKC/CCC. It can request access to any documents and correspondence that it deems relevant to the assessment of the complaint. The ICC may consult experts who may or may not be affiliated with SKC/CCC. If one of the ICC members is in any way involved in the complaint this committee member is excluded from participating in the procedure.

5. An instituted inquiry is completed within six weeks after the complaint has been declared admissible, unless the ICC considers this to be in conflict with the due care required for the inquiry. If this is the case, the complainant and the defendant are notified of this in writing, stating reasons. This letter also states when the inquiry will be completed

6. The week after the written response from the defendant as mentioned in step 3 is received by the ICC the complainant and the defendant are sent a written invitation to a hearing. The complainant and the defendant are heard separately. The hearings are private and confidential. The ICC is authorised, either at the request of the complainant and the defendant or at its own initiative, to hear third parties. If the ICC does hear third parties, complainant and defendant are given the opportunity to respond to this. The complainant can request the support of the external counsellor or a counsellor or a representative of his/her choice. The defendant can request the support of a counsellor or representative of his/her choice.

7. A report is made of every hearing. Within a week of receiving this report the persons involved (complainant and defendant) are asked to sign the report for approval, having added notes where relevant. If a person involved refuses to do this the reason must be stated in the report.

8. Within six weeks after the complaint has been declared admissible the ICC will come to a decision on the complaint. A simple majority of votes suffices. The Committee may decide to state the minority opinion in its decision. The ICC will notify the Chairman of the Board, the complainant and the defendant of its verdict, accompanied by a recommendation. The External Counsellor or the representative will receive a copy of the verdict.

9. Based on and within two weeks after the ICC's verdict and recommendation, the Chairman of the Board decides on the measures/decisions to be taken and notifies the complainant and the defendant of the decision and the grounds for that decision. This also includes the ICC's recommendation and whether it has been followed or, if not, why it has been deviated from. However, the Chairman of the Board will only depart from the recommendation if there are compelling reasons to do so and will report this to the ICC. The decision is communicated in writing.

10. In consultation with the external counsellor, the ICC examines if and how aftercare should be provided for the complainant and, if relevant, the defendant. The external counsellor can only give after care to the person she guided throughout the process. The other person in that case has to find someone else.

11. There is a wide variety of sanctions that can be applied by the Board for inappropriate behaviour, ranging from disciplinary measures to suspension to dismissal (in line with Dutch Labour Law provisions) of the employee. The sanction should be proportional to the gravity and severity of the inappropriate behaviour that has been displayed by the employee.

4 External Counsellor (Vertrouwenspersoon)

Appointment of the External Counsellor (EC)

- 1) The Board appoints an External Counsellor through Arboned, the Arbo organisation contracted by SKC/CCC.
- 2) The Board can terminate the appointment:
 - 2.1 at the External Counsellor's own request;
 - 2.2 because the conditions for appointment are no longer met;
 - 2.3 because of inadequate performance of the External Counsellor

What is the position of the External Counsellor?

The EC takes an independent position and is only accountable to the Board, without being obliged to reveal the names of employees that call on her or to disclose the nature or content of the discussions she/he has. The EC will use a neutral place (not the office) for meetings with employees.

What is an External Counsellor?

The EC is the point of contact for employees that are confronted with problems, conflicts, aggression, violence, intimidation, etc. (see also Code of Conduct). She is also the contact person for complainants that have a work-related conflict which could not be resolved internally. The EC is independent, a skilled communicator, gives advice and can handle sensitive information.

What does the External Counsellor do?

The EC can confidentially advise employees at their request on issues that they experience in their work situation. The EC does this by listening, analysing, advising, facilitating, etc. in order to contribute to conflict resolution. The EC does not replace existing procedures and protocol. The EC will see first if the complainant, who is facing a problem, can address the issue internally her/himself with the relevant person(s) in the organisation. If that is the case, the EC will remain in the background during this process.

Method of working of the External Counsellor

The EC investigates the problem/situation that was put forward and contacts the person/department in the organisation that can best deal with it. The next step is then to advise the complainant how to go about with the situation. The EC can intervene at three levels:

1. Provide an advice, after which the complainant will try to resolve the problem situation her/himself.

2. The EC can submit the problem to a person or institution for further processing and introduce the complainant to this person or institution.
3. The EC can support the complainant in submitting a written complaint to the Integrity Complaints Committee (ICC) in accordance with the SKC/CCC's Complaints Procedure.

The External Counsellor will provide the Board with an annual account of his or her activities which will be included in the SKC/CCC Annual Report.

5 Whistle-blower reporting point

The SKC/CCC foundation has created a Whistle-blower reporting point with the independent organisation “SeeHearSpeakUp” to deal with (anonymous) reports of fraud, corruption and other integrity issues regarding the SKC/CCC foundation. This facility can be used by Employees, Consultants, Interns, Associates, Partners and Volunteers that would like to lodge a complaint anonymously.

Once the “SeeHearSpeakUp” organisation receives a complaint, they will forward it to the HR Coordinator or the Board member with HR responsibility, who in turn will forward the complaint to the Integrity Complaint Committee. The process as described under 8.3 will then be followed and protection of the Whistle-blower will be guaranteed. The confidential reporting channels of SeeHearSpeakUp are open 24/7 and 365 days a year. A summary and contact details of SeeHearSpeakUp are provided below.

6 Contact details

Position	Contact details
External Counsellor	EC@cleanclothes.org
Chair person of the Integrity Complaints Committee	ICC@cleanclothes.org
SeeHearSpeakUp – Whistle Blower	See page below for contact details

Welcome

Clean Clothes Campaign is committed to upholding the highest standards of conduct and ethics in all areas of your organisation. In line with this commitment **SeeHearSpeakUp** has been appointed to provide an external and independent confidential reporting service to you and your colleagues. If you have serious concerns about any aspect of your organisation's work you are encouraged to come forward and voice those concerns in a safe and secure manner. You have the right to raise concerns in the knowledge that they will be taken seriously and investigated appropriately.

Concerns that you raise will be passed to senior officers within your organisation to consider potential investigation. Your personal details, such as your name and contact information will not be shared with your employer unless you provide **SeeHearSpeakUp** with your consent to share your details. Although not encouraged, you can also raise concerns anonymously to **SeeHearSpeakUp**.

How it works

Your employer encourages you to raise concerns internally. However, if for whatever reason, you wish to raise concerns to **SeeHearSpeakUp** you can do so using the following reporting channels:

PHONE



ONLINE



EMAIL



You can call **SeeHearSpeakUp** call handlers on **Belgium 0800 74189; Netherlands 0800 022 2398**. The confidential reporting hotline is operated 365 days a year, 24 hours a day. All call handlers are professionally trained and qualified to ensure that you are dealt with in a professional and confidential manner.

You can report online via the website at www.seehearspeakup.co.uk/en/file-a-concern

Alternatively you can email your concerns to **SeeHearSpeakUp** at report@seehearspeakup.co.uk. When emailing please state the organisation you work for in the subject header.

TYPES OF WRONGDOING YOU CAN REPORT

- ⊕ Financial Mismanagement
- ⊕ Bribery
- ⊕ Discrimination
- ⊕ Retaliation or Retribution
- ⊕ Fraud
- ⊕ Legal
- ⊕ Environmental
- ⊕ Health and Safety
- ⊕ Bullying
- ⊕ Theft
- ⊕ Corruption