



Sustainability Policy

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Contact: csr@cookiecompanygroup.com

Concept, fashion, brand & sustainability experts

Our process of Due Diligence

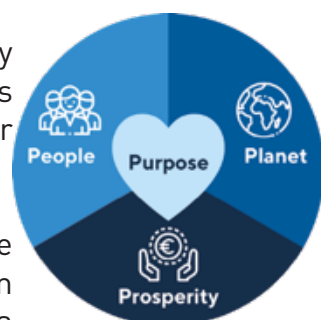
We, TCCG, accept responsibility for the consequences of our activities in our supply chain and work, within our capabilities, towards preventing, mitigate and where needed remediate the possible negative impact on people, environment and animal welfare.

In this process we follow the UNGP and OECD guidelines for multinational enterprises (2011) and guidance (2017).

TCCG realizes that Buying Practices can contribute to negative or positive impact in the supply chain and we are therefore committed to analyse our Buying Practices and to work in dialogue with our suppliers to improve our Buying Practices.

Adopt our policy.

We have made our policy based upon various topics which are important for our organisation.



To make our process more clear and to control them better we have made a separation in how our products are made and measure the impact on the people in our supply chain and from which materials and processes our products are made to measure the impact on our planet.

Prevent, mitigate, remediate.

We will assess our suppliers and our supply chain based upon our policy. We will go with them through the various reports and audits which they have conducted, some on our behalf. Then we will cease, prevent or mitigate harm depending on the situation, and which supply chain partner has the most influence to prevent. Besides the harm caused, infringement of our policy in the way of working can lead into a termination of our cooperation. The progress will be verified, monitored and validated to see the effectiveness of the measures. We will also take our learnings and see if we can use them in other countries or factories.

We need to

Strengthen our management system

We need to be able to measure our progress on the different topics. First we need to establish our own system to track our progress and we will look into a third party verification system in 2022. Systems like B-Corp or the SAC.

Communicate

We will communicate regularly about our process and strive to have full transparency in our chain. Via B2B: website, Linked IN, quotations, Yammer.

TCCG Policy consists of 15 different aspirational goals, in no particular order.
We have divided each goal into 5 steps.

We have defined 15 (aspirational) goals to improve working conditions and to reduce the negative impact/ increase the positive impact on animal welfare and the environment. 5 of these have our priority for the upcoming two years.

1. Policy based on ILO Convention/ definition to specific source.
2. Risks
A Potential risks
B Risks in our supply chain
3. Prioritisation: yes/no both including explanation
The prioritisation our of activities is based on the questions below:
 - What is the likelihood of an adverse impact?
 - How severe is that impact in terms of its extent, the number of people affected and the possibility of the consequences being irreversible?
4. The process to prevent, mitigate and remediate
5. For the 5 priority themes: SMART Goals for the upcoming years.

- All our products are made without the use of child labour.
- In our supply chain there is no room for discrimination, everybody is treated equally.
- All our labour is done without being forced in any kind of way.
- We manage our supply chain in a timely way that decent working hours will be respected.
- We actively work towards the payment of a living wage in our total supply chain
- All the employees in our supply chain have safe and healthy working conditions.
- To control our supply chain we need full transparency therefore unauthorised use of sub-contractors and unauthorised homeworkers is not allowed.
- We support the freedom of association
- In our supply chain there is no room for bribery and corruption in any form.
- During our production processes we strive to use the least amount of water possible and we minimize the use of hazardous chemicals to the bare necessity.
- We want to minimise the emission of all our greenhouse gasses in our total supply chain
- No animals are hurt during the production of any of our products.
- In the total lifecycle of our products, from production to end of life we will minimise the pollution by microplastics.
- We acknowledge that our products have a negative impact on the planet, therefore we use our resources carefully and keep striving towards full circularity of all our products.
- We strive to have all our packaging made from 100% recycled materials and that they are made in such way that they can be easily recycled again after usage.

Sustainable Development Goals

To connect the Sustainable development goals we need to thorough full check them and see which topics can be aligned with these goals. We have made a scheme in order to see the alignment.



TCCG // Policy	Subject in the Dutch Agreement on sustainable Textiles IMVO	Sustainable development goal	Specific target of the sustainable development goal
All our products are made without the use of child labour	Child Labour	Decent work and economic growth	8.7
Discrimination and gender In our supply chain there is no room for discrimination, everybody is treated equally.	Discrimination and gender	Gender equality	5.2
All our labour is done without beeing forced in any kind of way	Forced Labour	Decent work and economic growth	8.7
We manage our supply chain in a timely way that decent working hours will be respected	Forced Labour		
All the employees in our supply chain have safe and healthy working conditions.	Occupational health and safety		
We support the freedom of association	Freedom of Association		
We actively work towards the payment of a living wage in our total supply chain	Living wage	Reduced Inequality	10.4
During our production processes we strive to use the least amount of water possible and we minimize the use of hazardous chemicals to the bare necessity.	Waterpolution and the use of hazardous chemicals water and energy	Good Health and well-health Clean water and sanitation Responsible consumption and production Life below water	3.9 6.3/6.4/6.5/6.6 12.4 14.1
We want to minimise the emission of all our greenhouse gasses in our total supply chain	Waterpolution and the use of hazardous chemicals water and energy	Good Health and well-health Affordable and clean energy Responsible consumption and production	3.9 7.2/7.3 12.4
We acknowledge that our products have a negative impact on the planet, therefore we use our resources carefully and keep striving towards full circularity of all our products.	Raw materials Responsible production	Affordable and clean energy Decent work and economic growth Responsible consumption and production	7.2/7.3 8.4 12.2/12.5/12.6/12.7/12.8
No animals are hurt during the production of any of our products	Animal welfare	Responsible consumption and production	12.2
In our supply chain there is no room for bribery and corruption in any form.		Peace, justice and strong institutions	16.5
To control our supply chain we need full transparency therefore unauthorised use of sub-contractors (homeworkers) is not allowed		Decent work and economic growth	8.8
In the total lifecycle of our products, from production to end of life we will minimise the pollution by microplastics.	Responsible consumption	Responsible consumption and production	12.7/12.8
We acknowledge that our products have a negative impact on the planet, therefore we use our resources carefully and keep striving towards full circularity of all our products	Responsible consumption	Responsible consumption and production	12.7/12.8
We strive to have all our packaging made from 100% recycled materials and that they are made in such way that they can be easily recycled again after usage.	Responsible consumption	Responsible consumption and production	12.7/12.8

1. Policy based on ILO Convention/ definition to specific source.
 “The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years.” (ILO Convention 138)

“There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour. [...] Children [in the age of 15-18] shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals.” (ILO Convention 182)

“States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development.” (UNCRC article 32 Convention on the Rights of the Child)

2. Risks
 A Potential Child Labour risks

Table 9 from the OECD DD guidelines Garment & Footwear, “Risk factors for child labour in the garment and footwear sector” (page 106 – 109)

Risk Factors	Explanation	Sector considerations
Governance The laws of a country do not conform with the ILO’s standards regarding minimum age and worst forms of child labour.	The government indicates its intent to uphold ILO standards on child labour by conforming domestic laws with ILO conventions. This is a minimum assurance that the government intends to protect children from child labour.	
Governance The government does not enforce child labour laws.	Child labour legislation is only as effective as it is implemented. Indicators on enforcement of child labour laws are perhaps the most important in determining whether child labour is a high-risk within a jurisdiction. Indicators of the resources spent on enforcement of child labour laws and investigations of violations, legal cases against violators and enforcement of legal decisions can be helpful in determining the above. ¹ Reports from civil society, trade unions and international organisations can likewise be a useful resource.	There continue to be significant gaps in legal frameworks and law enforcement capacity to combat child labour in many garment and footwear production and exporting countries.

Our policy

All our products are made without the use of child labour

Risk Factors	Explanation	Sector considerations
Governance Poor access to and/or poor quality of education	The risk of child labour is increased when children are not able to attend school. This may be due to a lack of schools nearby or other barriers, such as school fees that are prohibitive or administrative hurdles such as the requirements of birth certificates. School systems may also lack a policy to reintegrate children who were previously working into school. Children of migrant workers may face unique obstacles to accessing education. For example, they may not speak the local language. When the quality of education is poor, parents may place greater value in sending a child to work than sending a child to school. ²	Many of the countries where garment and footwear manufacturing, finishing and raw material production are based continue to face significant obstacles in achieving universal education. In some countries where garment supply chains exist, the compulsory education age is below the minimal age for work.
Governance The government does not have adequate anti-discrimination in education laws and/or does not properly enforce them.	Discrimination and exclusion of certain (minority) groups, e.g. from access to education, may increase the risk of child labour.	In the garment and footwear sector, children from minority groups or workers, for example migrants, are less likely to go to school and end up in child labour in some contexts.
Sector Informal employment	Child labour is most prevalent in informal sectors of the economy and formal sectors might subcontract to informal unregulated units with child labour.	Informal employment is common at most stages of the garment and footwear sector supply chain. Cotton harvesting often employs high rates of informal seasonal workers. Informal employment is particularly prevalent in leather stitching and intricate handwork, such as embroidery and beading.
Sector Tasks are considered to be better performed by children	In some sectors there is a myth that children are more highly skilled at performing certain tasks.	In some contexts there is a myth that children are better skilled at intricate sewing, stitched leather, beading, embroidery, etc.

Risk Factors	Explanation	Sector considerations
Sector Migrant labour	Children of seasonal migrants often migrate with their parents and they are particularly vulnerable to child labour. Seasonal work sites are often far away from schools and other services and school admission on a seasonal basis may be problematic. Child migrants often experience maltreatment – including suffering from isolation, violence, sub-standard working conditions, non-payment of wages and the threat of being reported to the authorities. ³	Cotton harvesting often employs high rates of informal seasonal migrant workers; In some contexts, international migrant workers account for 75% of the workforce. Rural-urban migration is likewise common in most exporting countries.
Sector Wages do not satisfy the basic needs of workers and their families;	Low wages and lack of access to decent work for other family members reduces household income and provides economic incentives for children to work.	Wage non-compliance is a risk at all stages of the garment and footwear supply chain that are labour intensive and employ low-income workers.
Sector Use of apprentice schemes	Children who are considered to be apprentices may not receive adequate compensation and may be subjected to long hours of work which interfere with their education.	Apprenticeship schemes are used in many contexts of the sector
Sector Subcontracting	Use of subcontracting reduces visibility into labour standards thus increasing the risk of child labour;	<i>Manufacturing (including Spinning)</i> Sub-contracting is a common practice in cut-make-trim and finishing (e.g. outsourcing to printers) globally.
Sector Use of private recruitment or employment agencies	The use of labour recruiters and their agents can create layers of separation between the employer and the worker. Employers may be unaware of the hiring practices of their operations, leaving workers exposed to exploitation. ⁴	<i>Manufacturing (including Spinning)</i> Private recruitment and employment agencies are often employed to hire both domestic and international migrant workers.

Risk Factors	Explanation	Sector considerations
Sector Existence of credit-arrangements and debt	The use of credit schemes or schemes to advance money when applied to children puts children at higher-risk of forced labour, debt bondage, precarious work and lack of adequate pay.	Credit schemes are at times built into apprentice schemes. Use of credit may exist amongst migrant workers hired through a private recruitment or employment agency.

Our own conclusions on the potential risk on child labour:

Based on our country risk matrix, we can conclude that there is a potential risk on child labour in India, especially in the lower tiers and in the south of India (Tamil Nadu).

B Risks in our supply chain

Based on the Amfori BSCI audits (tier 1) and the initial audits conducted by the local CSR team, we can conclude that so far, we have not identified cases of child labour in our supply chain. We should notice that the status of our monitoring activities, especially further down the supply chain should improve. In order to be able to identify child labour in case there is.

3. Prioritisation: yes/no both including explanation

The likelihood of child labour, especially deeper down the supply chain in India is possible. “Child labour will often involve grave harm to children that can be challenging to remediate”.

4. The process to prevent, mitigate and remediate

Is part of the Amfori BSCI CoC and is being checked during social audits

Prevention:

Age verification system -> The CSR managers from Redefined in India and China do perform an initial audit before business with a factory can start. Part of the initial audit are questions and document inspections about an age verification system (e.g. Personal Files, qualification of Labor agent, Labor contracts, Young worker registration etc.) Please see attachment DD question 2.2.2.

Mitigate and remediate

We have not yet described our own process and responsibilities in case child labour is found. Therefore we need to include this in our actions for the upcoming 6 months.

5. As this is one of the priority themes, we have defined SMART Goals for 2021, 2022 and 2023
It is TCCG goal to contribute to the shared AGT goal to “permanently eradicate child labour in the production or supply chain, ensuring that child labour is not displaced or relocated to other sectors or countries.”

Specific	<p>We will write extensive guidelines for TCCG, our suppliers and their subcontractors to outline the details of responsibilities related to the subject of child labour and young workers. This document will be based on the OECD Due Diligence Guidance Garment & Footwear.</p> <p>Our document will contain the following topics:</p> <ul style="list-style-type: none"> - Process to prevent: <ul style="list-style-type: none"> A) Producers must establish a robust age verification system. B) TCCG monitoring activities in order to check the existence and quality of the age verification system. In case the age verification system fails to meet requirements, TCCG will help create awareness at supplier level and agree on a CAP. - Process to remediate: <ul style="list-style-type: none"> A) What is expected from suppliers in case of child labour is found. B) In case child labour is found in a part of the TCCG supply chain, TCCG commits to continuing its business relationship with the supplier and providing them with support as long as they are willing to work together in a transparent way to develop responsible solutions that are in the best interests of the child including enabling access to education. <p>The next step is that TCCG Suppliers are responsible for the implementation of this policy through their supply chain.</p>
Measurable	This will be in a written guideline / document.
Acceptable	To increase the acceptance of the document, we will involve all relevant stakeholders for their feedback on the document.
Realistic	All companies that take the responsibility in doing their due diligence on the risk of child labour and young workers, do have a policy and plan on how to prevent, mitigate and remediate child labour and young workers.
Timeline	October 2021

1. Policy based on ILO Convention/ definition to specific source.

“There is no discrimination in employment.

Recruitment, wage policy, admittance to training programmes, employee promotion policy, maternity protection, policies of employment termination, retirement, violence and harassment and any other aspect of the employment relationship shall be based on the principle of equal opportunities, regardless of race, colour, sex, religion, political affiliation, union membership, nationality, social origin, deficiencies or handicaps (ILO Conventions 100, 111, 183 and 190)”

2. Risks

A Potential risks

The risk of discrimination is present in the supply chain of garment, textiles and footwear. The risk analyse shows that the risk of discrimination and gender is often linked to the more severe risk of forced labour: more specifically: Uyghur minorities in Xinjian and China and the young (female), often from a lower cast workers in Tamil Nadu. In India there is still a risk of discrimination and sexual harassment of women.

B Risks in our supply chain

Based on the Amfori BSCI audits (tier 1) and the initial audits conducted by the local CSR team, we can conclude that so far, we have not identified cases of child labour in our supply chain. We should notice that the status of our monitoring activities, especially further down the supply chain should improve. In order to be able to identify child labour in case there is.

3. Prioritisation: yes/no both including explanation
We realize that the theme of discrimination is an important risk, also in our supply chain, especially in India and China. However as it is in many cases directly linked to forced labour, which is a more severe risk, we have made the decision to first work on the theme of forced labour.
4. The process to prevent, mitigate and remediate
Part of the Amfori BSCI social audits.

5. We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year.

It is TCCG goal to contribute to the shared AGT goal to:

“eradicate discrimination from the production or supply chain and to achieve equal rights, opportunities and pay for women, minorities and other groups suffering discrimination in the production or supply chain.”

All our labour is done without being forced in any kind of way

1. Policy based on ILO Convention/ definition to specific source.
"Forced Labour" All Work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. (ILO, Forced Labour Convention, 1930 [No. 29] and ILO Protocol 2014 to the Forced Labour Convention)

2. Risks
A Potential risks
Table 9 from the OECD DD guidelines Garment & Footwear, "Risk factors for child labour in the garment and footwear sector" (page 126)

Risk Factor	Relevance to the sector
State-orchestrated forced labour State-orchestrated forced labour is when the government itself forces citizens to work in a particular sector.	<i>Cotton</i> In some countries forced labour in cotton production is state-orchestrated. In these contexts, local authorities send government and private business employees to pick cotton in order to meet cotton production quotas.
Private recruitment & employment agencies The use of labour recruiters and their agents can create layers of separation between the employer and the worker. Employers may be unaware of the hiring practices of their operations, leaving workers exposed to exploitation. ¹	Private recruitment and employment agencies are often employed to hire both domestic and international migrant workers in garment, footwear and textile manufacturing. <i>Transportation</i> Workers are often employed through labour brokers or employment agencies (e.g. seafaring transport). Within some contexts, these jobs are viewed as favourable leading to high recruitment fees and indebtedness.

Risk Factor	Relevance to the sector
Prison labour Involuntary work performed by prisoners who have not been convicted in a court of law and whose work is not supervised by a public authority is considered forced labour. Similarly, involuntary work performed by a prisoner for the benefit of a private undertaking is also considered forced labour. ²	In some countries, prison labour is used to produce garments including federal contracts for military uniforms, thus increasing the risk of forced prison labour.
Subcontracting When not accounted for, the use of subcontracting reduces visibility into the labour standards of the supplier, thus increasing the risk of forced labour.	Sub-contracting is a common practice in cut-make-trim and finishing (e.g. outsourcing to printers) globally.
Informal workers Workers employed in informal enterprises, including home-based workers and those in geographically remote rural regions, are considered to be particularly vulnerable to forced labour, notably debt-induced forced labour. ³	Informal employment is common at most stages of the garment and footwear sector supply chain. Cotton harvesting often employs high rates of informal seasonal workers. Informal employment is particularly prevalent in leather stitching and intricate handwork, such as embroidery and beading.
Production pressures Workers that are working in labour-intensive industries contexts with set production quotas and fluctuating orders may be more exposed to forced overtime	Excessive overtime is common throughout garment and footwear cut-make-trim. While not all overtime is considered forced-labour, forced labour does occur if overtime is compulsory and exceeds the weekly or monthly limits allowed by laws, irrespective of the reasons for such overtime. ⁴

Risk Factor	Relevance to the sector
Existence of credit-arrangements and debt A person provides labour to pay off his or her debt. Interest rates often diminish the person's ability to pay the debt and the terms of payment are often indefinite.	<i>Cotton</i> In some sourcing contexts it is common for farmers to finish a crop cycle without enough money to purchase inputs for the following year, leading them to take on increasing loans with high interest rates. <i>Manufacturing</i> Credit schemes are at times built into apprenticeship schemes. Use of credit may also exist amongst migrant workers hired through a private recruitment or employment agency. Children and adolescents are also more likely to be employed and exploited through apprenticeship schemes.
Children and adolescents in the workplace Children and adolescents in the workplace are more vulnerable to forced labour.	Children and adolescents are often employed at all stages of the garment and footwear sector.
Employment of migrant workers Migrant workers are more exposed to certain forms of forced labour, particularly those with an irregular status, whose vulnerability can be exploited through coercion. For example, migrant workers may be vulnerable to coercion through the withholding of documents (e.g. passports). The retention of these documents or other valuable personal possessions can be considered an indicator of forced labour if workers are unable to access them at their discretion and if they feel they cannot leave employment without risking the loss of the document. ⁵ Migrant workers may also be more vulnerable to debt-induced forced labour due to recruitment fees owed to labour brokers. ³	<i>Cotton</i> In some cases children migrate with their family to work in cotton plantations. However, although children may migrate voluntarily, they may be exploited upon arrival. <i>Manufacturing</i> In many countries, the garment and footwear sectors are highly dependent on internal and international migrant workers. In some contexts, international migrant workers make up to 75% of the workforce.
Onsite housing of workers Workers who live on-site are more at risk of being physically confined to the workplace or to employer-operated residences outside of working hours. ⁶	The use of dormitories to house workers is very common across many garment and footwear exporting economies.

Our own conclusions on the potential risk on forced labour:
Based on our country risk matrix, we can conclude that there is a potential risk on forced labour in

- 1) India, especially in the lower tiers and in the south of India (Tamil Nadu)

- 2) China, especially in the region Xinjiang there is a risk on forced labour of Uyghurs minorities as well throughout the whole supply chain in the rest of China.

- 3) Cotton from different regions. There is still a risk in Uzbekistan on the use of forced and child labour, although the situation in Uzbekistan

B Risks in our supply chain

Based on the Amfori BSCI audits (tier 1) and the initial audits conducted by the local CSR team, we can conclude that so far, we have not identified cases of forced labour in our supply chain. We should notice that the status of our monitoring activities, especially further down the supply chain should improve. In order to be able to identify forced labour in case there is.

3. Prioritisation: yes/no both including explanation
The likelihood of forced labour in our supply chain is high. We are sourcing from two of the regions where there is a risk on forced labour, therefore this is one of the high priority themes for us.

We realize that cotton production in different areas has also a risk on forced labour. However we need to set priorities and therefore we will first focus on the risks on forced labour in China and India.

4. The process to prevent, mitigate and remediate
We will 'translate' the recommendations and guidelines from NGO's and other relevant stakeholders into a document that will be used internally for creating awareness on this theme and will serve as guidelines for TCCG Buying & CSR team what to do in order to prevent, mitigate and remediate the risk of forced labour.

We will include the following into our guidelines:

Input from ILO:

Business can play an important role in the elimination of forced labour. In particular, companies can:

- Ensure that workers always have free access to their documentation, including passports, identity papers and travel documents;
- Have a clear and transparent company policy, setting out the measures taken to prevent forced labour and trafficking. Clarify that the policy applies to all enterprises involved in a company's product and supply chains;
- Monitor carefully the agencies that provide contract labour, especially across borders, blacklisting those known to have withheld documents of workers to prevent them freely leaving if they so choose.

We will include relevant input from the recommendations as described in the SOMO/ Arisa report "spinning around worker' rights".

5. As this is one of the priority themes, we have defined SMART Goals for 2021, 2022 and 2023
It is TCCG goal to contribute to the shared AGT goal to "To prevent and eradicate forced labour in the production or supply chain."

Specific	<ol style="list-style-type: none"> Develop guidelines with commitment for ourselves and what we expect from our suppliers in order to prevent, mitigate and remediate the risk of forced labour. We will use specific guidelines to make a separation based on the different risks. The risk on Sumangli in India in the spinning mills is very different to approach in comparison with the risk of forced labour of Uyghurs in China. We will include relevant stakeholders in the development of this document. Part of the transparency & monitoring plan: Monitor working conditions deeper down the supply chain Gaining insight on factory level on: recruitment practices, the composition of the workforce at all production locations in Tamil Nadu before the end of 2021 -> all active locations (2020:20) China -> before the end of 2021 -> all active tier 1 locations -> before end of 2022 -> all active tier 2 & 3 locations Create internal & supplier awareness on this risk and our policy, internal in China and India
Measurable	<ol style="list-style-type: none"> Written document as guideline, Follow the monitoring plan An overview with all production locations and their status on the recruitment practices and composition of the workforce A presentation with the updated TCCG CSR policy and plan, we will include the risk matrix. This presentation will be shared with Buying team (TCCG and RDFD)
Acceptable	To increase the acceptance of our policy and plan, we will involve all relevant stakeholders for their feedback on the document.
Realistic	All companies that take the responsibility in doing their due diligence on the risk of forced labour, do have a policy and plan on how to prevent, mitigate and remediate on forced labour.
Timeline	October 2021

⁴ <https://www.cecc.gov/sites/chinacommission.house.gov/files/documents/CECC%20Staff%20Report%20March%202020%20-%20Global%20Supply%20Chains%2C%20Forced%20Labor%2C%20and%20the%20Xinjiang%20Uyghur%20Autonomous%20Region.pdf>

⁷ <https://www.ftm.nl/artikelen/nederlandse-bedrijven-worstelen-met-de-oeigoerenkwestie>

⁸ <https://www.aspi.org.au/report/uyghurs-sale>

⁹ <https://www.somo.nl/nl/wp-content/uploads/sites/2/2020/11/Ketenimpact-Oeigoerse-dwangarbeid.pdf>

¹⁰ https://www.ilo.org/washington/news/WCMS_767753/lang--en/index.htm

¹¹ https://www.ilo.org/empent/areas/business-helpdesk/faqs/WCMS_DOC_ENT_HLP_FL_FAQ_EN/lang--en/index.htm#Q3

¹² <https://www.imvoconvenanten.nl/-/media/ser/downloads/engels/2016/agreement-sustainable-garment-textile.pdf?la=en&hash=249F7F84DABE76107C4927DE23A342B7>, page 29

Policy based on ILO Convention/ definition to specific source.

No excessive working hours

Hours of work shall comply with applicable laws and industry standards. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate. (ILO Convention 1).

1. Risks

A Potential risks

Low wages: in contexts in which workers earn very low wages, they may prefer to work overtime in order to earn an extra income. This is often the case for migrant workers who are responsible for sending money home to their families.

Poor purchasing practices: In some instances the actions of retailers or brands may contribute to excessive overtime. Examples of this include last-minute style changes and the setting of unreasonable lead times, notably for re-orders.

Inefficiencies in production planning: Over-booking, poor production planning and inefficiencies in production may also result in excessive overtime. Overbooking remains a challenge in the sector often due to the lack of consistency in orders. Suppliers may be reluctant to expand their production capacity without confidence that demand will remain high. To account for this uncertainty, in some cases, suppliers hire a limited number of skilled workers as regular workers and then rely on overtime hours, temporary contract workers and subcontracting to manage the shifts in demand.

B Risks in our supply chain

Low Wages:

In our supply chain we face excessive overtime issues in China. These overtime issues are mentioned in every audit report we receive. This is a very complex case as we face low wages and migrant workers in the majority of our production facilities. Every time when we discuss these subjects with especially the Chinese factory owners they claim that, even if we would raise the wages until a decent living wage, the overtime still exists. Even in other areas of work, the Chinese culture is 996 which means starting at 9 am finishing at 9 pm and 6 days a week. All above the legal limits We keep on addressing the excessive overtime issues and share the insights with our clients and suppliers. For us as a small importer it is impossible to change the Chinese culture in this matter.

In India the situation is different. Although excessive overtime do exist there, we have not encountered this in our BSCI reports. To remediate on the issues on Tier 2 and Tier mentioned in the report we are planning to conduct our own audits in our major dyeing facilities and spinning mills as well. We will look into their hour registration system and if they are robust enough to control the working time of the workers and if the payment slips are correct and according the legislation.

Poor purchasing practices and Inefficiencies in production planning:

These 2 points go hand in hand in our case. To investigate our practices we have done the PPA and PPSA tool. We have seen that although we insisted on honest answers some of the respondents did fill in everything with the highest score. Nevertheless we saw that on communication and feedback we are on the right track but on training we could improve. Internally and externally. What we will plan in 2022 is additional training for our staff especially on fair labour costing.

We at TCCG are looking into another ways how to address this culture and we would like to stimulate free time as well. Numerous studies show that the longer you work the less effective you are and the higher the chance that you get injured. In 2021 we are looking to start a trial together with our licenses to see if we can get cinema tickets to have all our employees going to the theatre and see the latest movie of the license they are producing

2. Prioritisation: yes/no both including explanation

We haven't prioritised excessive overtime because the root cause in China is laying in cultural behaviour and we can't change the situation for a country solemnly by our purchasing practices. After the Somo and Arisa report we are going to put more effort in chasing back this situation in the supply chain, even though our CMT's could not directly be linked to these cases we feel it as our duty to do so.

The process to prevent, mitigate and remediate

We will demand from our suppliers a reliable system to track the working hours and payments to the workers.

Working this much hours is also causing risks on health and safety during work. Furthermore it

We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year

1. Policy based on ILO Convention/ definition to specific source.

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income. (ILO Conventions 26 and 131). Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage. OECD Guidelines for Multinational Enterprises (2011), chapter 5, article 4b

2. Risks

A Potential risks

Risks factors in order to not paying the wages that satisfy basis needs. Examples of vulnerable workers include:

- Workers employed in the informal economy
- International migrant workers
- Workers paid through piece-rate versus hourly wages

B Risks in our supply chain

We realize that we have not enough information now to draw a conclusion on the actual risk of (not paying) living wages to the workers in our supply chain.

It is part of the Amfori BSCI audits and our own audit to check on the payment of minimum wages. However we do not yet check on the payment of living wages.

3. Prioritisation: yes/no both including explanation

The payment of Living wages can be a catalyst to achieve improvements in the other themes. We realize that there are (five) more severe risks now in our supply chain that needs to be our priority. However we will start with opening the conversation with our clients

4. The process to prevent, mitigate and remediate

Our process of preventing, mitigating and remediating the risk on (not paying) living wages is not in place yet. It is part of the Amfori BSCI audits and our own audit to check on the payment of minimum wages. However we do not yet check on the payment of living wages.

5. Living wage is not a top 5 priority theme as for this moment, there are more severe risks that we need to focus on first. However, we know that the payment of (Living) Wages have a direct link to many other themes. Therefore we have included

Specific	Develop a plan of action together with our B2B customers. <ol style="list-style-type: none"> 1. First we need to prepare the following: <ul style="list-style-type: none"> - Which factories do we use for Zeeman and Takko and make a gap analyse between the existing wages and living wages, based on the AGT overview 2. We will contact our customers Zeeman and Takko that are signatories/ members of AGT and/ or FWF to start the dialogue about cooperation on this theme. 3. Select one factory in India and one factory in China that are working for Zeeman and/or Takko and start conversation with factory about their willingness to cooperate. 4. Open costing for a selection of products. At the moment we cannot define a target wage -> We first need to make an open costing and make a link to the labour cost.
Measurable	The steps in the process are clear. It is difficult to define yet what is the measurable impact on the workers.
Acceptable	For the price setting, we are very much dependent on the B2B customers' price. And we realize that the factory is dependent on our price setting. By starting the dialogue, we open this conversation This is one of the challenging themes.
Realistic	The plan is to first start the dialogue and open costing in order to get a better understanding about the price setting.
Timeline	<ol style="list-style-type: none"> 1. September 2021 2. October 2021 3. November 2021 4. December 2021

¹⁴ OECD Due Diligence Guidance Garment & Footwear, page 156

¹⁵ <https://www.imvoconvenanten.nl/-/media/imvo/files/kleding/nieuws/2021-living-wages-nl.pdf?la=nl&hash=A55C871A8E26CB24850A11CD2AF10EFB>

1. Policy based on ILO Convention/ definition to specific source.

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. Effective regulations shall be implemented to prevent accidents and minimise health risks as much as possible (following ILO Convention 155). Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.

2. Potential risk, our Prioritisation and the current process in tier 1 to prevent:

The risk on poor healthy & safety working conditions is high, especially in India and Pakistan and deeper down the supply chain.

However for the tier 1 suppliers, we do include H&S in our own initial audits, it is included in the Amfori BSCI and other social audits. Therefore, we need to focus first on our transparency & monitoring of the whole supply chain and then H&S is also included.

It is TCCG' goal to contribute to the shared AGT goal to "For employees to work in healthy conditions and in a safe environment in the production of our goods"

We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year.

All our suppliers agree with the above statement and fully align with this policy sharing all their supply chain partners. We have included this as a separate chapter in our contract with the office to ensure the importance on this subject.

Business partners/ suppliers are responsible for communicating (cascading) the TCCG CSR policy to all those in the supply chain below them.

1. Policy based on ILO Convention/ definition to specific source.

We at TCCG can't do things alone and rely on a strong supply chain. Therefore we need to know our Tier 1, tier 2 and tier 3 suppliers in order to be on top of our game. This information is crucial for our business and our licensors and clients need to know where the products are made. Nowadays the impact of not knowing where your products are is a huge risk to licensors and clients as they can get negative promotion from the public whenever a certain product is found in a wrong place.

During our production we check if the goods are subcontractors and audit the subcontractor on basic steps. We are considering to improve the subcontractor audits to the same level as our suppliers.

2. Risks

A Potential risks

There are numerous potential risks involved when our products are subcontracted. As we have a strong due diligence policy, we can't accept that goods are produced in circumstances which we don't approve.

B Risks in our supply chain

In the textile business subcontracting is very common as a lot of the suppliers simply don't have all the necessary processes in their own factory. Subcontracting can take place in different tiers. For 2021/2022 we focus on getting knowledge on all the subcontractors used in tier 1,2 and 3. Most important is tier 1.

3. Prioritisation: yes/no both including explanation

As this has a high impact on our business case we need to improve our due diligence and strengthen our management systems in order to get better control on these processes.

4. The process to prevent, mitigate and remediate
In the report Spinning around workers' rights from Somo and Arisa, we are mentioned as the Cookie Company Group and they have also given us clear recommendations which are mentioned in page 11. We will use these recommendations in order to strengthen our management system and our transparency. We have had bad experiences in the past regarding full transparency as some of our customers went directly to our factories, therefore we are looking into a system in which we can give full transparency, and we can take responsibility but without facing the same issues again. We already work via the AGT with the Open Apparel Registry.

5. As this is one of the priority themes, we have defined SMART Goals for 2021, 2022 and 2023

Specific	Develop a robust system to control our subcontractors along our productions
Measurable	Conduct audits and check and verify by documents and track orders and financial records of the supply chain per order.
Acceptable	We need to get the confidence of the suppliers that transparency works and gains advantage in their business as well. We also share e.g our Detox pool in order to advise certain tier2 and tier suppliers in order to have a better chain.
Realistic	The plan is to first map all the current subcontractors used, then make a systematic approach to have a preferred subcontractors list per supplier, and finally start to improve the working circumstances in the subcontractors as well
Timeline	Mapping is already in place and we try to establish the systematic approach q1 2022. Q3 2022 we will have established preferred subcontractors per supplier and in 2023 we will have corrective action plans in place at these subcontractors which need to be carried out. We will hold our main supplier responsible for the progress made on subcontractor level to increase our leverage.

We support the freedom of association

1. Policy based on ILO Convention/ definition to specific source Freedom of association and the right to collective bargaining.

The right of all workers to form and join trade unions and bargain collectively shall be recognised. (ILO Conventions 87 and 98) The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions. (ILO Convention 135 and Recommendation 143).

Risks

2. A Potential risks

The risk of violation of this theme is very high, as well in India and in China. See further explanation in the risk matrix. This is a very complex (and politically sensitive) topic.

Therefore we rather focus on 1) a (team of) democratically elected worker representative, and 2) a working grievance mechanism in the factory.

B Risks in our supply chain

We have not a complete overview of which factories do have a democratically elected worker representative, or a working grievance mechanism in the factory.

3. Prioritisation: yes/no both including explanation
 As soon as we are able to manage the priority themes, we will develop a plan with input from stakeholders, together with our local CSR team in order to get insight in the status of 1) a (team of) democratically elected worker representative, and 2) a working grievance mechanism in the factory.

4. The actions described above can be seen as a mitigating activity in case there is no Freedom of Association.

5. We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year.

- 1.** Policy based on ILO Convention/ definition to specific source.
As Amfori BSCI member, we follow the guidelines that they have included on this topic:
Business partners observe this principle when, and without prejudice to the goals and expectations set out in this chapter, they are not involved in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving or accepting of any improper monetary or other incentive. Business partners are expected to keep accurate information regarding their activities, structure and performance, and should disclose these in accordance with applicable regulations and industry benchmark practices. Business partners should neither participate in falsifying such information, nor in any act of misrepresentation in the supply chain. Furthermore, they should collect, use and otherwise process personal information (including that from workers, business partners, customers and consumers in their sphere of influence) with reasonable care. The collection, use and other processing of personal information is to comply with privacy and information security laws and regulatory requirements.
- 2.** Risks
A Potential risks
This is not yet included fully in our risk matrix. However we will include this in the follow up risk analyse in Q1 2022

B Risks in our supply chain
It is part of our own initial audit. If auditor sees any indication to bribery or corruption, we will not start working with this supplier.
- 3.** Prioritisation: yes/no both including explanation
As we have set 5 priorities based on our risk matrix, we are going to focus on the top 5 priority first.
- 4.** The process to prevent, mitigate and remediate
This is part of the Amfori BSCI Audit, our own audit (severe topic and therefore zero tolerance)
- 5.** We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year.

The use of freshwater and the disposal of wastewater is becoming more and more important. This is by far creating the biggest impact on our valuable planet. The most water is consumed during the growing stage of cotton and wet processing of the textiles.

RISK: related to hazardous chemicals that are common to use for prints.

1. Policy based on ILO Convention/ definition to specific source.

Cotton policy

Cotton is a crop which uses a lot of water during growth. Approx. 5000 to 8000 litres of water are needed for 1kg of cotton. Besides the usage, also the pesticides used during growth pollute the mandatory water. Next to water there are also issues in harvesting the cotton with possible child an forced labour. At TCCG we understand that cotton is harmful to the world and especially on the water usage and we are going to establish a program to start with other materials then cotton to see if we can lower down our annual cotton volume. We are thinking of using more sustainable alternatives of viscose such as Tencel.

Textile wet processing.

Textile wet processing which includes pre-treatment, coloration/dyeing, printing, washing and finishing, is a crucial stage in textile manufacturing. Wet processing already implies that a lot of water is used during these processes and in most of the cases this is one way usage. Recycling of used water is coming onto the market with the bigger dyehouses but not common in the market yet.

Environmental concerns

Over the years, the textile industry has been in the spotlight for using vast amount of natural resources, fresh water, energy, and chemicals, while producing waste, and polluting local waterways

at manufacturing countries with hazardous wastewater. In order to overcome the overall environmental impact, different steps can be taken place to reduce water use, energy use and avoid or control hazardous chemicals from being released into the environment.

Hazardous chemicals.

For the hazardous chemicals we follow the ZDHC campaign on the MRSL and we have established our own RSL which is signed by our suppliers last year.

2. Risks

A Potential risks

B Risks in our supply chain

The risks of hazardous chemicals are already explained a little more in our policy above. Basically in the wet processing stage we face the biggest risks in our supply chain besides the pesticides used in cotton

3. Prioritisation: yes/no both including explanation
this is a priority for TCCG as this is having a big impact on our business and the planet. Also our customers demand from us a lot of effort in using DETOX certified facilities and having special sludge testing for Aldi suppliers

4. The process to prevent, mitigate and remediate
We have shared our MRSL and RSL with the suppliers and ask them to sign off. Furthermore we conduct BEPI self assessments in some of our factories. We will share the presentation from Solidaridad about wet processing with our teams in china and india and inform the suppliers during next physical visits. Hopefully we can conduct them in 2021 still. In general we have a lot of tools present but we have a lack of consistency. In 2021 we will focus on a good process. This process also includes a human risk assessment following the WHO guidance as mentioned in the OECD Due Dilligence guidance.

Whenever we find chemicals used which are not allowed we demand a corrective action in the goods and make sure that the banned chemicals aren't used in the future anymore.

5. As this is one of the priority themes, we have defined SMART Goals for 2021, 2022 and 2023

Specific	Check our current RSL and MRSL and define a good working process for all our suppliers. We also need to inform the MRSL to Tier2 and tier 3 and establish a durable process to minimise the hazards caused by chemicals.
Measurable	We do random inspections on chemicals on our products and therefore we can see if the hazardous chemicals are used. Secondly we check with our inline inspections the used wet processing facilities. In the future we want to see if we can also do third party audits like BSCI in our wet processing units.
Acceptable	To gain insights and control on all the chemicals used in our processes.
Realistic	We need to start capacity building by improving the knowledge of our staff and conduct audits on the wet processing facilities.
Timeline	Update the current RSL and MRSL including mapping of these RSLs and MRSLs from our clients. Done q3 2021. In q4 2021 we need to train our staff on the current chemicals used, the use of MSDS and proper chemical storage.

We want to minimise the emission of all our greenhouse gasses in our total supply chain

We control the energy usage of all our supply chain partners and work towards a better planet by helping our partners using more sustainable options. With some suppliers we work with the BEPI SAQ self-assessment questionnaire to gain more information and knowledge at supplier level.

We want to measure our Greenhouse Gasses in 3 different area's

- Our own operations
- Supply Chain
- Product.

1. Policy based on ILO Convention/ definition to specific source.

We at TCCG want to get deep insights on the energy consumption of our processes in order to make a policy how to decrease the quantity of greenhouse gasses in our atmosphere. Not only during production of our raw materials but also dyeing for example consumes a lot of energy as the materials need to be heated to absorb the dyestuff. Our first policy will consist of calculating our current footprint and find out by an Product lifecycle analysis which items and which processes are the most "emitting".

2. Risks

A Potential risks

B Risks in our supply chain

Everybody has a responsibility to take care of our planet, and therefore everybody has the consequences of too much GHG emissions. We all know the Paris agreement and the climate goals that were set there. The risks on greenhouse gasses occur in 3 different steps. We will mainly focus on our product as this has the biggest impact on greenhouse gasses and also the part where we can start. Another big risk is that there will be legislation on CO2 emissions and almost certain a tax. Therefore controlling our CO2 emissions will be key in controlling our prices for the future.

3. Prioritisation: yes/no both including explanation

At the moment we don't prioritise these steps as we have decided to take on other subjects. We expect to start with this project beginning of 2022. When we see a chance to start earlier we will definitely do.

4. The process to prevent, mitigate and remediate We will consider the following steps from the OECD guidelines in order to make our policy upon.

5. We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year

Risk Factor	Example measures to reduce GHG emissions and monitor improvements
Fibre selection	Consider the potential GHG emissions of a material alongside other features, such as feasibility, cost and demand when designing a product. ¹ For example, synthetic fibres often have comparatively high GHG emissions as a result of energy required for raw material production. Conversely, plant fibres, such as cotton or linen, have comparatively low GHG emissions from production, with linen having substantially lower production-phase emissions, because of its comparatively low need for pesticides and fertilisers and irrigation. ²
Textile finishing	<ul style="list-style-type: none"> • Establish an energy management plan at the site-level that includes company-wide coordinated measures for energy management • Implement best available techniques (BAT) as defined by Best Available Techniques Reference Documents for the sector or sub-sector³ • Implement energy efficiency measures (e.g. energy conservation technology, optimisation of steam generation and pressurised air, waste heat recovery from waste water and waste gas, process optimisation, etc.) • Implement energy conservation measures (e.g. implementation of energy saving through improvements in the process and reaction conditions)⁴ • Increase efficiencies and quality so as to reduce need for re-processing due to failures • Install and operate accurate meters and/or measuring software as a fundamental step to benchmarking performance and to initiating efficiency improvement
Transportation	<ul style="list-style-type: none"> • Reduce the need for urgent airfreight by implementing responsible purchasing practices as outlined in Box 4. Consider the location of warehouses and distribution centres in relation to where products are sourced and sold so as to reduce transportation needs. • Require freight transporters to track and communicate CO2 emissions data⁵ • Track emissions (in relation to transport) quarterly across business units (e.g. manufacturing and assembly units, distribution centres and customer centres)
Packaging	<ul style="list-style-type: none"> • Reduce size of packaging • Use resources which can be reused or recycled

If we need to use any animal materials, we will use recycled materials or with certifications. None of the processes used in the production of our products can have any impact on animals: (live) plucking/(force)feeding, muelensing, slaughter of domesticated animals, and abuse.

We fully agreed with:

- 1.** Policy based on ILO Convention/ definition to specific source.
The five freedoms, FAWC 1993 as stated below:
Freedom from hunger or thirst by ready access to fresh water and a diet to maintain full health and vigour
Freedom from discomfort by providing an appropriate environment including shelter and a comfortable resting area
Freedom from pain, injury or disease by prevention or rapid diagnosis and treatment
Freedom to express (most) normal behaviour by providing sufficient space, proper facilities and company of the animal's own kind
Freedom from fear and distress by ensuring conditions and treatment which avoid mental suffering
- 2.** Risks
A Potential risks
At the moment, TCCG does not make use of materials derived from animals.
For the future, if we need to make use of any of the materials from animals, our policy is to only make use of materials that are certified by recognized standards like RWS (Responsible Wool Standard).

B Risks in our supply chain
- 3.** Prioritisation: yes/no both including explanation
This theme has no priority for TCCG as we don't use any animal based material.
- 4.** The process to prevent, mitigate and remediate
In case we need to use animal based materials (like wool in socks), we will only accept material with relevant certification.
- 5.** We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year

We are aware that all our plush and fleece items are polluting the waterways and oceans. We actively search for possible solutions to minimise the impact.

- 1.** Policy based on ILO Convention/ definition to specific source.
Various investigations done for many years already have found out that microplastics are polluting the world. Microplastics are microscopic parts of fibres which can't dissolve anymore. Mostly manmade fibres such as polyester and polyamide are used. At the moment there isn't any official legislation on microplastics, this is in the process of making. What research also found out is that fleece items in clothing are spreading a lot of microfibrils during washing by consumers. Currently we are using a lot of fleece for our products. We want to develop a strategy how to minimise the pollution on microplastics based upon the legislation to come.
- 2.** Risks
A Potential risks
B Risks in our supply chain
Risks on microplastics are on environmental scale and on legislation scale. In general we want to minimise our environmental impact and thus decrease the use of polyester fleece. Secondly we don't know what the legislation will be on microplastics and how quickly the market can adapt to the changes which will be caused by the legislation.
- 3.** Prioritisation: yes/no both including explanation
Due to the fact that there is no legislation yet. We can't prioritise. When the legislation will be ready we will first check the impact and then prioritise upon the impact
- 4.** The process to prevent, mitigate and remediate
Until we know what the legislation will be no official tests are made to check the quantity and likelihood of microplastics. Therefore we can't make a policy or adjustments on our current microfleece quality. What we will do is that we are going to develop similar products from other materials which don't release microplastics.
- 5.** We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year

Via our label Trashcode® we will set yearly levels to increase our use of better/recycled or circular products in order to be circular in 2035 for TCCG.

1. Policy based on ILO Convention/ definition to specific source.

Minimising the impact on the planet is one of our most sustainable targets to achieve. By doing things less bad, like recycled materials or organic cotton, we don't make a statement. By 2035 we want to sell only circular products.

2. Risks

A Potential risks

B Risks in our supply chain

As circularity is new and still in development stage it is too difficult to predict the risks at this moment. At this moment besides the recycling or upcycling of the material which is taken back from end consumers is a new. The other processes are still similar in our regular process like spinning, weaving, knitting and sewing. Therefore the same risks occur as mentioned above. Only when there is a new procedure or technique developed the total business model and supply chain will evolve into a value chain. Where every part, supplier, client, wholesaler plays its role. And increase the value of the products and/or material with every cycle.

3. Prioritisation: yes/no both including explanation

The development of circularity has got our priority as this is a long process. Even if we point out 2035 we need to act now to make this possible.

4. Our Process

First we need to determine what circularity is for us as The Cookie Company Group. There is a lot of misunderstanding in the market what it means, is one time recycling already circular or should it be always recyclable and thus circular.

Steps which we are going to take are:

1. Which products of our current portfolio are suitable for recycling/circularity right now?
2. What is the main reason why our products can't be recycled. Is this due to the quality, dyeing of the fabric, too much materials involved?
3. Can we do trials of recycled material in our current items?
4. Make a study on price impact of circularity for our current products?

5. As this is one of the priority themes, we have defined SMART Goals for 2021, 2022 and 2023

Specific	Determine circularity and our roadmap toward 2035.
Measurable	Track our progress on the materials by providing physical samples including a rough price calculation. Besides the price calculation we need to have also an impact study on the positive impact on these circular products.
Acceptable	We should be able to deliver commercial circular products latest 2035 but if there is a chance to do this earlier we will try to do it.
Realistic	The plan is to investigate above questions in order to make a realistic timeline.
Timeline	We will start to investigate points 1 2, and 3 this year with the first results provided q1 2022. Point 4 5 and 6 will be investigated in 2022. In q3 2022 we will evaluate the priority before making the roadmap towards 2035.

We strive to have all our packaging made from 100% recycled materials and that they are made in such way that they can be easily recycled again after usage.

- 1.** Policy based on ILO Convention/ definition to specific source.
Packaging is an important success factor in our company. When we deliver appealing products to our stores the goods.
The packaging itself should be made from materials that are either recycled or recyclable.
Secondly is that we need to make packing as small as possible to lower down our carbon footprint during transport from supplier to end consumer.
- 2.** Risks
A Potential risks
B Risks in our supply chain
Packaging materials can consist of hazardous chemicals which we ban via our MRSL. Then we also need to consider using recycled materials.
- 3.** Prioritisation: yes/no both including explanation
This is not our top priority and we will extend this policy in 2021
- 4.** The process to prevent, mitigate and remediate
We will inform our own design department on materials, packing ways and efficiency in order to work actively in the design stage on producing a better packaging. Secondly we have established a preferred packing supplier for our majority of the products. In this case we have leverage to him to improve the materials and we can control the quality of our packing better.
- 5.** We have not defined SMART Goals yet as this is not one of our priority themes for the upcoming year

On all of the above points we have done a risk analysis PER country and where applicable, PER region and in Q4 2021 we will do this PER product type to see how possible the topics which we discussed above are likely to happen and in which part of the supply chain. Starting from the cotton plantation until the delivery to our client.

If you have any questions, feel free to contact us at
csr@cookiecompanygroup.com

