Ethical Trading Policy

INDUSTRY STANDARDS

Oeko-tex www.oeko-tex.com

The Oeko-tex standard 100 is a globally uniform testing and certification system for textile raw materials, intermediate and end products at all stages of production.

Test for Harmful substances

The internationally binding test catalogue (can be found on their website), according to oeko-tex100, is based on scientifically proven parameters and is revised annually in line with the latest legislation and research. It includes:

Substances which are prohibited by law such as carcinogenic dye stuffs.

Substances which are regulated by law, such as formaldehyde, softeners, heavy metals or pentachlorophenol.

Substances which according to current knowledge are harmful to health, but which are not yet regulated or prohibited by law, such as pesticides, allergy inducing dyestuffs or tin-organic compounds.

Parameters such as colourfastness and a skin friendly ph-value, which are precautionary measures to safeguard consumers health.

Worldwide Responsible Apparel Production (WRAP)

WRAP is an independent, non profit organisation dedicated to the certification of lawful, humane and ethical manufacturing throughout the world.

It is not enough that it's principles are subscribed to, WRAP monitors the factory for compliance with detailed practices and procedures implied by adherence to these standards.

Laws and Workplace Regulations

Manufacturers of sewn products will comply with laws and regulations in all locations where they conduct business.

Prohibition of Forced Labour

Manufacturers of sewn products will not use involuntary or forced labour – indentured, bonded or otherwise.

Prohibition of Child labour

Manufacturers of sewn products will not hire any employee under the age of 14, or under the age interfering with compulsory schooling, or under the minimum age established by law, whichever is greater.

Prohibition of Harassment or Abuse

Manufacturers of sewn products will provide a work environment free of harassment, abuse or corporal punishment in any form.

Compensation and Benefits

Manufacturers of sewn products will pay at least the minimum total compensation required by local law, including all mandated wages, allowances and benefits.

Hours of Work

Manufacturers of sewn products will assure that hours worked each day, and days worked each week, shall not exceed the legal limitations of the countries in which apparel is produced. Manufacturers of sewn products will provide at least one day off in every seven day period, except as required to meet urgent business needs.

Prohibition of Discrimination

Manufacturers of sewn products will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

Health and Safety

Manufacturers of sewn products will provide a safe and healthy work environment. Where residential housing is provided for workers, apparel manufacturers will provide safe and healthy housing.

Freedom of Association and Collective Bargaining

Manufacturers of sewn products will recognise and respect the right of employees to exercise their lawful rights of free association and collective bargaining.

Environment

Manufacturers of sewn products will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

Customs Compliance

Manufacturers of sewn products will comply with applicable customs law and in particular will establish and maintain programs to comply with customers laws regarding illegal transhipment of apparel products.

Security

Manufacturers of sewn products will maintain facility security procedures to guard against the introduction or non-manifested cargo into outbound shipments (eg drugs, explosives, biohazards, and/or other contraband).

The Fair Labor Association (FLA)

The missions of the FLA is to combine the efforts of industry; civil society organisations, and colleges and universities to protect workers rights and improve working conditions worldwide by promoting adherence to international labor standards. The FLA holds its participants – those involved at every stage of the manufacturing and marketing process – accountable to the FLA workplace code of conduct. At it's core, the FLA is built on four pillars:

Collaborative Action

The FLA's broad makeup provides a unique power and effectiveness to improve the situation of workers in factories across the globe. In all of its programs and initiatives, the FLA leverages the strength of its diverse membership to effect positive change in working conditions. The FLA also works with governments, other labour and human rights groups, and local trade unions and NGOs in its projects.

Monitoring, Transparency and Public Reporting

Companies who join the FLA commit to public reporting on the conditions in their supplier factories, to establish internal systems for monitoring working conditions and maintaining Code standards, and to being part of a rigorous system of monitoring.

Ensuring Remediation

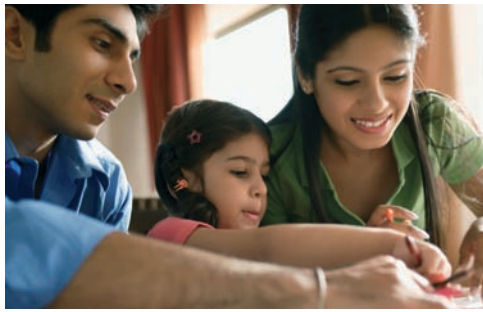
The FLA requires that companies work with the factories to ensure that violations of the code are corrected through development of a remediation plan. In addition, the FLA conducts verification audits to confirm ongoing progress in audited factories.

Third Party Complaints

Anyone – a worker, advocate, company or individual – can contact the FLA to report Code violations at a factory supplying products to a member company. Complaints are confidential and are rigorously investigated. When violations are found, the FLA publicly reports them and works with all stakeholders to find sustainable solutions.

CHILDREN NEED THEIR CHILDHOOD

Our next generation has the right to grow up as children, they need access to education and a stable home life. We will not permit the employment of child labour in the manufacture of our products.



FAIR WAGES

The reason our products are made in the Far East is because of low wage costs. However employees still have to be rewarded to a fair level enabling them to provide for themselves and their families.

THE WORLD WE LIVE IN

We constantly monitor our suppliers' to check that they are making ever – increasing efforts to reduce impacts on the environment. We all need to act now to help reduce the changes that are happening to our world.

FAIR LABOUR PRACTICE

A safe working environment with compassionate management – not too much to expect?

adidas golf

CSR is a core element in the adidas Group's company strategy. They have a strong proactive programme to improve factory conditions in the global supply chain. In 1998 they introduced a supply chain code of conduct, now called the 'workplace Standards' whose compliance and monitoring is coordinated by their Social & Environmental Affairs (SEA) team, covering all brands of the adidas Group.

adidas expect partners – contractors, subcontractors, suppliers, and others – to conduct themselves with the utmost fairness, honesty and responsibility in all aspects of their business. Specifically:

Business Partners must not use forced labour.

Business Partners must not employ children who are less than 15 years old, or less than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

Business Partners must not discriminate in recruitment and employment practices.

Wages must equal or exceed the minimum wage required by law or the prevailing industry wage.

Employees must not be required except in extraordinary circumstances to work more than 60 hours per week and must be allowed at least 24 consecutive hours rest within every seven-day period, and must receive paid annual leave.

Business Partners must make progressive improvement in environmental performance in their own operations and require the same of their partners, suppliers and subcontractors.

Ashworth and Callaway

Ashworth and Callaway will conduct their business in a manner consistent with the highest ethical standards and will seek and utilise partner companies who do the same.

Partner companies may not use child labour which is defined as anyone under the age of 14 or under the age interfering with compulsory schooling, or under the minimum age established by law, whichever is greater.

Partner companies will comply with all wage and hour laws and regulations, including minimum wage, overtime, maximum hours, piece rates and other issues involved with compensation, including providing legally mandated benefits.

Partner companies will comply with all applicable environmental legal requirements and observe environmentally conscious practices in all locations that the partner company operates.

Beechfield

Beechfield Brands is firmly committed to maintaining industry leading quality standards with innovative and dependable products.

Beechfield define and grow brands through rigorous application of quality standards and principles, to provide customers with consistently excellent service and value. These standards cover all aspects of the supply chain, from suppliers through to distribution.

As part of this process they respect and understand the local laws in the respect of wages, health and safety, child labour and human rights. Field based staff carry out full audits to ensure that the factories they use are compliant with the applicable local standards.

Suppliers undergo strict assessment, covering ethical policy, through ability to meet the product quality and service standards required by Beechfield Brands. Beechfield have established partnerships with a dedicated manufacturing base, thus ensuring consistency of quality and supply.

Every product is labelled to allow full traceability throughout the supply chain.

Canterbury

Committed to providing a healthy, safe and fair workplace for all employees and to this end it is their intention to only work with reputable suppliers, manufacturers and their agents who are likewise committed to the philosophy.

Suppliers must observe and fully apply local laws or regulations on employment protection matters such as minimum wages, equal pay, hours of work and overtime.

Suppliers must not employ children where to do so would disadvantage their education or development.

Suppliers must manage all waste that they generate in accordance with the local laws or in such a way to avoid harm to the environment or to the local population.

FOTL

FOTL strives to implement and enforce the highest environmental and ethical standards through its global operations. The company has its own detailed Code of Conduct which is integral to its business. The Code of Conduct is based on current best practice with regard to employment, health and safety and the environment.

FOTL requires that all workers receive salaries that are at or above the local minimum wage and are highly competitive. The minimum age for employees at FOTL plants is 18 years and refuses to work with any factories that employ under age workers or forced labour. All FOTL products have had Oeko-Tex 100 approval since 1998, certifying that they contain no substances that may be harmful to humans or the environment.

Gildan

Gildan firmly believe in labour practices that not only comply with the laws in effect but also correspond to industry best practices. In 2006 the Company updated its code of conduct to reflect, in a single code, compliance with Fair Labour Association (please visit fairlabor.org for further information) and Worldwide Responsible Apparel Product (WRAP) standards, as well as corporate social responsibility best practices in effect throughout the industry.

Gildan renewed, for the third consecutive year, its Oeko-Tex Standard 100 certification

In 2006, to further enhance environmental, health and safety practices, Gildan developed an environmental management system (EMS) plan that will be implemented company-wide during 2007 and 2008. In 2004 Gildan adopted sustainable environmental practices by creating a highly efficient biological wastewater treatment system (biotope) that is being used at its textiles facilities in Honduras and the Dominican Republic.

Gildan is also presently working on a new project, the salt recovery system, which consists of recycling the salt from the wastewater and reusing it in the dyeing process. This new system, tested in 2007 and scheduled for implementation in 2008, will complement the biotope system.

For the Comprehensive Corporate Social Responsibility policy report please visit www.gildan.com

Glenmuir

Glenmuir seeks partners who share their commitment to the promotion of best practices and continuous improvement, in areas such as:

1 Health and safety in the workplace

2 Minimise impact on the environment

3 Legal minimum age of employment throughout the globe

4 Legal wage levels, bonuses, overtime pay, holiday entitlement

5 The principle that decisions on hiring, salary, benefits, advancement or termination are based solely on an individual's ability to do the job

6 Management practices that recognise the dignity of the individual, the rights of free association and the right of a workplace free of harassment

7 A hygienic working environment with formalised accident recording procedures and medical facilities

Hanes

Hanes Brands Inc. (HBI) believes in doing business with those suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants who embrace and demonstrate high standards of ethical business behaviour.

Suppliers will not employ individuals in violation of the local mandatory school age, or under the legal employment age in each country where they operate.

Suppliers will not discriminate based on personal characteristics or beliefs.

Hanes is committed to protecting the quality of the environment around the world through sound environmental management. HBI will meet or exceed applicable environmental laws and regulations and seeks to reduce waste and minimise the environmental impact of their operations.

Hanes strives to continuously improve environmental performance through resource conservation, waste minimisation, water and energy efficiency and effective use of raw materials. Hanes will measure environmental performance and work to promote environmentally friendly practices.

Henbury

All manufacturing locations are inspected regularly by local representatives ensuring that working conditions are to the very highest standard and that the working hours do not exceed local government criteria with no child or enforced labour. Henbury are also working with local charities to give back to the countries who have given them so much support through the years.

Henbury do not permit factories to employ staff below the age of 16, which is above the international employment standard. Henbury do not work with factories that use any form of forced labour, including prison labour.

Supplier factories are visited and inspected regularly by a Henbury representative. The issues of working hours, forced overtime, heating and ventilation, health and safety are examined.

Kariban

It is the policy of Kariban to only purchase goods from Suppliers and Contractors whose Code of Practice on Health and Safety are as follows:

They adhere to AZO dye European Union legislation, Oeko-Tex standard 100 requirements.

They do not use or condone the use of any labour which has been forced or coerced and this includes prison labour as well as child labour.

They subscribe to the payment of proper and legal wages and benefits. The working hours should not exceed the local allowance for overtime and they should encourage one day in seven as a holiday in accordance with or subject to local practices.

Kustom Kit

Kustom Kit adopts a rigorous selection process for garment manufacturers ensuring only those that are totally committed to exceeding high ethical standards become appointed suppliers.

Children must not be employed below the legal minimum age required by the law of the individual country.

Employees are to be paid no less than the legal minimum wage as required by the law of the individual country.

Working hours must not exceed those set out by local legislation and overtime must be voluntary not compulsory.

Manufacturers are frequently inspected and reported upon by local independent agents.

Kustom Kit is also dedicated to protecting the environment and purposely seeks out suppliers who take positive action to minimise both waste and the impact of their manufacturing processes on the surrounding environment.

Lea Sportswear

Lea subscribes to the principles of WRAP and also the Ethical Trading Initiative.

Lea Sportswear actively promotes the use of suppliers who maintain proper standards within their factories.

Factories supplying products to Lea Sportswear are inspected by their agents and by their own staff to ensure compliance with the above principles. These inspections are undertaken on a regular basis to all supplier factories.

Okarma is made from 100% certified organic cotton, using eco friendly dyes and finishing processes. Organic agriculture is a healthy and sustainable production process. Cotton is grown without the use of harmful pesticides and synthetic fertilizers. Organic farming methods retain soil fertility, promote bio-diversity and reduce farmers' debt.

PF Concept

Will not accept goods on which children, younger than the age for completing compulsory education subject to local laws have worked.

Require suppliers/manufacturers to ensure that wages and benefits paid to its employees are at least consistent with the local laws or legislation governing minimum wages and benefits.

Require suppliers/ manufacturers to comply with all local environmental laws and legislation and be committed to improving and investing in environmental efforts.

Premier

Premier clothing strives to conduct business to the highest ethical & environmental standards seeking to use and utilise manufacturers that do the same.

Premier is working towards all the range carrying the Oeko-Tex standard.

Forced labour, whether in the form of prison, bonded or uncompensated labour is not used.

Every employee must be treated with respect and dignity.

Premier's suppliers all provide a safe place of work, meeting all local laws relating to health, safety and welfare in the workplace.

Progressive Safety Footwear and Clothing

All suppliers demonstrate high standards of Ethical Trading. PSF believe in protecting the legal, ethical and moral rights of their workers in European and Third world countries. They will not condone or permit any supplier to use prison/forced or child labour and will not knowingly use any suppliers who employ children under the legal employment age within that country.

Regatta

Ethical trading and respect for human rights are core company values. By developing long term partnerships with suppliers their intention is to promote internationally recognised ethical standards, to uphold local legislative standards and remain sympathetic to local cultures. Through building trading relationships, supporting local livelihoods and demanding appropriate ethical standards Regatta aims to achieve the highest ethical standards without imposing unachievable conditions.

Regatta has an ethical trading code which is communicated to all suppliers these include:

Child Labour
No children younger than the minimum age established by law or under an age interfering with compulsory schooling shall be employed.

Working Hours
The Hours worked shall not exceed the maximum legal limits each day or per week.

Remuneration
Wages must be at least the minimum required by local law, including allowances and benefits.

Good ethics are at the heart of the Regatta business. They are proud and fond of the brand they have created. Customers and other people connected with the Company have expectations of Regatta and they are clear in their obligations to endeavour to protect the values that we all share. We are part of a wider community, from those who enjoy the great outdoors at leisure to those who benefit from the livelihood the Regatta business provides. Regatta cannot control every aspect of life in the world but can use what influence they have to make a difference.

Result

Requires all authorised garments bearing its name to be manufactured under conditions which adhere to strict standards on working hours and good working conditions including factory temperature.

Result requires all suppliers to employ based on equal opportunity and non racist policies.

Does not permit the employment of workers under the minimum age established by local law or below the compulsory school going age.

Actively encourages all suppliers to pursue correct environmental practices including the recycling of waste materials and the re-circulation of waste heat generated in the dyeing process.

RTY

Livingstone International will only do business with vendors and suppliers that share the company's adherence to high legal, ethical and moral standards. All suppliers, vendors and other business partners are expected to comply with Livingstone International Operating Principles and to assure compliance in all contracting, subcontracting or other relationships.

For Example

Will only do business with vendors and suppliers who:

- provide reasonable wages and benefits that equal or exceed the prevailing local industry standard.
- comply with the prevailing local work hours and do not exceed them, except for appropriately compensated overtime.
- share the company's commitment to the community and to the environment.

They must conform to all legal requirements regarding environmental codes and guidelines.

Further, Livingstone will seek business partners who demonstrate a commitment to progressive environmental practices and to preserving the earth's resources.

Will not knowingly do business with vendors and suppliers that use involuntary, indentured or forced labour, including prison labour that is not on a voluntary basis.

All products supplied must conform to all European Union Environmental legislation.

Russell Europe

Complies with Oeko-Tex and WRAP continually working to become one of the first major clothing companies to have its factories fully accredited for the new Worldwide Responsible Apparel Production standard.

By ensuring its compliance with stringent ethical standards such as Oeko-tex and WRAP Russell is able to give customers confidence that practices like child labour, unfair work conditions and environmental pollution are not used in the production of any of their garments.

Wombat

Goods must have been produced:

Lawfully through fair and honest dealing.

Without exploiting the people who made them.

In decent working conditions.

Reducing the environmental impact during production and transportation.

Wombat does not condone the use of child labour and suppliers must not employ children, other than under the ILO convention 138 and Recommendation 146 which defines a child as a person younger than 15 years old.

Wombat does support legitimate, legally sanctioned apprentices and educated-related work as long as the child is not being exploited, there is no risk to the child's health, education and development, and you have the permission of the child's parents.