

REISS HUMAN RIGHTS POLICY

Our Approach

Reiss recognises its responsibility to respect human rights throughout its operations.

We are committed to ensuring that people are treated with dignity and respect by upholding internationally recognised human rights principles encompassed in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Our approach is to implement the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) and to recognise and manage the risk of harm associated with our business, including modern slavery, unsatisfactory working conditions, discrimination, lack of freedom of association, retained wages, working excessive hours, human trafficking and forced or bonded labour, particularly to the most vulnerable and exploited, such as women and children.

As a business we shall seek to avoid infringing the human rights of others and work to address any adverse human rights impacts we identify. Based on salient risk analysis of our operations and activities we have identified five key stakeholder groups have the greatest potential to be impacted or harmed and where Reiss' attention should be primarily focused, and these are: -

- People working for Reiss' suppliers and business partners
- People working for service providers to Reiss; -
- Employees of all Reiss group companies; -
- Communities whose environment is impacted by the sourcing and manufacture of REISS's products, such as by water pollution from Reiss' suppliers' factories;
- Reiss' Customers in relation to their safety, privacy and right not to be discriminated against.

Definitions:

Human rights abuse refers to any act or omission that violates internationally recognized human rights principles, such as the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. These principles encompass the right to life, liberty, and security of person; freedom from slavery, torture, and cruel, inhuman, or degrading treatment or punishment; freedom from discrimination; freedom of association and collective bargaining; the right to a fair wage and safe and healthy working conditions; and the right to education and health care.

Reiss recognises its responsibility to address the following types of human rights abuses that may occur in its business operations:

- **Modern slavery:** This includes forced labour, human trafficking, and the exploitation of workers through debt bondage, deception, or other forms of coercion.
- **Unsatisfactory working conditions:** This includes unsafe or unhealthy working environments, excessive hours, and discrimination based on race, gender, religion, or other factors.
- **Lack of freedom of association:** This includes the prohibition of workers from forming or joining trade unions.
- **Retained wages:** This includes the withholding of wages from workers or the denial of their right to access their own wages.

- Working excessive hours: This includes requiring workers to work more than 48 hours per week without appropriate compensation or rest periods.
- Human trafficking and forced or bonded labour: This includes the recruitment, transportation, transfer, harbouring, or receipt of people through force, fraud or coercion for the purpose of exploitation.
- Discrimination against vulnerable groups: This includes discrimination against women and children.

Our Commitment

We take seriously any allegation of human rights abuse in all its forms will not tolerate human rights against individuals within Reiss' key stakeholder groups.

Reiss is committed to respecting internationally recognised human rights, and in particular we will undertake all reasonable and practical steps in relation to the following: -

- Requiring that safe, healthy and secure working conditions are provided, which are free from discrimination, and which allow freedom of association and a fair wage for people within Reiss supply chain and within Reiss;
- Not tolerating any forms of modern slavery, human trafficking, forced labour or child labour against any individual working for Reiss' suppliers or Reiss' business partners
- Treating Reiss' customers, those working for or with Reiss, fairly and without discrimination; - Respecting the human rights of people in communities impacted by our operations.

Reiss has policies and procedures in place to identify, prevent or mitigate human rights' risks and remediate any adverse impact operations may have caused or contributed to.

Our Aims-

We recognise that preventing, detecting and reporting instances of human rights abuse connected with Reiss' business operations, including modern slavery, is the responsibility of Reiss and of all of our suppliers, business partners and employees. Our aims are:

- For Reiss' suppliers, business partners and employees, to understand and comply with this policy;
- -To ensure that all of our direct contractual arrangements, procurement principles and training supports respect for human rights by all Reiss employees, suppliers and business partners; -
- To work with our suppliers and business partners in a collaborative manner to build awareness of human rights impacts.

How we are monitoring our progress

Monitoring progress on business and human rights is an essential aspect of ensuring that companies are upholding their commitments and making a positive impact. Here are some of the ways that Reiss will monitor progress on business and human rights:

1. By establishing clear goals and metrics:

- Set specific, measurable, achievable, relevant, and time-bound (SMART) goals for human rights performance.
- Develop metrics to track progress against these goals, including the number of suppliers adhering to human rights standards, levels of supply chain visibility and percentage of employees receiving modern slavery training, number of employees and supply chain workers with access to a grievance mechanism.

2. By conducting regular due diligence:

- Implement a comprehensive due diligence process to identify, assess, and manage human rights risks throughout the product supply chain, and business operations.
- Engage with suppliers and business partners to assess their human rights practices and compliance with Reiss's policy.
- Conduct audits and site visits to verify compliance and identify potential risks.

3. By gathering and analysing data:

- Collect data from various sources, including internal records, supplier assessments, stakeholder feedback, and external reports.
- Analyse data to identify risks, trends, patterns, and potential areas for improvement.
- Use data to inform decision-making and resource allocation for human rights initiatives.

4. By engaging stakeholders:

- Establish open and transparent communication channels with stakeholders, including suppliers, employees, communities, and NGOs.
- Seek feedback from stakeholders on Reiss's human rights performance and identify areas for improvement.
- Collaborate with stakeholders to develop and implement human rights initiatives.

5. By reporting and disclosing our progress:

- Prepare regular reports on Reiss's human rights performance, including progress towards goals, metrics, and stakeholder feedback.
- Disclose human rights risks and impacts in a transparent and accessible manner.
- Engage with investors and consumers to demonstrate Reiss's commitment to human rights.

By implementing these monitoring strategies, Reiss aims to effectively track its progress on business and human rights, identify areas for improvement, and demonstrate its commitment to respecting human rights throughout its operations.

To give feedback on this policy or raise any questions or concerns, please email esg@reiss.com

Christos Angelides
CEO
December 2023

Appendix A: Prioritising Human Rights Risks

Reiss acknowledges the dynamic nature of human rights risks and is committed to upholding its responsibility to respect human rights throughout its value chain. This commitment is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs), providing a robust framework for our due diligence efforts. We also draw upon guidance from the OECD, ILO, and Ethical Trading Initiative (ETI) to inform our approach.

Our human rights due diligence process is designed to systematically identify, prevent, mitigate, and remediate potential adverse human rights impacts within our value chain. Effective risk assessment is the cornerstone of this process.

1. Supply Chain Risk Assessment Approach:

Our risk assessment process is multi-layered, integrating the UNGP's core principles of Scale, Scope, and Irremediability. We apply these principles with a granular and in-depth approach to ensure comprehensive risk identification and management.

2. Identifying Relevant Human Rights:

Our assessment is explicitly grounded in internationally recognized human rights standards, including the Universal Declaration of Human Rights, the ILO core conventions, the UNGPs, and other relevant instruments. We consider a broad range of human rights, including, but not limited to:

- Freedom of association
- Child labour
- Forced labour
- Discrimination
- Working hours
- Wages
- Health and safety
- Community rights
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Based on sector-specific risks and stakeholder input, we have identified our salient human rights issues as:

- Labour practices
- Exploitation of migrant workers
- Forced labour
- Child labour
- Freedom of association
- Health and safety

3. Granular Risk Identification (Scale & Scope):

- **Geographical Level Risk Assessment:**
 - We utilise online risk assessment tools and global datasets to gain an initial overview of our supply base.
 - We conduct detailed online research into current socio-political issues affecting current and any proposed new manufacturing regions to understand potential concerns and inform our due diligence programme.

- **Supplier and Facility Level Risk Assessment:**

We recognize the limitations of desk-based assessments and conduct more granular, context-specific risk assessments at the supplier and facility levels.

- **Supplier-Specific Questionnaires:** We require suppliers to complete detailed questionnaires addressing their human rights policies, practices, and management systems before onboarding and at regular intervals. This information is stored centrally in our supplier management database.
- **On-site Assessments and Audits:** Our locally based Next Code of Practice team conducts regular on-site assessments and detailed audits of all supplier facilities. These audits cover a comprehensive range of human rights indicators and are designed to identify specific risks at each location.
- **Worker Interviews:** The Code of Practice team conducts confidential interviews with workers to gather firsthand accounts of working conditions and potential human rights issues.
- **Stakeholder Engagement:** We actively engage with workers, communities, collaborative initiatives, NGOs, and trade unions to understand their perspectives and gather information about potential issues.

4. Analysing the Types of Risks (Scope):

- We record the number of potentially affected workers in each facility/region.
- We analyse the nature of potential human rights violations, assessing specific risks related to each relevant human right within our value chain. For example, we assess the risk of child labour by examining recruitment practices, age verification procedures, and the types of work being performed.

5. Assessing Irremediability:

- **Remediation Measures:**
 - Our supplier due diligence programme includes remediation measures.
 - We acknowledge that not all harms can be easily remedied.
- **Irremediability Assessment:**
 - We consider the long-term impacts of human rights violations and the effectiveness of potential remediation efforts.
 - We acknowledge that certain forms of discrimination or environmental damage can have lasting consequences that are difficult or impossible to fully reverse.
 - We prioritize preventing such harms in the first place.

6. Categorizing Severity:

- We categorise the severity of identified risks based on the combined assessment of scale, scope, and irremediability.
- This categorization informs our prioritisation of actions.

7. Prioritising Action:

We prioritise action based on the following criteria:

- **Salient Human Rights Issues:** We prioritise addressing our salient human rights issues, which are the most severe risks to people.
- **Most Severe Risks:** We focus on risks that have the greatest potential to cause irreversible harm to individuals.
- **Legal Obligations:** We comply with all applicable legal obligations related to human rights.
- **Stakeholder Concerns:** We respond to the concerns of stakeholders, particularly those directly affected by our operations, and those who represent people affected by our operations including Trade Unions, Workers Groups and representatives and NGO's.
- **Business Impacts:** We consider the potential impact of human rights risks on our business, including reputational, financial, and operational risks.

8. Transparency and Reporting:

- We are committed to transparency and will publish a summary of our human rights risk assessment process and key findings periodically.
- This report will include information on our salient human rights issues, the methodologies we use, and the actions we are taking to address identified risks.

9. Continuous Improvement:

- We recognize that human rights due diligence is an ongoing process.
- We regularly review and update our risk assessment methodology and practices to ensure they remain effective and aligned with evolving best practices.
- We welcome feedback from stakeholders and are committed to continuous improvement in our efforts to respect human rights.

For comments or feedback, please contact esg@reiss.com.

Appendix B

Summary of the Universal Declaration of Human Rights

The Universal Declaration of Human Rights (UDHR) outlines 30 fundamental rights and freedoms that are inherent to every person, regardless of their race, sex, nationality, religion, or any other status. These rights are divided into three main categories: civil and political rights, economic, social, and cultural rights, and collective rights.

Civil and Political Rights

- Right to life, liberty, and security of person: This right protects individuals from arbitrary deprivation of life, torture, and cruel, inhuman, or degrading treatment or punishment.
- Freedom from slavery and servitude: This right prohibits slavery, the slave trade, and forced labour.
- Freedom from torture and cruel, inhuman, or degrading treatment or punishment: This right protects individuals from torture, cruel, inhuman, or degrading treatment or punishment.
- Freedom from arbitrary arrest, detention, and exile: This right protects individuals from arbitrary arrest, detention, and exile.
- Right to a fair and public hearing by an independent and impartial tribunal: This right protects individuals from arbitrary interference with their privacy, family, home, or correspondence, and from attacks upon their honour and reputation.
- Right to be presumed innocent until proven guilty: This right protects individuals against arbitrary interference with their privacy, family, home, or correspondence, and from attacks upon their honour and reputation.
- Right to seek asylum from persecution: This right protects individuals from prosecution based on their race, religion, nationality, membership in a particular social group, or political opinion.
- Right to a nationality: This right protects individuals from arbitrary deprivation of their nationality.
- Right to freedom of movement and residence: This right protects individuals from arbitrary deprivation of their nationality.
- Right to marry and found a family: This right protects individuals from arbitrary deprivation of their nationality.
- Right to own property: This right protects individuals from arbitrary deprivation of their property.

- Right to freedom of thought, conscience, and religion: This right protects individuals from interference with their privacy, family, home, or correspondence, and from attacks upon their honour and reputation.
- Right to freedom of opinion and expression: This right protects individuals from interference with their privacy, family, home, or correspondence, and from attacks upon their honour and reputation.
- Right to freedom of assembly and association: This right protects individuals from interference with their privacy, family, home, or correspondence, and from attacks upon their honour and reputation.

Economic, Social, and Cultural Rights

- Right to work and to enjoy just and favourable conditions of work: This right includes the right to free choice of employment, just and favourable remuneration ensuring an existence worthy of human dignity, and the right to join trade unions and bargain collectively.
- Right to social security: This right includes the right to social security, which is essential for the realization of other human rights.
- Right to education: This right includes the right to education, which shall be free, at least in the elementary and fundamental stages.
- Right to enjoy the benefits of scientific progress and its applications: This right includes the right to enjoy the benefits of scientific progress and its applications.
- Right to a healthy environment: This right includes the right to a healthy environment.
- Right to participate in cultural life: This right includes the right to participate in cultural life.

Collective Rights

- Right of self-determination: This right includes the right of people to freely determine their political status and freely pursue their economic, social, and cultural development.
- Right of peoples to freely dispose of their natural wealth and resources: This right includes the right of peoples to freely dispose of their natural wealth and resources.
- Right to development: This right includes the right to development.