



Responsibly Joules Policies

In these policies, the following words and phrases shall have the following meanings:

“Joules” shall mean Harborough Hare Trading as Joules and all its direct and indirect subsidiaries.

“Product Suppliers” shall mean finished goods suppliers, raw materials suppliers, production sites, licensees and any subcontractors used by vendors in the manufacture or the process of manufacturing of Joules Products.

“Strategic Partners” shall mean i) all partners that provide services or goods to Joules, other than those identified as “Product Suppliers” above ii) Friends of Joules sellers, and iii) partners that Joules provides services or products to.

“Joules Products” shall mean all products bearing the Joules name and trademarks, including products manufactured specifically for Joules or products made under licence.

Joules’ Ethical Trading Policy

At Joules we recognise that we have a duty to act responsibly and to focus on doing the right thing for both people and planet.

Our Ethical Trading Policy demonstrates our commitments to minimise the social and ethical impact of our business and outlines our expectations for our suppliers and strategic partners, and how we can work collaboratively to deliver on these commitments.

Policy Standards

Our Ethical Trading Policy is aligned with the Ethical Trading Initiative’s (ETI) Base Code which is founded on the conventions of the International Labour Organisation’s (ILO) code of good labour practice.

The ETI Base Code consists of the following 9 principles:

- 1) Employment is freely chosen
- 2) Freedom of association and the right to collective bargaining are respected
- 3) Working conditions are safe and hygienic
- 4) Child labour shall not be used
- 5) Living wages are paid
- 6) Working hours are not excessive
- 7) No discrimination is practised
- 8) Regular employment is provided
- 9) No harsh or inhumane treatment is allowed

For more information on these principles go to www.ethicaltrade.org/eti-base-code



Policy Implementation

All Supplier factories used to make Joules Products go through strict procedures to ensure they are compliant with our Ethical Trading Policy. All factories are audited annually as a minimum against local laws and the ETI Base Code by a third-party ethical audit company using the industry recognised Sedex SMETA audit methodology.

Joules only accepts semi-announced or unannounced audits to ensure this is a true reflection of normal working conditions. Joules also reserves the right to conduct unannounced factory visits and/or contact the auditing organisation or other brands also working with the factory, to support the ethical validation process.

The ethical audit information, including any non-compliances against local law or the ETI Base Code, is used to grade the factories. If a factory is found to have critical or reoccurring major non-compliances Joules will suspend all business with the factory until these have been resolved and the factory re-audited. In the first instance, Joules will work with the factory to try to resolve any non-compliances, however if a factory is unwilling to make the necessary changes Joules reserves the right to begin the exit process following industry best practice.

Expectations of Suppliers

Our Suppliers are responsible for ensuring that all factories used to make Joules Products meet the requirements of our Ethical Trading Policy. Every factory should meet local laws and minimum labour standards.

All Suppliers should have a continuous improvement plan to show progression against the ETI Base Code.

All Suppliers must engage with Joules to resolve any audit non-compliances, failure to do so may result in termination of the business relationship.

All new Suppliers must sign up to the Joules Ethical Trading Policy and provide the requested information as per the Joules onboarding process to ensure they are compliant.

All Suppliers must not use subcontractors unless explicitly agreed to by the Joules Head of Quality and Technical. If a subcontractor is needed by a Supplier, the subcontractor must go through the Joules Supplier onboarding process like all other factories.

All Suppliers must comply with the below sourcing guidelines:

- 1) Cotton yarns, fibres and fabrics that have originated from Uzbekistan, Turkmenistan or Xinjiang Uyghur Autonomous Region (XUAR) **cannot** be used in the manufacture of Joules Products.
- 2) Joules Products **cannot** be manufactured in Xinjiang Uyghur Autonomous Region (XUAR) or Myanmar.

Joules Commitments to Suppliers

Joules will provide a clear Ethical Trading Policy that sets out the requirements and guiding principles to help our Suppliers identify potential ethical risks within their operations.

Joules will issue Suppliers with a Corrective Action Plan (CAP) following an audit to support them in making the necessary changes needed to meet the Ethical Trading Policy requirements.



Joules aims to support all Suppliers to meet the Ethical Trading Policy requirements and will work collaboratively with them to address any issues that may arise.

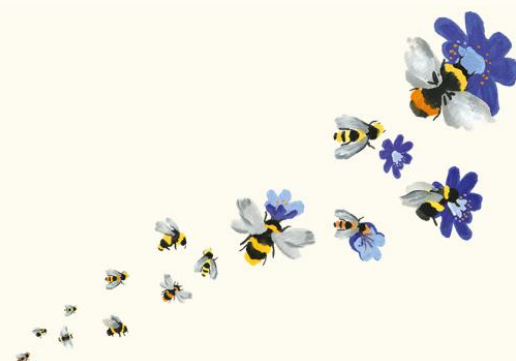
Joules has a formal Supplier onboarding process in place to ensure that Joules sets our suppliers up for success and they are given the support needed from the start of the relationship to meet our Ethical Trading Policy requirements.

Joules has a formal Supplier exit process in place based on industry best practice using ETI and Fair Wear Foundation guidance to ensure that Joules terminates any Supplier relationships responsibly.

Joules will provide suppliers with a formal grievance mechanism to raise any issues with us and the opportunity to provide anonymous feedback.

Expectations of Strategic Partners

Joules is committed to delivering on our Ethical Trading Policy to ensure that all workers involved in the production of Joules Products have access to a fair deal in line with the ETI Base Code. Therefore, Joules expects all strategic partners to ensure the same requirements are upheld throughout their operations and supply chains.



Joules Environmental Policy

At Joules we recognise that we have a duty to act responsibly and to focus on doing the right thing for both people and planet.

Our Environmental Policy demonstrates our commitments to minimise the environmental impact of our business and outlines our expectations for our suppliers and strategic partners, and how we can work collaboratively to deliver on these commitments.

Policy Standards

We recognise that there are environmental impacts across all of our operations, both direct and indirect. These include:

- Design – Our products & our packaging;
- Development – Our processes;
- Sourcing – Our raw materials & our packaging;
- Manufacturing of our products;
- Shipping;
- Warehousing;
- Marketing & Communications;
- Sales:
 - Our retail stores
 - Our ecommerce operations
 - Our shows operations
 - Our wholesale operations
 - Our licensed partners
 - Our Friends of Joules business;
- Customer service;
- Product disposal;
- Our Head Office operations.

We are committed to identifying, reducing and minimising these impacts wherever possible.

Joules will use relevant environmental legislation and local laws to ensure we meet minimum standards across both direct and indirect operations and will strive to use relevant standards and best practices to measure and enhance our environmental work.

Policy Implementation

Joules commits to undertake the following work in order to meet the requirements of the Environmental Policy:

- Ensure compliance with all relevant environmental legislation.
- Develop and implement objectives and targets to ensure continual improvement in our environmental performance.
- Operate our Head Office, Distribution Centre and Retail stores in a manner consistent with our environmental commitments, seeking to proactively measure, monitor and minimise energy



consumption, waste generated, waste sent to landfill, water consumed, transport and logistics emissions and other environmental impacts.

- Proactively consider the environmental impact of the raw materials we design into our products, consistently increasing the percentage of more environmentally sustainable materials wherever possible.
- Take reasonable and appropriate measures to ensure that our supply chain operates in ways which minimise our indirect environmental impact.
- Adopt a risk-based approach to providing appropriate training in environmental issues for our employees according to their role, work they undertake, and their environmental responsibilities.

Sustainable Materials

Joules recognises the responsibility we have to minimise the impact of the materials sourced for Joules Products. We are therefore working to move all raw materials used to more sustainable sources through sourcing recycled, organic, renewable, or regenerative materials.

- All **cotton** must be sourced through the Better Cotton Initiative (BCI) or certified organic/in-conversion or recycled sources. Joules prohibits the use of cotton sourced from Uzbekistan, Turkmenistan, or the Xinjiang Uyghur Autonomous Region (XUAR).
- All **polyester and polyamide** must contain a minimum of 20% certified recycled content and where possible the use of synthetic materials must be minimised.
- All **manmade cellulosic fibres** (MMCF) must be produced from wood pulp from certified sustainably managed forests and where possible must also be made using closed loop environmentally friendly production processes.
- All **leather** must be sourced from Leather Working Group (LWG) certified tanneries, meet the requirements of our Animal Welfare Policy and be fully transparent and traceable.
- All **leather** must not come from regions where land has been deforested for agriculture.
- All **wool** must be certified responsibly sourced or certified recycled and meet the requirements of our Animal Welfare Policy.
- All **feather and down** must be RDS certified and meet the requirements of our Animal Welfare Policy.
- All **rubber** must be from certified sustainably managed forests or be certified recycled.
- All **wood** and **paper-based** products and packaging must be from certified sustainably managed forests or be certified recycled.
- All **plastic** based products and packaging must be from recycled sources and recyclable or reusable.

Expectations of Suppliers

Our Suppliers are responsible for ensuring that all the factories used to make Joules Products meet the requirements of our Supplier Environmental Policy. Every factory should meet local laws as a minimum.

In order to support Joules Environmental Policy, all Suppliers must ensure they comply with the requirements outlined in the Joules Supplier Environmental Policy, which can be found in the Supplier Legal Requirements manual. This covers, environmental management systems, safe manufacturing and product information, transparency and traceability, materials and transport.



Suppliers must be able to provide Joules with such evidence as is reasonably necessary to confirm they meet the requirements of the Joules Environmental Policy. This may include factory visits and audits by any Joules employee or Joules authorised 3rd Party company.

Suppliers must support Joules in meeting our sustainable materials commitments by only sourcing raw materials that meet the requirements outlined in the Supplier Environmental Policy and providing all relevant proof of certification for any environmental claims made.

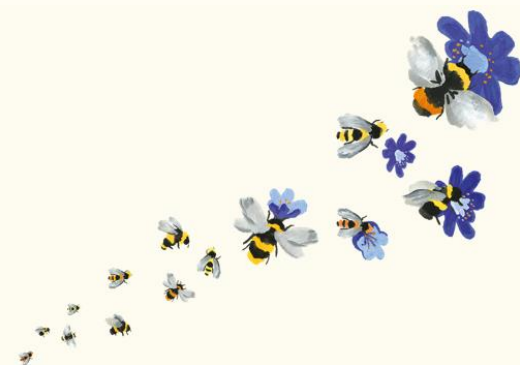
Joules Commitments to Suppliers

Joules will provide a clear Supplier Environmental Policy that sets out the requirements and guiding principles that will help our Suppliers to identify potential environmental risks within their operations.

Joules aims to support all Suppliers to meet the Supplier Environmental Policy requirements and will work collaboratively with them to address any issues that may arise.

Expectations of Strategic Partners

Joules is committed to minimising the environmental impacts of all our activities and products wherever possible. Therefore, Joules expects all strategic partners to ensure the same requirements are upheld throughout their operations and supply chains.



Joules Animal Welfare Policy

At Joules we recognise that we have a duty to act responsibly and to focus on doing the right thing for both people and planet.

Joules is committed to ensuring that all of our products are produced in a manner that safeguards the welfare of animals. In order to meet our requirements, we expect all our Suppliers to adhere to the Joules Animal Welfare Policy.

Policy Standards

- The Supplier must ensure that no materials derived from animals are used that are from vulnerable, endangered species identified on either the International Union for the Convention of Nature (IUCN) Red List or species listed in the Convention of International Trade in Endangered Species (CITES).
- The Supplier must not slaughter animals solely for the production of a Joules product. Leather for use in Joules products is only acceptable if it is a biproduct of the meat industry.
- The Supplier is required to ensure the best animal welfare conditions for all animals at all stages of the supply chain.
- The Supplier must ensure that animals are raised, transported and slaughtered under recognised higher animal welfare standards. These standards should be based on the IOE's Animal Health Codes or the Farm Animal Welfare Committee's Five Freedoms that state animals should be:
 - free from hunger and thirst;
 - free from discomfort;
 - free from pain, injury and disease;
 - free to express normal behaviour; and
 - free from fear and distress.
- The Supplier must be able to provide Joules with such evidence as is reasonably necessary to confirm that the source of the animal product meets the requirements of this Animal Welfare Policy, this may include factory visits and audits by any Joules employee or Joules authorised 3rd Party company.

Animal Products

Joules **does not allow** the following to be used in any Joules Products because they do not adhere to our animal welfare policy requirements:

FUR

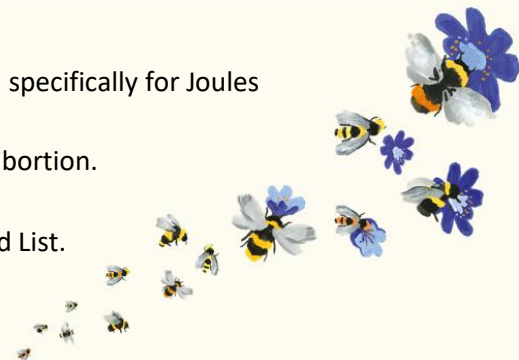
- Any type of fur or pelt.

WOOL

- Any wool from sheep which have been mulesed.
- Angora.

LEATHER, SKIN & BONE

- The skin or leather from any animal which has been slaughtered specifically for Joules Products.
- The skin or leather from any animal which was a product of an abortion.
- Leather obtained by live skinning or live boiling.
- Horn, bone and shell as it appears on the CITES list and IUCN Red List.



- Leather from calves which have been kept in veal crates or pigs that have been kept in sow crates.

ANIMAL TESTING

- Any animal testing for all Joules Products and/or the component parts/raw materials contained therein.
- Any cosmetics and household products that are not Leaping Bunny certified cruelty free by Cruelty Free International.

Joules **does allow** the following animal materials to be used in Joules Products subject to the following restrictions:

WOOL

- Sheep and lambs' wool that comes from animals that were raised, transported and slaughtered under recognised higher animal welfare standards.
- Alpaca wool that is certified by the Responsible Alpaca Standard.
- Mohair wool that is certified by the Responsible Mohair Standard.

FEATHERS AND DOWN

- Feather and down that is certified by the Responsible Down Standard.
- Recycled feather and down that is certified by the Global Recycled Standard.

LEATHER, SKIN AND BONE

- Skin from sheep, pigs, shearling, camel and cow leather that were raised, transported and slaughtered under recognised higher animal welfare standards.

HAIR

- All animal hair and other fibres (such as camel hair) must have been removed using best practice shearing, combing or harvesting techniques.

Joules' Commitments to Suppliers

Joules will provide a clear Animal Welfare Policy that sets out the requirements and guiding principles that will help our Suppliers to identify potential animal welfare risks within their operations and supply chains.

Joules aims to support all Suppliers to meet the Animal Welfare Policy requirements and will work collaboratively with them to address any issues that may arise.

Expectations of Strategic Partners

Joules is committed to safeguarding animal welfare across all our activities and products. Therefore, Joules expects all strategic partners to ensure the same requirements are upheld throughout their operations and supply chains.



Joules Restricted Substances Policy

Joules has an expectation that all products supplied to us will be safe for consumer use and will be compliant with the laws and countries where those products are to be sold.

In order to meet Joules restricted substances policy requirements all Suppliers must ensure Joules Products meet the below standards:

- UK REACH
- REACH
- US Consumer Product Safety legislation and CPSC requirements
- California Prop. 65
- Any other chemical requirements in specific countries as and when Joules outline these to suppliers

It is expected that Suppliers will keep material safety data sheets (MSDS) and ensure that every MSDS is checked to ensure it complies with all the requirements set out above. This policy goes hand in hand with the Joules Supplier Environmental Policy and suppliers who comply with the environmental policy will automatically comply with this chemicals policy.

Supplier Manual 3(d) deals with the due diligence testing that Joules can choose to perform on Joules Products at any time, it is expected that all Joules Products will always pass testing. If they do not, Joules reserves the right to instigate a return to manufacturer and a recall from wholesale and retail customers. All of the costs of this recall action would be charged back to the supplier in question along with a potential claim for damage to Joules' goodwill and reputation.

Expectations of Strategic Partners

Joules is committed to ensuring that Joules Products are safe for consumer use and compliance with laws and regulations. Joules expects all strategic partners to ensure the same requirements are upheld for their products, operations and supply chains.

