



ETI Corporate Transparency Framework

1.1 - A statement articulating company's commitment to respect labour rights in its supply chain activities, in line with the ETI Base Code

At Beeswift Limited, we are acutely aware of our role in society and the accompanying responsibilities it entails. We have consistently held the belief that forging trustworthy collaborations with our suppliers, prioritizing the well-being of our employees, and adopting a long-term perspective to safeguard the environment for future generations are not just acts of good citizenship, but also fundamental principles of sound business practice. Moreover, doing what is right morally and ethically is an integral aspect of our corporate behaviour.

This entails treating everyone equally and respectfully, maintaining a zero-tolerance stance against discrimination and inappropriate conduct, ensuring that our actions today preserve the planet for tomorrow, and treating our supplier partners fairly, recognizing them as vital contributors to our mutual success. These convictions have profoundly influenced our longstanding approach to procurement and supplier relationships. These enduring partnerships are constructed upon trust and shared objectives, and we exercise great discretion in selecting partners who genuinely share our values. This helps to guarantee that individuals within our supply chains are treated with dignity and fairness, with their human rights upheld and promoted, and that we jointly fulfil our mission to become a net-zero enterprise.

Beeswift's Global Sourcing Principles articulate the minimal requirements and anticipations concerning how we and our supplier partners conduct business to safeguard human rights, as well as labour, environmental, ethical, and legal obligations in their own operations and supply chains. Our supplier alliances are constructed on open and transparent discussions, underpinned by a shared ethos of ongoing enhancement that extends beyond mere legal compliance. As our business relationships evolve, we continually collaborate with our supplier partners to elevate standards and enhance working conditions.

Our dedication to our customers and stakeholders is crystal clear: we will consistently treat individuals within our organization and supply chain with fairness. We persistently evaluate and enhance our practices to ensure that we have the most efficient measures in place to prevent and address any adverse impacts on human rights. Acting with integrity and fulfilling our commitments is what 'doing the right thing' means to us. Transparency in reporting on our sourcing practices and operations is central to our sourcing strategy. Our commitment to transparency entails the publication of certain data and information about the supplier partners we collaborate with, allowing customers and stakeholders to monitor our progress.

Our values and concern for people and the planet extend throughout the entire supply chain involved in the production or disposal of the products and services we procure. A shared commitment to adhere to and communicate these standards throughout the supply chain is central

to our relationship with our supplier partners, placing a responsibility on them in their interactions with their own suppliers.

These Principles reflect Beeswift's beliefs and values, which are in alignment with our dedication to the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Women's Empowerment Principles, the right to a Clean, Healthy, and Sustainable Environment, the Children's Rights and Business Principles, and the UN Global Compact, as well as numerous globally recognized collaborative codes, including the Ethical Trading Initiative (ETI) Base Code and the Global Social Compliance Programme Reference Code.

This document serves as a means to establish a shared understanding of the Principles, but what truly matters is how they are applied in our day-to-day working relationships. It is only through dialogue and a spirit of partnership that we can collectively drive tangible change for both people and the planet. These Principles undergo regular review, conducted in collaboration with our supplier partners and external organizations, to ensure their relevance and currency. We understand that for us to thrive, we must continually seek ways to enhance our business practices, with fairness, ethics, and environmental impact at the forefront of our decision-making.

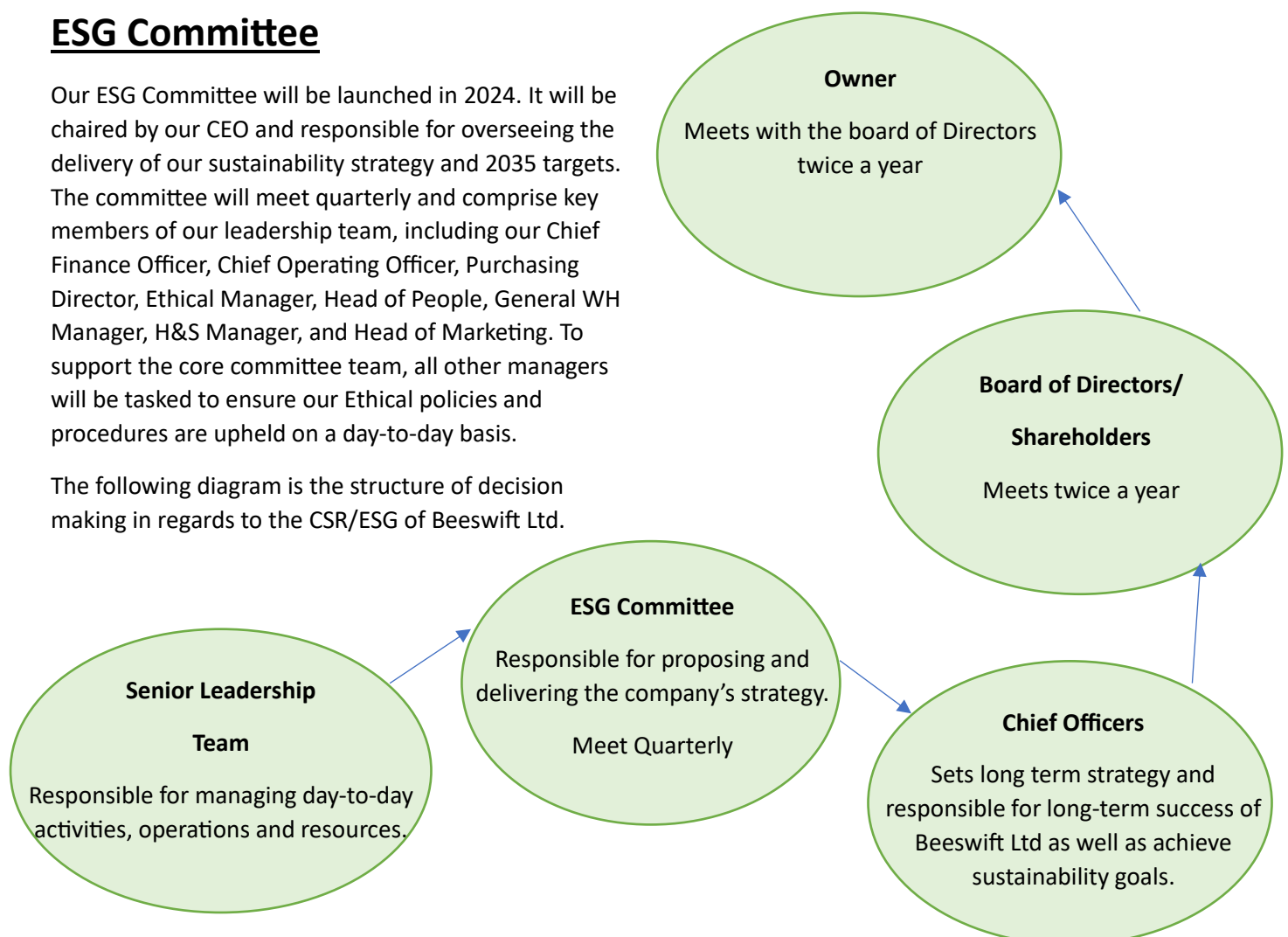
1.2 – Governance and accountability Structure

A robust governance structure and internal controls framework is embedded throughout Beeswift Ltd and is central to our responsible approach.

ESG Committee

Our ESG Committee will be launched in 2024. It will be chaired by our CEO and responsible for overseeing the delivery of our sustainability strategy and 2035 targets. The committee will meet quarterly and comprise key members of our leadership team, including our Chief Finance Officer, Chief Operating Officer, Purchasing Director, Ethical Manager, Head of People, General WH Manager, H&S Manager, and Head of Marketing. To support the core committee team, all other managers will be tasked to ensure our Ethical policies and procedures are upheld on a day-to-day basis.

The following diagram is the structure of decision making in regards to the CSR/ESG of Beeswift Ltd.



1.3 – Describe how we have identified and prioritized human rights risks in your operations or supply chains.

Our risk assessment framework for our Own Brand products delves into five critical domains that may present a higher risk of human rights violations:

- **Country of Origin Evaluation:** This involves a comprehensive analysis of the environment within the supply chain's country of origin.
- **Nature of Employment:** We assess whether a job requires skilled, semi-skilled, or unskilled labour.
- **Type of Labor:** We categorize roles as permanent, seasonal, or procured through agencies.
- **Recognized Industry, Cultural, or Community Challenges:** We identify any endemic issues, such as gender discrimination, prevalent within the industry or culture.
- **Supply Chain Capability Assessment:** We scrutinize the knowledge and capacity of our suppliers to address supply chain risks.

These risk categories are systematically mapped throughout our key supply chains, enabling us to pinpoint the most pertinent supply chain risks wherever they may arise. To bolster this process, we utilize the Sedex platform to gain insights into risk areas in advance, providing us with a deeper understanding of potential risks to our supply chains. Furthermore, we regularly review our risk assessment in collaboration with stakeholders.

Our initiative to elevate standards for workers in our supply chains employs a combination of approaches. This includes on-site visits by our in-house responsible sourcing team, independent ethical audits carried out by trusted partners, and independent certifications to ensure the quality of working conditions in high-risk locations. Crucially, each of these methods involves direct engagement with workers, inspections of related facilities like housing, and a review of pertinent documents.

Ethical auditing primarily concentrates on the 'first tier' of the supply chain, such as the sites responsible for producing the final product (e.g., clothing factories). Sites located in high-risk countries must undergo an initial audit before commencing supply, followed by annual audits. Additionally, suppliers in high-risk regions must sign up to the Sedex platform, making all audits fully transparent. These ethical audits adhere to the SEDEX Members Ethical Trade Audit (SMETA) guidelines.

SMETA, a SEDEX initiative, streamlines the auditing process by establishing a robust methodology and a standardized format for audit reports and their corresponding corrective action plans. Utilizing the SEDEX platform allows us to aggregate information about our suppliers and supply chain sites in a single location, aiding in our strategic analysis. For instance, we analyse data concerning women in primary sites to inform our gender-related strategies.

All audits are conducted by specialists who must first undergo an internal review of their experience and competence before conducting any audits or interviews with workers, ensuring the use of their native language where applicable. The composition, size, and duration of the audit team are tailored to the specific supplier or site and mirror the gender profile of the workforce and the languages spoken.

While informing suppliers of the audit date in advance helps ensure the availability of all necessary records for inspection and fosters ownership of ethical issues, it can also open the door to potential manipulation. To mitigate this risk, we typically conduct 'semi-announced' audits, this allows suppliers to prepare the necessary records but minimizes the potential for manipulation. Additionally, we retain the flexibility to perform entirely unannounced visits if specific concerns arise, including to validate audit findings.

Upon the conclusion of all audits, a closing meeting is held to discuss any non-compliances, and a Corrective Action Plan Report (CAPR) is established in collaboration with the supplier and the auditor. If critical non-compliances are identified, the audit company reports them directly to us. They also notify us of any issues that the supplier refuses to acknowledge or that cannot be verified. Any attempt to interfere with the course of the audit is treated as a critical non-compliance and reported to our company.

Following the audit, suppliers are mandated to address all corrective actions specified in the audit report, rectifying non-compliances in line with the ETI Base Code and local laws. The supplier must complete all corrective actions within agreed timeframes and obtain independent auditor verification of closure. This entire process, from planning through supplier completion to final auditor verification, is tracked through SEDEX, providing our Commercial teams with oversight, and enabling them to take action when necessary.

While we maintain a 'zero tolerance' stance on critical breaches of the ETI Base Code, it is important to emphasize that we do not sever ties with suppliers facing such issues. Our primary objective is to rectify the problems and establish practices to prevent their recurrence. We continue to work with suppliers who demonstrate commitment and capability to avoid repetition, as we believe this approach fosters improvement. Simply discontinuing relationships, in addition to negatively impacting workers when orders are cancelled, discourages transparency with suppliers regarding the challenges they confront.

In cases where significant human rights concerns emerge at new sites, we reevaluate the appropriateness of sourcing in collaboration with our commercial colleagues. If relevant, we provide support to suppliers to address non-conformances before commencing supply.

In order to prioritise risks Beeswift follow the following levels of risk based off the ETI base code:

1. No forced labour & child labour shall not be used (Top Priority).
Slave labour and child labour are top priorities as Beeswift feels that these are the worst breaches of the base code.
2. Safe and hygienic working conditions & No harsh or inhumane treatment.
After slavery and child labour, Beeswift feels the next most important areas to work on are ensuring that the workers are safe in their working environments without the use of harsh or inhumane treatment.
3. No discrimination is practiced.
Once the working environment and treatment of workers is correct, we then make sure that no discrimination is practiced, and we work to educate our suppliers on what discrimination is.

4. Working hours are not excessive.

We try to ensure that the working hours worked are compliant with local law and that they aren't excessive. This can be tricky when dealing with suppliers from China and India due to the workers not having access to the same amenities we have in the west and therefore rather than do nothing they feel their time is better spent earning more money to support their families.

5. Living wages are paid.

It is important that the workers then earn a wage that is compliant with local laws. This can be difficult in China and India where the suppliers may use migrant workers and will pay the migrant workers per item produced rather than pay a salary however Beeswift have not encountered that issue with our suppliers, but we are aware it does happen.

6. Freedom of association and the right to collective bargaining are respected.

We then help suppliers understand the need to either allow a worker committee that is democratically elected or access to union representation to allow the workers to provide a voice to the company without fear of penalization.

7. Regular employment is provided.

Lastly, we make sure that the work is continually available and that situations such as zero hour contracts don't exist or even happen. This is why where there may be a breach in the ETI base code, we work with the suppliers to fix it because if we stopped using the supplier then the drop in money to the company will most likely mean people will lose their jobs which will negatively affect the local area.

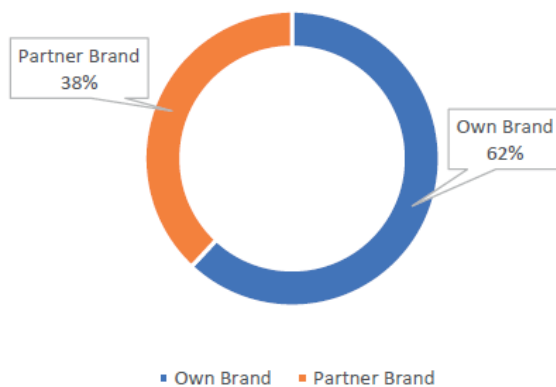
1.4 – Geographical spread of supply chain including region, country, Product type, and percentage of spending.

Supp No	% of Spend (21-22)	Supplier types	Province/Region	Country ISO	Product Type
BR280	10.00%	Own Brand	JIANGSU	CN	Safety Clothing
BL084	7.91%	Own Brand	FUJIAN	CN	Safety Clothing
BN001	6.91%	Own Brand	PUNJAB	PK	Workwear
BL003	6.07%	Own Brand	PUNJAB	PK	Workwear, Safety Clothing
BK062	5.77%	Own Brand	HUBEI	CN	Footwear
BZ002	4.89%	Own Brand	JIANGSU	CN	Safety Clothing
BK004	4.68%	Own Brand	SHANDONG	CN	Gloves
BQ015	4.11%	Own Brand	SHANGHAI	CN	Gloves, Socks
BJ043	3.81%	Own Brand	FUJIAN	CN	Footwear
BZ008	3.43%	Own Brand	ZHEJIANG	CN	Footwear
BH006	2.92%	Own Brand	ESSEX	GB	Gloves
BZ009	2.83%	Own Brand	ZHEJIANG	CN	Safety Clothing
BO039	2.44%	Own Brand	ZHEJIANG	CN	Workwear, Safety Clothing
BK003	2.31%	Own Brand	FUJIAN	CN	Safety Clothing
BK053	2.27%	Own Brand	MONGKOK	HK	Safety Clothing
BW142	2.05%	Own Brand	FUJIAN	CN	Safety Clothing
BN002	2.00%	Own Brand	JIANGSU	CN	Gloves
BL047	1.90%	Own Brand	TAIPEI HSIEN	TW	Eyewear, Bump caps
BA544	1.86%	Own Brand	TAINAN	TW	Eyewear, Hearing Protection
BS140	1.63%	Own Brand	TAINAN	TW	Eyewear
BL084A	1.36%	Own Brand	FUJIAN	CN	Safety Clothing
BI161	1.27%	Own Brand	HATYAI SONGKHLA	TH	Gloves
BR273	1.27%	Own Brand	SHANGHAI	CN	Medical
BS204	1.21%	Own Brand	SHANGHAI	CN	Workwear
BH007	1.13%	Own Brand	HEBEI	CN	Respiratory Protection
BJ005	1.11%	Own Brand	SELANGOR	MY	Helmets
BF143	1.07%	Own Brand	FUJIAN	CN	Workwear
BS130	1.04%	Own Brand	KOWLOON	HK	Footwear
BG086	1.01%	Own Brand	GUANGDONG	CN	Gloves
BH002	1.00%	Own Brand	JIANGSU	CN	Freezerwear
BL059	0.87%	Own Brand	FUJIAN	CN	Workwear, Safety Clothing
BB017	0.87%	Own Brand	ZHEJIANG	CN	Winter Workwear
BG164	0.74%	Own Brand	HUBEI	CN	Medical

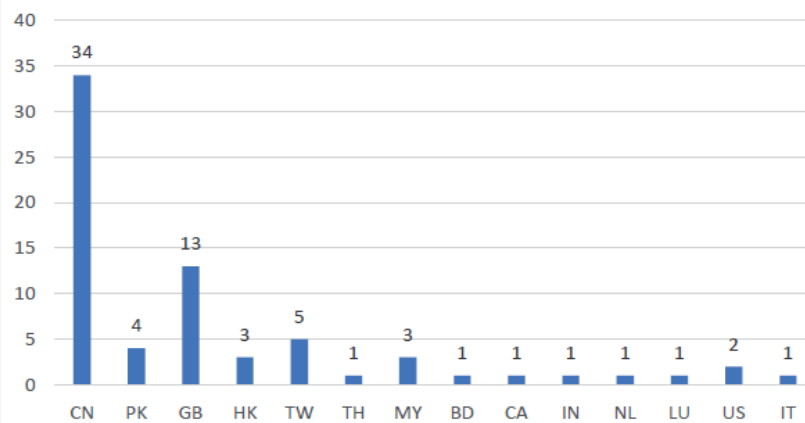
BW138	0.69%	Own Brand	JIANGSU	CN	Gloves
BF177	0.67%	Own Brand	SHANDONG	CN	Gloves
BT105	0.62%	Own Brand	SELANGOR	MY	Gloves
BP088	0.57%	Own Brand	KARACHI	PK	Gloves
BI002	0.49%	Own Brand	CHITTAGONG	BD	Gloves
BJ047	0.48%	Own Brand	JIANGSU	CN	Medical
BJ153	0.41%	Own Brand	HUBEI	CN	Medical
BK056	0.39%	Own Brand	KWUN TONG	HK	Workwear
BR062	0.34%	Own Brand	PERAK	MY	Gloves
bw160	0.30%	Own Brand	JIANGSU	CN	Gloves
BG081	0.29%	Own Brand	GUANGDONG	CN	Knee Pads
BF166	0.21%	Own Brand	GUANGDONG	CN	Medical
BR072	0.18%	Own Brand	FUJIAN	CN	Workwear
BR279	0.17%	Own Brand	ONTARIO	CA	Medical
BC191	0.12%	Own Brand	TAOYUAN COUNTY	TW	Helmets
BF159	0.10%	Own Brand	GUANGDONG	CN	Medical
BV020	0.07%	Own Brand	MUMBAI	IN	Respiratory Protection
BN001A	0.05%	Own Brand	PUNJAB	PK	Gloves
BS778	0.05%	Own Brand	GUANGDONG	CN	Medical
BJ040	0.04%	Own Brand	CHANG HUA COUNTY	TW	Footwear Accessories
BK057	0.02%	Own Brand	SHENZHEN	CN	Medical

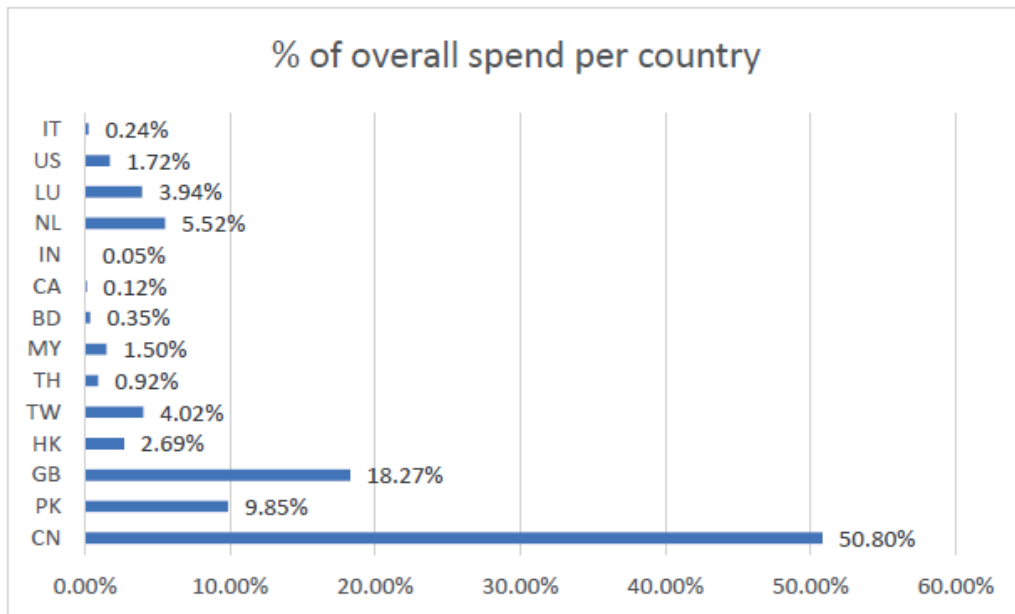
Name	%of Spend (21-22)	Supplier types	Province/Region	Country/ISO	Product Type
3M (UK) PLC	23.31%	Partner Brand	BERKSHIRE	GB	Respiratory protection, Hearing protection
DUNLOP PROTECTIVE FOOTWEAR B.V	20.02%	Partner Brand	RAALTE	NL	Wellies
DUPONT DENEMOUR (LUXEMBOURG)	14.29%	Partner Brand	CONTERN	LU	Chemical Coveralls
ANSELL (UK) LTD	7.39%	Partner Brand	CITY OF LONDON	GB	Gloves
BOLLE BRANDS (UK) LTD	6.09%	Partner Brand	SURREY	GB	Eyewear
HONEYWELL SAFETY PRODUCTS (UK) LIMITED	5.75%	Partner Brand	HAMPSHIRE	GB	Eyewear, Respiratory protection, Gloves
CENTURION SAFETY PRODUCTS LTD	4.88%	Partner Brand	NORFOLK	GB	Helmets
ERGODYNE	3.92%	Partner Brand	MINNESOTA	US	Gloves
UVEX (UK) LIMITED	3.00%	Partner Brand	SURREY	GB	Eyewear, Respiratory protection
MOLDEX METRIC AG & CO KG	2.50%	Partner Brand	NOTTINGHAMSHIRE	GB	Respiratory protection
PAPOICHANDY CUTTER INC	2.32%	Partner Brand	CALIFORNIA	US	Box Cutters & Knives
MSA BRITAIN LIMITED	1.99%	Partner Brand	WILTSHIRE	GB	Helmets
GOJO INDUSTRIES EUROPE LIMITED	1.43%	Partner Brand	BUCKINGHAMSHIRE	GB	Hand Wash
VITAL ID	1.22%	Partner Brand	HAMPSHIRE	GB	Safety Accessories
KASK SPA	0.87%	Partner Brand	CHIDUNO	IT	Helmets
MIDLAND PAPER PRODUCTS LIMITED	0.84%	Partner Brand	WORCESTERSHIRE	GB	Paper rolls
MAPA UK	0.18%	Partner Brand	WORCESTERSHIRE	GB	Gloves

% spend between Own Brand and Partner Brands



Number of suppliers per country





Supplier countries of highest risk (highest to lowest)

1. China
2. Hong Kong
3. India
4. Bangladesh
5. Pakistan
6. Malaysia
7. Thailand
8. Great Britain
9. Taiwan
10. Italy
11. Netherlands
12. United States
13. Canada
14. Luxembourg

Based off the list to the left we concentrate on the countries of highest risk to us as a priority and spend more time working with the suppliers in these areas more to bring them up to our approval in line with the ETI base code.

1.5 - Describe the company's approach with regard to respect for trade union rights including respect for freedom of association and collective bargaining.

A substantial component of our efforts in this regard involves fostering constructive communication among trade unions, suppliers, industry associations, certification, and auditing firms. Our work is progressively focusing on engaging key suppliers in recognizing the significance of worker representation, drawing from the resources provided by the ETI on Freedom of Association, Collective Bargaining, and worker representation.

In locations where trade unions are present, we collaborate with suppliers to ensure that trade union representatives are accorded the respect they deserve, and no discriminatory practices occur.

In instances where trade unions are absent, we aim to ensure that all our suppliers establish independent worker committees that are democratically elected. We firmly believe that when workers can independently organize and select their representatives without interference from management, labour conditions generally tend to be significantly better than in places where worker

representation is lacking. Furthermore, our experience has shown that management is often more respectful of organized workers in such cases.

1.6 - Report on salient risks found and plans made to mitigate risk.

After we've identified our primary concerns, our next step is to actively collaborate with our suppliers, the broader industry, civil society, and, where relevant, policymakers to mitigate human rights risks. In other words, we focus on the measures we can implement to prevent, diminish, or effectively manage these risks. These measures may encompass ethical audits, cooperative initiatives, or worker training programs designed to enhance their understanding of human rights.

Our strategy is founded on three fundamental principles:

1. Enhancing standards for individuals employed in both our internal operations and our supply chains through ongoing improvement initiatives in partnership with suppliers.
2. Spearheading transformative industry-wide initiatives aimed at addressing prevailing labour and community issues.
3. Advocating for broader systemic changes.

The human rights requirements we impose on our suppliers are reviewed and updated annually, and this process involves input from both internal and external stakeholders. These updates are informed by the latest global information available at that time, and we make sure to communicate these requirements directly to our suppliers.

The salient risks to our supply chain are mainly from countries like China and India where the culture differences are difficult to overcome. Though due to the long relationships we have had with these suppliers and the time we have spent working with them has aided our ability to instil change in the companies.

In one year we found that through our auditing we had managed to encourage one supplier to help promote to the workers the importance of paying for the social insurances from their hometown, and the supplier was able to provide a certificate from the local Chinese government to support this. This is a big step forward but it can take time to help encourage these types of changes with our suppliers.

Another salient risk we have found was at a Chinese supplier in Fujian province supplying workwear clothing. Workers at the facility are working more than the statutory 44 hours a week and are working more than 36 hours a month overtime. Although they are not meeting the requirements of China Labour law, we made the decision that safeguards are in place at the facility to protect workers. We accept that working patterns and behaviours are not easily changed and that we will continue to work with the supplier and promote change for the betterment of the workers.

Signed,

D R Washbourne

Print Name: **D R WASHBOURNE**

Position: Chief Executive Officer **ON BEHALF OF GERBER GOLDSCHMIDT GROUP (UK) LIMITED,
BEESWIFT LIMITED AND BEESWIFT BV**

D J Griffin

Print Name: **D J GRIFFIN**

Position: Chief Financial Officer **ON BEHALF OF GERBER GOLDSCHMIDT GROUP (UK) LIMITED, BEESWIFT
LIMITED AND BEESWIFT BV**

B Baldwin

Print Name: **B BALDWIN**

Position: Chief Operational Officer **ON BEHALF OF GERBER GOLDSCHMIDT GROUP (UK) LIMITED,
BEESWIFT LIMITED AND BEESWIFT BV**

SIGNED: 31/01/2024