

TFG Brands Homeworkers Policy

1. Introduction

This policy communicates our position towards homeworking in our supply chains and provides our supply chain partners with guidance in delivering our expectations.

Homeworkers exist in our supply chains and we are supportive of this. The majority of homeworkers are women who are balancing paid work with domestic and family responsibilities; few have practical alternatives, and homeworking provides a valuable income stream for them and their families.

Homeworkers often lack visibility in supply chains and are generally employed informally, leaving them in a vulnerable position. The income of many homeworkers often does not reach legal minimum wage and they have no security of employment.

We are committed to sustaining homeworkers' employment and making their work as regular as possible, while contributing through our purchasing practices to improved rights, income, and working conditions.

For any queries, feedback, disclosures, or whistleblowing please contact sustainability@tfg-brands.co.uk.

2. How is homework defined?

Our definition of homework is based upon the [International Labour Organisation \(ILO\) Convention \(1996, C177, Article 1\)](#) which promotes the equality of treatment between homeworkers and other wage earners.

The term homework means work carried out by a person, to be referred to as a homeworker:

- a. In his or her home or in other premises of his or her choice, other than the workplace of the employer;
- b. For remuneration;
- c. Which results in a product or service as specifies by the employer, irrespective of who provides the equipment, materials or other input used, unless this person has the degree of autonomy and of economic independence necessary to be considered an independent worker* under international laws, regulations, or court decisions.

*In practice, homeworkers working in global supply chains are producing goods to company specifications. They do not have 'the degree of autonomy and of economic independence necessary to be considered an independent worker', and so they are clearly homeworkers covered by the ILO definition.

3. Our Commitment and Responsibility

TFG Brands is committed to:

- a. Communicating our position on homeworking throughout our company and to all relevant business partners.

- b. Ensuring that the presence of homeworkers in our supply chains will not lead to the relocation of work or cancellation of orders.
- c. Working with our suppliers for the sustainable improvement of labour conditions for homeworkers in our supply chains, establishing clear timeframes for action, and involving homeworkers and/or their representatives in this process.
- d. Engaging, where appropriate, with other brands and relevant non-governmental organisations in the sustainable improvement of labour conditions for homeworkers in our supply chain.

4. Supplier and Partner Responsibilities

We expect our suppliers and partners to:

- a. Adopt a shared policy of acceptance of homeworking and commitment to improving homeworkers' labour conditions where these do not meet those set out in the ILO Convention on Homeworking (1996, C177, Article 4) and our Code of Conduct.
- b. Communicate this policy to all those in the supply chain below them, including intermediaries and homeworkers themselves.
- c. Work with us to identify where homeworking occurs in their supply chains and disclose this information to us.
- d. Where homeworking is present, work with us to develop an action plan for improving labour conditions for homeworkers if they are found to be below those set out in international labour standards and our Code of Conduct, and to involve homeworkers and/or their representatives in this process.

5. Working Together

We are committed to working with suppliers to identify homeworking and improve working conditions for homeworkers. This may involve different measures, depending on the context.

These measures include:

- a. Mapping homeworkers against current records including name, proof of age and address etc.
- b. Developing systems to guarantee payments to homeworkers, such as passbooks and payslips.
- c. Providing training and information to homeworkers about their rights and entitlements under this policy and an accessible grievance mechanism.
- d. Enabling enrolment in statutory social systems or equivalent private provisions.
- e. Developing a work quota system to provide more regular work and deter subcontracting.
- f. Providing training and information to any intermediaries such as agents on their responsibilities and entitlements as distributors of homework.
- g. Providing access to key health and safety equipment, such as potable water, and lighting applicable to work detail.
- h. Providing direct employment for homeworkers.

6. The use of intermediaries

The use of intermediaries is common practice in homework supply chains.

It is the responsibility of suppliers and partners to:

- a. Establish transparency of supply chain between the supplier and the homeworker, understand all tiers of intermediaries and disclose this information to TFG Brands.
- b. Establish a pre-qualification system for intermediaries that are involved in the contracting of work to homeworkers. Intermediaries should be compliant with national law.
- c. Establish internal protocols for the outsourcing of work to homeworkers (e.g. verification that intermediaries handling the work have been prequalified, tracking of pieces and payments made).
- d. Establish contractual relationships with intermediaries stipulating expectations including:
 - Keeping a record of all homeworkers. N.B All working members of a family should be recorded as homeworkers.
 - Keeping a record of all quantity of work distributed and payment made.
 - Keeping a record of any social security or health insurance benefits being provided to homeworkers.
- e. Provide training to intermediaries on their legal obligations and TFG Brands' standards (as related in this policy and our Code of Conduct).

N.B For the purpose of this policy, 'Intermediary' is defined as any person (s) or organisation not directly employed by the supplier who is involved in the sourcing of homeworkers, distribution or collection of home work or other roles contributing to the completion of work by homeworkers in the TFG Brands supply chain.

7. Questionnaire for home-based work

Factory details

(Site which commissions home-based work for TFG London Brands production):

Name factory:

Contact person (at management level):

E-mail address:

Address:

Postal code:

City:

Province:

Country:

Phone:

1. Which parts or specific tasks of the whole production cycle are done at home worker units?

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2. What share (%) of total production for Hobbs/ Phase Eight/ Whistles takes place at home worker units?

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3. Are the home workers individuals, families or do they work in collective groups?

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RELATION BETWEEN SUPPLIER / CONTRACTOR / SUBCONTRACTORS (IF APPLICABLE) AND HOMEWORKERS:

4. Are home workers registered workers to the supplier / contractor / subcontractor (if applicable)? If not, on what basis agreements are made and controlled?

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5. Is the relation regulated in a contract? If yes, in what terms?

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6. What are the terms of payment (e.g. per piece, period of payments)? If applicable describe the terms of loans or pre-funding. In case the production takes place at a factory and at home, do workers at the factory receive the same pay as those working from home?

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7. What is the system of placing orders to home workers?

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a. What lead times are given?

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b. Time frame of delivery?
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c. Can home workers influence the amount of production they need to do?
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d. Frequency of order placement (number of orders in one year, period of order)?
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8. What is provided to the homeworkers?

a. Machinery (specify ownership and whether loans are given to homeworkers; if so under what terms)?
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b. Fabric?
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c. Other supplies?
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TFG London Brands needs to agree with the supplier / contractor on a defined set of homeworkers producing for TFG London Brands. This is to ensure stability in sourcing and improvements of working conditions for those homeworkers over time.

Those homeworkers must receive a salary or piece rates that allow them to earn the equivalent of at least minimum wage per hour. They should also receive regular work as far as is reasonably possible and be notified about gaps in production in advance.

The supplier will need to collect and maintain a register of individual homeworkers.

8. Register of individual home-workers.

1. Name of the person in contact with homeworkers (e.g. contractor, head of homemaker group etc.)
2. Name of the worker / household (if the household consists of several homeworkers, please register all individuals)
3. Sex of the worker
4. Age of the worker
5. Father's name
6. Home address
7. Phone number
8. Supplier code / worker ID (if applicable)
9. Village, district, state name

10. Documentation of payments

11. Other details, if any.

If you need to provide a completed questionnaire please request a blank copy to Francesca Mangano at f.mangano@whistles.co.uk