

LABS Code of Conduct

Code of Conduct

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Stichting Life and Building Safety Initiative (“**LABS Foundation**”)
Arthur van Schendelstraat 500
3511 MH Utrecht
<https://labsinitiative.com/>

1. Introduction to the Code of Conduct

This Code of Conduct provides the ethical framework in which LABS Foundation and all of its affiliates and stakeholders operate. It provides an overview of the values, commitments, responsibilities, and integrity for which we stand. When operating within the framework of this Code of Conduct, we create responsible and transparent operations.

Our Code of Conduct applies to all our people; it governs every decision we make. By “our people” we mean LABS Foundation’s employees (including our Board of Directors) as well as other related entities’ employees performing activities for or related to LABS Foundation. We expect our participants, service providers, and other stakeholders to apply similar standards of conduct when working for LABS Foundation or participating in the activities of LABS Foundation.

This Code of Conduct is a living document and will be renewed when necessary. Our stakeholders will be informed when a new version is available.

2. Compliance with the Code of Conduct

Our work must comply with the Code of Conduct as well as with LABS Foundation’s policies and the applicable laws of the countries in which we operate.

Our reputation for acting ethically and responsibly is dependent upon the decisions that every one of us makes. It is therefore our responsibility to comply with all the policies that apply to the work we do and the decisions we make as set out in this Code of Conduct.

If ever in doubt about a course of conduct, we have to ask ourselves:

- Is the behavior consistent with the Code of Conduct?
- Is the decision ethical?
- Does the decision comply with the law?
- Will the decision reflect well on me and LABS Foundation?
- Would I want to read about it in the newspaper?

If the answer is “No” to any of these questions, don’t do it.

If you are still uncertain, ask for guidance.

We are all required to comply with the Code of Conduct by accepting this Code of Conduct, either as an individual employee of LABS Foundation or related entity or as an affiliated organization as a whole.

Non-compliance with the Code of Conduct or with relevant supporting policies or procedures will result in proportionate corrective action from management.

3. LABS’ Purpose and Values

Purpose

LABS Foundation strives to make the apparel and footwear supply chain safe from life safety risks related to structural, electrical, and fire safety and evacuation.

Values

LABS Foundation has the following key values that we propagate:

- Safety of the workers in the factory
- Execute operations and activities with honesty, integrity, openness, and respect for the human rights and interests of workers
- Continuously learn and reflect critically on our work, both internally and externally
- Transparency in activities, progress, and publications wherever feasible
- Work and build local sector leadership in the engagement of life and building safety in the supply chain
- Work towards the institutionalization of life and building safety
- Deliver on plans and avoid deliberately overpromising (but think big!)
- Listen and be open to arguments of others, internally and externally
- Be accountable for your actions
- Speak up when you disagree and don't spread rumors

4. Commitments

Our People

The relationship between LABS Foundation and our stakeholders is based upon mutual respect. At LABS Foundation, we create a work environment in which both our people and our stakeholders feel appreciated and respected for their contributions. Everybody needs to have the opportunity to reach their full potential.

Our Program

The overall purpose of LABS Foundation is to accelerate and ensure worker safety in the apparel and footwear supply chain. By collaborating with front running companies, LABS Foundation believes meaningful impact can be achieved. Many workers in key apparel-producing countries work in unsafe environments that can have lethal consequences. The LABS Program is a multi-stakeholder (including but not limited to factories, civil society organizations, public sector agencies, buyers, brands, retailers, agents, other private sector parties, and other stakeholders in the apparel and footwear sector) platform with the purpose to pre-competitively strive to make the apparel and footwear supply chain safe from life safety risks related to structural, electrical, and fire safety and evacuation (including relevant safety training). The LABS program approach will include developing country-specific solutions that delivers a harmonized framework for monitoring, assessing, reducing risks, and remediating as well as building capacity.

Our Stakeholders

LABS Foundation will convene the private sector and other institutions on a global and national level to work on the issue of worker safety in the apparel and footwear supply chain. LABS Foundation leverages private stakes, merges public and private interests, and maximizes synergies. LABS Foundation offers unique opportunities for collaboration in accelerating sustainable trade, thereby addressing worker safety through our convening powers, close relationship with different stakeholders, and our specialized knowledge as a program developer.

LABS Foundation strives to further enhance the existing relationships as well as to develop new strategic alliances in our Program. Our organization also supports the identification and development of harmonizing initiatives and maintenance of thematic-focused and sector specific relationships.

In line with LABS Foundation's value proposition, it is important to communicate internally and externally in an accurate and transparent manner. To improve collaboration and continuously learn and improve, regular monitoring and evaluation of the Program is conducted in a thorough and collaborative manner.

5. Responsibilities

Individual Responsibilities

We have the following general individual responsibilities:

- **Outcome focus: Maximize personal contribution to ensure satisfactory outcomes**
Understand what the goal is. Know the stakeholders with whom we are working and respond energetically to their feedback. Ensure activities and decisions will optimize relations and consider effectiveness at all times.
- **Personal integrity: Match words with actions to build mutual respect**
Carry out all work in an independent and impartial manner in accordance with local and international laws. Treat stakeholders in a fair and consistent way, maintaining confidentiality to build trust and respect. Demonstrate organizational values in behavior and have a personal vision of these values. Respect your environment and use materials and energy efficiently and safely. Respect people from all genders.
You can expect to be treated with trust and respect by all.
- **Drive: Strive to achieve and keep going when things are difficult**
Demonstrate commitment to the LABS program and commit to achieving results. Show tenacity in overcoming obstacles, remain resilient and optimistic, meet deadlines, make things happen, and be prepared to take calculated risks.
It is the commitment of the leadership team and the managers in LABS Foundation and related legal entities to make you perform well. Enable them to do their job well: be transparent about your difficulties and ask for help!
- **Teamworking: Build and maintain relationships within and across teams**
Commit to final decisions and work in cooperation with others to achieve individual and team objectives. Share knowledge freely and maintain positive relationships within and across teams.
You can expect to have access to the right information you need to function well and get the help you need to meet your goals.
- **Develop self and others: Create or contribute to an environment in which both you and others are motivated to learn and develop**

- Give support to others, taking time to guide and provide feedback.
 - Find opportunities to learn and develop, celebrate success, and take care of yourself so our people can be at their best.
 - LABS Foundation considers the health, safety, and welfare of its employees, clients, and third parties connected with its business to be of paramount importance. LABS Foundation aims to provide a safe and healthy working environment and ensures that our employees have the information and resources to perform their duties safely.
- **Act responsibly while travelling**
Upholding safety and security is the responsibility of LABS Foundation's people and all persons associated with LABS Foundation. LABS Foundation and its people should be aware of the risks associated with business travels and will take appropriate and adequate measures to reduce these risks. Our people will adhere to the Safety and Security Policy applicable to them and should never put themselves or others at risk in order to protect organizational or personal property.
 - **Confidentiality**
Maintain confidentiality associated with your work. Breach of confidentiality is taken seriously and will attract disciplinary and/or legal action. In the course of your activities performed for LABS Foundation, you may come across information that is sensitive or confidential in nature. Both during and after the performance of activities for LABS Foundation, you shall refrain from disclosing, in any way whatsoever and to any other party, any information of a confidential nature regarding LABS Foundation's activities that has come to your attention in the course of performing activities and whose confidential nature is clear or should reasonably be clear. This obligation shall apply, by way of example and without limitation, to any adaptation or variation of designs, drawings, process, methods, material specifications, business plans, financial, commercial, or technical information of the company or its customers, associates, and prospects, competitive information, names of participants, proposed transactions, computer software, computer systems and databases, intellectual property, patent, and/or trade secret laws.

6. External Communications

External Communications in General

LABS Foundation has a Communications Officer that takes the responsibility for all external communications on behalf of LABS Foundation. Other people working on behalf of LABS Foundation are not authorized to communicate externally on behalf of LABS Foundation.

If one is contacted and asked to discuss LABS Foundation business with members of the press, they do not provide any information. Instead, they should politely inform press members that they are not authorized to discuss the subject and refer them to our spokespeople.

Social Media

When using social media for stating opinions about topics directly mentioning LABS Foundation's name, work, or program, all should ensure it is clear to social media circles that they are stating an opinion on their own account and not speaking on behalf of LABS Foundation.

Such precautions include:

- Stating the materials and opinions they are posting are theirs and not LABS Foundation's
- Taking every possible precaution to ensure they are not disclosing any confidential or sensitive information about LABS Foundation or its stakeholders
- Refraining from using any third- party logos or trademarks without the relevant permission
- Not misusing somebody else's personal or confidential information or intellectual property
- Sending or posting information that is defamatory to LABS Foundation, its program, activities, and/or colleagues
- Complying with local data protection and privacy laws

7. Integrity

Conflict of Interest

Everyone is free to occupy paid and unpaid additional positions provided that their work for LABS Foundation is not compromised. In case of (possible) conflicts between LABS Foundation position and the additional position, the future occupation of an additional position will be presented to the management who will decide the appropriate resolution of the conflict.

Everyone will act in the best interest of LABS Foundation, avoiding any conflict with personal interest (including those of family and close friends), business activities, or financial interests. No one will seek to gain for themselves or others through misuse of their positions.

Intimidation

As one of our key values is respect, naturally, intimidation or harassment of any kind is unacceptable (including gender-based violence, verbal abuse and sexual harassment). If someone feels physically or verbally intimidated by a co-worker or superior, the first instance should preferably be discussed with the relevant management. If the intimidation is perceived by the employee as very sensitive or if it concerns (a member of) the management, another co-worker or the physician of the health and safety service can be addressed. Every organization related to LABS Foundation should provide a means of recourse for their workers in case of intimidation or harassment.

Everyone is required to undertake the mandated trainings on gender and safer working environment covering gender norms and biases, structural discrimination, sexual harassment prevention and how to combat and overcome these biases.

Private Use of Equipment

If LABS Foundation makes equipment such as a computer or a mobile phone available to anyone, including our own staff, the private use of this equipment must be limited. All equipment made available by LABS Foundation must be used carefully.

Gifts and Presents

Small gifts and reasonable hospitality are appropriate when given or accepted in good faith without any intention of influencing any person in order to gain any advantage through improper performance or otherwise obtaining an improper advantage.

Any gifts or hospitality must be reasonable, proportionate, and appropriate in the circumstances at hand. There must be no possibility of them being misunderstood by the recipient or others as a bribe. As a guideline, we consider this to be the case if such gifts and presents do not exceed the value of €25 (non-repetitive). No prior gifts or hospitality may have been provided frequently to the same recipient or received from the same provider that could raise an appearance of impropriety. All gifts must comply with the applicable local laws and must be given openly, not secretly, and recorded fairly and accurately in books and records of the organization that employs the individual that provided the gift or any other form of hospitality.

Accepting and providing gifts or hospitality that do not meet above conditions is strictly prohibited unless specifically approved in writing by one of LABS Foundation Board Member.

Anti-Bribery and Anti-Corruption

Bribery, fraud, and corruption are all threats to sustainable development, and as such are threats to the core values which LABS Foundation seek to promote. With this in mind, LABS Foundation is committed to managing the risk of fraud and corruption in its internal operations as well as in all activities which are either managed by or associated with it. In pursuit of these objectives, LABS Foundation conducts business honestly and does not tolerate any form of fraud or corruption. LABS Foundation, its staff, and any of its affiliates or stakeholders will not engage in any form of relationship, agreement, or activity where there is evidence or suspicion of fraud or corruption. Our people and those of our participants, affiliates, and other stakeholders are at all times required to act in compliance with the zero-tolerance principle on fraud and corruption.

LABS Foundation, its people, and its participants will not, directly or indirectly, receive from or provide to any person anything of value for the purpose of gaining or rewarding any advantage reached through improper performance or otherwise to obtain an improper advantage. Any demand for or offer of a bribe must be rejected immediately and reported to LABS Foundation. Depending on the seriousness of a breach, an employee's or participant's failure to comply with this policy whether intentionally or by an act of negligence, may lead respectively to disciplinary action or termination of the business relationship.

The integrity and accuracy of LABS Foundation, its affiliates, and stakeholders' record keeping and reporting systems will be respected at all times. The accounting records and supporting documents accurately describe and fairly reflect all transactions and other business engagements. No false, artificial, or misleading content will be included in any books and records. All transactions, gifts, and hospitality received and given must be fully documented; all accounts, invoices, memoranda, and third party related documents should be prepared accurately and completely. All expense claims relating to gifts and hospitality incurred from or with third parties must be submitted. Everyone is forbidden to use, authorize, or condone the use of "off-the-books" bookkeeping, secret accounts, unrecorded bank accounts, slush funds, falsified books, or any other device that could be utilized to distort records or reports of LABS Foundation's or other related legal entity's true operating results and financial

conditions. No one shall use agents or others to circumvent the law or to engage in practices that run contrary to the Code of Conduct.

Where fraud, corruption, or bribery is alleged, detected, or suspected, it should be brought to the attention of LABS Foundation as soon as possible. LABS Foundation will investigate the matter, seek the recovery of the misappropriated funds (if applicable), and promptly determine the appropriate course of action.

Political Neutrality

Any person representing LABS Foundation, including consultants contracted by LABS Foundation, must be politically neutral and unbiased at all times when performing work for LABS Foundation. LABS Foundation representatives must respect the nature of LABS Foundation's work, irrespective of their own (political) views. This means that LABS Foundation representatives must provide services to everyone without unfair discrimination, regardless of political affiliation or preference. In no circumstance is it permitted to use LABS Foundation's resources or position for political purposes or goals.

8. Where to Get Help

We encourage everyone to discuss questions they may have about this Code of Conduct and to suggest ways to improve it. Additionally, we urge everybody to report to their manager and/or to their legal counsel any concerns or conduct that may violate the Code of Conduct. Your manager and legal counsel are there to help you; always seek their guidance when in doubt. LABS Foundation recognizes it may not be easy to report concerns or suspicious conduct, however, when we know of a (potential) issue, we can address it and can probably mitigate (some of) the consequences. Reporting concerns and suspicious conduct is very important and the right thing to do.

Whistle-Blower Policy

LABS Foundation has a whistle-blower policy that enables LABS people to raise concerns about inappropriate conduct that is occurring or suspected within LABS Foundation, its activities, or another organization with which LABS Foundation has a relationship.

LABS Foundation adheres to an open door policy and suggests all LABS people to approach a confidential advisor in the event that there is either evidence or suspicion of wrongdoing. As such, if a LABS Foundation staff member becomes aware of any behavior or conduct they believe to be illegal or a violation of the principles set out in the Code of Conduct, they can raise their concern with a confidential advisor.

Every organization related to or working with LABS Foundation should provide access to a whistle-blower policy and adopt an open door policy for their workers as a good practice.

LABS Foundation people are recommended to seek advice from a confidential advisor if they are uncertain as to the merits of their suspicion. Any inquiry of this type will be treated confidentially. If you feel uncomfortable approaching all confidential advisors, you are encouraged to speak with the

Executive Board or Advisory Board of LABS Foundation. In all circumstances, the whistle-blower's identity will be kept confidential.

Any information disclosed to the confidential advisor will remain confidential until the issue is resolved, a reasonable time has lapsed, or to the extent possible considering the need to conduct a satisfactory investigation. This policy is aligned with IDH SpeakUp Policy. **For more details, refer the following link: [IDH SpeakUp Policy](#)**

LABS Foundation will periodically review the Code of Conduct and make appropriate additions or changes. Employees and other stakeholders will be fully informed of all changes to the Code of Conduct.