

## OROTON COTTON SOURCING Policy

Oroton is committed to conducting its business with the highest standards of integrity and will only work with suppliers who share and follow our high standards of ethical business behavior and who demonstrate commitment to those standards.

Global cotton supply is complex and may include forced and child labour practices if not adequately controlled. This Policy demonstrates our expectations regarding the use of Cotton from Uzbekistan and Turkmenistan and define the responses and actions resulting from any identified use of cotton from Uzbekistan or Turkmenistan within our supply chain.

This Policy applies to all vendors, factories or authorised sub-contractors (“suppliers”) in all Regions involved in the manufacturing of Oroton proprietary branded and licensed merchandise sold by Oroton or any authorised seller.

Oroton has an expectation that Vendors, factories and Sub-Contractors will not knowingly use cotton from Uzbekistan or Turkmenistan in our products. Oroton will not sell products that use cotton from these countries or source directly from these countries themselves.

We also expect that all Vendors, factories and Sub-Contractors will be able to provide satisfactory evidence (such as Certificate of Origin validation) for all cotton sourced when requested.

In addition, Vendors, factories and Sub-Contractors will not source fabrics or yarns manufactured using cotton from Uzbekistan or Turkmenistan for any Oroton products which includes not to purchase cotton from spinners and mills that use Uzbekistan/Turkmenistan cotton.

Vendors, factories and Sub-Contractors shall maintain adequate records of all suppliers of cotton used in any of our products ensuring the records kept include:

- Country of Origin of the cotton;
- Name of the Mill supplying the cotton;
- Volume of cotton purchased/used for Oroton products.

Oroton will monitor compliance to this Policy and our Ethical Sourcing Policy and we or our representatives, may visit a supplier’s factories to audit compliance of any part of this Policy to ensure our business expectations are being upheld. These visits may occur at any time and be announced or unannounced.

Oroton always expects suppliers to co-operate, to be honest and transparent in their dealings with Oroton and commit to making continuous improvements in their operations. Any breaches of this Policy or our Ethical Sourcing Policy will be reported to the supplier for follow up and corrective action. Where there are breaches and/or the supplier does not demonstrate a willingness to comply, Oroton reserves the right to discontinue business with the supplier.

This Oroton Policy and Ethical Sourcing Code does not replace the local laws of the countries in which our suppliers operate. At a minimum, suppliers should always be familiar with and comply with all relevant laws and regulations. In the event of a conflict between these standards and a local law, the stricter requirement must be followed.

The complete Oroton Ethical Sourcing Policy and Supplier Code of Conduct, can be obtained by visiting [www.orotongroup.com](http://www.orotongroup.com)

This Policy should be applied with all Oroton Policies and social compliance expectations and operates within the legal and regulatory requirements of the Country in which Oroton, our Suppliers and Sub-Contractors operate.