



**CottonConnect Global Human
Rights Policy
March 2023**



Overview from CottonConnect's CEO

CottonConnect's purpose is to improve cotton supply chains to secure sustainable, traceable, and transparent supply now, and into the future – improving lives in the communities which we serve, for everyone who works for and with us, and beyond.

Respecting human rights therefore sits at the heart of what we do, and what we stand for, and this policy sets out our public commitments: to comply with international standards; embed human rights into our policies and procedures; understand the human rights impacts of our work, both positive and negative; and encourage our suppliers and partners to make the same commitment.

It includes our human rights principles, the codes of conduct that underpin our relations with suppliers, partners and farmers, and our procedures for risk assessment, alongside our commitment to keep our policies under review, based on the feedback received from our employees, governance committees, internal and external stakeholders, partners, and external experts.

For the retailers we work with, they can be assured that our programmes offer commercial benefits associated with good human rights practices, and that partnership with us can bring about major benefits and improvements to individuals, communities and society.

The policy is approved by our Board and sets out expectations for all of us at CottonConnect, embedding the responsibility to respect human rights through all business functions. We believe that wherever we work we should do so responsibly, respecting the rights of everyone who works for and with us. That is the right thing to do, and it is central to fulfilling our purpose.

Alison Ward

Chief Executive Officer
CottonConnect



Purpose and Scope

CottonConnect, a global social enterprise with a social purpose to help brands re-imagine their supply chain, is committed to respecting, and protecting human rights across its supply chain.

We also expect our suppliers, business partners and partners at field level to uphold these principles and adopt similar policies in their workplaces. We are committed to upholding the human rights of all CottonConnect employees and all those whose lives we touch through our multifaceted programs.

CottonConnect's Commitment to Human Rights

CottonConnect is committed to the United Nations Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, International Labour Laws, Modern Day Slavery Compliances, EU Directives on Corporate Due Diligence in Supply Chains, Social Development Goals (with focus on 5,8,8.7, 12,13,14&15), ILO (International Labour Organisation) provisions related to (a) Freedom of Association-87), (b) Collective Bargaining-89), (c) Prohibition of Forced Labour (29 & 105), (d) Prohibition of Child Labour-138, (e) Prohibition of worst forms of Forced Labour-182, (f) No discrimination in the work place -111, etc.

As a member company of ISEAL Alliance, Sustainable Apparel Coalition, Partnerships for Sustainable Textiles, Cotton 2024, we are committed to respecting and protecting human rights.

CottonConnect works with the local laws on human rights, and respects internationally recognised guidelines on human rights within our supply chain and communities where we do business. In case of conflict between the two, we will search for solutions to observe international laws while respecting human rights.

Approach to meet this commitment:

CottonConnect's Human Rights policy is based on 6 principles of safeguarding:

- (1) **Empowerment:** People being supported and encouraged to make their own decisions and informed consent
- (2) **Prevention:** It is better to take action before harm occurs.
- (3) **Proportionality:** The least intrusive response appropriate to the risk presented.
- (4) **Protection:** Support and representation for those in greatest need.
- (5) **Partnership:** Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.



(6) **Accountability:** Accountability and transparency in safeguarding practice.
(Ref. www.scie.org, *Principles introduced by Department of Health, UK 2011*)

Governance

The implementation of CottonConnect's Human Rights Policy will be overseen by the Country Level HRDD officers and the Local Partners' HRDD officers. The issues of business and human risks are discussed at all levels. Where the grievances are raised by our workers at CottonConnect level or our supply chain, we manage the flow of information to protect the identity of those raising their voice as well as actioning it towards remediation. Where necessary these issues are escalated to the CEO level. The policy would be continuously reviewed to assess its effectiveness and adapt to any emerging issues.

Policy Framework

Our Human Rights Policy Framework consists of

- CottonConnect's Human Rights Policy
- CottonConnect's Code of Conduct
- Prevention of Sexual Harassment at workplace (POSH) Policy
- Anti Bribery and Corruption Policy
- CottonConnect's Grievance, Complaint and Dispute resolution mechanism
- CottonConnect's Safeguarding Policy
- REEL Code of Conduct version 3.0, Social Conditions

Together these collective guidelines help us meet our human rights commitment and compliances.

CottonConnect's Code of Conduct:

CottonConnect's Code of Conduct is applicable to all its employees, local partners, supply chain partners, our program farmers and our vendors. It is mandatory for all employees of CottonConnect to attend Human Rights Due Diligence training conducted by the organisation. Our activities and operations shall be carried out in strict compliance with the highest legal and ethical standards. All interactions with customers, suppliers and project partners shall be fair, honest, and strictly compliant with contractual undertakings and applicable laws and regulations.

All programs and activities will be designed and undertaken in a way that will protect people from any risk of harm that may arise from their coming into contact with CottonConnect either in person or through its digital channels.



Salient Risks Associated to Human Rights

The salient risks have been derived after more than 12 years experience of working with various stakeholders and engaging with our partners from local to global level.

Based on our engagements CottonConnect will be working to mitigate the following salient risks in our working areas with support from our supply chain and local partners.

- Child Labour
- Gender Discrimination
- Decent wages/Living Wages
- Health and Safety
- Climate Change
- Water and Sanitation
- Forced Labour

Child Labour

CottonConnect promotes child rights, children's education and strictly prohibits child labour in any form at CottonConnect and local partners' offices, farms, ginning or spinning unit premises. This extends to our vendors and travel agencies too. We are committed to work toward eradicating child labour from our own operations and supply chains by modes of identification, preventing and remediating child labour. We promote primary education for all children.

Gender Discrimination

CottonConnect works towards promoting gender equality and belonging in its work force and all its business alliances and farm programs. We also follow zero tolerance on sexual exploitation. We have established an Internal Committee to execute Prevention of Sexual Harassment at workplace (POSH) Policy effectively.

We are also engaged in the areas linked to women empowerment as we also see that empowering women will also help in ensuring better education for children of the farmers' and farm labourers' family. Thus, this will help in prevention of issues relating to child labour.

Decent Wages

CottonConnect is committed to providing competitive and fair pay. We comply with the local laws and understand the risk to rightsholders in our due diligence process. We are also committed to improving the working environment by adhering to working hours applicable under local laws. Where no legal limit exists or if it affects the workers' health and safety, we will appropriately regulate the working hours, decent



wages, and rest hours. We will always explore interventions to promote living wages. We also promote equal wages to male and female labourers for the same type and same hours of work in operations/farming under our programs.

Health and Safety

We are committed to conduct our activities in a way that protects the health and safety of the lives we touch through all our businesses. We continuously aim to build on to the health and safety aspects we work on.

Climate Change

We are committed to reducing the impact of climate change with the support of proactive, innovative practices and proper management of resources. We will motivate our local partners and farmers to adopt and promote sustainable practices that improve soil, plant, and animal health, which can improve resilience to climate change. We will promote new technologies that can also support adaptation to climate change. We will train/support to train the farmers for actively restoring unproductive land and take appropriate steps towards the conservation of biodiversity and natural resources. We will also ensure that farms are free from any forms of hazardous waste and our local partners are trained for the appropriate disposal of such waste without causing harm to our environment.

Water and Sanitation

CottonConnect commits to support the identification and preservation of water sources utilised for irrigation. We will work to ensure that water used in the field is safe for crops, soil, and human health. CottonConnect will promote the sustainable use of water and interventions to optimize water usage at all levels.

In all farms and ginning units, safe drinking water is accessible to all farm and ginning workers during their working period. CottonConnect will ensure that all the workers in ginning /spinning units who are associated as supply chain partners under CottonConnect's various programs, also have access to sanitation facilities.

Forced Labour

CottonConnect does not tolerate any forms of forced labour in our operations or that of our local partners, supply chain partners or vendors or in farming done by farmers under our various farm programs. We promote responsible recruitment, transparency amongst employees and allowing freedom of expression and movement to all employees.



Freedom of Association (FoA)

CottonConnect shall respect all workers/farmers to form or to join a trade union of their choice and to engage in the union's activities onsite if available. They will also have the right to choose their representatives. CottonConnect upholds that work-included subcontracted work is equally remunerated according to the type of work provided or to both genders alike.

Human Rights Due Diligence

As a business leader, employees, and social innovators we want our activities to have a positive impact on our communities and wider society. We are committed to prevent or mitigate any negative impacts to human rights that are linked to any of our businesses through our supply chain, even if we have not directly actioned the same.

CottonConnect aims to utilise a multipronged approach for implementing due diligence by:

Identifying our human rights issues by working on our country risks and understanding the issues through our rich field experiences and human rights impact assessments at all levels. Such engagements are done at local as well as global levels. Our checkpoints include feedbacks we receive as well as the grievance which come through our grievance mechanisms.

Prioritising this will help us to know the salient risks we wish to work on based on our operations as well as that of our supply chain. CottonConnect's terms and conditions of partnership makes it clear that our suppliers, supply chain partners, local partners and farmers are responsible for ensuring compliances with the Code of Conduct in their supply chain/farming operations. Our code of conduct is guided by the OECD Due Diligence Guidance. Our program effectiveness at each level is tracked by the committees who work diligently to mitigate issues faced.

Where we identify issues, we work with our suppliers to find a remedial solution for the same. We are committed to providing them with necessary resources like training on regular intervals to help them find and implement solutions. We are further reflecting on our business practises and collaborations with our supply chain on enhancing positive impact and make adaptations when required.



Remediation and Grievance Mechanisms

An important part of our human rights due diligence is ensuring that each person associated with us in some way is provided with remedy where issues arise with reference to our Code of Conduct

Working in line with the UN Guiding Principles on Business and Human Rights, in all our businesses, supply chains and local partner to field level, we are committed to providing remedy, be it through our existing grievance mechanisms or through active collaborations with others in the industry.

Individuals can raise concern through CottonConnect's "We Value Your Voice/ Speak-Up" open line/ WhatsApp number-which is available 24 hours a day. They can also send us emails to grievancesandcomplaints@cottonconnect.org OR safeguarding@cottonconnect.org from anywhere globally. Farm workers can also share their grievance with CottonConnect's local partner during Focus Group Discussions.

To avoid human rights violation and for proactive remediation activities we are maintaining and developing easily accessible and fair grievance mechanisms at all levels.

CottonConnect at all levels respects human rights and continuously strives to improve our human rights due diligence framework with focus on the vulnerable groups specifically women, children, differently abled and migrants. We will review our commitments on regular intervals based on the feedback received from our internal stakeholder employees, members of the POSH committee, members of the CottonConnect Gender Advisory Panel, members of CottonConnect Committee on Human Rights; and external stakeholders including brands and customers, local partners, supply chain partners, vendors, external experts, farmers and farm labourers.