

CODE OF CONDUCT

Guiding our efforts to improve working conditions
for all those involved with Picture



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RIDE PROTECT & SHARE



We hold ourselves accountable for the future planet and for the future people. And we apply the same criteria to all our partners. We present our code of conduct (definition: a set of rules, guidelines, and behaviors for employees to follow). This code of conduct pieces together, the bare minimum, standards out there for ourselves and our partners.

As a member of Fair Wear Foundation, the starting point to our work is the responsible business conduct (RBC) policy. This document lays out our main policy, and details out the specifics of it. This allows us to not only uphold these standards but also strive to do more. This is part of our work of being an ethical company, as well as a way to ensure that we are a business in/of/for the future.



Responsible business conduct policy

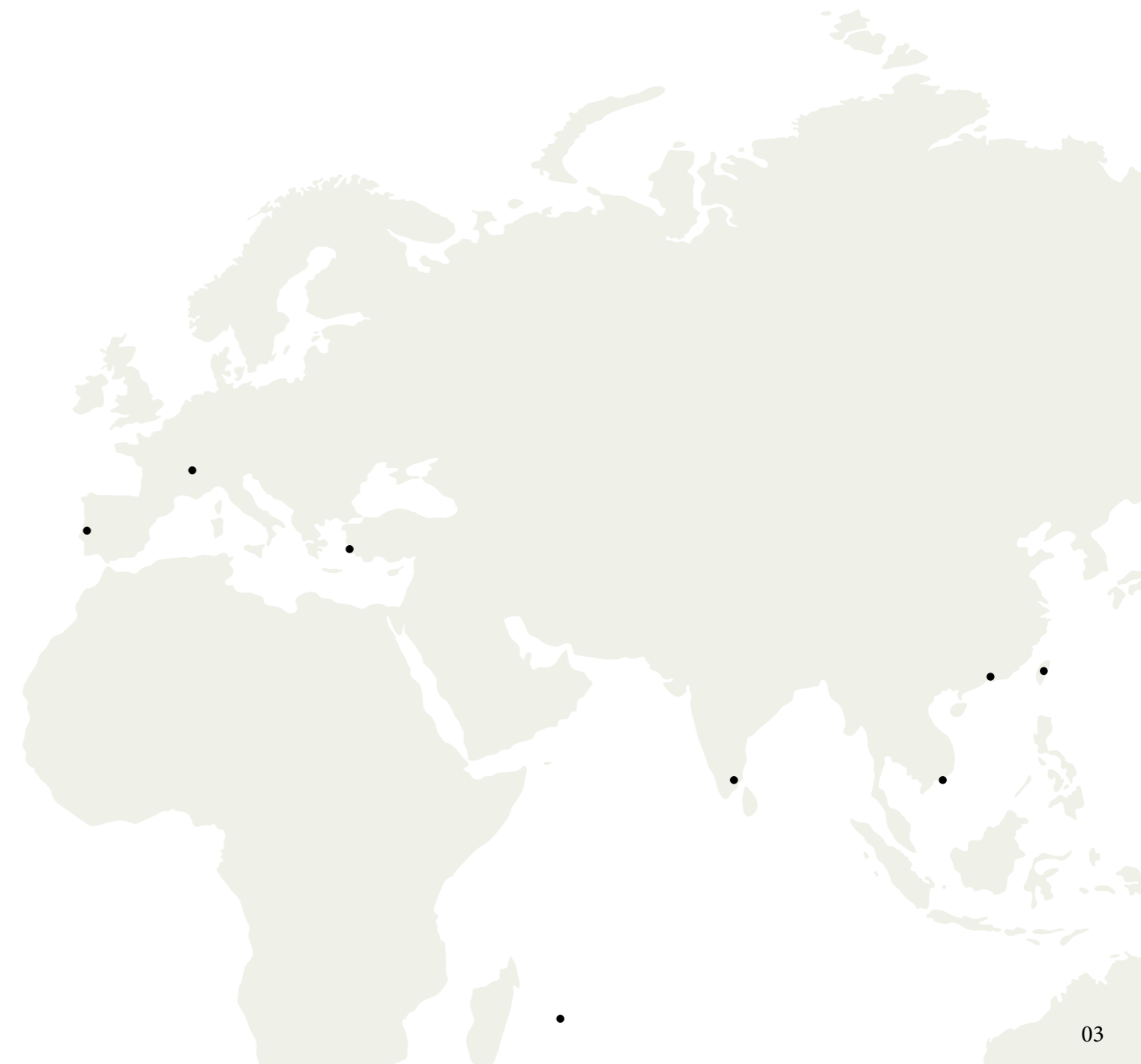
Picture upholds our suppliers, our partners, our stores, and our offices to Fair Wear Foundation's 8 Code of Labor Practices. We are committed to enforcing, monitoring, and improving upon these labor standards throughout our supply chain. This code of conduct will break down what these standards are and how we enact them.





The scope

This policy is applicable to all partners of Picture (and us writing this code, too). That being said, we spend our time, energy, and \$\$ on a specific part of the supply chain: from raw materials to assembling. This means the farmers, manufacturers, and possible subcontractors they may have. Why this part of the chain? Data shows us that issues are more likely to occur here than at retailers or warehouses. Geographically, the regions of Southeast Asia, China, Taiwan, Turkey, Portugal, and Mauritius are at play here. The scope is whomever creates and makes Picture gear.



Defined commitments

We hold ourselves and our partners to Fair Wear Foundation’s 8 code of labor practices. All of our partners are aware of these standards. How? When we start with a new partner, it’s a bit like a new romantic relationship, unfortunately, it’s more contractual though. Before committing to a relationship with someone new, you maybe try to find their Instagram, ask your friends about them, and do deep dive. We do the same with new partners but it’s called our due diligence process and it’s less creepy. This process begins to introduce the standards we expect of the partner. At the beginning (the honeymoon phase 😊), the labor standards must be read, agreed to, and signed off on. On top of this agreement, we get to know one another, perhaps over coffee or a beer. We discuss what these labor practices mean to us, why we think they are important, and what we may expect of one another. We hope to hear what our new partner thinks of all this, too. Additionally, flyers, in local languages, with the 8 labor practices are posted in every factory and are updated when needed. These flyers include a phone number to call for grievances or complaints.

In the following, we will describe each of Fair Wear labor practices... in Picture style.

01

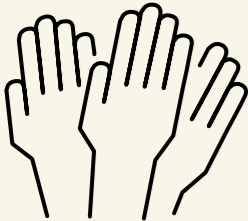
Employment is freely chosen



All employment associated with or making Picture products must be voluntary. Not implying volunteer work, it means that employees freely decide to work and when to stop working. There is no force around someone working there – whether through debt bondage, compulsory labor, non-payment of wages and or slave-like conditions.

02

Freedom of association and the right to collective bargaining



All employees have access to, and hopefully support in, creating and maintaining a local trade association. This is important in giving a voice to all. These organizations will follow national legislation. Within these organizations, no employee should be excluded or experience discrimination. Same is applied to those who participate in organization, suppliers and upper management should not treat union employees differently.

03

No Discrimination in employment

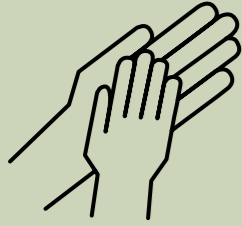


No discrimination in any part of employment (hiring, payment, trainings, promotions, terminations, etc.). All business partners should have a functional grievance mechanism where employees can voice objections no matter how big or small. This should be operative on top of the hotline from Fair Wear.



04

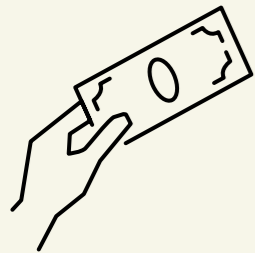
No exploitation of child labor



No exploitation of child labor, period. All partners must comply with the national legislation on minimum working age. To ensure this, partners should have an age verification system. We understand that those of school age might work; however, we expect that working doesn't happen during education hours.

05

Payment of living wage

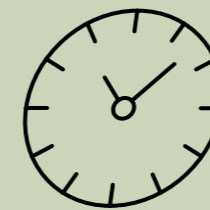


Payment of living wage means wages should allow employees to meet all their needs (food, water, shelter) plus have the ability to save and live a good life. There are different standards for different regions. Since this is a process to achieve, we require that our partners pay the regional, national, international or collectively bargained salaries, whichever is highest.

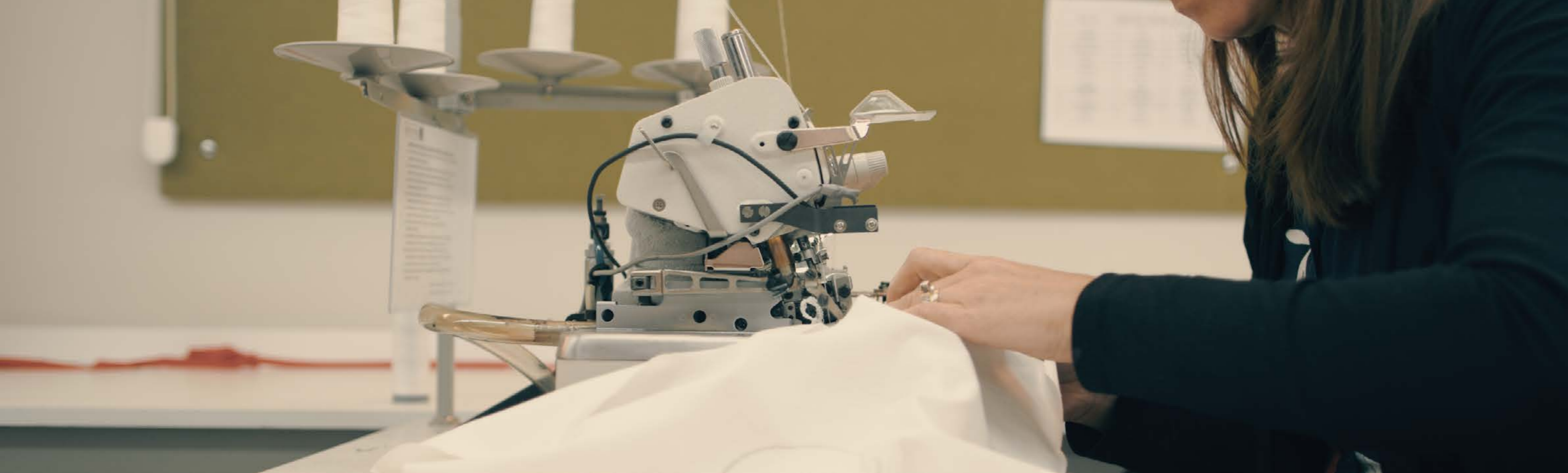


06

Reasonable hours of work



We uphold our partners to keep to the nationally regulated working hours of their country. A norm is that a work week should not exceed 60 hours with overtime, with one day off per week. All working hours, normal or overtime, should be compensate correctly.



07

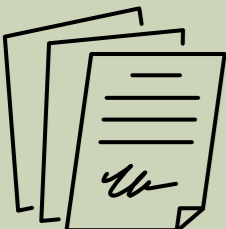
Safe and healthy working conditions



Working conditions should be safe and healthy both mentally and physically. Basic chemical safety, emergency precaution, personal protective equipment, and skills training should be met. We strive for a positive work environment and employee satisfaction.

08

A legally binding employment relationship



A legally binding employment relationship means that all employees have a contract of some type – internship, temporary, permanent, etc. This contract outlines the working hours, compensation and benefits that are mutually agreed-upon and understood by employee and employer. It is important that this contract is not based on disciplinary deductions or conditional payments.

In addition to the Fair Wear Standards, Picture has certain environmental standards that we expect our partners to be committed to.



Complying with national and international legislation on environmental impact, air quality, pollution, safe drinking water, waste treatment, and energy.



Complying with our restricted substance list.



Complying with animal welfare legislation with a commitment to healthy and humane practices.

Monitoring & Remediation

With these commitments, we must have ways of implementing and monitoring them. From a combination of Fair Wear's knowledge, other multistakeholder initiatives, and our own brains, we use these tools:

- Audits
- Social dialogue & communication
- Human rights due diligence (HRDD)
- Continuous risk analysis of supplier country & suppliers themselves
- Crafting preventative policies
- Training Picture staff on these topics and how it relates to their work
- Tracing our supply chain
- Following corrective action plans (CAP)

When issues arise, there's many paths of actions. Here are some of them. One, we want to act collaboratively to address the issue. Here acting collaboratively means with the partner, with other brands, or with Fair Wear. Second, we want to understand and evaluate the issue as a risk. Third, we want to have an open and honest conversation with the partner experiencing the issue. Fourth, if necessary, we create a preventative policy for the long-term.

The diagram (from Fair Wear) on the right illustrates the steps we try to take. It's not always perfectly circular but it still helps us make progress.



