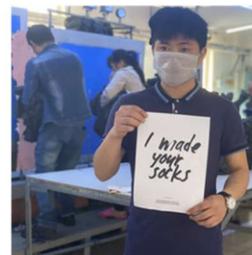




# Star Sock

## Report 2019



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## Star Sock

In 2019 Star Sock has renewed its strategy for the coming period from 2020 – 2023. It was important to renew the strategy because the old version dated back to 2015 and the team within Star Sock has changed significantly. The owners decided to make the strategy together with the whole team, because everybody has their own role in the follow-up of this strategy. Star Sock is a transparent company within itself and the supply chain. This process is a good example of the transparency.

### Strategy

#### Mission

A challenging company with sustainability as it's strength.

#### Vision

Join, for positive footprints.

At Star Sock we acknowledge that positive footprints are a must for our world's future. We believe that success is not measured just in money, but foremost in the positive impact we have on the planet, and the people around us. We aim to achieve positive footprints through:

- The positive Star Sock footprint: providing sustainable socks
- Lead by example: with a profitable business proposition that is sustainable
- Spark the change: sharing our story to promote sustainable development and social impact, inspiring others to initiate change

#### Belief

Doing good things yourself can make a great change together.

#### Promise

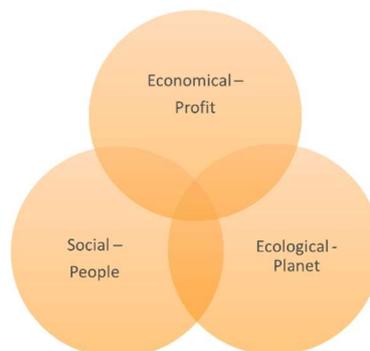
Together we provide sustainable socks, and drive positive change in our value chain and beyond.

The three pillars, shown in the vision, already point out how we are going to transfer our strategy into our operation.

**The positive Star Sock footprint.** Focus on product and process throughout the whole supply chain.

**Lead by example.** Focus on our internal processes, how to be profitable with a sustainable business.

**Spark the change.** Focus on all our external stakeholders and inspire them throughout our business.



As with all sustainable business cases, People, Planet and Profit need to be in balance, and so the pillars of Star Sock.

## Due Dilligence

Star Sock is going to follow the strategy based upon the following due diligence process:

### **Adopt our policy.**

We have defined 15 subjects on which our policy is based. These subjects will be explained in the next pages. In our policy the actual and potential harm is identified, for our own operation as well as our supply chain.

### **Strengthen our management system**

We need to be able to measure our progress on the different subjects and we will adopt a system to make this possible. The data will exist of qualitative and quantitative figures.

### **Cease, prevent or mitigate.**

We will assess our suppliers and our supply chain based upon our policy. We will go with them trough the various reports and audits which they have conducted, some on our behalf.

Then we will cease, prevent or mitigate harm depending on the situation, and which supply chain partner has the most influence to do something about it. Besides the harm caused, infringement of our Star Sock policy in the way of working can lead into a termination of our cooperation. The progress will be verified, monitored and validated by Star Sock to see the effectiveness of the measures. We will also take our learnings and see if we can use them in other countries or factories.

### **Communicate**

Through our annual report and monthly updates, which we expect to provide in 2021 at the latest, we will communicate about our processes and about the harm we adressed in our supply chains. Meanwhile we keep on cooperating with the stakeholders to prevent harm. Communication is always a two way street in our opinion; we listen to complaints coming from consumers, clients, factories, or any other partners in our supply chain. We can solve most of the issues trough honest and open communication. Furthermore, we rely on stakeholders who can help us in controlling and checking various steps in our supply chain such as the Global Organic Textile Standard and the Global Recycling Standard.

The effectiveness of our due dilligence process is measured by the extent to which actual and potential harm is prevented, or in some cases mitigated in our own operations and supply chain.

## Star Sock policy

We have consulted different stakeholders to give guidance on the different subjects we should make our policy on, such as the Dutch Agreement on Sustainable Textiles, Fair Wear Foundation and the OECD guidelines for sustainable supply chains, as well as the Sustainable development goals. Unfortunately these stakeholders all adress similar subjects but they are not aligned as some are specific for textiles while other initiatives cover almost everything.

As our mission states: A challenging company with sustainability as it's strength. We have made our own subjects which we think are important to address in our supply chain. Table 1.1 Coherence between various sustainable stakeholders shows our subjects with the crosslink between the subjects of the Dutch Agreement on Sustainable Textiles, Fair Wear Foundation, and which sustainable development goals are having the most overlap.

	Star Sock Subject	Subject in the Dutch Agreement on sustainable Textiles	Fair Wear Labour Standards	Sustainable development goal	Specific target of the sustainable development goal
1	Child Labour	Child Labour	No exploitation of child labour	Decent work and economic growth	8.7
2	Discrimination and gender	Discrimination and gender	There is no discrimination in employment	Gender equality	5.2
3	Forced labour	Forced Labour	Employment is freely chosen Legally binding employment relationship	Decent work and economic growth	8.7
4	Working time	Forced Labour	Reasonable hours of work		
5	Occupational health and safety	Occupational health and safety	Safe and healthy working conditions		
6	Freedom of Association	Freedom of Association	Freedom of association and the right to collective bargaining		
7	Living wage	Living wage	Payment of living wage	Reduced Inequality	10.4
8	Hazardous chemicals	Waterpollution and the use of hazardous chemicals water and energy		Good Health and well-health Clean water and sanitation Responsible consumption and production	3.9 6.3 12.4
9	Water	Waterpollution and the use of hazardous chemicals water and energy		Good Health and well-health Clean water and sanitation Responsible consumption and production Life below water	3.9 6.3/6.4/6.5/6.6 12.4 14.1
10	Greenhouse gas emissions	Waterpollution and the use of hazardous chemicals water and energy		Good Health and well-health Affordable and clean energy Responsible consumption and production	3.9 7.2 / 7.3 12.4
11	Resource use	Raw materials		Affordable and clean energy Decent work and economic growth Responsible consumption and production	7.2 / 7.3 8.4 12.2/12.5/12.6
12	Animal Welfare	Animal welfare		Responsible consumption and production	12.2
13	Bribery and corruption			Peace, justice and strong institutions	16.5
14	Unauthorized use of sub-contractors (homeworkers)			Decent work and economic growth	8.8
15	Responsible consumption	Responsible consumption		Responsible consumption and production	12.7/12.8

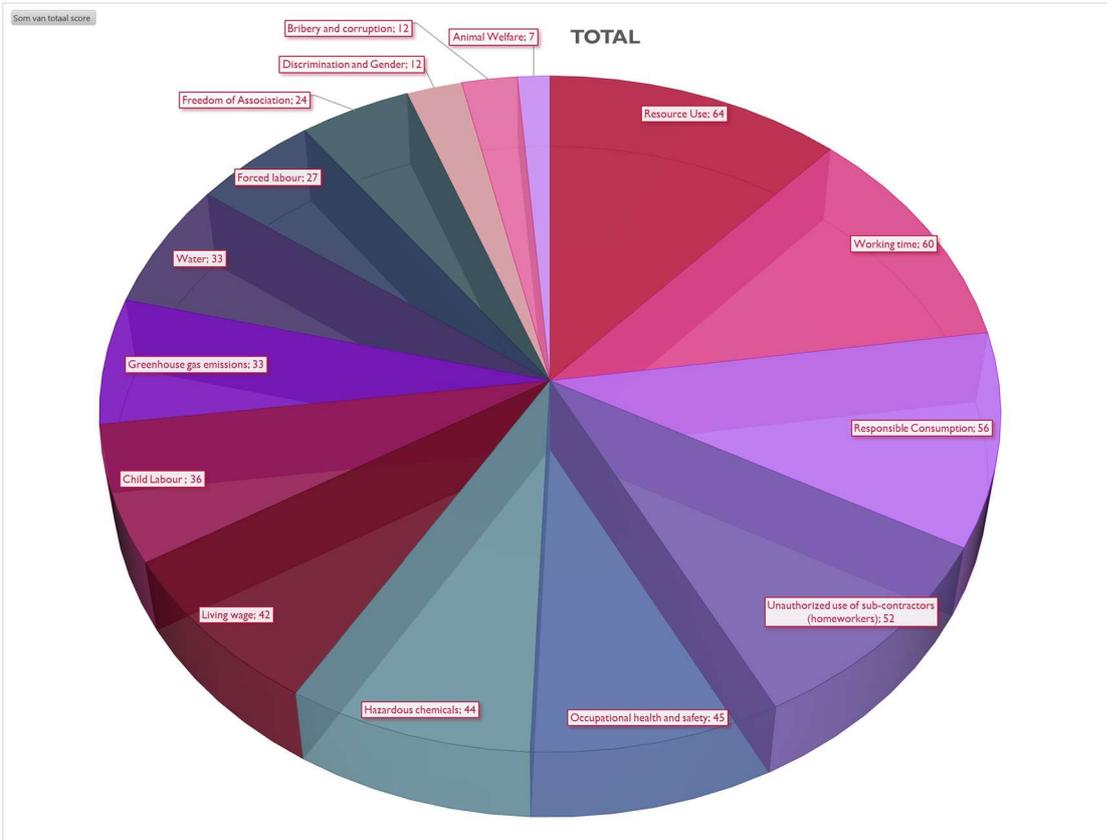
Table 1.1 Coherence between various sustainable stakeholders

We need to have a due diligence process which supports our organisation to fulfil the strategy as defined earlier and give follow-up on the 15 subjects. Therefore, we set up a system which can monitor our progress. This system also helps us to make the risk analysis in a proper way and can value the different subjects from our perspective, from our stakeholder perspective, but more interestingly, from our client perspective. We can also add these figures and progress in our management system.

How common is this subject in our supply chain?	1 = relatively uncommon, 4 = highly common to occur
How much direct influence do we have on this subject?	1 = far away in the chain e.g., cotton plantation 4 = directly at our production location
How important is the theme for Star Sock?	1 = less important 4 = key point for Star Sock
How much progress did we made on this subject already?	1 = barely addressed 4 = long-term plans to address this theme in our supply chain

Table 1.2 Rating system per subject

We realise that it is almost impossible to make the decision, “which subject is the most important” but with above scoring system we hope that we can balance the most important subjects out. Per subject you will find the scores given by Star Sock. Please see a summary of the rating in piechart 1.1 Rating system per subject.



Piechart 1.1 Rating system per subject

# Star Sock and the Sustainable Development Goals



If you look at our 15 subjects and which SDG’s are the most connected, then we see that the following four SDG are pleaded the most. Star Sock will focus on the following four SDG goals.

	SDG GOAL	SDG TARGETS
	Responsible consumption and production	12.2 By 2030, achieve the sustainable management and efficient use of natural resources. 12.4 By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment. 12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse. 12.6 Encourage companies, especially large and transnational companies to adopt sustainable practices and to integrate sustainability information into their reporting cycle. 12.7 Promote public procurement practices that are sustainable, in accordance with national policies and priorities. 12.8 By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.
	Clean water and sanitation	6.3 By 2030, improve water quality by reducing pollution, eliminating dumping and minimizing release of hazardous chemicals and materials, halving the proportion of untreated wastewater and substantially increasing recycling and safe reuse globally. 6.4 By 2030, substantially increase water-use efficiency across all sectors and ensure sustainable withdrawals and supply of freshwater to address water scarcity and substantially reduce the number of people suffering from water scarcity. 6.5 By 2030, implement integrated water resources management at all levels, including through transboundary cooperation as appropriate. 6.6 By 2020, protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes.
	Affordable and clean energy	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix. 7.3 By 2030, double the global rate of improvement in energy efficiency.
	Decent work and economic growth	8.4 Improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-year framework of programmes on sustainable consumption and production, with developed countries taking the lead. 8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms 8.8 Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.

## Star Sock is a member of the following Sustainability initiatives

### GOTS (Global Organic Textile Standard)

<https://www.global-standard.org/the-standard.html>



The Global Organic Textile Standard (GOTS) defines requirements to ensure organic status of textiles, from harvesting of the raw materials, through environmentally and socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer.

This standard covers the processing, manufacturing, packaging, labelling, trading and distribution of all textiles made from at least 70% certified organic natural fibers. There are several compulsory criteria focusing on areas such as waste water treatment, environmental management, working, and social conditions.

CU Star Sock number: 1000677

### GRS and RCS (Global Recycled Standard)

<https://textileexchange.org/>



The Global Recycled Standard (GRS) is an international, voluntary, full product standard. The goal of the GRS is to increase use of Recycled materials in products and reduce/eliminate the harm caused by its production. The Global Recycled Standard is intended for use with any product that contains **at least 50%** Recycled Material. Each stage of production is required to be certified, beginning at the recycling stage and ending at the last seller in the final business-to-business transaction.

Star Sock CU number: 1000677

### RCS (Recycled Claim Standard)

<https://textileexchange.org/>



The Recycled Claim Standard is intended for use with any product that contains **at least 5%** Recycled Material. If the percentage is lower than 95%, the RCS Blended logo shall be used for these claims. The RCS does not address social or environmental aspects of processing and manufacturing, quality, or legal compliance.

Star Sock CU number: 1000677

### BCI (Better Cotton Initiative)

<https://bettercotton.org/>



The Better Cotton Initiative (BCI) is the largest cotton sustainability program in the world. BCI aims at making the global cotton production better for the people who produce it, better for the environment it grows in, and better for the sectors future. BCI provides, together with its partners, trainings to farmers on more sustainable practices. BCI is based on seven principles that include areas such as better practice in use of pesticides, care for water and soil, and enhancing biodiversity.

Star Sock BCI nr is 1004346

Fair Wear Foundation  
<https://www.fairwear.org/>



The goal of Fair Wear Foundation is to improve the ethics in the clothing industry. Fair Wear is looking for new solutions and driving step-by-step improvements that create real change for the people who work in garment factories. Four key activities make up the Fair Wear approach: brand performance checks, factory audits, complaint helplines, and factory training sessions.

We became member: 31-01-2015

Amfori BSCI  
<https://www.amfori.org/content/amfori-bsci>



The goal of BSCI is to improve social performance in global supply chains across all industries.

BSCI has a strong code of conduct with 11 principles that support the members. These range from fair remuneration to no child labour, along with a step-by-step approach that enables companies to monitor, engage, get empowered, and support their sustainable trade.

We became member 1-6-2009 NID nr 2960

Agreement on sustainable textiles / covenant (Dutch Agreement on Sustainable Garments and Textile)

<https://www.imvoconvenanten.nl/en/garments-textile/agreement>



Star Sock has signed the agreement on sustainable textiles in 2017.

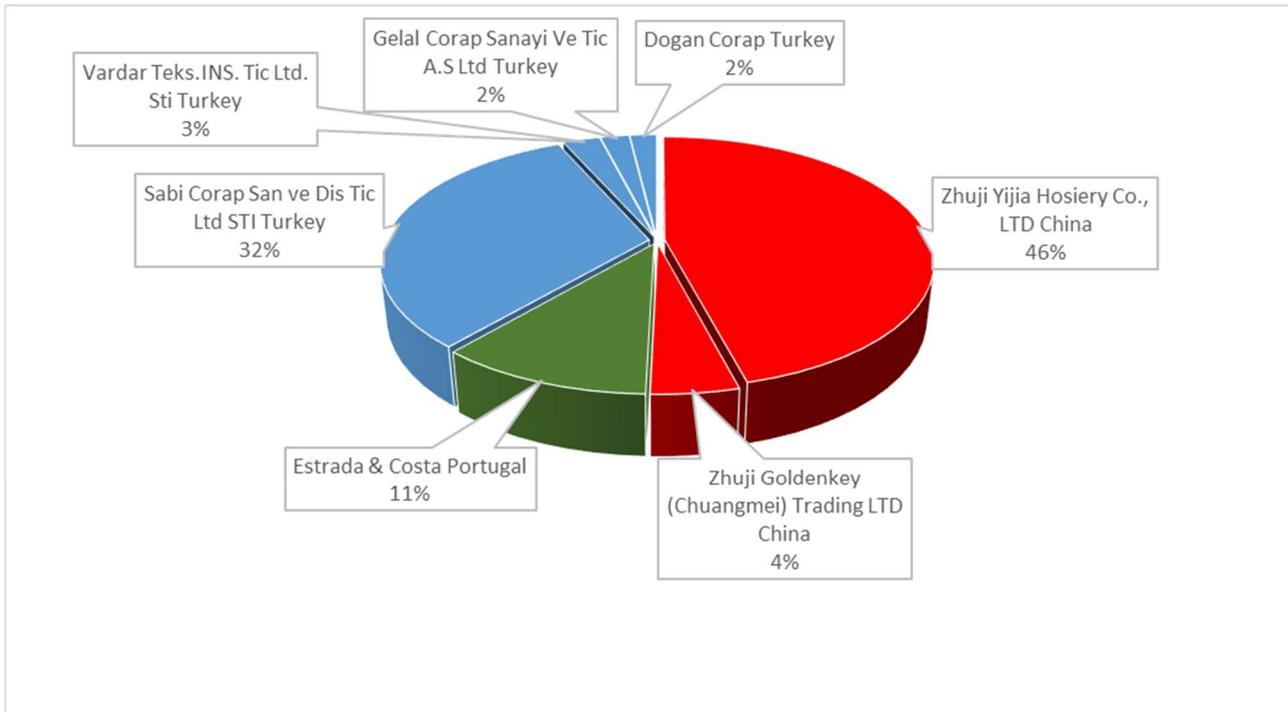
SER is a coalition of businesses and other organisations working together on international responsible business in the garment and textile sector. The aim is to improve working conditions, prevent pollution, and promote animal welfare in production countries. The involved companies/institutions include industry associations, trade unions, NGOs, and the Dutch Government. The participating businesses commit themselves to fighting discrimination, child labour, and forced labour. They also undertake action to support living wages, health and safety standards for workers, and the right of independent trade unions to negotiate. Additionally, the covenant works on reducing the negative impact of their activities on the environment.

We have signed the agreement 13-11-2017

## Production in 2019

In 2019, our turnover was five mln euro, which was a bit less than last year. Nevertheless, we have made a lot of progress in using more sustainable materials. If you look at our figures of previous years, you will see increases in the use of Organic cotton and in chemically recycled Nylon Econyl.

The production of these socks took place in three countries within seven different facilities. Half of the materials was produced in China, 40% in Turkey, and the last 10% was produced in Portugal.



Piechart 1.2 percentage of productionvalue per factory and country

	Supplier	Production country	2019 in %
	Zhuji Yijia Hosiery Co., LTD	China	45,94%
	Zhuji Goldenkey (Chuangmei) Trading LTD	China	4,44%
	Estrada & Costa	Portugal	10,86%
	Sabi Corap San ve Dis Tic Ltd STI	Turkey	32,13%
	Vardar Teks.INS. Tic Ltd. Sti	Turkey	2,65%
	Gelal Corap Sanayi Ve Tic A.S Ltd	Turkey	2,06%
	Dogan Corap	Turkey	1,91%

Star Sock has been working together with all of these facilities for a longer period of time because our work with the facilities is highly based on mutual trust and cooperation. Therefore, the need to switch between factories is mostly, if not completely, eliminated. Unfortunately, we did have to let go of some factories in the past due to lack of orders. It is better to consolidate for our leverage within all these suppliers.

The possible harm as well as insights on steps that have been taken will be addressed per subject. In general we see the following issues per country.

## Portugal

Portugal is a country on the low risk list of Fair Wear Foundation and is part of the European Union. This does not mean that there are no risks involved but the risks are limited. The biggest risks are further back in the supply chain, e.g., where the cotton is sourced. Most of the materials for our production come from Spain or China. All the cotton we use in Portugal was made of recycled cotton sourced from Spain. Unauthorised subcontracting is a general issue which, unfortunately, is quite common in our business. We are aware of this fact and we uphold good communication with our factory Estrada & Costa about his production planning and, if needed, why he has to subcontract the order.

## Turkey

Turkey is a top 10 player of garment exports in the world. Therefore, it is also interesting for us to produce socks, due to the efficient supply chain and the shorter lead time for shipments to Europe. The socks industry is quite old and a lot of factories are now owned by second or third generation families. Due to the fact that the factories are family owned, they have invested a lot of money back into their facilities, hence the knitting machines are quite new and advanced. Although there are still a lot of old machines (50 or 60 years), these machines are still running in the business and are able to do the work. The sock production still takes place in the outskirts of the highly populated city of Istanbul. Most of the factories are located in four neighbourhoods. Almost all the workers live in the city and factories arrange minivan transport from their apartments to the factory.

### Labour issues in Turkey

Turkey has long had a close relationship with the European Union and is already familiar with many international workplace standards. Improvements are still needed in many areas. Small and medium-sized factories with a wide sub-contractor chain are the norm across the country. These factories already work together for a long time, as they are handed down through the family. Unfortunately, working conditions get worse down the supply chain, which is also difficult to reach from our side.

Syrian refugees. More than 3.5 million Syrian refugees are living in Turkey without any social security or an official job. In order to survive, they need to have some kind of income, thus, a lot of Syrian refugees work in the textile industry as it offers unskilled labour. This also happens in the socks business. At Star Sock we have educated our factories in Turkey that if they want to work with Syrian refugees, they should treat them as normal employees and give them a regular contract like they do with all the other workers. At the moment, no Syrian workers can be found in our factories, simply because they didn't hire them. We have our quality control on the ground to avoid illegal subcontracting with facilities where Syrian refugees are working. We have also conducted a Workplace Education Programme within Saby in 2019 to train the workers on their rights.

## China

China is the largest exporter of garments in the world. It has developed rapidly over the last years and is now becoming one of the most mature production countries. Guided by the government a lot of improvements have been made on the production of raw materials and in dyeing and finishing processes. Unfortunately, there are still some huge difficulties to overcome.

Basic necessities in our factories are well arranged, such as good health and safety issues but we keep facing excessive overtime. We have a lot of migrant workers who come from other places throughout the whole of China. The salary they earn is around the living wage level, but they work six days a week, 12 hours per day on average. In busy periods these working hours can increase. Star

Sock is constantly discussing with the factories how to drop the working hours but it is not as easy as it seems.

Our socks are produced in a town called Zhuji, however, most workers can easily work somewhere else, which they will if they aren't able to work a certain amount of hours. If we increase their salaries, yet put a maximum on their working hours, the workers will end up earning the same amount of money for less time. Nevertheless, these are migrant workers and want to work as much as they can because they don't know what to do with their free time. We have gathered this information from the worker representative meetings, which we facilitate when we visit the factory.

## Child Labour

"The age for admission to employment shall not be less than the age of completion of compulsory schooling and, in any case, not less than 15 years." (ILO Convention 138)

"There shall be no forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour. [...] Children [in the age of 15-18] shall not perform work which, by its nature or the circumstances in which it is carried out, is likely to harm their health, safety or morals." (ILO Convention 182)

Star Sock is dedicated to comply with the above laws, which were ratified by their members in the mentioned conventions and will not accept any child labour in the total supply chain, from raw material, like cotton, to the sock.

We have incorporated the ILO conventions in our Code of Conduct to enforce our suppliers and their supply chains to follow these regulations, as formed by the ILO.

Child labour in the supply chain.

A lot of child labour is already eradicated in our Supply Chain. This has various reasons, one of them is that the economic and cultural development of our production countries is already on a certain level that Child labour is not accepted in any way. Unfortunately, this is in the first and second tier of our supply chain. What happens further in the supply chain is very difficult for us to track 100%. Nonetheless we keep on discussing these issues while doing factory visits, so child labour will be

If we encounter Child labour we will take the following measures

We will remove the child/children immediately from their hazardous tasks and make sure that the payment is continuing for them although they don't work. Furthermore, we will consult Fair Wear Foundation and other local organisations to see how we can help the families of the child workers. In addition, we engage with the plantation/factory owner how to prevent these cases in the future by giving proper training and increase awareness on all the workers. Lastly, we will install management systems to stop these problems from happening in the future and help the plantation/factory owner to make a sustainable business case without the use of child labour.

Worldwide Supply Chain issues

In general, child labour does not occur in our tier one suppliers. Further back in the chain, in ginnery or cotton plantation it is very difficult for us to track. We are aware of the issues on the cottonfields and that child and forced labour can occur in certain countries like Oezbekistan or Turkey. We don't allow our suppliers to buy cotton of which they know comes from a place where they have child and/or forced labour. Furthermore, we try to use mainly GOTS certified cotton in order to have a little more grip on the farming and ginning process. Our aim is to put as much pressure on our supply chain so that everybody is aware of the situation regarding child labour and that the ginnery and the plantation do whatever it takes to eradicate this type of labour, or don't buy from places where they can't 100% guarantee the child labour free production.

To do

- Add the sourcing of cotton to our code of conduct of our suppliers that they don't buy any Oezbek cotton, or cotton of which they know is harvested by child labour and/or forced labour.

## Country specific issues

### China.

In China we have never found any child workers in our direct suppliers. We do sometimes discover young workers, students which are working in the basic process of packing/finishing of the socks. There are special regulations for these workers and they can't work as much as normal staff.

### To do

- Statement on young workers and that they are aware of the regulations on hiring young workers. And follow-up that young workers don't work excessive overtime.

### Portugal

In Portugal we have never found any child workers and also never discovered any young workers, although young workers can be used during holiday periods. The BSCI reports never stated any evidence that child workers are used.

### Turkey.

In Turkey we face similar issues as in China. Also, here we need to arrange that the special regulations of young workers are known and executed in a proper way. What differs Turkey from China is the situation of the Syrian Refugees, as they are working illegally in the supply chain. Unfortunately, child labour still exists within these groups. They have a difficult position as they don't earn any money legally, yet they are in need of basic living standards for which they are willing to do any type of work as long as it earns money. More information on Syrian Refugees will be discussed after illegal subcontracting.

### To do

- Statement on young workers and that they are aware of the regulations on hiring young workers. And follow-up that young workers don't work excessive overtime.
- Extra careful on the situation with Syrian refugees and child labour as this will definitely will occur, and maybe not at our first tier level but also in the Gineries and Cotton plantation. Star Sock will make a statement on Syrian refugees which need to be signed by all parties involved in the supply chain not only our first tier.

### Annual Evaluation.

- Check every audit if there are issues occurring.
- Star Sock checks the personal files during every visit and discuss during the meeting

## Discrimination and gender

"There is no discrimination in employment.

Recruitment, wage policy, admittance to training programmes, employee promotion policy, policies of employment termination, retirement, and any other aspect of the employment relationship shall be based on the principle of equal opportunities, regardless of race, colour, sex, religion, political affiliation, union membership, nationality, social origin, deficiencies or handicaps (ILO Conventions 100 and 111)"

Star Sock is a transparent company in which there is no room for any discrimination on employment. We cannot and will not accept these events to happen within our company or our supply chain. Any finding of any discrimination in our organisation will result in an official warning, the second time means dismissal. In our supply chain it is difficult to have these findings, and/or take similar measures. Therefore, we are trying to arrange anti-grievance mechanisms in our supply chain so the discrimination can be addressed without any change of “reprisal” as these are often delicate issues.

If we look into our supply chain we haven’t found any cases that there is discrimination going on. In our production countries, both men and women are working closely together in similar working places and doing similar jobs. Our biggest factory in china has a female owner.

We have not encountered any kind of discrimination in all of the audits we have in our tier one factories nor in any other BSCI reports. However, we do realise that this discrimination can occur further back in the supply chain.

China, Portugal and Turkey.

Discrimination in Employment is very difficult for us to control, even in our own tier one factories and even if we have installed a grievance mechanism. The further we go into tier two, the more complex it becomes to address these harms.

All our first-tier production countries have ratified the ILO conventions mentioned above. Furthermore, in our audits, which are done by Fair Wear Foundation and BSCI, nothing was mentioned about the cases above.

Together with the Fair Wear Foundation, we have an anti-grievance mechanism installed and have the worker information sheets presented in the factories. We are still aware that the following risk factors are present.

- Our Fair Wear audits show that we have a high turnover of workers, especially in China. Although this could be seen as a possible base for discrimination, within Star Sock we believe that the reason isn’t based upon discrimination but more based on other work-related issues such as type of food or workplace. Also, there are bigger groups of workers who would like to work together.
- Location of housing and Dormitories. In China it is quite common to have dormitories present at the factories and a lot of workers stay there as they are migrant workers so there is a chance that, especially unmarried young women, could have been discriminated by their bosses or the manager of the dormitory. In all those years we are working with Fair Wear Foundation we have never heard any of these stories. In Turkey, the commuter transport is arranged with minivans partly paid by the factories for which we also don’t have any information on discrimination or gender-based violence.

Whenever we encounter these issues we will immediately act. Together with the Fair Wear Foundation and local stakeholders we will investigate the issue, after which we will take measures accordingly, including contacting the local police offices and helping the victims to seek justice.

## Forced Labour

**“Forced Labour”** All Work or service which is extracted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily. (ILO, Forced Labour Convention, 1930 [No. 29])

Star Sock wants to eradicate all the forced labour out of the supply chain and establish processes in such a way that forced labour isn't used. In our audits we have never found any evidence on forced labour but we do know that certain risks can occur in our supply chain.

Our major risks lie within the cotton material, as already mentioned earlier in regards to child labour. What makes it more complex is that some of the forced labour is organised by countries. We have heard of the situation, where North Korean workers are forced to work in the Uzbek cottonfields. Star Sock doesn't want to support these types of labour and won't source its cotton from Uzbekistan.

We are also aware of the situation with the Uyghurs in China and closely follow the reports or other information sources that are available. Last March there was a report published by the Australian Strategic Policy Institute (ASPI) called 'Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjian. <https://www.aspi.org.au/report/uyghurs-sale> We immediately took action upon this report and checked our supply chain if one of our tier suppliers was working with one of the suppliers mentioned in the report. For the years 2018/2019 and 2020 we didn't find any clear evidence that we have worked indirectly with one of these suppliers.

Other known risks of forced labour are the withholding of personal documents, annual payment of salary or any other way to prevent a worker from leaving their employment freely and by their own decision. These situations can occur when workers live on-site in the factory dormitories. During our audits, the dormitories are always inspected and during interviews the auditors try to find out if these cases are occurring. In our subcontractor checklist, we have embedded questions regarding the payment of the wages on a monthly basis instead of annually.

China, Portugal and Turkey.

China has not not ratified the ILO convention and together with the above mentioned report the situation with the Uyghur community is a delicate situation. As this is on country level, Star Sock can only do what is within its power to have control of their own supply chain. Portugal and Turkey have ratified this convention, but this doesn't waive our duty of controlling our supply chain on above mentioned risks.

How are we going to prevent forced labour in our Supply Chain

- Star Sock isn't going to use Uzbek cotton in their products
- Any relationship with factories who work with forced Uyghur workers will be terminated to eradicate the forced labour.
- Star Sock is pro-actively asking questions where the cotton/raw materials are coming from and will report any found issues to local and international stakeholders and make a step by step remediation plan as we have never dealt with such a situation directly.

## Working time

### No excessive working hours

Hours of work shall comply with applicable laws and industry standards. In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every seven-day period. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate. (ILO Convention 1).

As this moment all of our production countries have ratified the first ILO convention, and being the first convention, it shows the importance. Unfortunately, this is still occurring within our supply chain. Star Sock fights against the structural and excessive overtime but it is very difficult and complex to eradicate. When addressing excessive overtime you also need to talk about living wages as this goes hand in hand.

When looking at excessive overtime we can divide it into two main risks as to why excessive overtime occurs.

The first risk is bad management by the factory, or any other supplier in the total supply chain. Whenever orders aren't managed in a proper way, the delivery deadlines are not met in which case the workers can be forced to work overtime in order to prevent a delay to the client. Star Sock has a long relationship with our factories and vast experience in handling complex orders, therefore, we are quite capable of calculating the necessary production time. When our order is placed at the factory, we check if our demanded leadtime is possible after which we ask a double confirmation from the factory. During the production, we have weekly contact with the factory to check the progress and solve any problems as soon as possible so the planning of the factory can be met. Despite our best efforts every year, there are some orders which are pushed into overtime.

The second risk is lack of salary. Especially in China, the salary in the regular hours isn't sufficient to support the living wage, therefore the workers work the excessive overtime to get a decent living wage. The simple solution would be that Star Sock increases the salary in the regular hours to the living wage. Unfortunately, after thoroughly investigating the factories and consulting our stakeholders it is not an easy solution. Even if we were to increase the wages, the workers would still continue to work the same overtime. 80 to 90% of our workers in China are migrant workers and they want to work as much as they can, spend as less time needed outside to avoid spending money, so they can save everything and support their families living in the inland parts of China. If they don't work overtime, they are going to spend more money which they can't afford themselves. Star Sock is trying to change this cultural behaviour by doing interviews with worker representatives, to see if we can support any free time of the workers. It is difficult to prove that working for 10 or 20 consecutive days their production slows down and they can work harder and more efficient if they take some rest. As there are many other factories in the neighborhood, if our factory doesn't give the workers the opportunity of overtime they are likely to work for a neighbouring factory.

Star Sock will focus on these risks in the upcoming years to see how we can address these issues.

China, Portugal and Turkey,

Star Sock has gained extensive knowledge on this subject but it is very difficult to change the behaviour in China. The situation in Turkey and Portugal is less dramatic with the excessive overtime and the basic salary is on a much higher level. During the audits which we held in our factories in Turkey no evidence of excessive overtime was found.

How the situation is in our other tiers of our supply chain is something we cannot easily monitor. Star Sock will develop a strategy in the coming year to see how we can get more knowledge in our supply chain. However, it is mentioned in our code of conduct and it is the first convention of the ILO, thus, it can't be eradicated easily.

As already mentioned we are going to try and mitigate these risks by keeping a close eye on these subjects during audits and discussing the situation with the factory management during every visit to keep the quality of the management on such a level that the first risk is almost eradicated.

## Occupational health and safety

Safe and healthy working conditions

A safe and hygienic working environment shall be provided, and best occupational health and safety practice shall be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Appropriate attention shall be paid to occupational hazards specific to this branch of the industry and assure that a safe and hygienic work environment is provided for. Effective regulations shall be implemented to prevent accidents and minimise health risks as much as possible (following ILO Convention 155). Physical abuse, threats of physical abuse, unusual punishments or discipline, sexual and other harassment, and intimidation by the employer is strictly prohibited.

Star Sock underlines the ILO convention and will not work with factories where the workers are at serious health and safety risks when they execute their job.

The Healthy and Safety on the working site is very important. During all our factory tours, we focus on the health and safety issues. During the last years, especially by the effort of Amfori, the health and safety on the working sites is enormously increased. Every factory has a doctors unit, specially trained staff, and are having fire drills regularly. Unfortunately, during every visit we still find partially blocked fire-extinguishers and emergency exits. It shows that the workers aren't fully aware of the possible issues and need more training. In our main production locations in China and Turkey we have held Fair Wear WEP (Workplace Education Programme) trainings to educate the staff on the possible risks of their working place.

In the knitting department, there is always a lot of noise but in our production facilities earplugs are available. Some workers also work with facemasks to avoid breathing in small cotton particles, which fly around during the knitting.

Further in our tiers, we also focus on these health and safety issues with our self-assessment questionnaires and emphasise the importance during our factory visits.

China, Portugal and Turkey.

The level of our factories has increased over the last years due to heavy guidance from our part, as well as the help of our stakeholders, Fair Wear Foundation and Amfori.

During our visits in our tiers, to dyehouses and spinningmills, we also check the Health and Safety issues in these production locations. Whenever we find anything which needs to be repaired immediately, like a broken emergency light, we won't leave the facility until it is repaired. More complex issues are discussed with the management and the stakeholders in regards to how urgent the issue is and how big the health and safety issues are before deciding whether we need to stop the production until the problem is solved or whether we can continue with the remediation plan.

## Freedom of Association

Freedom of association and the right to collective bargaining

The right of all workers to form and join trade unions and bargain collectively shall be recognised. (ILO Conventions 87 and 98) The company shall, in those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination and shall have access to all workplaces necessary to carry out their representation functions. (ILO Convention 135 and Recommendation 143).

Freedom of association and the right to collective bargaining is one of the most fundamental rights to secure the protection of the workers in our supply chain. Star Sock is aware of these rights and informs the workers in our factories with the FWF worker information sheet on their right on collective bargaining.

China hasn't ratified these ILO conventions where Portugal and Turkey did.

Working with collective bargaining and labour associations like unions is something which Star Sock hasn't done actively in the past. Last year, we have gained more knowledge on the country specific issues of unions.

China, Portugal and Turkey

In China, there is a form of collective bargaining going on because the workers have a strong demand on the socksmarket in Zhuji. They can basically work in any factory and if the factory doesn't meet their demands in terms of salary, food, working hours, or working environment, the workers will simply leave and go work somewhere else.

In Turkey there are unions but the system of working with unions is complex, there are a lot of different unions available, and a union can only work within a factory if a certain percentage of the factory's total workforce is a member of this union. The level of participation with a trade union is very low. The importance of unions is mentioned during the WEP training from Fair Wear Foundation, however, workers don't have the confidence that a union is going to change the situation for them.

The situation in Portugal is similar to the Dutch situation where unions are active but on a low profile basis unless there are major issues happening, like closing the factory or bankruptcy.

Star Sock will condemn any intimidation on workers, or anti-union behaviour in our supply chain. We will not tolerate these kind of practices in our supply chain and together with the stakeholders we will take measures to cease these risks.

Star Sock will keep mentioning collective bargaining and the reason why it is so important but this won't be a focus point in the upcoming years.

## Living wage

Wages and benefits paid for a standard working week shall meet at least legal or industry minimum standards and always be sufficient to meet basic needs of workers and their families and to provide some discretionary income. (ILO Conventions 26 and 131). Deductions from wages for disciplinary measures shall not be permitted nor shall any deductions from wages not provided for by national law be permitted. Deductions shall never constitute an amount that will lead the employee to receive less than the minimum wage.

Employees shall be adequately and clearly informed about the specifications of their wages including wage rates and pay period. On top of that, Star Sock will start a dialogue with the factory management and other clients of the factory to start paying a living wage.

Furthermore, Star Sock demands a legally-binding employment relationship. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship, shall not be avoided through the use of labour-only contracting arrangements. Or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment. Younger workers shall be given the opportunity to participate in education and training programmes.

Together with the help other Fair Wear Foundation members, Star Sock is starting to do an investigation on how much the living wage should be in the area where our factories are located. We are planning to do these investigations in China and in Turkey in 2020. As soon as we have established the living wage, we can calculate the wage gap and see if we can close this gap. Unfortunately, Star Sock doesn't have the power by itself to increase all the wages as we don't have enough production volume to fulfil the total production capacity. Star Sock is going to start a dialogue with other suppliers once our investigation is done to see how we can increase the wages. This goes hand in hand with the situation of excessive overtime as mentioned earlier in the report. A final solution isn't found yet and we still keep on searching to find this.

We do know that the wage gap according to international standards is there, but we want to know the truth of the local situation in our factories, e.g., the housing costs can vary depending on the area you live in. Therefore, a personal investigation is necessary. It will be very difficult to close the gap as, it still has a high priority for Star Sock and we are investigating how we can pay a premium price for our products so that Star Sock can at least pay a living wage.

All the payments of the wages in our supply chain are done by banktransfer and in every factory there is a digital system to control and record the working hours.

If we go back into our tiers, the payment of a living wage is difficult for us to judge. The most insights we gain by audits from our stakeholders and we don't audit our tier two and further suppliers. When visiting tier two and further back, Star Sock is not skilled enough to check the salary system and understand if they really pay a living wage. After we have established the living wage in our factories we are going to take steps back into the supply chain to share our learnings further back in the chain.

China, Portugal and Turkey.

In China, we are aware of the piece rate systems which are in place. It is in their cultural behaviour that “if I work harder than my neighbour I should earn more”. In theory, there is nothing wrong with a piece rate system, nor is there something wrong with the fact that people benefit when they work harder. It does become a problem if the wage they earn is less than the minimum wage due to their productivity. Star Sock and its factory owners state that this won't happen and the minimum wage is always paid. This is also verified by external audits done by Fair Wear Foundation.

During the audit which was held in 2019 the salaries of 40 workers were reviewed. 75% of them are on an average salary which is at 66% of the Asia floor wage level and on 166% of the local minimum wage. If you calculate this back with the working hours they have to work, there is still a big gap to cover.

In Portugal, we don't have any problems because the minimum wage is on the estimate wage level. There are other problems such as young workers who are not willing to work in factories anymore, therefore, the average age of the workers is increasing.

In Turkey, the minimum wage increased rapidly throughout the last years to work towards a decent living wage. Nevertheless, there is still a gap which needs to be closed. This is also shown in the audit by Fair Wear Foundation. When we look into our last audit of 2018. All the workers were above the living wage estimate for 1 person, but if you calculate the figures with a family of 4 people, considering the fact that both parents are working, then the wages are only on a level of 75%.

To do

- Conduct an interview and fill in form to establish the costs of living per factory/area.
- Calculate the wage gap
- Make a detailed plan of action to increase the wages with help of other companies who source in our factories
- Check the wage levels in our tiers back.

## Hazardous Chemicals

The use of chemicals could be harmful to the environment. At Star Sock we believe that this should be minimalised as much as possible within the market standards. We follow the ZDHC and the DETOX campaign in the process of terminating all hazardous chemicals in the whole supply chain.

We have made our RSL and MRSL and shared this with our suppliers. We are going to update this in 2020 to be ready for the MRSL 2.0 from ZDHC. To control the chemicals even better we regularly do random tests on our finished goods to check the chemicals used. We also increased our volume of certified GOTS cotton to have more grip on the dyeing process.

Chemicals are used in various steps of the production process of socks. They are mostly used in the production process of the synthetic fibres and in the dyeing of the natural and synthetic fibres. Other chemicals used are softeners, silicon washes and detergents in the washing process within the factory, and the oils which are used in the knitting process.

China, Portugal and Turkey.

In China a lot of dyehouses are closed down in 2019 because there were a lot of poorly equipped facilities and by enforcing the tightened regulations they all had to close down. Therefore, the bigger dyehouses keep on producing, which has a positive impact on the use of chemicals. The bigger the facility, the better they are managed and controlled. Star Sock works with different dyehouses but they all work with a similar standard. When we select dyehouses we check if they are GOTS certified and if they can handle our RSL and MRSL standard. All these dyehouses keep a clear chemical inventory from the chemicals used.

If we look at our factories, improvements can be made on keeping a chemical inventory and having a proper storage of the chemicals used. As already mentioned these are not heavy chemicals but any chemical should be handled with care. This will be put on the to do list to arrange.

In Portugal, we mainly work with recycled yarn which is dyed for the first time. The difficulty is that we don't know which chemicals are used the first time. Therefore, we rely on the global recycling standard and oekotex, to eradicate hazardous chemicals in our items. We test some orders on a yearly basis to check the quality. We have never found exceeded limits of the hazardous chemicals.

In Turkey the dyehouses work in a similar way as the Chinese dyehouses. We have even more grip on this supply chain because every dyehouse has its own color book. By deciding which colors we use we push the factory to buy from this specific dyehouse. However, this is not 100% solid as any other dyehouse can copy these colors, but due to the limited quantity of kg's we buy, most of the time the easiest option is chosen.

Todo

- Update our RSL and MRSL.
- Check chemical inventory in the factories

## Water

The use of freshwater and the disposal of wastewater is becoming more and more important. This is by far creating the biggest impact on our valuable planet. The most water is consumed during the growing stage of cotton and the dyeing of the yarn. Star Sock wants to have more impact on the water usage in its supply chain. At this moment, we are aware of the water usage but we are not capable of making any policy on the water usage as our knowledge is too little.

We are going to start with mapping our water supply chain by asking all our suppliers in tier one and two to keep records of their water usage. We are also going to ask them to track which water is used. The water usage is divided into several parts such as purified drinking water, collected rainwater, recycled greywater, municipal mains, wells, and surface water.

After we have received the records we are going to make an impact plan per supplier and its tiers to see where we can start a water use reduction.

Waste water discharge. Besides keeping record of the water usage, they should also keep records of their water discharge. We can track if water gets leaked out of the process and try to minimise the wastewater discharge in our facilities. Even within our own office building we need to be aware of this if possible. Furthermore, the question remains whether we can make the water circular and stop wasting but reusing it infinitely.

Dye-houses. Especially dyehouses are well equipped to do the above steps but we need them to go a step further. What can they do to purify their water better to have less pressure on the municipal waste water system, or even better to re-use their wastewater again. They need to control their use of salt and other chemicals in such a way that the waste water is less harmful. Besides this, they need to control their sludge, how much are they producing, which chemicals are found in there, and where are they going to discharge this material? Records need to be available in a transparent way so it can be checked randomly.

If water scarcity occurs it should be known, especially at the dyehouses where they have the biggest water usage. Also, they should know where they buy their cotton and what the situation is on the water scarcity over there. This information should be presented to Star Sock and we are going to make a benchmark to compare the different cotton fields with the different types of water scarcity to find out high and low risk cotton areas.

China Portugal and Turkey.

China. In China the water usage is being monitored in the bigger dyehouses by the government. Where in the past the municipalities were involved, now it is a national organisation. Dyehouses who exhaust more waste water, or have worse quality have to be fined in order to pay for the extra pressure on the environment. We are not aware exactly where all our cotton is grown but we work with GOTS to have a better tracement. We are going to try to have the first water footprint, also from the cotton plantations, by tracing back our GOTS orders to find where the cotton really came from, in order to establish a way of working for all our cotton. Investigate the national and local regulations on wastewater management and see the if the necessary management system is in place.

Portugal

In Portugal we buy mostly recycled yarn. In Portugal we focus on the water consumption in the knitting factory, which is quite low and don't prioritise this country on a high level

Turkey.

In Turkey we are going to do similar steps as what we are planning to do for China.

Todo

- Investigate our current water footprint
- Make our policy based upon the water footprint for 2019/2020
- Actively focus on the water usage and see where we can get any deductions
- During every visit pay extra caution on this situation and discuss with factory management what they think they can do, eg invest in digital water flow meters to start tracking their own footprint.

## Greenhouse gas emissions

Star Sock wants to have a positive impact on the world. This is not only measured by water usage, or the use of chemicals but also in terms of Greenhouse Gas Emissions. We strive to have the least Greenhouse gas emissions possible and we check if we can compensate all the Greenhouse gas emissions we have to be positive in the end.

Star Sock wants to measure first its current footprint and find out in which part our GHG is the highest and in which parts we can take the necessary steps to lower down the footprint. We can't do this by ourselves and we need our stakeholders to help us with this process as our figures need to be verified by a third party. At the moment we are investigating which party can help us in this subject.

If we look into the steps of our GHG emissions, they come from three major sources. One is the energy consumption of our total chain during the production of the socks. The second is the materials of which the socks are made and the way this energy is gained. The third source is the transportation within our chain. And the fourth source is the water usage in the consumer phase. How often are our socks washed?

To become GHG positive we need to compensate this by doing things that are good for the earth. We are considering which compensations are possible and how to obtain them, e.g. planting more trees, or improving the biodiversity in the production countries.

China Portugal and Turkey

After we have investigated our current energy use, we want to establish an energy management plan at our factories, so that they are aware of the energy is used and what the maximum limit is. Then we want to implement energy saving measures to see if we can reduce the maximum annually. We don't solely look to energy use but also to efficiency in the process; how can we reduce mistakes, can we use less material with the same output, or use recycled material for our packing. Another big energy consumption lies within the dye houses and how well they are reusing their heat. Besides the enormous usage of water, they also use an incredible amount of energy to heat the water for dyeing. Often this heating is done by burning coal but perhaps we can find more energy friendly ways.

## Transportation.

Transportation is another main subject which needs to be addressed. As already mentioned, we first need to measure our current footprint and find out where the majority of our footprint is made before we can see how we can minimise our footprint. It can be quite challenging to find out exactly as the gasoline usage differs per driver and per vehicle. The steps we are going to take are: first analyse our transported kilometres in combination with the transportation way, sea boat air. Then we are going to calculate the quantity of socks we have transported along this way to calculate the costs. For the cost calculation part we will use an environment standard to calculate them.

### To do

- Set up a calculation per factory in each country in which they can fill in their energy consumption
- Check how the calculation is done and perhaps invest in specific energy meters so we know the costs per step within the factory
- Ask our factories to go back in their tiers and see if we can get similar information
- Make an energy action plan per factory and its supply chain.
- Don't forget our own office and own transportation methods, of travelling to clients and factories.
- Also check the wearing phase of our socks and make them from recycled or reused materials and durable. In addition, inform the consumers how they can contribute on reducing the Greenhouse gas emissions by washing in cool water and air dry clothing instead of the tumble dryer among other things.

## Resource use

As sustainability is our core strength we want to minimise the usage of virgin materials in any step of the supply chain. If we need to use virgin materials we want them to be processed in a less harmful way for the environment. We strongly recommend regenerated, recycled, and reused materials. All these materials should be covered by external and independent organisations (such as GRS, BCI or GOTS) to ensure the usage and strengthening of the supply chain.

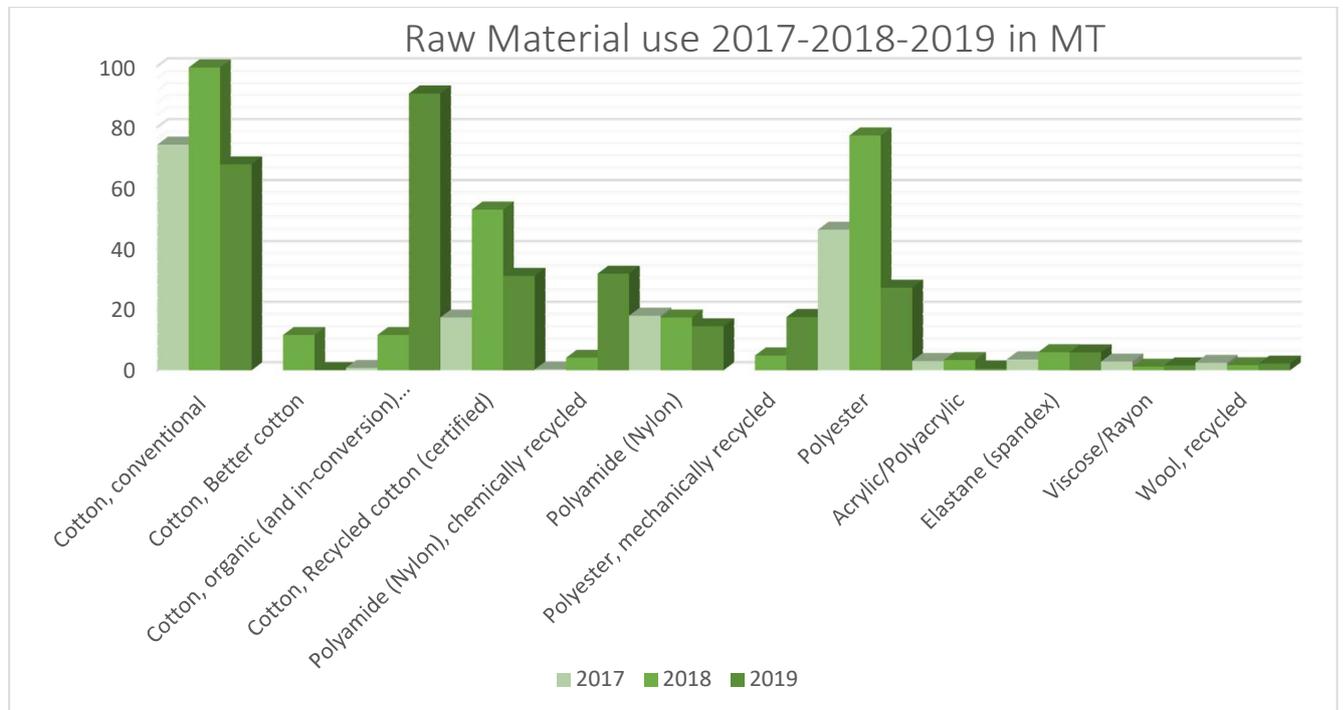


Chart 1.1 Raw material usage.

Star Sock also wants to increase the use of Paperwise (*paper made not from wood but from agricultural waste* [www.paperwise.eu](http://www.paperwise.eu)) material instead of real paper to decrease our footprint.

With the use of raw materials the waste should also be managed. All our factories need to recycle as much waste as they can.

China Portugal and Turkey.

All our production countries need to start working on recycled materials as much as they can. Additionally, they need to think about recycling within their own facilities and see if they can decrease their own waste of their operations. Suppliers need to make a management system on their waste, in which they check which waste they have, how much waste it is, and how to recycle the waste into new materials. This system is shared with Star Sock regularly.

To do

- Waste information management system in place at factory site
- Once it is established at the factory push back to tier two and further
- Also check our waste management at our headquarters

## Animal Welfare

No animal is hurt during the total production process of our socks. If we need to use any animal materials, recycled materials are preferred .

Star Sock doesn't work with wool very often. We have some small production running from recycled wool, with GRS certificate. None of the processes used in the production of our socks can have any impact on animals: (live)plucking/(force)feeding, mulesing, slaughter of domesticated animals, and abuse.

## Bribery and Corruption

Do unto others as you would have them do unto you

Star Sock believes in a fully transparent supply chain. In our transparent supply chain there is no place for corruption and bribery. If Star Sock finds any case of this taking place, the relationship will be terminated. Suppliers shall carry out their activities in an honest and transparent way, keeping appropriate accounting records to facilitate the traceability of the decisions made. This should be done to prevent any type of bribery, extortion or corruption taking place. Suppliers shall not offer, request accept or grant any gifts or donations. Suppliers shall not manipulate or influence their workers, nor shall they forge any files or records in order to alter the outcome of any audit taken place.

Star Sock is aware of the risk of bribery but has never found any real evidence that it took place. Any bribery or corruption found within our chain will immediately result in termination of the relation.

To do

- Establish an anti-bribery management system in the factory and train the workers on anti-bribery mechanisms.

## Unauthorised use of sub-contractors (homeworkers)

We expect that you do business with your supplier the same way as Star Sock is doing business with you. Star Sock insists that you disclose the subcontractor before any production of Star Sock taking place and no production can start after written confirmation from Star Sock.

If any production is found on places that are not disclosed to Star Sock the result is that we will terminate the relationship.

Star Sock is fully aware that the socks business is very much depending on subcontracting and that not all the subcontractors are bad places. We have also found cases of subcontractors which were even bigger and better organised facilities then who Star Sock normally is working with.

Steps to be taken before orders can be produced

- Star Sock have visited the subcontractor before
- The code of labour practices from Fair Wear Foundation are presented
- The code of conduct is signed by the subcontractor
- We will do in line inspection at the subcontractor to follow the movement of our goods

China, Portugal and Turkey.

We work with subcontractors in China and Turkey. Our main factories know that they can never subcontract a total order to external parties, they always need to be involved in at least one step of the production process so they feel it is their responsibility. Subcontracting can also help the factories when they have a lack of orders; they can work with other factories together to avoid stopping their machines. What we often see is that factories have a certain number of machines but try to take 20% more orders on an annual basis so they can manage everything properly. If for whatever reason the orders are not coming, they can scale down without having a lot of immediate effect such as letting go of some workers. This situation is very common to have a network of factories which are on a similar level and help each other out. It works both ways, our factories can also work as subcontractors for other parties.

The most important thing is that Star Sock knows 100% where their goods are during the whole supply chain.

## Responsible consumption

The most sustainable product is the product which is never produced. Star Sock is going to strive to work within our supply chain in the most effective way. This subject relates to the use of raw materials but this is more focused on the sales of our goods and our clients. Instead of selling 1.000.000 pieces we want to sell 967342 pieces which are packed efficiently per shop. In this way 30.000 pairs don't have to be produced and the sell-out will be less if we work closely together with the client to make this optimisation. Also, the carbon footprint of our products will be less if they don't have to be moved from one shop to another, or from one client to another. We strongly believe that all our logistic and ICT systems should be built to make this process more efficient and possible.

Sharing information, especially in the sales department, is crucial to make this happen and will result in a more flexible and less CO2 emitting supply chain.

## About this report

Information. The information in this report is collected by various members of the Star Sock team.

Transparency. We strive to be fully transparent as a company and we hope to inspire others to follow our efforts. We will present this report annually. In this way our progress can be reported. This report is based upon our efforts beginning of 2019 until beginning of 2020.

Any positive feedback or remarks please feel free to send us an email at [info@starsock.nl](mailto:info@starsock.nl)