



SUPPLIER CODE OF CONDUCT

Soho House is committed to ensuring that work conditions in its supply chain are safe, that workers are treated with respect and dignity, that manufacturing and sale processes are ethically and environmentally responsible and that the conduct of its business is based on principles of integrity, honesty and fairness. Soho House's suppliers (for both goods and services) are obligated, in all of their activities, to operate in full compliance with the laws, rules and regulations of the countries in which they operate.

This Code of Conduct goes further, drawing upon internationally recognised standards, which are universally applicable. Soho House requires that its suppliers implement and adhere at all times to this Code of Conduct, and specifically requires that its suppliers ensure that the same principles of this Code of Conduct are implemented and adhered to by all others with whom they do business, including employees, sub-contractors and other third parties. Suppliers are required to periodically review their practices to ensure compliance with this Code of Conduct. All suppliers sent a copy of this Code of Conduct will be deemed to have accepted and agreed to it unless otherwise notified to Soho House. This Code of Conduct shall take precedence over any other Code of Conduct or terms provided by a supplier that seek to govern the same subject matters.

1. Labour and Human Rights

Soho House expects its suppliers to respect the rights of their employees and to comply with all relevant labour legislation, regulations and directives in the countries in which they operate (or, in the absence of any such legislation, regulations or directives, in compliance with relevant ILO conventions).

As a minimum level of assurance, we expect our suppliers to ensure that all locations used by them or their suppliers in the manufacture of products meet the provisions of the Ethical Trading Initiative (ETI) Base Code or similar standards.

The ETI Base Code includes provisions in the following areas: employment is freely chosen; freedom of association and the right to collective bargaining are respected; working conditions are safe and hygienic; child labour is not used; living wages are paid; working hours are not excessive; no discrimination is practised; regular employment is provided and no harsh or inhumane treatment is allowed.

In addition to meeting the above recognised standards, suppliers must maintain accountability standards and procedures for employees or contractors that fail to meet these standards. Suppliers must also confirm that they provide employees and managers who have direct responsibility for supply chain management with training on the mitigation of labour abuses.

2. Forced Labour

Suppliers should not use any form of forced, bonded, indentured, or prison labour. All employment must be on a voluntary basis and workers should be free to terminate their employment at any time with reasonable notice.

Suppliers, wherever located, must work towards ensuring that there is no slavery, forced labour or human trafficking in their business or at any stage of their supply chain and comply with and report fully under any applicable legislation, such as the UK Modern Slavery Act.

If a supplier manufactures, or sources, products in countries that are deemed to be high risk for child labour or slave labour, they must actively participate in one of the following:

- An internationally recognised programme with third party verification to bring better labour standards to the region. Internationally recognised programmes include ILO Better Works, Fairtrade Labelling Organizations International, SIA Social Fingerprint and the Fair Labour Association; or
- A country-specific programme for sourcing companies, such as BSR's China Training Initiative or Health Enables Returns.

3. Child Labour

Suppliers must not use child labour at any stage of the manufacturing and sale process. Workers should normally be at least 15 years old but must be at least the minimum age for employment in that country or the age for completing compulsory education in that country whichever is the higher, as permitted by ILO Minimum Age Convention.

4. Harsh Treatment and Harassment

Suppliers must be committed to a workplace free of harassment. Suppliers should not threaten workers with or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

Suppliers must maintain adequate procedures to ensure the protection of whistleblowers in accordance with local laws, directives and regulations.

5. Freedom of Association

Suppliers must ensure that workers and employers have the right to form labour unions and employer's associations and higher organisations without prior permission, in order to safeguard and develop their economic and social rights. Where the right to freedom of association is restricted under law, there must be an equivalent means of independent representation for workers.

6. Non-Discrimination

Suppliers must not discriminate against any worker based on age, race, colour, sex, religion, political opinion, sexuality, disability, national extraction or social origin nor shall they participate in any acts or practices that may be defined as any distinction, exclusion or preference that impairs equality of opportunity or treatment in employment.

7. Remuneration

Suppliers must pay a fair remuneration for both men and women workers, for work of equal value in accordance with applicable local laws. Workers must receive wages and benefits that at a minimum meet all applicable laws.

8. Wages and Working Hours

Suppliers should comply with local laws relevant to living minimum wages, standard working hours and employee benefits. Suppliers should not delay, withhold or defer wages legally due to its employees. Overtime hours will be voluntary and fully compensated at regular or premium rates, according to local legal requirements.

In special circumstances, employees may be expected to work longer than standard hours for limited periods of time. Where this occurs, additional working hours and consecutive working days will be in compliance with the local regulations and planned in a way to ensure safe and humane working conditions.

9. Health and Safety

Suppliers must ensure that they and their sub-contractors abide by all local laws, directives and regulations to provide a safe and healthy working environment which will facilitate optimal physical and mental health in relation to work and the workplace or in any other location where production or work is undertaken. This involves suppliers having management systems in place that meet the requirements set out in the ILO Occupational Safety and Health guidelines. Requisite and appropriate training must be given to workers on workplace in safety practices and procedures, including fire protection.

10. Environment

Soho House is committed to protecting the environment and requires its suppliers to adhere to all environmental legislation, regulations and all local laws to facilitate the protection of the environment and to have processes committed to reducing the environmental impact of their designs, manufacturing processes, and waste emissions, etc. Soho House seeks to work with suppliers who put plans in place to improve environmental impact. This includes, but is not limited to:

- Minimising GHGs
- Minimising water usage
- Minimising waste
- Maximising reuse and recycling
- Avoiding single-use plastics
- Use of renewable energy
- Adoption of closed loop processes
- Involvement in climate lobbying activities
- Avoidance and removal of all microbeads (polyethylene, polypropylene, polyethylene terephthalate or polymethyl methacrylate)

11. Sustainability-related and Certified Products and Textiles

Suppliers should aim to ensure that all products and textiles they use meet appropriate sustainability objectives.

12. Animal Testing and Animal Based Products

Soho House will not condone the use of animal testing on any products. If a supplier asserts that there is an exceptional situation in which consumers would benefit from the animal testing, the supplier must receive explicit approval from Soho House before supplying the relevant products.

Suppliers should not use and must not supply to Soho House products that make use of any fur, skins, food or food ingredients of plant or animal origin (including fish) of any species specified in the International Union for Conservation of Nature (IUCN) Red List of Threatened Species.

13. Timber and Timber Products

In respect of all products made of wood or containing wood components, suppliers must hold a sustainability certification. Ideally this would be Forest Stewardship Council (FSC) or other certification standards accepted by the Carbon Disclosure Program (CDP). For all products made of wood or containing wood components, a full chain of custody must be available (from country of origin to production) and produced to Soho House if requested.

14. Waste in Electrical and Electronic Equipment

Any supplier supplying electrical or electronic equipment must meet the standards of the European Waste Electrical and Electronic Equipment Regulations (WEEE) 2006 (as amended) and the Restriction of Hazardous Substances Directive (RoHS).

15. Toxins and Heavy Metals

Suppliers must, as far as is possible, minimise the concentration of heavy metals and brominated fire retardants in products and packaging being supplied and must comply with UK standards on maximum levels of heavy metals and brominated fire retardants and heavy metals including cadmium, hexavalent chromium, lead and mercury.

Suppliers supplying cleaning and toiletry products must comply to legislation and regulations for any products containing ingredients known to be hazardous.

16. End of Life

Soho House's suppliers must have in place plans for all products' end of life, such as up-cycling, recycling, composting and/or safe disposal of any non-usable parts.

17. Anti-Bribery and Anti-corruption

Suppliers are required to comply with all relevant laws, rules and regulations applicable to them, including all applicable anti-bribery, anti-lobbying and anti-corruption laws, regulations and codes. This includes compliance with the UK Bribery Act 2010 and equivalent applicable legislation in other countries. Suppliers should at all times act in accordance with Soho House anti-bribery and anti-corruption policies and procedures as may be communicated to them from time to time and should notify Soho House immediately in writing if any violation, or suspicion of a violation, of such policies and procedures arises. Suppliers are responsible for ensuring that any persons who perform services for and on their behalf are also compliant with these provisions.

Suppliers must not be involved in any form of money laundering and must agree to provide Soho House with any information it reasonably requires to satisfy itself that it knows the beneficial ownership of the supplier and that the supplier is not involved in criminal activity.

18. Review & Audit

Soho House will review and revise this Code of Conduct from time to time. Suppliers hereby acknowledge and assure Soho House's right to review and conduct audits and/or physical inspections (including unannounced inspections) of its suppliers' facilities and records, including those of any sub-contractor or other third party involved in the purchase of products from Soho House and their sale to end customers, on an on-going basis to verify compliance with the requirements of this Code of Conduct. Full and open access must be given to Soho House and / or its auditors in respect of facilities that actively engage in the manufacturing and procurement of its products.

June 2018