



Ethical Sourcing Policy

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OTG Ethical Sourcing Policy

1. Purpose ONTHEGO Sports (OTG) is committed to sourcing and providing products and services in an ethical and socially responsible way. The OTG Ethical Sourcing Policy (the Policy) sets out ethical and socially responsible business practices to meet the expectations of our stakeholders throughout the manufacture and supply of merchandise. OTG expects suppliers to demonstrate a commitment to ethical and social responsibility.

2. Sources The Policy is developed to meet internationally accepted labour standards and is based on the Ethical Trade Initiative Base Code (ETI).

3. Application The Policy sets out the minimum requirements that suppliers must comply with in order to do business with OTG.

OTG expects suppliers to:

1. Comply with the minimum ethical standards for employment practices and environmental compliance outlined in the Policy
2. Cooperate in full with any external audit process by or on behalf of OTG
3. Demonstrate compliance with the Policy by demonstrably assessing ethical sourcing compliance and continual improvement
4. Evidence corrective action that is taken to rectify any non-compliance with the Policy
5. Not outsource any work unless first agreed upon in writing by OTG.

4. Ethical Standards OTG expects suppliers to comply with the following ethical standards. Where there is a disparity between an ethical standard and a local law, whatever provides greater protection for workers or the environment shall apply and must be adhered to in order to comply with the Policy.

Legal requirements are met

All suppliers fully comply with the local regulations and laws concerning labour, health, safety, and the environment in the countries in which they operate.

Child labour is never used

The Policy enforces zero tolerance of child labour. Suppliers do not under any circumstances use and exploit children for labour.

Suppliers can verify the age of all employees to prove they do not use child labour.

Workers under the age of 18 are not employed at night or in hazardous conditions.

Suppliers develop, participate in, or contribute to policies and programs that provide for the transition of any employed child into quality education until they are of employable age.

No harsh or inhumane treatment is allowed

Workers are treated with dignity and respect.

Suppliers prohibit physical abuse, the threat of physical abuse, verbal abuse, sexual harassment, and all other forms of intimidation, to keep ensure workers are humanely employed.

Employment is freely chosen

Workers are not engaged under forced, bonded, or involuntary labour.

Workers are free to leave their employment after reasonable notice and do not have to lodge identity papers or deposits with their employer.

The supplier is not convicted or investigated in relation to any modern slavery practice.

Freedom of association is granted

Suppliers have an open attitude towards the activities of unions.

Workers have the right to join a union or form trade unions without discrimination from their employer. They have appropriate access in the workplace to carry out their representative functions.

In circumstances where the right to collective bargaining and freedom of association is restricted by the local laws, suppliers support alternative means of independent and free association and bargaining.

Working conditions are safe and hygienic

Suppliers provide a safe, hygienic working environment informed by prevailing industry knowledge, the applicable laws and standards, and any relevant safety and health hazards.

Appropriate steps are taken to prevent or mitigate the causes of hazards in the working environment in order to prevent injury to health.

Responsibility for health and safety is assigned to a senior management representative for each supplier.

Suppliers ensure emergency evacuation processes are established and regularly practiced by occupants of the working environment. All firefighting equipment and exits are maintained to the required standards.

Suppliers ensure that all workers undertake regular, recorded health and safety training that is repeated for new or reassigned workers.

Suppliers provide workers with access to clean and drinkable water, clean toilet facilities, and (if necessary) sanitary facilities for food storage and preparation.

Accommodation provided to workers is clean, safe, and appropriately meet the workers' basic needs.

Wages are paid correctly

At a minimum, wages and benefits paid meet any applicable national laws, standards, regulations, or industry benchmark standards, whichever is the higher.

Before entering into employment, every worker is provided with written, understandable information about their employment conditions and about the particulars of their wages for each particular pay period each time they are paid.

Wages are paid in a timely manner and are always enough to meet basic needs and provide discretionary income.

All disciplinary measures are recorded. Deductions from wages is not permitted as a disciplinary measure.

Deductions from a worker's wages only occur with the express written permission of the worker.

Working hours are not excessive

Working hours comply with the national laws, collective agreements, and the provisions covered below that provide the greater protection for workers.

Working hours (excluding overtime) are defined by contract and do not exceed 48 hours per week.

All overtime is voluntary and responsibly takes into account the extent, frequency, and hours worked by individuals and the workforce as a whole, without replacing regular employment. Overtime is always compensated at a premium rate and not less than 125% of local laws or the regular rate of pay.

Workers have at least one day off in every seven- (7)-day period. Where national law permits, they have two (2) days off in every 14-day period.

Suppliers ensure that total hours worked in any 7-day period does not exceed 60 hours, except where:

1. It is allowed by the national law.
2. It is allowed by a collective agreement that was freely negotiated with a worker's organisation.
3. Safeguards protect workers' health and safety.

Suppliers keep accurate, complete, and transparent records of hours worked at all times.

No discrimination is practiced

Suppliers do not practice nor tolerate workplace discrimination against workers based on race, national origin, caste, age, religion, disability, gender, marital status, sexual orientation, union membership, or political affiliation.

Regular employment is provided

Work occurs through the establishment of a recognised legal employment relationship.

Suppliers meet their legal and social security obligations to employees. Suppliers do not avoid their obligations through the use of labour-only contracting, subcontracting, or home-working arrangements, excessive fixed-term contracts, or apprenticeship schemes that deny real skill development or regular employment.

No bribery or corruption is tolerated

The Policy enforces zero tolerance of bribery or corruption. Suppliers are not involved in acts of bribery or corruption, which includes taking any bribes, favours, benefits, or other improper payments in cash or kind to obtain business or likewise.

Suppliers never falsify documents or records.

No unapproved outsourcing or subcontracting

No work is outsourced or subcontracted unless approved by OTG in writing prior to commencement of work. Any arrangements must be documented and available for review by OTG or an independent auditor.

Suppliers must have appropriate policies and procedures in place to ensure that subcontractors demonstrably comply with the Policy.

The environment is protected

Suppliers prevent any impact on the health of the local environment and community by complying with local and national environmental laws and regulations.

Suppliers actively endeavour to comply with international standards on environmental protection.

Suppliers do not knowingly source cotton fibre produced in Uzbekistan.

5. Compliance

Suppliers must maintain adequate records to demonstrate their compliance with all aspects of the ethical standards set out in the Policy. To audit a supplier's compliance with the Policy, OTG employees, agents, or representatives reserve the right to view a supplier's compliance records and visit their working environments.

Any non-compliance with the Policy will require the supplier to take corrective action, such as maintaining a Corrective Action Plan (CAP) and regularly updating the remediation process.

OTG is committed to working with suppliers who may not be fully compliant with the ethical standards from the outset in order to develop their ethical and socially responsible business practices to achieve full compliance with the Policy. However, OTG reserves the right to cease trading with any supplier where there is no reasonable prospect for rectifying any non-compliance with the ethical standards.

6. Review

The Policy will be reviewed every two (2) years.

7. Sign-off



Mick Spencer
Chief Executive Officer
12 February 2018