

MEMBER REPORTING FOR

Varner

For 2017

IEH Ethical trading initiative Norway



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"Ethical Trading Initiative Norway's members have made a commitment to implement measures that contribute to better conditions in their supply chains."

To readers of this report

Ethical trade should ensure that production of goods and services is fair, responsible and compliant with relevant legislation. IEH - Ethical Trading Initiative Norway's members have made a commitment to implement measures that contribute to better conditions in their supply chains. IEH's Code of Conduct provides the foundation for this work. The Code of Conduct covers working conditions, human rights, the environment and anti-corruption.

Members are also obliged to report annually on their progress, including the challenges they face and their achievements to date. The report is made publicly available and can be downloaded from IEH's website.

IEH's template for reporting was updated in 2012. One of the changes made was a stronger focus on the impact of improvements made in the supply chain, placing a clearer responsibility on members to measure the impact of their work. The reporting template aims to incorporate the expectations laid down in the United Nations Guidelines for Business and Human Rights and in the OECD Guidelines for Multinational Enterprises. This includes issues such as due diligence and stakeholder engagement. Indicators that are included in Global Reporting Initiative G4 have been included where these are deemed to add value to the reporting process. For signatories of Global Compact, it is our intention that this report covers the requirements laid down for reporting on supply chain improvements as part of the annual Communication of Progress.



Heidi Furustøl
Managing Director IEH

Foreword from: Marius Varner, CEO

Whereas the year 2016 could be described as the year of new partnerships, looking back at 2017, it has been a year of continuity and action. We continued building on and developing strong collaborations with our many partners and continued integrating sustainability principles in our ongoing business activities.

We launched our new Sustainability Strategy. We used the product life cycle concept to evaluate the opportunities, salient risks and adjustments associated with our branded products over the entire life cycle, and identified for the coming years a number of ambitions and targets related to Corporate Social Responsibility, Quality Assurance and Environmental Sustainability.

Sustainability has been on the agenda for the entire organization and a key element in our dialogue with our suppliers and in the implementation of a new Product Lifecycle Management System for the buying organizations.

Through the Sweden Textile Water Initiative, STWI, we started in 2016 addressing water related issues in our supply chain in a more effective way. In 2017, we had three factories in the project with great achievements. Our aim is to enroll more factories in this project in 2018.

To address the challenges in the cotton industry we joined The Better Cotton Initiative, BCI, in 2016. BCI is a not-for-profit organization stewarding the global standards for Better Cotton, and bringing together cotton's complex supply chain, from the farmers to the retailers. Varner has committed to procure 50% of Better Cotton by 2020, and achieved to procure 29% by the end of this year. New for 2017 is our commitment to ensure that 100 % of the cotton we use comes from the most sustainable sources by 2025. Together with several fashion and textile brands, we signed the Sustainable Cotton Comuniqué initiated by the Prince of Wales International Sustainability Unit in May 2017. Another important milestone is our partnership with Fairtrade International through one of our brands Dressmann, making Dressmann the world's leading fashion brand procuring Fairtrade cotton. This cooperation will strengthen the work towards a more sustainable cotton industry.

We became part of the Social Dialogue program in 2015, together with JETI. The program is providing training and tools to workers and management at factories on how to solve and prevent workplace problems in a constructive ways, while respecting the rights and responsibilities of all parties. A mid-term impact assessment of the Social Dialogue Program has shown promising results. These encouraging results have lead us to continue the program in our supply chain in 2018. We are proud to have been part of the numerous achievements under the Accord framework in Bangladesh since 2013 and signed the new Accord agreement in September 2017. The new agreement will take effect in May 2018. We look forward to continuing working together with our stakeholders under The Accord 2.0 to ensure a safe and sustainable Ready-Made Garment industry in Bangladesh.

In order to achieve a truly sustainable business, we need to constantly evolve and adapt. Our ultimate aim is to contribute to positive change for people that are impacted in any way by our business. As we enter 2018, we want to make progress, share best practices and knowledge and build on our achievements.



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Scope of reporting

Members of IEH are in different phases of their work with ethical trade. They also work in different industries each with different and often unique challenges. Some members purchase directly from production facilities, others partly or exclusively through agents. Smaller companies are usually unable to allocate the same resources to their work with ethical trade as larger organisations.

As a result of this, companies have the option to deselect non-mandatory questions in the table below. Deselected questions will not appear later in the reporting template. As a standard yes is selected for all questions. Report readers may find a complete template with all questions at www.ieh.no.

Companies are expected to provide an explanation for each deselected question.

	YES	NO
Step 2 - Screening of new suppliers (indicator 2-1, point b-d	✓	
Step 2 - Mapping of conditions at supplier level (question 2.5)	✓	
Step 2 - Number of existing suppliers mapped according to method adopted (indicator 2-2)	✓	
Step 3 - Time elapsed before paying suppliers (indicator 3-2)	✓	
Step 4 - Competence building activities provided for supplier (question 4.3)	✓	
Step 4 - Measures to improve working conditions and respect for human rights (indicator 4-1)	✓	
Step 4 - Mapping and measures taken to improve workers' wage level (question 4.4)	✓	
Step 4 - Measures concerning freedom of association and collective bargaining (question 4.5)	✓	
Step 4 - Measures (corrective) taken to improve environmental stewardship (indicator 4-2)	✓	
Step 4 - Anti-corruption measures taken (question 4.6)	✓	
Step 4 - Certification of products, materials and services (indicator 4-3)	✓	
Step 4 - Improvement projects initiated or taken part in (question 4.8)	✓	
Step 5 - Communication with stakeholders (question 5.3)	✓	
Step 5 - Procedures for dealing with complaints in the supply chain (question 5.6)	✓	
Step 5 - Number of complaints received and measures taken (indicator 5.1)	✓	

About the company

Company name:

Varner

Main brands, products and/or services offered:

Retail / Apparel.
Company brands: A-Z, Bik Bok, Carlings, Cubus, Days Like This, Dressmann, Dressmann XL, Urban, Volt, Wow

Description of company structure:

Varner is the mother company for all business units. Ethical trade and sustainability implementation is done in a common way across all business units. Certain projects or focus areas may be initiated at company brand level.

Head Office address:

Nesøyveien 4, Billingstad, Norway

Head Office address:

Number of employees:

11,000

Turnover (NOK):

11,400,000,000

Main characteristics of the company's supply chain:

Purchases included within this report:

Garments (Clothing) & Accessories

Number of suppliers:

184

Monetary value of purchases, divided by type of product and services, type of supplier (e.g. producer, manufacturer, agent) and region/country:

Type of product and service	Percentage of purchases (%)
Garments & Accessories	100 %

Type of supplier:	Percentage of purchases (%)
Own brand suppliers (173 suppliers)	75 %
External brand suppliers	25 %
NOTE 1: Varner was in 2017 working with 184 "suppliers". Each supplier may own/use one or more "factories" for production. As per time of reporting 324 first tier factories were used for Varner production. The list of production units / factories can be found published on the company website (www.varner.com).	
NOTE 2: In addition to 184 suppliers used for our own branded goods, we purchase external branded goods from several agents and suppliers. Approximately one fourth of our total purchases are external branded products, which are not owned, designed, produced or labelled by or with any of the Varner's own brands. External brands and suppliers of external brands are required to follow our Code of Conduct and provide us with required documentation. These external brands suppliers are not included in the figures in this report.	
NOTE 3: In Q2.3 and Indicators 2.2; 4.1; 4.2 data is presented on factory level (not supplier level).	

Region/country:	Percentage of purchases (%)
China	41 %
Turkey	13 %
Bangladesh	28 %
India	11 %
Pakistan	3 %
Europe	2 %
Vietnam	1 %
Other	1 %

Contact person for this report:

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Year when IEH membership started:

2003

“Improving the working conditions in our supply chain is a priority."





Goals and Progress for the Reporting Year

Goals	Progress	Relevant step in IEH's implementation model 1	2	3	4	5
BCI target: 10% of all Varner cotton will be Better Cotton	Reached 29% BCI cotton	☐	☐	☑	☑	☐
STWI: 2-4 suppliers in China and India engaged in the STWI projects	Engaged 2 suppliers in India and 1 in China in STWI projects. All dyeing mills	☐	☑	☑	☐	☐
Establish the Social Dialogue concept and method in 2 of 4 core markets.	The Social Dialogue concept has been established in one core market. The target of extending to one additional market has not been reached in 2017 but will be carried over into 2018-2019.	☐	☐	☑	☑	☐
Continue to increase transparency (and traceability) in the supply chain. Solidify the CSR program for 2nd tier factories in 2 core markets, and introduce and implement the program in 1 additional market in 2016.	A full scale CSR program has been extended to tier 2 in the supply chain in 3 core markets.	☐	☑	☑	☐	☐
Nordic Ecolabel Swan: to certify 2 suppliers in Bangladesh, and 2 in Turkey	2 suppliers certified in India, 2 suppliers pending in Bangladesh, expected to be certified in late March	☐	☑	☑	☐	☐
Increase suppliers abilities to drive sustainable improvement processes through training and capacity enhancement.	We have continued the establishment of training programs for suppliers and workers. Over 5000 workers/managers in factories were trained in various aspects of ethical trade in Various programs initiated by Varner. And 87 000 additional workers were reached in awareness sessions. See pages 30-31 for more information.	☑	☐	☑	☐	☐

Goals	Progress	Relevant step in IEH's implementation model 1	2	3	4	5
Continue to establish partnerships and protocols to encounter high risk scenarios in core markets.	We have established new partnerships to handle risk scenarios in Turkey (a partnership with CYDD to encounter risk of child labour) and have signed the new and extended Accord Bangladesh framework to manage Occupational Health and Safety Risk in Bangladesh.	☐	☐	☑	☑	☐

Goal for Coming Year

Goals	Relevant step in IEH's implementation model 1	2	3	4	5
Define and implement concrete activities for 2018 based on the overall Varner Sustainability Strategy. Some examples are mentioned below.	☑	☐	☐	☐	☑
* STWI: 2-4 more suppliers in STWI projects.	☐	☑	☑	☐	☐
* Nordic Ecolabel Swan: certify 2 more suppliers	☐	☑	☑	☐	☐
* Fairtrade: 1% of Fairtrade certified products on Varner level	☐	☐	☑	☑	☐
* Continue to increase suppliers (including managers and workers) ability and capacity to drive sustainable improvement processes.	☐	☐	☑	☑	☐
* Increase transparency and traceability beyond tier 1 in the supply chain	☐	☑	☐	☐	☐
* BCI target: 30 % of all Varner cotton will be Better Cotton	☐	☐	☑	☑	☐



1. COMMIT

Commitment in the company and its supply chain



1. COMMIT
COMMITMENT IN THE COMPANY AND ITS SUPPLY CHAIN

Commitment in the Company

Q1.1 Describe how your company's work with ethical trade is anchored at Board level.

The CEO and the Chairman of the Board, the owners of the company, are directly involved in following-up the Varner's CSR work. Sustainability Manager reports directly to the CEO and the Chairman of the Board on a regular basis, at least 3 times a year. Sustainability is a regular topic on the agenda of the Board Meetings.

Q1.2 Describe how your company's work with ethical trade is anchored at top management level:

Name and position of persons in top management team with main responsibility for ethical trade:

Marius Varner, CEO, Varner
Petter Varner, Chairman of the Board, Varner
Øyvind Bustnes, CEO, Varner Retail

The extent to which incentives/bonuses are related to ethical trade/sustainability indicators:

The Sustainability department has a yearly bonus based on performances on a set of indicators.

The extent to which internal reporting routines are established for work with ethical trade:

Sustainability Manager reports directly to the CEO and Chairman of the Board of Varner and to the CEO of Varner Retail. Reporting is done regularly on the progress on the sustainability strategy and the goals set therein.

Other relevant information:

The Sustainability department includes the Corporate Social Responsibility (CSR) function, the Quality assurance (QA) function and environmental focus. This report is in great extend focusing on CSR-related issues.

Internal Competence Development and Awareness Raising

Q1.3 Describe what needs have been identified regarding competence development and awareness raising:

We experience that the level of awareness is rapidly increasing and with that, more competence development is needed. Constantly improving our competencies related to more sustainable design and product development, preferred fibers and materials, and related to more environmental-friendly production processes is important in order to achieve our goals and ambitions.

Q1.4 Describe competence development activities and measures to raise awareness that have been completed during the reporting year:

We have run several internal training sessions covering different aspects related to Quality Assurance and to the topics listed above.
The Sustainability forums every second month which gathers a sustainability-coordinator from each buying

chain is an important channel for sharing experience and knowledge.
The Sustainability department has had one-on-one meetings with the management from the brands to raise awareness about important and current topics related to sustainability and to encourage strategic discussions.

Commitment in the Supply Chain

Q1.5 Please provide a complete URL (web address) to your company's code of conduct, or attach if preferred:

http://varner.com/globalassets/sustainability/people/2016---responsible-manufacturing-varner.pdf

Q1.6 Describe how your company communicates compliance with your code of conduct (CoC) to your suppliers. Please include:

How the intention of the CoC is communicated:

The Code of Conduct is an integrated part of the Varner Sustainability Manual. The manual contains requirements for Origin and Processing of Raw Materials (incl. animal welfare), Product Requirements (inc. RSL) and Requirements for Responsible Manufacturing (incl. CoC, chemical handling and environmental requirements and guidance).

The Sustainability Manual is distributed to all suppliers. All suppliers must sign a contract where they agree to follow and implement requirements, including those in CoC, at all levels in the supply chain. All new suppliers are required to meet with the Sustainability Department to go through all requirements and expectations in the manual. A Sustainability on-boarding training program for suppliers has been developed and piloted in 2017 and is now manditory for all new suppliers. Follow-up meetings on requirements are held regularly. Requirements in the CoC are also emphasized at factory visits, in meetings and before and after social inspections.

Systems in place for capturing feedback and encouraging dialogue with the suppliers:

Points of contact for feedback and dialogue are clearly defined when a cooperation with a supplier is initiated. Openness and transparency is highlighted from the beginning of a business relationship as fundamental to the cooperation. This is also emphasized regularly in meetings, at factory visits, and in regular correspondence. The Sustainability department is set up independent from purchasing and procurement to facilitate honest feedback on the Varner business approach and buying practices. Suppliers are evaluated on a yearly basis on several criteria relevant to the cooperation, including sustainable practices. The aim of the evaluation is to jointly enable improved performance. An important part of the evaluation is to provide a thorough feedback to our suppliers about their performance.

Incentives for good working conditions and and environmental stewardship:

Suppliers and factories with good performance on social and environmental aspects are promoted for internal business teams.

The extent to which the CoC is translated into local languages:

The CoC has been translated into Chinese, Turkish, Hindi, Bengali and Tamil.

Other relevant information:

Q1.7 Describe the extent to which your CoC is communicated to sub-suppliers further up the supply chain. Describe any activities you engage in to ensure that this happens:

The communication and distribution of the CoC to sub-suppliers is an ongoing process. Each supplier is required to distribute our CoC to their business partners and ensure that it is being followed. Our production offices check sub-suppliers knowledge about the requirements in the CoC by by visits, inspections and meetings.

Indicator 1-1: State the percentage of your company's first tier suppliers, included in the scope of the report, who have received and accepted your CoC for ethical trade:

	2017	2016	2015
Total number of suppliers:	184	173	184
Percentage of total number of suppliers:	100 %	100 %	100 %
Percentage of total monetary value of purchases:	100 %	100 %	100 %



2. ASSESS

Assessing risk in the supply chain



Screening of New Suppliers

Q2.1 Describe how your company takes ethical trade considerations into account when choosing new suppliers. Describe the criteria that results in:

A supplier not being used:

- Lack of transparency
- Insufficient management of production standards, missing capacity/capability of improvement and development
- Critical breach with the Varner Code of Conduct/Responsible Production Standards
- Extensive number of sub-contractors or non-transparent supply chain
- Weak or missing knowledge about social compliance and proper working conditions
- Lack of willingness to adjust non-responsible practice

Improvements being carried out as a prerequisite for trade with this supplier:

All suppliers and factories are required to undergo an inspection of social conditions before any cooperation can begin. This can either be an inspection from Varner's own CSR-personel or from an independent auditing company - usually both is required. If any issues are found being in breach with the Varner Code of Conduct the supplier will be required to improve these before cooperation can start.

Choose from the list the elements that are included in your screening process:

- [x] Self Assessment Questionnaire (SAQ)
- [x] Own visits
- [x] Inspections
- [x] Reports from earlier inspections
- [x] Choosing of certified companies
- [x] The supplier has a programme for following up sub-suppliers
- [ ] Other

Provide a more detailed descriptions of your screening methods:

All factories planned for use for Varner are required to undergo detailed assessments before they can be approved for use. A wide range of methods are used for screening. Some key steps are: A pre-assessment done by locally employed CSR-specialists. At this stage the factory unit (or units) is visited and inspected and all pre-exsiting documentation on social and environmental aspects is reviewed. Based on findings next steps are decided. If the factory is found to be acceptable based on the pre-assessment a full Code of Conduct Audit will be done by a third party or an internal auditor. After this stage the factory can be approved for use by the CSR-department if the factory (or factories) is found to be up to the required standard and the supplier is willing to commit to the Varner Code of Conduct program.

Indicator 2-1: Screening of new suppliers and measures taken

A) State the percentage of new suppliers that have been screened for either working conditions, human rights, environmental impact or corruption, or for the existence of a program for following up its own suppliers in these areas:

Percentage of new suppliers that have been screened	2017	2016	2015
Percentage of new suppliers that have been screened:	100 %	100 %	100 %

B) Describe the most important issues that have been identified and in which countries they occurred:

Identified issues in 2017	Relevant CoC element	Country
Excessive overtime	Working Hours	China, India, Bangladesh, Turkey
Insufficient management systems and controlling systems for working hours	Working Hours, Wages and Benefits	China, India
Incorrect overtime calculation rates	Wages and Benefits, Working Hours	China, India
Non-transparent records for wages and overtime	Wages and Benefits, Working Hours, Laws and Regulations	China, India, Bangladesh, Turkey
Lack of health and safety training	Occupational Health and Safety	India, Bangladesh, China
Improvements needed for building safety	Occupational Health and Safety	Benagladesh, India, Turkey, China
Insufficient or non-effective worker management dialogue and grievance systems	Freedom of Association, Laws and Regulations	Bangladesh, India, China, Turkey

C) Out of the total number of screened supplies, please provide:

Follow-up of screened suppliers in 2017	Percentage (%)
Percentage not traded with as a result of the screening:	34 %
Percentage for which requirements for improvements were specified:	66 %

D) Please provide details regarding your actions to follow up screened suppliers:

When potential suppliers/factories have been screened as per methods mentioned in Q2.1, the CSR Varner department will decide if the supplier is suitable for cooperation with Varner or not. Suppliers/factories with critical breaches to the Varner CoC, will not be approved. Business may be initiated with suppliers/factories with less serious breaches to the CoC may be approved if a plan for improvements has been set and implementation has started.

Overview of Where Production Occurs (existing suppliers)

Q2.2 To what extent do you know where the products are produced. Include:

Knowledge of first tier of production:

All our suppliers' first tier producers have been mapped as well as second tier producers in 3 out of 4 core markets. All factories must be registered and approved by Varner CSR-department before they can be used. Factory information must be declared for each single order. Random checks, announced, semi-announced and unannounced visits and inspections are done to ensure that unauthorized outsourcing does not occur.

How much is known about where sub-suppliers and raw material production occurs:

The Varner CSR Program, which includes announced and unannounced audits and visits as well as improvement and remediation support, has been rolled out for 2nd tier factories in 3 out of 4 core production markets. For selected supply chains 3rd to 4th tier factories are also included in the program.

All suppliers are required to keep updated information about sub-suppliers available for Varner. For certain product groups sub-suppliers must be declared for each order, and for certain products sub-suppliers must be inspected and approved before use. Information on sub-suppliers is validated by audits, factory visits and random controls.

Since 2014, 100% of our down products has been certified with focus on animal welfare and traceability. In 2016 Varner started to use Responsible Down Standard (RSD) continuing the same principles of animal welfare and traceability through the supply chain.

Specific challenges related to traceability:

Although we have developed traceability procedures and checks, visits and inspections are done to verify the information it is difficult to control the use of sub-suppliers in all tiers of the supply chain completely.

Any other relevant information:

Q2.3 Please provide a list of the number of first tier suppliers per country: (suppliers known to the company):

Country	Number
China	133
Bangladesh	50
India	31
Turkey	71
Italy	11
Serbia	2
Vietnam	2
Republic of Korea	10
Pakistan	3
Poland	1
Sri Lanka	4
Sweden	2
Norway	1
Portugal	1

Method for Assessing Risk for Existing Suppliers

Q2.4 Has your company established a risk profile (per country/industry sector) associated with working conditions, human rights, environmental risk and corruption in the supply chain?

Yes

If yes, please describe the methods you have adopted for developing this risk profile:

Evaluation of risk is done by using available information (such as existing country profiles developed by third party organizations) and by using experience and competence from local organizations and NGOs. Varner have regional sustainability teams in all core sourcing markets who have detailed expertise on local and regional risks and are in continuous contact with relevant stakeholders such as workers, workers associations, NGOs, governmental bodies, employers associations, and other companies operating in the same market. Risks are

evaluated related to industrial process required for type of production. Risk profiles are developed for all new/ potential markets/countries before initiating business.

Q2.5 Describe the extent to which your company has developed risk profile for individual suppliers. Please include:

The criteria used to decide which suppliers to perform risk assessment on:

Risk profiles are developed for all suppliers and factories.

The number and geographical location of suppliers for whom you have developed individual risk profiles:

Risk profiles are developed for suppliers and factories in all regions, including core markets (China, India, Bangladesh, Turkey).

Methods used for arriving at the risk profile:

Risk profiles for suppliers are developed through a due dilligence process including document reviews, onsite assessments, visits, self-assessment, interviews, profile of local context, stakeholder input.

Any other relevant information:

Indicator 2-2: Number of existing suppliers assessed for either working conditions, human rights, environmental impact, corruption or program for supplier follow-up, broken down by risk assessment methods:

Number of suppliers assessed	2017	2016	2015
Number of suppliers	324	322	370

Number of suppliers divided by risk assessment methods	2017	2016	2015
Inspections (Internal)	487	339	265
Inspections (External)	50	63	74
Check of reports from previous inspections	115	41	74
Check of certification	25	11	9
Onsite pre-assessments	38	124	169
Onsite CSR visits	145	129	115
Inspections/assessments on specific topics *	284	312	102
* Such as engineering assessments of building			
and electrical safety			

Description of Supply Chain Risk Profile

Q2.6 Describe your company's supply chain risk profile in relation to compliance with your code of conduct:

Please specify:

Which countries are deemed to be high risk:

Risk for breach of Code of Conduct is in general considered to significant in all production markets, although the risk profiles are different between the markets, in terms of where risks are aparent and the nature of the given risks.

Which aspects of your CoC are particularly at risk of being breached:

- Working Hours
- Occupational Health & Safety
- Wages & Benefits
- Freedom of Association and the Right to Collective Bargaining

Challenges when it comes to sub-suppliers and raw materials production :

- Traceability of raw materials
- Chemical requirements
- Conformance to social requirements
- Transparency

Other specific challenges, e.g. in relation to suppliers being located in export processing zone, subcontracting labour or outsourcing production.

Unauthorized outsourcing of production to undeclared factories is a risk we are aware of and use significant resources to mitigate. We experience a challenge related to freedom of association for factories in Export Processing Zones. We plan to address this challenge within the scope of the Social Dialogue program together with ETI.



3. ADAPT

Adapting purchasing practices



Long-term Supplier Relations

Q3.1 Describe your company's policy and/or practice relating to the length of supplier relations.

Varner has long-term relationship with suppliers as a part of the business strategy. No suppliers are sourced for one-time orders or brief business relationships. Detailed due diligence on important business aspects is done prior to opening a new business relation to make sure that there is a base for a long term business relationship. A vast majority of the business is done through long term relationships.

Indicator 3-1: Proportion of your total purchase coming from suppliers with whom your company has a long-term business relation (see definition):

	2017	2016	2015
Percentage purchase through long-term agreements:	95 %	95 %	95 %

Purchasing Practices

Q3.2 Has your company performed an analysis of how your purchasing practice affects your suppliers?

Yes

If yes, please describe how this was done and what the main findings were:

We carried out a survey among our suppliers in 2016 to get feedback on our purchasing practices and sustainability efforts. The majority of the suppliers are content with time line for order confirmation to placing orders, but we see that we can make improvement when it comes to capacity booking and planning.
In addition, we nominated and encouraged all our suppliers to take part in the 2016 international survey of purchasing practices that has been conducted by ILO and ETI's in Norway, Denmark and UK.

Q3.3 Has your company amended its purchasing practice to minimise negative impacts or to promote better working and environmental conditions at suppliers?

Yes

If yes, please describe the changes that have been made:

Our buying organisations have adopted focus on early confirmations, increased early forecasting of orders, and more clear timelines. This is closely follow-up by the Production Offices covering all of our four major production countries. There has also been a process to make process and business practices more uniform across business units which has been crucial with the introduction of a Product Lifecycle Management System. This is

an ongoing process and we will continue to focus on how we can continue to implement purchasing and supply management best practices.

Indicator 3-2: Time elapsed prior to paying suppliers

A) Please state the credit terms in terms of number of days in your standard agreements with suppliers:

Standard credit terms for suppliers	2017	2016	2015
Number of days:	30	30	30

B) Please state the percentage of supplier payments made within the agreed credit term:

Percentage of payments made within agreed time	2017	2016	2015
Percentage paid within agreed time:	99.0 %	99.0 %	99.0 %

Evaluation of the Impact of Changes made to Purchasing Practices

Q3.4 Describe how your company has assessed the impact of any changes made to your purchasing practices and provide details of the results of this assessment:



4. COLLABORATE

Improvements in the supply chain



4. COLLABORATE IMPROVMENTS IN THE SUPPLY CHAIN

Product Design and Choice of Raw Materials

Q4.1 Has your company chosen product design features or raw materials that reduce negative impacts or promote better working or environmental conditions?

Yes

If yes:

Describe measures taken in the reporting year:

1. 29% of all cotton was procured according to the Better Cotton Initiative in 2017, goal of 50% by 2020.
2. Focusing on expanding the use of certified Organic cotton.
3. We have initiated a partnership with Fairtrade Norway now buying Fairtrade certified cotton.
4. Since 2014 we have certified 100% of our down products according to animal welfare and traceability. In 2016 we switched to a new standard; Responsible Down Standard continuing with 100% certified products.
5. We have expanded the use of Swan certified products and number of Swan certified suppliers.
6. We have 3 factories doing projects through our membership in Sweden Textile Water Initiative

Describe the impact that your company expects these measures to have:

1.Procuring Better Cotton we will be a part of the development of Better Cotton as a sustainable mainstream commodity. Making cotton production better for the people who produce it, better for the environment it grows in and better for the sector's future. BCI production uses less water, less synthetic fertilizers and pesticides, increase the yield and focuses on better working conditions for the farmer.
2. By expanding the use or certified Organic cotton, we will be a part of securing the farmer a premium for his crop, reduce the use of synthetic fertilizers and pesticides.
3. By buying Fairtrade certified cotton we will be a part of securing better working conditions for farmers, and a steady income. The Fairtrade premuim will also help the local community contributing to development.
4. By continuing the certification of our down products we address and recognize issues related to animal welfare and traceability. By following RDS our customers can feel safe Varner take animal welfare and traceability seriously.
5. Expanding the the number of Swan certified suppliers and increasing the use of Swan certified products will enhance the traceability in the supply chain, and securing the chemical use in production.
6. The membership in STWI will help save water, energy and chemicals used in our supply chain, and the STWI member's supply chains. the Aim for the STWI projects are that there should be a financial win, a environmental win and a social win. This project is not directly linked to raw materials, as such, but relates to the processing of raw materials.

Competence Development of Suppliers

Q4.2 Has your company identified the competence development needs of suppliers in order for them to be able to meet your code of conduct requirements?

Yes

If Yes, please provide:

Identified competence development needs:

- Awareness about transparency practice
- Knowledge about solid systems for control of overtime use and compensation.
- Awareness and knowledge about worker management cooperation (and social dialogue)
- Fire safety (including especially engineering and maintenance of electrical set-up at factories)
- Best practice on human resource management
- Production efficiency and planning
- Workers Occupational Health and Safety training

Planned competence development activities:

One-on-one training of suppliers/factories in all regions on relevant development goals. Continued training of suppliers (incl. mangement and workers) on how to drive processes to improve working conditions and sustainable practice.

Suppliers included in terms of number, country/region and type of supplier:

Expected that at least 50% of all suppliers will be covered by development activities targeting either management, mid-management, supervisor or worker level (or a combination of these target groups).

Q4.3 Has your company contributed to competence development of suppliers in the reporting year?

Yes

If yes, please describe in the table below:

Completed competence development activities
Suppliers included in terms of number, country/region and impact (expected or measured)

Competence development activity (organised by oneself or others)	Number of suppliers	Country or Region	Impact (expected or actual)
Social Dialogue Training (Trainers from Joint Ethical Trading Initiatives)	3 (103 workers, 16 managers)	Bangladesh	Knowledge about social dialogue and how to exercise management-worker dialogue at the workplace to prevent and solve problems

Competence development activity (organised by oneself or others)	Number of suppliers	Country or Region	Impact (expected or actual)
Rights & Responsibility Training (Center for Responsible Business (CRB) and train the trainer)	8 (3994 workers)	India	Knowledge and awareness about rights and responsibilities at the workplace, and how to take action if rights are violated
General CSR training for supplier CSR responsible and top management (Varner internal trainer)	17	Turkey	Increased knowledge and awareness about practical implementation of requirements in Varner CoC
Women Empowerment Principles training (Trainers from UN)	4	Turkey	Practical implementation of the WEP framework
Worker Engagement training (using the QuizRR tool)	4 (837 persons)	China, Bangladesh	Increased awareness about engagement at the workplace
The Accord Bangladesh Health & Safety Training (The Accord Bangladesh trainers, training consist of 7 modules over 7 days)	29 (253 workers, 146 managers)	Bangladesh	Practical knowledge on how to prevent and solve health and safety issues at the workplace
The Accord Bangladesh Health & Safety Awareness Training (The Accord Bangladesh trainers, training consist of 2 modules over sessions)	29 (apx. 87000 workers)	Bengladesh	Increased awareness about health and safety risks at the workplace and how to detect and notify risks
Training in CSR management practice (Varner internal trainer)	22 (120 managers)	India, Sri Lanka	Increased knowledge on how to manage risks and requirements in a systematic way

Competence development activity (organised by oneself or others)	Number of suppliers	Country or Region	Impact (expected or actual)
Training in proper management of CSR requirements (TAOS China)	2	China	Increased knowledge on how to organize and manage risks and requirements in a systematic way

Improvement of Suppliers

Indicator 4-1: Improvement measures concerning working conditions and human rights (HR)

A) Please report on the number and percentage of current suppliers where you have identified non-compliance issues connected to working conditions and HR:

Identified issues connected to working conditions and HR	Number	Percentage
Suppliers in the reporting year with identified issues related to working conditions and human rights:	241	74 %

B) State the percentage of these suppliers (of the number given in 'A') where:

You have agreed or requested improvements
Improvement measures have been completed
Contracts have been terminated (e.g. as a result of unwillingness to improve conditions)

Please also divide improvement measures into CoC clause and country/region

Improvement measures for working conditions and HR	2017	2016	2015
Percentage of suppliers where you have agreed or requested improvements*	90 %	90 %	75 %
Percentage where improvement measures have been completed*	50 %	43 %	40 %
Percentage where contracts were terminated*	6 %	4 %	7 %

* Percentage of the suppliers where non-compliance issues have been identified (of number stated in 'A')

Percentage distributed by CoC clause in 2017	Improvement measure completed (%)
Freedom of association and collective bargaining	2 %
Health and safety	66 %
Working hours	7 %
Wages	5 %
Regular employment	11 %
Environment	9 %
Corruption	1 %

Percentage distributed by country/region in 2017	Improvement measure completed (%)
Bangladesh	40 %
China	24 %
India	20 %
Turkey	15 %
Sri Lanka	1 %

C) Please provide details on the most important improvement measures:

- Improved systems for managing working time/overtime and compensation
- Improvement of factories internal systems for managing relevant risk areas and policies
- Improved standard of electrical installations
- Improved standard of Occupational Health and Safety especially related to electrical installations, fire risk, awareness of health and safety requirements.
- Improved level of democratically elected worker representatives

Q4.4 Describe measures that your company has taken to ensure that workers receive a decent wage that covers the basic needs for the worker and his/her family, such as:

A gap analysis of workers' actual wages and proposed levels of a decent wage:
Focus on wage practice and wage levels is a part of the ongoing follow-up in the supply chain. We continue to focus on transparent and solid wage systems that allow for analysis on factory level of wage gaps. We are targeting here the widespread use of falsified and inaccurate data used for wage measurement.

Measures taken to reduce the gap between actual wage levels and the proposed level for a decent wage:
All supplier are required to implement solid wage systems that allow for analysis of wage levels in a transparent manner. Workers are trained on their rights related to wages. In the cotton sector we have initiated use of the Fairtrade standard which has at its core the fair trade terms that allow for a better compensation for small scale farmers.

Any other measures:
We have preformed internal wage gap analysis. We aim to develop a wage improvement project in 2018.

Q4.5 Describe measures that your company has taken, in the reporting year, to ensure that workers' right to freedom of association and collective bargaining are respected. Describe in terms of:

Measures taken:
The focus on worker representation and social dialogue has been extended this year. The Social Dialogue program in Bangladesh in particular has been continued where 25 out of 50 factories have completed a social dialogue program (lead by Varner or other clients).

Number and type of suppliers covered:
25

Countries or region:
Bangladesh

Indicator 4-2: Measures for Reducing Environmental Impact in the Supply Chain

A) Please report on the number and percentage of current suppliers where you have identified issues connected to environmental impact.

Findings relating to environmental impact	Number	Percentage
Suppliers with identified environmental issues in the reporting year.	106	33 %

B) State the percentage of these suppliers (of the number entered in 'A') where:

You have agreed or requested improvements
Improvement measures have been completed
Contracts have been terminated (e.g. as a result of unwillingness to improve conditions)

Please also break down measures by theme and country/region.

Measures for reducing environmental impact in the supply chain	2017	2016	2015
Percentage of suppliers where you have agreed or requested improvements*	100 %	100 %	100 %
Percentage where improvement measures have been completed*	31 %	25 %	65 %
Percentage where contracts were terminated*	0 %	0 %	0 %

* Percentage of the suppliers where issues have been identified (of number stated in 'A')

Percentage distributed thematically in 2017	Improvement measure completed (%)

Percentage distributed by country/region in 2017	Improvement measure completed (%)
Bangladesh	63 %
China	9 %
India	24 %
Turkey	3 %

C) Please provide details on the most important improvement measures:

Improved chemical handling practice and procedures

Q4.6: Describe measures that your company has taken in the reporting year relating to anti-corruption in your supply chain. Please include:

Requirements to change of practice and termination of contracts/business relations:
Focus on anti-corruption continues to be a part of the Varner sustainability and business approach. Anti-corruption is covered in the scope of all Varner initiated audits.

Measures to improve your company's own anti-corruption work:
In addition to the requirement related to anti-corruption in the supply chain we have a set of anti-corruption principles that all Varner employees must sign and follow. The internal requirements for ant-corruption was reviewed and updated in 2016, and new protocol and training was rolled out in 2017.

Use of Certification Schemes

Q4.7 Describe your company's policy on whether certification is used as a means for improving conditions in your supply chain:

Certification standards and schemes such as Nordic Ecolabel Swan, Fairtrade, Better Cotton Initiative (BCI), Responsible Down Standard (RSD) are used as a means to improve conditions, particularly beyond tier 1 in the supply chain. Certificate SA8000 may under certain conditions, and after additional due diligence, be an accepted a way to display performance on social conditions.

Indicator 4-3: Proportion of purchased material, products and/or services that have some form of environmental or social certification.

Please provide the percentages of purchased material, products and/or services that is certified by social or environmental standards, according to each categories that is relevant to report on by your company:

Category material/product/service	2017 % certified	2016 % certified	2015 % certified
Cotton- preferred cotton measured in qty- Varner	49 %		

Please show the distribution by certification standard for the reporting year:

Category material/product/service (in 2017)	Certification standard	Percent certified
Production facilities- 4 suppliers	Nordic Ecolabel Swan	
Cotton- measured in cotton lint purchased Varner level	BCI	29 %
Cotton- measured in qty- Varner	BCI	24 %
Cotton- measured in qty- Varner	Organic Cotton (OSC/GOTS)	26 %
Cotton- measured in qty- Varner	Nordic Ecolabel Swan	1 %

Category material/product/service (in 2017)	Certification standard	Percent certified
Down- measured in qty- Varner	Responsible Down Standard	100 %

Improvement Projects and Activities

Q4.8 Please describe improvement projects or activities in the reporting year where the main purpose is to improve compliance to your code of conduct.

Project name:	Sweden Textile Water Initiative (STWI)
Purpose:	Achieve a better understanding of the water challenges faced in the industry
Main activities:	Identifying challenges related to the use of water, chemicals and energy consumption, and finding the right mechanisms to address them
Country/ies:	China, India
Project partners:	Stockholm International Water Institute, other brands
Start date and expected finish date:	2016 -
Learning gained and challenges met:	Increased knowledge and competence about environmental challenges, increased awareness and concrete improvement plans for factories.
Ethical requirements addressed:	Environment

Project name:	Work 2 Learn (W2L) Bangladesh
Purpose:	Provide education and vocational training for marginalized young adults in Bangladesh
Main activities:	Set-up training centers and school for textile education and provide practical training at factories with good working standards.
Country/ies:	Bangladesh
Project partners:	Save the Children, local training partner, suppliers
Start date and expected finish date:	2013 - 2016, new phase from 2017 to 2020
Learning gained and challenges met:	Increased knowledge about the complexity of child labour in Bangladesh and the route from poverty to steady work. Improved relations with suppliers and knowledge about their needs when it comes to training and competence.
Ethical requirements addressed:	Child labour and apprenticeship for young workers

Project name:	Refugee Support Project Turkey
Purpose:	Ensure support and appropriate remediation for Syrian refugees at work in Turkey
Main activities:	Establishing policy, procedure and partnerships.
Country/ies:	Turkey
Project partners:	Association for Solidarity with Asylum Seekers (ASAM), Refugee Support Center (MUDEM), suppliers
Start date and expected finish date:	2015 - 2018
Learning gained and challenges met:	Increased understanding of the complex situation of refugees, and how to integrate refugees at workplaces in a responsible manner. Regulations and slow bureaucratic process in issuing work permits has put obstacles on the progress.
Ethical requirements addressed:	Discrimination, regular employment

Project name:	Social Dialogue (JETI)
Purpose:	Establishing platform and neccessary tools for effective social dialogue at factories
Main activities:	Training with trade union representatives, worker representatives (WPC) and factory management (in joint and separate training sessions). Facilitating dialogue between workers and management.
Country/ies:	Bangladesh
Project partners:	Joint ETIs, IndustriALL, suppliers
Start date and expected finish date:	2015 - 2016, new suppliers included from 2016 and 2017
Learning gained and challenges met:	The project has so far highlighted the need for balanced information and training in rights and responsibilities for both workers and management about social dialogue.
Ethical requirements addressed:	Freedom of Association

Project name:	QuizRR Worker Engagement Pilot
Purpose:	Increase management and worker awareness about workplace dialogue
Main activities:	Video-based training and impact survey
Country/ies:	Bangladesh, China
Project partners:	QuizRR, IEH, suppliers
Start date and expected finish date:	2016-
Learning gained and challenges met:	Increased awareness at worker and management level about the intention and effect of worker engagement at the workplace.
Ethical requirements addressed:	Workplace Rights, Freedom of Asssociation

Project name:	Rights & Responsibilities (R&R) Training
Purpose:	Increase awareness for workers and mid-level management about rights and responsibilities at the workplace
Main activities:	Video-based training on several topics
Country/ies:	India
Project partners:	Centre for Responsible Business (CRB), suppliers
Start date and expected finish date:	2015-2018
Learning gained and challenges met:	Increased awareness at worker and management level about rights and responsibilities, and the importance of aligned expectations between the different parties.
Ethical requirements addressed:	Occupational Health and Safety, Harassment and Disciplinary Measures, Wages and Benefits, Working Time, Freedom of Association

Evaluating the Impacts of Improvements Measures

Q4.9 Please evaluate the impact of the improvement measures completed by your company in the reporting year. Evaluate the impact against the risk profile of your supply chain and issues that are identified:

We have initiated improvement measures on a wide range of topics in 2017. In the following we have focused on the particular area of Occupational Health and Safety at factories in Bangladesh.

In May 2018 the initial Accord Bangladesh framework ends and the new framework "transitional Accord" starts. Varner has been a signatory to The Accord since 2013 and has signed the neew agrement effective from May 2018. Although some months are left of the initial Bangladesh Accord framework (2013-2018), and a lot of work is still left until May 2018, it's now a good time to look back over the 5 years of The Accord and review the progress and impact of the framework.

It is clear that The Accord has been an unprecedented initiative in cooperation between labour unions and companies both in terms of cooperation efforts within a legal framework, and in scale. At it's core The Accord aim to make factories safe in the textile sector in Bangladesh. In short, The Accord encompasses:

The agreement consists of six key components:
1. A five year legally binding agreement between brands and trade unions to ensure a safe working environment in the Bangladeshi RMG industry
2. An independent inspection program supported by brands in which workers and trade unions are involved
3. Public disclosure of all factories, inspection reports and corrective action plans (CAP)
4. A commitment by signatory brands to ensure sufficient funds are available for remediation and to maintain sourcing relationships
5. Democratically elected health and safety committees in all factories to identify and act on health and safety risks
6. Worker empowerment through an extensive training program, complaints mechanism and right to refuse unsafe work.

Varner has cooperation with 50 factories in Bangladesh covered under the scope of The Accord. From 2013 until January 2018 a total of 3980 issues (82%) have finished remediation. 466 issues (9,5%) have been improved but are pending verification from engineers, and 522 issues (10%) are not yet remediated. So far approximately 87 000 workers at these factories have taken part in awareness sessions and 253 workers and 145 managers who are part of factory health and safety committees have received a training program over 7 days for how to prevent, detect and handle health and safety risks.



5. COMMUNICATE

Strengthening awareness, dialogue and support



Internal and External Communication about Ethical Trade

Q5.1 Describe how your company communicates internally about its work with ethical trade:

The Sustainability forums every second month which gathers a sustainability-coordinator from each buying chain is one important information channel. There are internal training sessions for the buying departments and the production offices on several sustainability-topics such as animal welfare, factory registration, etc.
The Varner Intranet is an important platform for document sharing (including policies, procedures and guidelines for sustainable practice). In addition, there are many formal (and informal) meetings between the buyers and the Sustainability department. In 2017 a new mobile application for internal communication and training has been introduced. There are several sustainability training modules. In 2018 more modules will be developed and the application will be made available for all employees.

Q5.2 Describe how your company communicates externally about its work with ethical trade:

We publish information about our work with ethical trade on the Varner website and have a link to our latest report to ETI-Norway. Contact details are available online and we strive to give feedback to all external queries.

Varner has on several occasions presented its sustainability work at conferences and seminars, and as guest speakers for students. For example, we spoke at the Fairtrade Norway's 20th Anniversary conference.
Varner has also this year been engaged in the Textile Interchange Project (TIP). TIP is a project initiated by LO and Virke and the aim is to teach school students about global trade and ethical trade, with focus on the textile and shoe industry. Varner arranged a factory visit at one of our suppliers in India during a study trip for TIP students in March 2017.

As last year, Varner participated in the Norwegian "Tekstilaksjon", an initiative from several textile brands and organisations which goal is to raise awareness about reducing textile waste. We are present in several international industry networks focusing on social and environmental improvements in production markets.

Q5.3 Please provide details on which themes your company has communicated with stakeholders about ethical trade in the reporting year. Show:

Which stakeholder groups were involved
Whether it was dialogue on impact by your company's supply chain activities
Whether it was communication of the results of your work with ethical trade

Topic/theme	Stakeholders	About impact of activities	About results communication
Syrian Refugees in Turkey	ASAM, MUDEM, suppliers	Yes	No
Day care centers in factories in India	CIVIDEP, labour unions, other companies, NGOs	Yes	No

Topic/theme	Stakeholders	About impact of activities	About results communication
Occupational Health and Safety in Bangladesh	Industry associations, labour unions, suppliers, workers, NGOs	Yes	Yes
Note: The above are just some examples of stakeholder communications on topics discussed. See Q4.3 and Q4.8 for more details			

Q5.4 Does the company make a list of its suppliers publicly available or does it make this information available to interested parties in any other way?

Yes

If yes, please give details:

A list of factories used for production is kept publicly available at the Varner website. The Bik Bok webshop displays the name of the production unit on the product pages.

Q5.5 Please provide an accurate web address where your company publishes information and/or reports about your work with ethical trade:

www.varner.com

Complaints Procedures

Q5.6 Describe how your company deals with complaints about non-compliance issues in the supply chain, divided by:

Tracking complaints made through established mechanisms such as supplier's own systems, national authorities and international mechanisms such as OECD National Contact Points.

We require the production facilities to develop internal complaints and grievances systems in order to enable workers to raise their issues to assigned persons/committees. The management is required to have a system in place to ensure the issues raised are resolved in a fair and efficient manner. We routinely check that these systems are available and effective for workers. In, addition a complaints mechanism available for all workers has been established in The Accord Bangladesh where we are a member.

Your company's own systems for receiving and dealing with complaints from both internal and external stakeholders.

The HR department together with the Security department in Varner are responsible for handling incoming complaints from both internal and external stakeholders. Internal mechanisms and policies

have been developed. Complaints received by the Sustainability department directly from workers are - if needed - resolved in collaboration with relevant local organizations. The indicators show the number of CSR related complaints at the supply chain level received by the Sustainability department.

Indicator 5-1: Number of complaints received through established complaints mechanisms

Provide the number of complaints received through established complaints mechanisms relating to working conditions, human rights, environmental impact or corruption:

Complaints received through established complaints mechanisms	2017	2016	2015
Number of complaints received	9	3	0

Divide complaints thematically and describe measures taken to follow-up or remedy:

Topic of complaints received in 2017	Number	Follow-up measures taken
Management misbehaviour at external stakeholder	1	Extended and discussed with relevant party
Unreglemented reassigment of worktasks	1	Investigation and remedy by independent party (The Accord Bangladesh)
Termination of employment contracts at factory	2	Stakeholder consultation, onsite and offsite investigation including interviews, meetings with all parties (including employer, labour union, clients)
Harassment and misbehaviour from supervisors	3	Investigation and remedy by independent party (The Accord Bangladesh)
Daycare facility access	1	Meetings with related parties and other clients
Excessive overtime	1	Meetings with related parties and other clients, onsite investigation including interviews.

Promoting Ethical Trade and Experience Exchange

Q5.7 Has your company engaged in activities to promote ethical trade or share experience/knowledge in the reporting year?

Yes

If yes, describe activities and the target groups for these activities, for example:

Suppliers
Business and trade networks
Authorities and/or public bodies
Other

Type of activity	Number	Target group(s)	Description
Industry specific collaboration	10	Other companies, multi-stakeholder initiatives, NGOs	Active involvement in industry groups with focus on sustainability/CSR in Turkey, India, China
Lectures at seminars	6	Other companies, public sector, NGOs	Lectures at seminars/conferences about method and work in CSR
Lectures at seminars	2	Suppliers, internal staff	Information sharing about ethical trade at suppler seminars and internal seminars
Experience exchange	2	Suppliers, NGOs, other companies	Represented in panel discussion about ethical trade in China and Bangladesh
Experience exchange	4	Students, NGOs, government	Hosting delegation at visits in supply chain
Experience exchange	1	Other companies	Sharing experience and method of working with social standards in the supply chain
Contributions to studies and researcl	1	Research organizations, other companies	Reseach project about understanding the impacts of microplastic fibers in the aquatic environment in order to develop a decision support framework that enables garment manufacturers to make environmentally informed choices in their material selection



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