

Arcadia

FASHION
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CODE OF CONDUCT GUIDEBOOK

PART ONE:
CODE OF CONDUCT AND
FACTORY PROCEDURES

BURTON
MENSWEAR
LONDON

DOROTHY PERKINS

EVANS

Debenhams

OUTFIT

TOPSHOP

TOPMAN

wallis

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CHAPTER 1: INTRODUCTION

To minimise audit fatigue, Arcadia Group accepts ethical audit reports requested by selected other retailers or brands.

It is important that the supplier provides Arcadia Group with the correct factory details and ensures that the factory shown on both Valid8 and the purchase order is accurate. It is essential that we know where our goods are made.

We will grade the audit reports. Where violations of our Code of Conduct are found, a corrective action plan (CAP) will be agreed between the factory and the auditing body. The supplier is required to work with the factory to complete the CAP in the Arcadia specified timescales.

Arcadia Group will continue to work with suppliers who show progress towards full compliance with our Code of Conduct and who strive for continuous improvement of standards in the work place.

CHAPTER 2: FACTORY SET-UP

1 FACTORY ASSESSMENT

Prior to proposing a factory to the Arcadia Group you are required to visit and assess the factory to ensure it complies with the Arcadia Group Code of Conduct. The factory needs to have the necessary social compliance and quality systems in place or have an effective remediation programme to resolve any adverse audit findings.

Do not use sub-contractors for any part of producing goods for us without telling us first and having agreement from us in writing. For details of our sub-contractor policy, see Appendix 1.

2. VALID8 SUBMISSION

The Arcadia Group have developed a system called Valid8 to store and manage factory ethical information. This system allows suppliers to set-up factories, upload, store and archive audit information, manage corrective actions, and validate the supply base. Valid8 can be used from any location with internet access via the website <https://arcadia.sgs.com/valid8>.

The following must be completed to set-up a new factory with Arcadia Group, before orders are placed.

a Obtain a Valid8 login

Go to the URL <https://arcadia.sgs.com/valid8/logon> and enter your username and password. If you do not have one, click on 'Register here'.

The Technical Manager for the brand you select will be sent the registration request. Once the request is approved, you will receive an email with login details. Once logged on, you can download the Training Starter Guide from the Help section.

b Ethical audit report

An acceptable ethical audit report, dated within twelve months of submitting the factory proposal, must be uploaded to Valid8.

Where sub-contractors are used for primary processes, a separate ethical audit report must be submitted for each sub-contractor. All sub-contractors must be disclosed on Valid8.

c Corrective Action Plan (CAP)

Where applicable, an up-to-date corrective action plan agreed with the auditing body must be uploaded to Valid8 with the audit report.

FACTORY SET-UP

3 COMMON PROBLEMS WITH AUDIT REPORTS

If the audit report submitted reveals critical violations of our Code of Conduct that are still outstanding at the time of submitting, the factory will not be set-up on our system.

Critical audit findings which prevent the factory being set-up include, where the local law requires, the following findings. Factories that do not:

- have approved building layout plans or a stability certificate from the appropriate inspectorate;
- have a functioning fire alarm in all factory buildings;
- have a valid business licence; or
- pay all employees the minimum wage.

Please make sure all these points are satisfactory before submitting a factory set-up request to us.

If a critical violation is found in an existing factory the supplier will be asked to attend a meeting to discuss the urgent remediation of the problem.

CHAPTER 3: CONFIRMING FACTORY INFORMATION

1 CONFIRMATION OF FACTORY ON PURCHASE ORDERS

It is the supplier's responsibility to check that the factory details on each purchase order are correct. Suppliers may only use factories that they have declared in advance to Arcadia Group, and which have been accepted for the supplier's use on Valid8.

Primary sub-contractors must also be declared (see Appendix 2: Sub-contracting policy).

Failure to comply may result in non-payment of the order. We reserve the right to take any further action we deem appropriate (including, but not limited to, legal action).

It is essential that we know where our goods are made.

2 FACTORY NAME OR ADDRESS AMENDMENT

If a factory's details change e.g. name or address, please amend in Valid8 and send for approval. We will confirm if any additional information is required.

A new independent ethical audit report and corrective action plan may be required.

3 FACTORY VALIDATION

Suppliers should review their factory list on Valid8 regularly. Factories that are no longer used should be flagged to your Arcadia Brand Technologist and disengaged.

Please make sure all factories and sub-contractors are declared and approved for use. If goods are being made in a factory which we have not approved, it is considered a serious breach of our Conditions of Trading.

CHAPTER 4: RIGHT OF ACCESS TO FACTORIES

All suppliers are to provide access to their production facilities and documents to ensure that the Code of Conduct is complied with, for each facility.

As stated in The Arcadia Group Conditions of Trading, 'You must allow our Authorised Inspector into the Factory at all reasonable times so he or she can inspect the Goods, along with the materials and processes used to make them, and take samples if necessary. You must give us information we ask for about the factory and the process of manufacture.

'If the Goods are being made by a sub-contractor you must make sure that the sub-contractor allows our Authorised Inspector to inspect the Goods, along with the materials and processes used to make them, and take samples if necessary. Whether or not you have an inspection, you must keep to the terms of the Agreement.'

The following are examples of where the right of inspection would be breached. They are meant to provide a basic understanding of how Arcadia Group views 'Right of Inspection' issues in relation to our Code of Conduct.

- The audit is arranged through the factory management/supplier, but the auditor is refused entry to the factory upon arrival without any valid explanation.
- The auditor is allowed to inspect all of the facility but is denied access to dormitories or to review any documents.
- When factory management states that only one unit in a local area produces the Arcadia Group goods but workers from other nearby units are observed working on our goods. All factories (all buildings) are to be audited.
- The factory fails to provide personnel information (in accordance with local laws) for the workers. For example, factory management refuse to provide records, stating those records have been sent to another country/office or the person in charge is unavailable.
- The factory may state that the appropriate individual is unavailable to authorise interviews with workers.

CHAPTER 5: AUDIT PROCESS

1 WHICH FACTORIES TO AUDIT

Arcadia Group requires all factories (including sub-contractors, see Appendix 1: Sub-contracting policy) to be independently audited against the Arcadia Group Code of Conduct.

2 AUDIT FATIGUE

Factories can sometimes have several ethical audits a year. As a result, factory owners spend time and money meeting different requirements, which can impact on production resources. Arcadia Group recognises this problem and therefore accepts a number of ethical audits requested by other retailers that meet our requirements. Audits should be:

- performed to the ETI Base Code;
- conducted on a semi announced or unannounced basis and dated within twelve months of submission unless otherwise stated;
- performed by an approved independent audit company; and
- accompanied by a completed corrective action plan (CAP).

3 ARCADIA GROUP APPROVED AUDIT COMPANIES

Intertek (ITS)

www.intertek.com

<http://www.intertek.com/business-assurance/supplier-management/corporate-responsibility>

Société Générale de Surveillance (SGS)

www.sgs.com

<http://www.sgs.com/en/Sustainability/Social-Sustainability/Social-Responsibility-SR/ETI-Audits.aspx>

Bureau Veritas (BV)

www.bureauveritas.com

<http://www.bvcps.co.uk/ethicalaudit>

UL

www.ul.com

www.ul.com/responsible-sourcing

Please contact us if you wish to submit an audit from a different organisation.

AUDIT PROCESS

4 HOW TO BOOK A NEW AUDIT

The audit process should be initiated by the supplier or factory. The audit needs to be requested within required critical path dates to meet order dates.

To initiate the audit, please contact the audit company directly and request an ethical audit for Arcadia Group. You will then be asked to complete an audit request form, detailing information on the site.

5 AUDIT PAYMENT

Once the audit company receives the audit request form, they will provide a quote for the audit. The supplier is asked to accept the quote and arrange payment. Once payment is received, the audit company will confirm an audit window.

6 AUDIT REPORT AND CORRECTIVE ACTION PLAN (CAP)

At the end of the audit, the auditors will discuss with factory management any findings of non-compliance found on the audit. A CAP will be produced and timescales for each non-compliance, if any, will be agreed.

7 CLOSING CORRECTIVE ACTION PLANS (CAPS)

Non-compliances listed on the CAP can be closed in two ways:

a Visual – Uploading evidence or auditor verification to Valid8

If the remedial actions required can be demonstrated visually, suppliers can submit photographs to close these non-compliances. The submissions should be made to the relevant brand technologist.

Examples of visual non-compliances that can be closed by photographs include:

- missing emergency exit signs;
- blocked fire exits; or
- exposed wiring.

AUDIT PROCESS

b Non-visual – Follow-up audit

If the required remedial action cannot be verified by a photograph a re-audit for the specific violations must be booked within the specified time frame and uploaded to Valid8.

Examples of non-compliances that require an audit to close include:

- working hours exceed legal limits;
- workers are fined as a disciplinary procedure; or
- failure to pay minimum wage.

CHAPTER 6: AUDIT ASSESSMENT AND FOLLOW UP

1 AUDIT GRADES

Audit reports are reviewed by Arcadia Group's Ethical Trading team on Valid8 and awarded one of the following grades.

a Green

Factories are graded 'Green' if the violations and/or conditions observed were deemed by us to be low or medium risk.

A new audit must be conducted within **one year** from the last audit date if the factory is still producing goods for Arcadia Group.

Green Examples:

- Arcadia Group Code of Conduct not posted on factory notice board.
- Fire-fighting equipment wall-mounted at incorrect height.
- Evacuation plans do not have a 'you are here' indicator.

b Orange

Factories are graded 'Orange' if the violations and/or conditions observed were deemed by us to be high risk.

A new audit must be conducted within **six months** from the last audit date.

Orange Examples:

- Insufficient number of first-aid kits.
- No trained fire fighters.
- Manipulation of company records.

c Red

Factories are graded 'Red' if the violations and/or conditions observed were deemed to be a critical risk.

Suppliers will be required to address these issues with urgency and arrange for an immediate re-audit. We may stop production if there is an inadequate response from the supplier or factory management.

Red Examples:

- No building layout plan approval or stability certificate from appropriate inspectorate.
- No functioning fire alarm in all factory buildings.
- No valid business licence.
- Workers are not paid legal minimum wage.

AUDIT ASSESSMENT AND FOLLOW UP

2 SCHEDULING FOLLOW-UP AUDITS

If a factory grade requires a follow-up audit, it is the responsibility of the supplier to co-ordinate and schedule this. A supplier that fails to schedule a follow-up audit within the specified time may be 'disengaged'.

During a follow-up audit, the auditor will check on the issues that caused the factory to receive the initial rating, but the audit scope will not necessarily be limited to this.

Please note that we only accept partial follow-up audits that are conducted within six months of the original, full audit. After six months, the site must have a full follow-up audit.

All follow-up audits must be conducted on a semi-announced or unannounced basis and submitted on Valid8.

SECTION B – CODE OF CONDUCT

Arcadia Group Code of Conduct

When customers buy our goods they must be sure that they have been produced under acceptable conditions. That means the goods must have been produced:

- lawfully, through fair and honest dealing;
- without exploiting the people who made them;
- in decent working conditions; and
- without damaging the environment.

This Code applies to the supplier, manufacturer or any other person involved in supplying goods to our companies. We have asked you to follow this code. The code is backed-up by a process of self-evaluation and independent inspections to make sure you keep to it.

The Code is designed to be fair, achievable, and easy to check, and to promote the ongoing development of our suppliers. It is based on International Labour Organisation (ILO) conventions and recommendations.

The goods must be made at the factory named in the purchase order.

Legal requirements - At all times, you must meet the legal requirements of the countries in which you are working.

The employer must only employ workers who are legally entitled to enter into employment in accordance with national immigration law.

Manufacturing processes – You are reminded that all premises involved in manufacture are subject to these standards. Sub-contracted processes – which are processes being carried out by another factory unit, or from domestic premises (home-working) – must be declared when the order is placed, and have our written permission.

Animal products programme

We are committed to making sure our products are from fair and ethical sources.

All suppliers must be socially responsible when using animal products.

For this reason we have introduced a 'Declaration of Ethical Compliance for Animal Products'. This means that you must meet the following conditions.

- You must only use leathers, skins and feathers that are by-products of the slaughter of an animal. Global standards agreed by the OIE (World Organisation for Animal Health) are set out in their practices for the protection of animals at the time of slaughter.

SECTION B – CODE OF CONDUCT

- You must not use products from endangered species on the CITES (Convention on International Trade in Endangered Species) or IUCN (International Union for the Conservation of Nature) list.
- You must not use angora, real fur (except for sheepskin, goatskin and cowhide) or pelts on any goods supplied to us.
- You must not use karakul (also known as broadtail and astrakhan), or any skin products from aborted animals in goods supplied to us.
- You must not use any leather that was taken while the animal was alive. Stunning and slaughter guidelines are laid out for different species in the OIE global standards.
- No feathers should be plucked from live animals. Feathers must only be purchased from licensed organisations with certification.
- No cosmetics sold by the Arcadia Group should be tested on animals.

You must keep to these conditions for the programme to work. This is a long-term programme that aims to make sure:

- animals are treated in a humane and ethical way; and
- you and we keep to any relevant laws, such as those on hygiene and waste disposal.

Arcadia Group Code of Conduct (March 2015)

a Employment is freely chosen

- 1 There is no forced, bonded or involuntary prison labour.
- 2 Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

b Freedom of association and the right to collective bargaining are respected

- 1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- 4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

SECTION B – CODE OF CONDUCT

c Working conditions are safe and hygienic

- 1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- 2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- 5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

d Child labour shall not be used

- 1 There shall be no new recruitment of child labour.
- 2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; 'child' and 'child labour' being defined at the end of this Code.
- 3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 4 These policies and procedures shall conform to the provisions of the relevant ILO (International Labour Organisation) standards.

e Living wages are paid

- 1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

SECTION B – CODE OF CONDUCT

- 3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

f Working hours are not excessive

- 1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.
- 2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*
- 3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- 4 The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by clause 6.5 below.
- 5 Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- 6 Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

SECTION B – CODE OF CONDUCT

g No discrimination is practised

- 1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

h Regular employment is provided

- 1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 2 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, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

i No harsh or inhumane treatment is allowed

- 1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

The provisions of this Code constitute minimum and not maximum standards, and this Code should not be used to prevent companies from exceeding these standards. Companies applying this Code are expected to comply with national and other applicable law and, where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection.

SECTION B – CODE OF CONDUCT

DEFINITIONS

Child

Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.

Young person

Any worker over the age of a child as defined above and under the age of 18.

Child labour

Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

Our Code should be displayed to factory workers in their own language. Translated copies are available on the ETI website <http://www.ethicaltrade.org/Z/lib/base/index.shtml>. If any workers are illiterate, the Code should be communicated to them verbally.

SECTION C – DECLARATION OF ETHICAL COMPLIANCE: ANIMAL PRODUCTS

Animal Products Programme

We are committed to making sure our products are from fair and ethical sources.

All suppliers must be socially responsible when using animal products.

For this reason we have introduced a 'Declaration of Ethical Compliance for Animal Products'. This means that you must meet the following conditions.

- You must only use leathers, skins and feathers that are by-products of the slaughter of an animal. Global standards agreed by the OIE (World Organisation for Animal Health) are set out in their practices for the protection of animals at the time of slaughter.
- You must not use products from endangered species on the CITES (Convention on International Trade in Endangered Species) or IUCN (International Union for the Conservation of Nature) list.
- You must not use angora, real fur or pelts are not to be used on any products supplied to Arcadia Group.
- You must not use karakul (also known as broadtail and astrakhan), or any skin products from aborted animals in goods supplied to us.
- You must not use any leather that was taken while the animal was alive. Stunning and slaughter guidelines are laid out for different species in the OIE global standards.
- No feathers should be plucked from live animals. Feathers must only be purchased from licensed organisations with certification.
- No cosmetics sold by the Arcadia Group should be tested on animals.

You must keep to these conditions for the programme to work. This is a long-term programme that aims to make sure:

- animals are treated in a humane and ethical way; and
- you and we keep to any relevant laws, such as those on hygiene and waste disposal.

As a supplier to Arcadia Group, it is your responsibility to demonstrate due diligence to ensure the above points are observed. You must talk to your suppliers to ensure they are aware of and meet our minimum requirements.

Suppliers of animal products are responsible for liaising with their factories and tanneries to ensure they are proactively managing all requirements specified by:

- local laws;
- hygiene legislation; and
- waste disposal legislation.

SECTION C – DECLARATION OF ETHICAL COMPLIANCE: ANIMAL PRODUCTS

Suppliers will be expected to provide the following details, where possible, for all animal products:

- the type of animal (eg cow, sheep);
- the country from which the animals come; and
- detailed information of the supply chain.

Documentation must be kept and made available to Arcadia Group, upon request, for 12 months after a product has been supplied to us.

APPENDIX 1: SUB-CONTRACTING POLICY

Arcadia Group recognises that its suppliers' factories may sub-contract certain processes in the production of Arcadia Group's goods. It is essential that we know where our goods are being made. You need to notify the relevant Arcadia Buying Department about any intended sub-contracting in advance, and have our written agreement. Our Code of Conduct (CoC) is to be applied throughout your supply chain.

1 WHAT IS A SUB-CONTRACTOR?

Arcadia Group classifies sub-contractors as factory units or domestic premises (home workers) producing goods or undertaking primary manufacturing processes. This includes cutting, sewing or knitting.

2 DECLARING SUB-CONTRACTORS

Sub-contractors need to be declared to our Buying Department prior to the purchase order being placed. Arcadia Group needs to agree the use of the sub-contractor(s) in writing. All factories conducting primary processes must be declared and approved on Valid8 with a valid ethical audit. This comprises of cutting, linking and sewing. Denim washing units must also submit an audit and demonstrate they have a functioning an Effluent Treatment Plant (ETP).

Suppliers must ensure that the correct factory is shown on the Purchase Order on the Extranet. The unit that will be used for the major transformation of the goods, for example, sewing or knitting, should be declared as the 'factory' on the Purchase Order.

APPENDIX 1: SUB-CONTRACTING POLICY

3 AUDITING SUB-CONTRACTORS

Please retain evidence that the Arcadia Group CoC is applied to throughout your supply chain. This includes sub-contractors and any units in which Arcadia Brands' labels are visible, such as packaging manufacturers, laundries, textile printers and warehouses.

- Ethical audits are required at a sub-contractor undertaking any primary manufacturing processes.
- We ask that you ensure that any sub-contractors understand and implement the Arcadia Group CoC.
- You must maintain a file recording the receipt, acknowledgement and understanding of the Arcadia Group CoC by all sub-contractors and factories.
- You are to keep records to show that they are carrying out regular reviews and checks in sub-contractors.
- We may request information to check that you are following our Code. We will keep this information confidential.
- Our staff or representatives may visit your factory, including sub-contractors, without warning to carry out inspections or audits.

4 CONDITIONS OF TRADING

Arcadia's sub-contracting policy forms part of our Conditions of Trading, Section 16.

- You must not transfer or sub-contract your responsibilities under the agreement without the written permission of an Arcadia Group authorised signatory.
- If we agree to you transferring or sub-contracting your responsibilities, you will be responsible for making sure that the person or organisation you transfer or sub-contract to keeps to the agreement. We may make a claim against you if that person or organisation fails to do so.

Failure to declare sub-contractors may lead to orders being cancelled and a review of our business relationship.