

## Declaration of country specific risks India

### Introduction

In accordance with the OECD Due Diligence Guidance, we perform a regular supply chain risk analysis. In this document we like to share relevant points that have been identified during our risk analysis as topics that are seen as most likely to happen in India. This is reflected in research, media coverage, audit results, Fair Wear's country study, information from NGO's and based on our own experiences. These insights can help us together conducting (human rights-) due diligence which is an ongoing risk management process to identify, prevent and mitigate risks. By signing this document, you declare to be aware of these risks and will act to mitigate the exposure to these potential risks.

### 1. Forced (child/migrant) labour

Sumangali(-like) schemes have been identified as a high and real risk, mainly happening in spinning mills in South India. Employment under Sumangali schemes is in violation with our Code of Conduct. We do not accept any form of forced, bonded or child labour.

Please find the ILO indicators of Forced labour in [English](#).

#### Are you aware of this risk?

- Yes
- No

#### What steps did/will you take to identify the risk of forced (child) labour at your spinning mills?

*Please briefly describe how you assess this risk.*

[Click here to enter text.](#)

#### Do workers stay in dormitories/hostels?

- Yes
- No

#### Have you employed or identified any migrant workers in your supply chain?

*If yes, please describe where they come from and what languages they speak.*

- Yes [Click here to enter text.](#)
- No

#### How do you prevent and mitigate this risk?

- Our spinning mills have a policy and procedures in place regarding recruitment (*please attach*)
- All subcontractors including spinning mills are identified and included in audit and compliance programs (including dormitories/hostels if applicable)
- We train spinning mills on labour rights to raise awareness
- Our spinning mills have an internal grievance mechanism in place\*
- Our spinning mills have an external grievance mechanism in place\*
- We engage with (local) NGO's on this issue. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case your spinning mills have a grievance mechanism in place:*

Were there any complaints? If yes, how many? [Click here to enter text.](#)

How did you handle these complaints? [Click here to enter text.](#)

## 2. Home based working

Homework can be defined as the production of goods or services carried out in premises other than those of the main employer, often in private homes. Homeworking refers both to individuals or family groups working together in their own home or groups of workers who come together in informal workshops, often home-based.

We require suppliers and factories who use homeworkers to register, manage and monitor homeworkers in their supply chain and aspire to achieve equal treatment of homeworkers in accordance with the [ILO Convention](#) as well as improved working conditions in accordance with our Code of Conduct.

### Are you aware of this risk?

- Yes
- No

### Is (part) of the production at homeworker units?

- Yes *(if yes, please fill out Annex 1)*
- No

### How do you prevent and mitigate this risk?

- We have a policy and procedures in place regarding recruitment *(please attach)*
- We have set out the terms of payment for fair remuneration (e.g. per piece, period of payments)
- We have a policy and procedures in place regarding the homeworking process *(please attach)*
- We register, manage and monitor homeworkers in an information system and keep a register containing information about the workers
- Homeworkers are included in audit and compliance programs
- We train homeworkers on labour rights to raise awareness
- We have an internal grievance mechanism in place for homeworkers\*
- We have an external grievance mechanism in place for homeworkers\*
- We engage with (local) NGO's on this issue. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case you have a grievance mechanism in place:*

Were there any complaints from homeworkers? If yes, how many? [Click here to enter text.](#)

How did you handle these complaints? [Click here to enter text.](#)

### 3. Discrimination and Gender

Gender equality is a key component to realise the rights to safe, dignified, properly paid employment. India ratified [ILO Conventions](#) and the United Nations Convention on the Elimination of All Forms of Discrimination against Women ([CEDAW](#)) to protect workers from discrimination and promote gender equality at work. Besides, the sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 is a legislative act in India that seeks to protect women from sexual harassment at their place of work.

Despite these positive developments, it remains significant challenging to fully implement existing laws and legal guidelines in India, and to shift the persisting social norms that ignore victims and their complaints. We do not accept any form of 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.

**Are you aware of this risk?**

- Yes
- No

**What steps you did/will you take to identify the risk?**

*Please briefly describe how you assess this risk*

[Click here to enter text.](#)

**How do you prevent and mitigate this risk?**

- We have a policy in place regarding gender equality and sexual harassment (*please attach*)
- Through audit and compliance programs
- We train workers, supervisors and management on how to identify, prevent and address gender-based violence and harassment
- We have a functioning Internal Complaints Committee (ICC) or internal grievance mechanism\*
- We have an external grievance mechanism in place\*
- We engage with (local) NGO's on this issue. Name: [Click here to enter text.](#)
- Other: [Click here to enter text.](#)

*\*In case you have a complaint/grievance mechanism in place:*

Were there any complaints? If yes, how many? [Click here to enter text.](#)

How did you handle these complaints? [Click here to enter text.](#)

#### 4. Energy power cuts

Many production countries are struggling with a severe shortage of electricity and/or gas, resulting in power cuts and blackouts causing delays because of production interruptions. This could lead to production interruptions and therefore, also put a risk on code of conduct principles (e.g. overtime to make up for production losses).

**Do you have an alternative/emergency power supply to cover shortages of power cuts?**

- Yes, please explain: [Click here to enter text.](#)
- No

#### 5. Financial stability

Undertaking a contract with a financially unstable supplier could result in issues such as interrupted supply, or decreased quality of the product if the supplier must cut costs in order to make profit. Or worse, that the supplier business could fail.

**Please describe the ownership structure of the business entity and support this with evidence**

[Click here to enter text.](#)

**Please provide a cash flow statement for the past 2 years to measure if your business has a positive liquidity (in Indian Rupee)**

- 2020 [Click here to enter text.](#)
- 2021 [Click here to enter text.](#)

**Solvency ratio (the ability of your business to pay off its debts and obligations)**

*Please mention in %.*

[Click here to enter text.](#)

**Please list your 3 biggest customers.**

	<i>Customer name</i>	<i>% of the production capacity per customer</i>
○ Customer 1	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
○ Customer 2	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>
○ Customer 3	<a href="#">Click here to enter text.</a>	<a href="#">Click here to enter text.</a>

***NOTE: please provide published financial statements and/or other documents to support your answers above.***

By signing this document you declare to be aware of these risks and take action to mitigate the exposure to these potential risks.

Date: Click here to enter text.

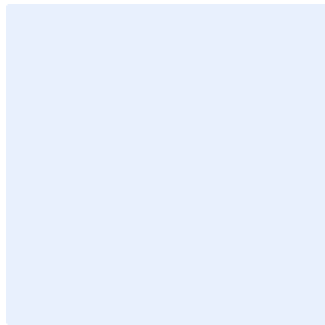
Supplier: Click here to enter text.

Name MD: Click here to enter text.

Signature:

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Company  
chop:



## Annex 1: QUESTIONNAIRE FOR HOME-BASED WORK

### Details factory

*(Site which commissions home-based work for Zeeman during production)*

Name factory: [Click here to enter text.](#)

Contact person (at management level): [Click here to enter text.](#)

E-mail address: [Click here to enter text.](#)

Address: [Click here to enter text.](#)

Postal code: [Click here to enter text.](#)

City: [Click here to enter text.](#)

Province: [Click here to enter text.](#)

Country: [Click here to enter text.](#)

Phone: [Click here to enter text.](#)

1. Which parts or specific tasks of the whole production cycle are done at home worker units?

[Click here to enter text.](#)

2. What share (%) of total production for Zeeman takes place at home worker units?

[Click here to enter text.](#)

3. Are the home workers individuals, families or do they work in collective groups?

[Click here to enter text.](#)

### ***Relation between supplier / contractor / subcontractors (if applicable) and homeworkers:***

4. Are home workers registered workers to the supplier / contractor / subcontractor (if applicable)? If not, on what basis agreements are made and controlled?

[Click here to enter text.](#)

5. Is the relation regulated in a contract? If yes, in what terms?

[Click here to enter text.](#)

6. What are the terms of payment (e.g. per piece, period of payments)? If applicable describe the terms of loans or pre-funding. In case the production takes place at a factory and at home, do workers at the factory receive the same pay as those working from home?

[Click here to enter text.](#)

7. What is the system of placing orders to home workers?

a. What lead times are given?

[Click here to enter text.](#)

b. Time frame of delivery?

[Click here to enter text.](#)

c. Can home workers influence the amount of production they need to do?

[Click here to enter text.](#)

d. Frequency of order placement (number of orders in one year, period of order)?

[Click here to enter text.](#)

8. What is provided to the homeworkers?

a. Machinery (specify ownership and whether loans are given to homeworkers; if so under what terms)?

[Click here to enter text.](#)

b. Fabric?

[Click here to enter text.](#)

c. Other supplies?

[Click here to enter text.](#)