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**Ontex Ethical Sourcing  
Requirements**

*January 2025*

# Introduction

At Ontex, we are committed to ethical sourcing and the promotion of human rights. By working closely with our suppliers, we aim to prevent and address significant social and environmental challenges while fostering responsible, fair, and transparent supply chains.

This document builds on those principles by providing detailed guidance on the social audit requirements for key suppliers, as outlined in the Supplier Code of Conduct and the Global Supplier and Vendor Handbook. It specifically explains the scope of third-party social audits, accepted audit schemes, and how audit results are evaluated.

To ensure compliance, any facility disclosed to Ontex may be subject to a social audit at any time. Audits are prioritized based on the assessed risk level of the country or commodity where the facility operates.



# ↑ Scope

## > Suppliers


The Ethical Sourcing Requirements stipulated in this document apply to all Suppliers of Ontex.

## > Risk country

The risk countries are defined as those countries where:

- Local working conditions fall below the international standards,
- There is a low degree of rule of law, or
- The international community has identified a need for considerable overall development.

The list of risk countries is updated on a regular basis. The outputs of this can be found in **Countries Risk Classification**[1] based on Radar, a risk assessment tool from Sedex.

 Suppliers should use this list to identify which of their **production sites are located in risk countries.**

[1] For an overview of the risk assessment methodology, please refer to <https://www.sedex.com/blog/understanding-supply-chain-risks-with-the-radar-risk-tool/>



# Audit & certification requirements



Independent third-party ethical audits or certificates are required for all production facilities within the scope of this document that are located in risk countries, as defined in the “Scope” section.



Verification of a company’s compliance with the obligations outlined in this chapter may be conducted by an independent third party.



Audits must be conducted on a semi-announced basis, unless otherwise agreed by the Ontex sustainability team.



The cost of the audit, travel and any associated costs of uploading the report onto the Sedex platform will be borne by the Supplier.

# Audit & certification requirements

## Accepted audits/certifications

Social audits are recurring evaluations designed to assess compliance with international standards and local law. The validity & minimum acceptable scores depend on the chosen audit scheme. **Only the audit schemes listed in the table below are accepted.**

Audit scheme	Results	Validity	Findings/Results	Accepted	Communication
<b>SMETA 4-Pillar</b>	A CAPR with corrective actions based on findings.	12 months	Findings: Non-conformities/Non-compliances; Observations; Good Examples	Yes	Sedex platform
<b>amfori BSCI</b>	A minimum score of C is required. If the supplier scores a D, an improvement plan will need to be set up by the supplier. During the re-audit (n+1) a minimum score of C should be obtained.	24 months (Full audit only)	A. Very Good B. Good	Yes	Email report
		12 months	A. Acceptable B. Insufficient C. Unacceptable	Yes Conditional No	
		Not valid	ZT- Zero tolerance	No	
<b>SA8000</b>	Certification	36 months	Not applicable	Yes	Email certification

For SMETA audits, the auditor must upload the report to the Sedex Platform and request a direct link between the Supplier and Ontex Group to ensure seamless access to audit information.

# Audit & certification requirements

## > APPROVED CERTIFYING BODIES

The auditing firms authorized to conduct SMETA, amfori BSCI and/or SA8000 audits are those directly accredited by Sedex, amfori BSCI & SA8000.[1]

## > PROOF OF VALID AUDIT REPORT OR CERTIFICATION

Our goal is to ensure that social compliance is addressed early in the sourcing process for each production facility. To achieve this, we request the following information:

- The preferred social audit scheme (SMETA, amfori BSCI, or SA8000)
- Link to Sedex platform showing 100% completion of the SAQ
- Last valid[2] audit result

If a Supplier uses the SMETA audit, we will connect with the Supplier via the Sedex platform. If a Supplier wishes to use the BSCI or SA8000 audit scheme for a production facility used for Ontex production, the Supplier will email the most recent valid SMETA report to the sustainability department[3] of Ontex and/or the Group Responsible Sourcing Specialist.

If the production facility in question has not been audited or certified at the time of tendering, or if the audit and/or certificate expire(s) prior to the production period, **a valid audit report/certificate must be provided no later than 6 months after the supplier begins supplying Ontex.**

If there is an existing audit report, the audit must be current and completed within the past 12 months from the date the supplier became a supplier of Ontex.

## > AUDIT RESULTS & CORRECTIVE ACTIONS

All Suppliers must work towards continuous improvement in the social and working conditions throughout their supply chain.

Suppliers must proactively review social audit reports and provide corrective action for non-compliances in a timely manner. It is the responsibility of the Supplier to review the audit report, discuss the findings and complete the Corrective Action Plan (CAP) accordingly and within the timing agreed with the auditors.

1] For a list of accredited certifying bodies, please refer for BSCI to <http://www.bsci-directory.org/auditors/view/fa.php>, for SMETA to <https://www.sedex.com/affiliate-audit-companies/> and for SA8000 to <https://sa-intl.org/resources/sa8000-accredited-certification-bodies/>. [2] See previous slide for info about validity of social audit reports (frequency & score) 3] Sustainability department Ontex: [sustainability@ontexglobal.com](mailto:sustainability@ontexglobal.com).

# Audit & certification requirements

## > **AUDIT RESULTS & CORRECTIVE ACTIONS**

**Scope: all suppliers based in high-risk and medium-risk countries within the defined scope**

All Suppliers must work towards continuous improvement in the social and working conditions throughout their supply chain.

Suppliers must proactively review social audit reports and provide corrective action for non-compliances in a timely manner. It is the responsibility of the Supplier to review the audit report, discuss the findings and complete the Corrective Action Plan (CAP) accordingly and within the timing agreed with the auditors. The CAP should be uploaded on the SEDEX platform according to the SMETA described process or sent via email when using amfori BSCI.

## > **Critical business and business non-Conformities**

We require our suppliers to establish and implement mandatory mechanisms to ensure the execution of effective corrective action plans. Progress must be monitored with Ontex through regular follow-ups. If the results remain unsatisfactory, an escalation process will be activated.

## > **Overdue critical business Non-conformities, critical non-conformities, and major non-Conformities**

Suppliers are required to conduct periodic social audits upon request and demonstrate proactive measures to address and resolve any outstanding issues.

## > **Reports with Zero Tolerance findings**

This will immediately require mandatory mechanisms to enforce the implementation of effective remediation action plans and initiate legal escalation procedures if necessary.

# ↑ Audit & certification requirements

## > Self-Assessment Questionnaire (SAQ) on SEDEX

### *Scope: all suppliers located in risk countries*

From the time of entry the individual agreement, through the entire period of sourcing and production, and up until the goods are delivered, all suppliers in risk countries must have completed 100% the SAQ in Sedex.

This will enable Ontex to identify any actual or potential adverse impact, and monitor compliance Management Systems in human, labor rights and environmental standards through our supply chain in real time.

## > Proof of completion

Within the scope of the tendering process, we request the following information:

- **Link with Ontex in Sedex (ZC1071907)**
- **Complete 100% the SAQ in Sedex**

Questions on SAQ please email [sedexplatform@sedex.com](mailto:sedexplatform@sedex.com)



# Audit & certification requirements

## > EcoVadis scorecard

### *Scope: any supplier upon request*

We strongly encourage all direct and indirect suppliers to share their scorecard in EcoVadis from the time of entry into the individual agreement, throughout the entire sourcing and production period, and until the goods are delivered.

Sharing the scorecard allows us to assess the supplier's commitment to respecting and promoting human rights within their own business and supply chains.

There are fees associated with the audit, including the use of the platform and the scorecard, which vary depending on the size of the supplier.

More details can be found via the following link. <https://ecovadis.com/plans-pricing/>.

## > Ontex Ethical Sourcing Requirements

### *Scope: any supplier upon request*

In cases where a valid EcoVadis scorecard is not available, suppliers may be requested to complete the Ontex sustainability questionnaire as an alternative means of assessment. This questionnaire will be sent annually during Q3 and is expected to be completed within three weeks, ahead of the closing of the year.

# Failing to meet the requirements

In case a Supplier is non-responsive to complete the SAQ in Sedex, and/or deliver a valid third-party social audit report, Ontex can organize the social audit (SMETA). The costs of the audit shall be borne by the Supplier.

If a Supplier fails to meet one or more of the ethical sourcing requirements, Ontex reserves the right to act and exercise its rights and remedies as it believes is appropriate or necessary in respect of any such breach or non-compliance, including by immediately cancelling or refusing to take delivery of an order for the products, terminating any contract with the Supplier.

> For any questions, please contact the Ontex Sustainability team.

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# Country risk rating list

- > The Country Risk Rating is based on the Sedex methodology and incorporates multiple sources from the Human Rights Index and other ratings. Countries are rated as high risk due to factors such as significant human rights violations, environmental issues, and poor labor standards.
  - > These ratings help guide our decision-making in alignment with our supplier due diligence program, Code of conduct, human rights policy and ethical requirements.
  - > **IMPORTANT:** Suppliers located in **high-risk countries**, or in **medium-risk countries** with significant risks related to **forced labor, freedom of association, health and safety, child and young workers, discrimination, wages, or regular employment**, are **required to submit a valid third-party social audit report** (e.g., **SMETA, amfori BSCI, or SA8000**).
- > In addition, our Group Responsible Sourcing Specialist conducts regular reviews of these risk ratings at least every Q4 of the year. Where new insights or information justify it, we may choose to adjust the rating to reflect current conditions or emerging risks.
  - > For more information or details contact to the Ontex Group Responsible Sourcing Specialist:  
[jessica.pazmolina@ontexglobal.com](mailto:jessica.pazmolina@ontexglobal.com).

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Afghanistan	High risk
Albania	Medium risk
Algeria	High risk
American Samoa	Medium risk
Andorra	Medium risk
Angola	High risk
Anguilla	Medium risk
Antigua and Barbuda	Medium risk
Argentina	Medium risk
Armenia	Medium risk
Aruba	Medium risk
Australia	Medium risk
Austria	Medium risk
Azerbaijan	High risk
Bahamas	Medium risk
Bahrain	High risk
Bangladesh	High risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Barbados	Medium risk
Belarus	Medium risk
Belgium	Medium risk
Belize	Medium risk
Benin	High risk
Bermuda	Medium risk
Bhutan	Medium risk
Bolivia, Plurinational State Of	Medium risk
Bonaire, Sint Eustatius and Saba	Medium risk
Bosnia and Herzegovina	Medium risk
Botswana	Medium risk
Brazil	Medium risk
Brunei Darussalam	Medium risk
Bulgaria	Medium risk
Burkina Faso	High risk
Burundi	High risk
Cambodia	High risk
Cameroon	High risk
Canada	Medium risk
Cape Verde	Medium risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Cayman Islands	Medium risk
Central African Republic	High risk
Chad	High risk
Chile	Medium risk
China	High risk
Colombia	Medium risk
Comoros	High risk
Congo	High risk
Congo, The Democratic Republic of the	High risk
Cook Islands	Medium risk
Costa Rica	Medium risk
Côte d'Ivoire	High risk
Croatia	Medium risk
Cuba	Medium risk
Curaçao	Medium risk
Cyprus	Medium risk
Czech Republic	Medium risk
Denmark	Low risk
Djibouti	High risk
Dominica	Medium risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Dominican Republic	Medium risk
Ecuador	Medium risk
Egypt	High risk
El Salvador	Medium risk
Equatorial Guinea	High risk
Eritrea	High risk
Estonia	Medium risk
Eswatini, The Kingdom of	High risk
Ethiopia	High risk
Falkland Islands (Malvinas)	Medium risk
Faroe Islands	Low risk
Fiji	Medium risk
Finland	Low risk
France	Medium risk
French Guiana	Medium risk
French Polynesia	Medium risk
Gabon	Medium risk
Gambia	High risk
Georgia	Medium risk
Germany	Medium risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Ghana	Medium risk
Gibraltar	Medium risk
Greece	Medium risk
Greenland	Low risk
Grenada	Medium risk
Guadeloupe	Medium risk
Guam	Medium risk
Guatemala	High risk
Guinea	High risk
Guinea-Bissau	High risk
Guyana	Medium risk
Haiti	High risk
Holy See (Vatican City State)	Medium risk
Honduras	High risk
Hong Kong	Medium risk
Hungary	Medium risk
Iceland	Medium risk
India	High risk
Indonesia	High risk
Iran, Islamic Republic of	High risk



## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Iraq	High risk
Ireland, Republic Of	Low risk
Isle of Man	Medium risk
Israel	Medium risk
Italy	Medium risk
Jamaica	Medium risk
Japan	Medium risk
Jersey	Medium risk
Jordan	High risk
Kazakhstan	Medium risk
Kenya	High risk
Kiribati	Medium risk
Korea, Democratic People's Republic of	High risk
Korea, Republic of	Medium risk
Kosovo, Republic of	Medium risk
Kuwait	Medium risk
Kyrgyzstan	High risk
Lao People's Democratic Republic	High risk
Latvia	Medium risk
Lebanon	High risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Lesotho	High risk
Liberia	High risk
Libya	High risk
Liechtenstein	Medium risk
Lithuania	Medium risk
Luxembourg	Medium risk
Macao	Medium risk
Madagascar	High risk
Malawi	Medium risk
Malaysia	Medium risk
Maldives	High risk
Mali	High risk
Malta	Medium risk
Marshall Islands	Medium risk
Martinique	Medium risk
Mauritania	High risk
Mauritius	Medium risk
Mayotte	High risk
Mexico	Medium risk
Micronesia, Federated States of	Medium risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Moldova, Republic of	Medium risk
Monaco	Medium risk
Mongolia	Medium risk
Montenegro	Medium risk
Montserrat	Medium risk
Morocco	High risk
Mozambique	High risk
Myanmar	High risk
Namibia	Medium risk
Nauru	Medium risk
Nepal	High risk
Netherlands	Medium risk
New Caledonia	Medium risk
New Zealand	Medium risk
Nicaragua	Medium risk
Niger	High risk
Nigeria	High risk
Niue	Medium risk
North Macedonia	Medium risk
Northern Mariana Islands	Medium risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Norway	Low risk
Oman	Medium risk
Pakistan	High risk
Palau	Medium risk
Palestine, State of	High risk
Panama	Medium risk
Papua New Guinea	High risk
Paraguay	Medium risk
Peru	High risk
Philippines	High risk
Poland	Medium risk
Portugal	Medium risk
Puerto Rico	Medium risk
Qatar	Medium risk
Réunion	Medium risk
Romania	Medium risk
Russian Federation	Medium risk
Rwanda	Medium risk
Saint Barthélemy	Medium risk
Saint Helena, Ascension and Tristan Da Cunha	High risk

## Risk Countries

Highlighted countries are included in the scope of social audits for 2025.

Country/Region	Overall Inherent Risk Category
Saint Kitts and Nevis	Medium risk
Saint Lucia	Medium risk
Saint Martin (French Part)	Medium risk
Saint Pierre and Miquelon	<b>Medium risk</b>
Saint Vincent and the Grenadines	Medium risk
Samoa	<b>Medium risk</b>
San Marino	<b>Medium risk</b>
Sao Tome and Principe	Medium risk
Saudi Arabia	<b>High risk</b>
Senegal	<b>High risk</b>
Serbia	Medium risk
Seychelles	Medium risk
Sierra Leone	<b>High risk</b>
Singapore	<b>Medium risk</b>
Sint Maarten (Dutch Part)	Medium risk
Slovakia	<b>Medium risk</b>
Slovenia	<b>Medium risk</b>
Solomon Islands	Medium risk
Somalia	<b>High risk</b>
South Africa	Medium risk

## Risk Countries

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Country/Region	Overall Inherent Risk Category
South Sudan	High risk
Spain	Medium risk
Sri Lanka	High risk
Sudan	High risk
Suriname	Medium risk
Sweden	Low risk
Switzerland	Medium risk
Syrian Arab Republic	High risk
Taiwan	Medium risk
Tajikistan	High risk
Tanzania, United Republic of	High risk
Thailand	High risk
Timor-Leste	Medium risk
Togo	High risk
Tokelau	Medium risk
Tonga	Medium risk
Trinidad and Tobago	Medium risk
Tunisia	High risk
Turkey	High risk
Turkmenistan	High risk

## Risk Countries

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Country/Region	Overall Inherent Risk Category
Turks and Caicos Islands	Medium risk
Tuvalu	Medium risk
Uganda	High risk
Ukraine	Medium risk
United Arab Emirates	Medium risk
United Kingdom	Medium risk
United States	Medium risk
United States Minor Outlying Islands	Medium risk
Uruguay	Medium risk
Uzbekistan	High risk
Vanuatu	Medium risk
Venezuela, Bolivarian Republic Of	High risk
Viet Nam	High risk
Virgin Islands, British	Medium risk
Virgin Islands, U.S.	Medium risk
Wallis and Futuna	Medium risk
Western Sahara	High risk
Yemen	High risk
Zambia	High risk
Zimbabwe	High risk

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