



Ontex
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Ethical Sourcing Requirements

GRP-POL-205 v1

June 2026

Introduction

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

This document builds on these principles by providing detailed **guidance on the social audit requirements for 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 findings are evaluated.

To ensure compliance, any facility producing for 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 **suppliers** of Ontex located in **high-risk** countries.

> Risk country

The high-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 and can be found in **Annex 1**. It is based on a pre-assessment tool from Sedex. Suppliers should use this list to identify which of their production sites are located in high-risk countries.



Audit & certification requirements

1. PROOF OF VALID AUDIT REPORT OR CERTIFICATION

Scope: suppliers located in high-risk countries

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 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 audit report to Ontex Sustainability team [1].

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 TYPE AND COSTS

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.

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 [2].

1] sustainability@ontexglobal.com 2] For a list of accredited certifying bodies, please refer for BSCI to <https://www.amfori.org/our-partners/> (auditing partners), for SA8000 <https://sa-intl.org/resources/sa8000-accredited-conformity-assessment-bodies/> and for Sedex <https://www.sedex.com/about/who-we-work-with/affiliate-auditors/>

Audit & certification requirements

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. The CAP should be uploaded on the SEDEX platform according to the SMETA described process or sent via email when using amfori BSCI. The final step should be the closure of the non-compliance.

> 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

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 |
|-----------------------|--|--------------------------------|---|-------------|---------------------|
| SMETA 4-Pillar | A CAPR with corrective actions based on findings. | 12 months | Findings: Non-conformities/Non-compliances; Observations; Good Examples | Yes | Sedex platform |
| amfori BSCI | 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 | Yes | Email report |
| | | 12 months | B. Good | Yes | |
| | | | C. Acceptable | Yes | |
| | | 12 months | D. Insufficient | Conditional | |
| | | Not valid | E. Unacceptable | No | |
| | | | ZT- Zero tolerance | No | |
| SA8000 | 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

2. SELF-ASSESSMENT QUESTIONNAIRE (SAQ) ON SEDEX

Scope: suppliers located in high-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.

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: sustainability@ontexglobal.com

Country risk rating list – Annex 1

- > 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** are required to complete a self-assessment SAQ and submit a valid third-party social audit report (e.g., SMETA, amfori BSCI, or SA8000).

Suppliers located 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 currently under observation. No immediate action is required; however, Ontex will continue to monitor these cases and may initiate requests for SAQs and social audits if necessary.

- > In addition, our Group Sustainability Team conducts regular reviews of these risk ratings. 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 please contact the Ontex Sustainability team: sustainability@ontexglobal.com

| Country | Risk |
|--------------------------|--------|
| Andorra | Medium |
| United Arab Emirates | High |
| Afghanistan | High |
| Antigua & Barbuda | Medium |
| Anguilla | Medium |
| Albania | Medium |
| Armenia | Medium |
| Angola | High |
| Argentina | Medium |
| American Samoa | Medium |
| Austria | Medium |
| Australia | Medium |
| Aruba | Medium |
| Åland Islands | Medium |
| Azerbaijan | Medium |
| Bosnia & Herzegovina | Medium |
| Barbados | Medium |
| Bangladesh | High |
| Belgium | Medium |
| Burkina Faso | High |
| Bulgaria | Medium |
| Bahrain | High |
| Burundi | High |
| Benin | High |
| St, Barthélemy | Medium |
| Bermuda | Medium |
| Brunei | Medium |
| Bolivia | Medium |
| Caribbean Netherlands | Medium |
| Brazil | Medium |
| Bahamas | Medium |
| Bhutan | High |
| Botswana | Medium |
| Belarus | Medium |
| Belize | Medium |
| Canada | Medium |
| Cocos (Keeling) Islands | Medium |
| Congo - Kinshasa | High |
| Central African Republic | High |
| Congo - Brazzaville | High |
| Switzerland | Medium |
| Côte d'Ivoire | High |
| Cook Islands | Medium |
| Chile | Medium |
| Cameroon | High |

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| China | High |
| Colombia | Medium |
| Costa Rica | Medium |
| Cuba | Medium |
| Cape Verde | Medium |
| Curaçao | Medium |
| Christmas Island | Medium |
| Cyprus | Medium |
| Czechia | Medium |
| Germany | Medium |
| Djibouti | High |
| Denmark | Medium |
| Dominica | Medium |
| Dominican Republic | Medium |
| Algeria | High |
| Ecuador | Medium |
| Estonia | Medium |
| Egypt | High |
| Western Sahara | High |
| Eritrea | High |
| Spain | Medium |
| Ethiopia | High |
| Finland | Medium |
| Fiji | Medium |
| Falkland Islands (Islas Malvinas) | Medium |
| Micronesia | Medium |
| Faroe Islands | Medium |
| France | Medium |
| Gabon | Medium |
| United Kingdom | Medium |
| Grenada | Medium |
| Georgia | Medium |
| French Guiana | Medium |
| Guernsey | Medium |
| Ghana | Medium |
| Gibraltar | Medium |
| Greenland | Medium |
| Gambia | High |
| Guinea | High |
| Guadeloupe | Medium |
| Equatorial Guinea | High |
| Greece | Medium |
| South Georgia & South Sandwich Islands | Medium |
| Guatemala | High |
| Guam | Medium |
| Guinea-Bissau | High |

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|--------------------------------|--------|
| Guyana | Medium |
| Hong Kong | Medium |
| Heard & McDonald Islands | Medium |
| Honduras | High |
| Croatia | Medium |
| Haiti | High |
| Hungary | Medium |
| Indonesia | High |
| Ireland | Medium |
| Israel | Medium |
| Isle of Man | Medium |
| India | High |
| British Indian Ocean Territory | High |
| Iraq | High |
| Iran | High |
| Iceland | Medium |
| Italy | Medium |
| Jersey | Medium |
| Jamaica | Medium |
| Jordan | High |
| Japan | Medium |
| Kenya | High |
| Kyrgyzstan | High |
| Cambodia | High |
| Kiribati | Medium |
| Comoros | High |
| St, Kitts & Nevis | Medium |
| North Korea | High |
| South Korea | Medium |
| Kuwait | High |
| Cayman Islands | Medium |
| Kazakhstan | Medium |
| Laos | High |
| Lebanon | High |
| St, Lucia | Medium |
| Liechtenstein | Medium |
| Sri Lanka | High |
| Liberia | High |
| Lesotho | High |
| Lithuania | Medium |
| Luxembourg | Medium |
| Latvia | Medium |
| Libya | High |
| Morocco | High |
| Monaco | Medium |
| Moldova | Medium |

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|--------------------------|--------|
| Montenegro | Medium |
| St, Martin | Medium |
| Madagascar | High |
| Marshall Islands | Medium |
| North Macedonia | Medium |
| Mali | High |
| Myanmar (Burma) | High |
| Mongolia | Medium |
| Macao | Medium |
| Northern Mariana Islands | Medium |
| Martinique | Medium |
| Mauritania | High |
| Montserrat | Medium |
| Malta | Medium |
| Mauritius | Medium |
| Maldives | High |
| Malawi | Medium |
| Mexico | Medium |
| Malaysia | High |
| Mozambique | High |
| Namibia | High |
| New Caledonia | Medium |
| Niger | High |
| Norfolk Island | Medium |
| Nigeria | High |
| Nicaragua | High |
| Netherlands | Medium |
| Norway | Low |
| Nepal | High |
| Nauru | Medium |
| Niue | Medium |
| New Zealand | Medium |
| Oman | Medium |
| Panama | Medium |
| Peru | Medium |
| French Polynesia | Medium |
| Papua New Guinea | Medium |
| Philippines | High |
| Pakistan | High |
| Poland | Medium |
| St, Pierre & Miquelon | Medium |
| Pitcairn Islands | Medium |
| Puerto Rico | Medium |
| Palestine | High |
| Portugal | Medium |
| Palau | Medium |

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|-----------------------------|--------|
| Paraguay | Medium |
| Qatar | High |
| Réunion | High |
| Romania | Medium |
| Serbia | Medium |
| Russia | Medium |
| Rwanda | Medium |
| Saudi Arabia | High |
| Solomon Islands | Medium |
| Seychelles | Medium |
| Sudan | High |
| Sweden | Medium |
| Singapore | Medium |
| St, Helena | High |
| Slovenia | Medium |
| Svalbard & Jan Mayen | Low |
| Slovakia | Medium |
| Sierra Leone | High |
| San Marino | Medium |
| Senegal | High |
| Somalia | High |
| Suriname | Medium |
| South Sudan | High |
| São Tomé & Príncipe | High |
| El Salvador | Medium |
| Sint Maarten | Medium |
| Syria | High |
| Eswatini | High |
| Turks & Caicos Islands | Medium |
| Chad | High |
| French Southern Territories | High |
| Togo | High |
| Thailand | High |
| Tajikistan | High |
| Tokelau | Medium |
| Timor-Leste | Medium |
| Turkmenistan | High |
| Tunisia | High |
| Tonga | Medium |
| Türkiye | High |
| Trinidad & Tobago | Medium |
| Tuvalu | Medium |
| Taiwan | Medium |
| Tanzania | High |
| Ukraine | Medium |
| Uganda | High |

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|--------------------------|--------|
| U,S, Outlying Islands | Medium |
| United States | Medium |
| Uruguay | Medium |
| Uzbekistan | High |
| Vatican City | Medium |
| St, Vincent & Grenadines | Medium |
| Venezuela | High |
| British Virgin Islands | Medium |
| U.S., Virgin Islands | Medium |
| Vietnam | High |
| Vanuatu | Medium |
| Wallis & Futuna | Medium |
| Samoa | Medium |
| Kosovo | Medium |
| Yemen | High |
| Mayotte | High |
| South Africa | Medium |
| Zambia | High |
| Zimbabwe | High |

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