



Survey: Jordan garment sector supply chain due diligence (2018)

Company: Columbia

1. Please explain your approach to mapping human rights risks in your Jordanian supply chain and whether you work with any local partners in doing so.

Columbia Sportswear Company has 1 contract manufacturing factory producing apparel products in Jordan. In addition to our own Code of Conduct and factory monitoring program we partner with the International Labor Organization's (ILO) Better Work program to monitor this factory.

2a. Does your company have a human rights policy which addresses worker rights in your supply chain?

All factories that produce products for Columbia Sportswear Company must comply with our Standards of Manufacturing Practices (code of conduct) and are subject to our internal social compliance audits on an unannounced basis. (https://www.columbia.com/on/demandware.static/-/Sites-Columbia_US-Librar...)

We are currently revising our migrant worker policy which addresses the issues of recruitment fees, document control and employment contracts.

2b. Does your company have a specific policy prohibiting discrimination and exploitative practices against migrant workers and refugees?

All factories that produce products for Columbia Sportswear Company must comply with our Standards of Manufacturing Practices (code of conduct) and are subject to our internal social compliance audits on an unannounced basis. (https://www.columbia.com/on/demandware.static/-/Sites-Columbia_US-Librar...)

We are currently revising our migrant worker policy which addresses the issues of recruitment fees, document control and employment contracts.

2c. Does your company have a specific policy on migrant worker recruitment that specifies: no payment of recruitment fees, no document confiscation, a written employment contract?

All factories that produce products for Columbia Sportswear Company must comply with our Standards of Manufacturing Practices (code of conduct) and are subject to our internal social compliance audits on an unannounced basis. (https://www.columbia.com/on/demandware.static/-/Sites-Columbia_US-Librar...)

We are currently revising our migrant worker policy which addresses the issues of recruitment fees, document control and employment contracts.

3. How many first tier suppliers based in Jordan does your company have and have you traced your supply chain beyond the first tier?

Columbia Sportswear Company has 1 contract manufacturing factory producing apparel products in Jordan. We are in the process of exiting this factory and will cease production at this factory by the end of 2018. We have no tier 2 suppliers in Jordan.

4. What steps does your company take to ensure that your policies and standards are implemented by first tier suppliers and suppliers beyond the first tier in your Jordanian supply chain?

Prior to the start of production we conduct an in depth on-boarding orientation so the factory fully understands our policies and expectations. In addition, all new factories are subjected to our social compliance audit to insure they are compliant with our standards (code of conduct) and meet local legal requirements. We also monitor our existing factories through regular audits which are either conducted by our internal team or in the case of Jordan, by Better Work, on at least an annual basis. All audits are conducted at unannounced basis. In the case of any non-compliance issues found, we communicate directly with factories to insure that the appropriate remediation is completed in a timely manner.

We work closely with the Better Work program which is focused on improving working conditions and labor rights through annual onsite assessment by Better Work's Jordan team. Better Work also conducts advisory visits for remediation, as well as fosters dialogue between workers and factory management. Our Jordan factory enrolled in Better Work Jordan's program

since it was launched in 2009. Since then we have consistently collaborated with Better Work on factory assessment and remediation and to focus on specific migrant worker and management issues.

5. How does your company monitor the compliance of first tier suppliers and suppliers down the supply chain with your policies and standards?

As mentioned above, our 1 factory in Jordan has been participating in the Better Work Jordan program since 2009. The most recent full assessment conducted by Better Work Jordan was in June 2017 and 8 advisory visits were conducted to follow up on the issues found in the assessment.

6. Please explain how you monitor recruitment systems used by your suppliers to employ migrant labour.

We have been working with the parent company of the Jordan factory for more than 10 years. The parent company operates factories in multiple countries and they have an established system of recruitment in all their factories. In addition to reviewing factory compliance performance and identifying areas for improvement, we regularly review the issue of recruitment of migrant labour with the management of the parent company and with the Jordan factory.

7a. In the last year has your monitoring uncovered instances of inadequate, unsafe or unsanitary worker accommodation?

During the assessment by the Better Work Jordan team in 2017, there were no issues of forced labor, working excessive overtime or incorrect overtime compensation. There was one verbal abuse case reported by the workers who reported a supervisors shouting at them in a degrading manner during the peak season. Some health and safety issues in the workplace and in the worker

accommodations were also identified. We addressed these issues with Better Work Jordan team and the factory management and collaborated with other brands sourcing at this factory to investigate the issues and to jointly push to have the factory quickly remediate these issues.

7b. In the last year has your monitoring uncovered instances of health & safety violations in the workplace?

During the assessment by the Better Work Jordan team in 2017, there were no issues of forced labor, working excessive overtime or incorrect overtime compensation. There was one verbal abuse case reported by the workers who reported a supervisors shouting at them in a degrading manner during the peak season. Some health and safety issues in the workplace and in the worker accommodations were also identified. We addressed these issues with Better Work Jordan team and the factory management and collaborated with other brands sourcing at this factory to investigate the issues and to jointly push to have the factory quickly remediate these issues.

7c. In the last year has your monitoring uncovered instances of workers being forced to work excessive overtime or not paid overtime at the correct rate?

During the assessment by the Better Work Jordan team in 2017, there were no issues of forced labor, working excessive overtime or incorrect overtime compensation. There was one verbal abuse case reported by the workers who reported a supervisors shouting at them in a degrading manner during the peak season. Some health and safety issues in the workplace and in the worker accommodations were also identified. We addressed these issues with Better Work Jordan team and the factory management and collaborated with other

brands sourcing at this factory to investigate the issues and to jointly push to have the factory quickly remediate these issues.

7d. In the last year has your monitoring uncovered instances of workers being subjected to sexual harassment or other abuse?

During the assessment by the Better Work Jordan team in 2017, there were no issues of forced labor, working excessive overtime or incorrect overtime compensation. There was one verbal abuse case reported by the workers who reported a supervisors shouting at them in a degrading manner during the peak season. Some health and safety issues in the workplace and in the worker accommodations were also identified. We addressed these issues with Better Work Jordan team and the factory management and collaborated with other brands sourcing at this factory to investigate the issues and to jointly push to have the factory quickly remediate these issues.

8a. In the last year has your monitoring uncovered instances in your supply chain where migrant workers have been charged recruitment fees?

The above issues were not found during the last assessment by Better Work in June 2017.

8b. In the last year has your monitoring uncovered instances in your supply chain where migrant workers have not been paid the minimum wage (or contractually agreed amount)

The above issues were not found during the last assessment by Better Work in June 2017.

8c. In the last year has your monitoring uncovered instances in your supply chain where migrant workers have had their passports retained by factories or other agents?

The above issues were not found during the last assessment by Better Work in June 2017.

8d. In the last year has your monitoring uncovered instances in your supply chain where migrant workers have been deceived in the recruitment process regarding salary level and/or employment conditions?

The above issues were not found during the last assessment by Better Work in June 2017.

9. What process does your company expect the supplier to follow when breaches of its policies or applicable regulations are identified and how do you verify corrective action has been taken?

When breaches of our policies are identified we verify with Better Work and via our own Social Compliance team that corrective action has taken place. In the case of reported verbal abuse we requested the factory to cease the practice immediately and encouraged the factory to arrange training programs, facilitated by Better Work Jordan, for its middle management staff to improve the communication and supervisory skills in this multi-cultural workplace. Fourteen classes were completed and more than 200 workers and management staff were trained since the last assessment in June 2017. The training programs

are still ongoing and monitored closely both Better Work Jordan and Columbia's Social Compliance team.

The factory formed Performance Improvement Consultative Committee (PICC) which consists of worker representative and management representative to be accountable and responsible for the corrective actions for all non-compliances identified (not limited to health & safety issues). Better Work Jordan conducted 8 advisory visits since the assessment in June 2017, worked with the PICC to keep tracking and verify the remediation progress.

10. How does your company ensure that it engages effectively with workers in its Jordanian supply chain?

- As previously stated, we have engaged with Better Work Jordan to work with factory's management staff for focused training on communication and supervisory skills. This included addressing communication issues between management and workers from different nationalities.
- We supported the factory's formation of a Performance Improvement Consultative Committee (PICC) which consists of worker representative and management representative to be accountable and responsible for working on corrective action and non-compliance issues and also for improving worker-management communications.
- We have leveraged Better Work interviews of workers of different nationalities during their assessments and follow up.
- We also collaborated with other brands working in the same factories to use interpreters and review worker interviews after their audits.

11. Do any of your company's suppliers in Jordan currently employ Syrian refugees?

No Syrian refugees have been recruited in our one Jordan factory.

12. What (if any) steps is your company taking to help integrate Syrian refugees into your supply chain?

No Syrian refugees have been recruited in our one Jordan factory.

13. How are you safeguarding (or planning to safeguard) the rights of Syrian refugees working in your supply chain and what steps are you (will you be) taking to ensure other local or migrant workers have decent access to work as employing Syrian refugees becomes more common?

No Syrian refugees have been recruited in our one Jordan factory.

14. How does your company evaluate the impact of its purchasing practices on the capacity of your suppliers or factories in Jordan to ensure decent working conditions including a living wage?

Columbia Sportswear Company has created Responsible Sourcing and Purchasing Practices guidelines that evaluate and help mitigate the impact of our purchasing practices on all of our suppliers and workers in our supply chain.

15. How does your company ensure freedom of association for all workers in its supplier factories in Jordan?

Freedom of association, which includes the right to collective bargaining, is included in our code of conduct and is audited against in our annual factory audits.

16. Please provide any further information regarding your company's activities in Jordan which you think are relevant.

Company provided no additional information.