

SURVEY on garment sourcing in Myanmar since the February 2021 coup
by Clean Clothes Campaign and SOMO
Sent out to international garment brands and retailers sourcing in Myanmar
***** March 2022 *****

Objective:

Through this survey CCC and SOMO aim to gain insight in the policies, practices and considerations of international garment brands and retailers with regard to their sourcing in Myanmar since the February 2021 coup. An adapted version of this survey is sent out to MSIs, improvement initiatives and certification schemes that operate in Myanmar, focusing on the guidance they may offer to their corporate members with regard to sourcing from Myanmar.

Set-up of the survey:

In order to obtain a comprehensive overview of your company's presence, policies and practices in Myanmar, the questionnaire below is divided in three sections:

1. General questions about your company's sourcing history in Myanmar and the responsible business conduct policies your company has in place;
2. Questions about how the February 2021 coup influenced your company's sourcing policies and practices;
3. Questions about your company's plans and projections in terms of whether to continue sourcing from Myanmar.

Publicly available information:

When they exist, please provide us with links to websites, web pages and/or publicly available documents on responsible business conduct/human rights due diligence, including supplier lists.

1. General questions about your company’s sourcing history in Myanmar and the responsible business conduct policies your company has in place

	Question	Clarification of question	Answer								
1.1	When did your company start sourcing from Myanmar?		2014								
1.2	Did (does) your company have an office or presence in Myanmar?		Yes: We have an office in Yangon with eight staff members (up from four before January 2021) – for safety reasons we will not disclose the location of this office or the names and nationality of those working there.								
1.3	What was the highest number of supplier facilities in Myanmar in the past five years?		43 factories								
1.4	How many supplier facilities did your company source from in Myanmar <i>in January 2021</i> ?		36 factories								
1.5	How many supplier facilities does your company source from <i>at the current moment</i> ?		<p>26 as of 28th March 2022</p> <table border="1"> <tbody> <tr> <td>Cheng Zhang Garment Industrial Co., Ltd.</td> <td>No. 2 Road Industrial Zone, Meiktila Township</td> </tr> <tr> <td>Dishang Fashion (Myanmar) Co., Ltd.</td> <td>Plot No. 96 (Kha), Mingyi Mahar Mingaung street, Myar Taing Block No. 14, Shwe Thanlwin Industrial Zone, Hlaing Tharyar Township</td> </tr> <tr> <td>Dongyu Garments Co., Ltd.</td> <td>No. 459, Kan Pet St. Shwe Lin Ban Indu Hlang, Tharyar Tsp.</td> </tr> <tr> <td>G&U (Myanmar) Fashion Co., Ltd.</td> <td>No. 292, Sat Mu 7 Street, Mingalardon Industrial Zone</td> </tr> </tbody> </table>	Cheng Zhang Garment Industrial Co., Ltd.	No. 2 Road Industrial Zone, Meiktila Township	Dishang Fashion (Myanmar) Co., Ltd.	Plot No. 96 (Kha), Mingyi Mahar Mingaung street, Myar Taing Block No. 14, Shwe Thanlwin Industrial Zone, Hlaing Tharyar Township	Dongyu Garments Co., Ltd.	No. 459, Kan Pet St. Shwe Lin Ban Indu Hlang, Tharyar Tsp.	G&U (Myanmar) Fashion Co., Ltd.	No. 292, Sat Mu 7 Street, Mingalardon Industrial Zone
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			Glowing & Win Investment Co., Ltd.	No. 272/273, R6 Street
			Golden Shine Co., Ltd.	U Paing No. 21+R+West 7, West S+L/2, Kwin no. 6/2, Pyitawthar Village Group, Hlegu Township
			Grand Enterprises Garment Co., Ltd.	No. 61-62, Kanaung Minthar Gyi Street, Dagon Myothit (East) Township
			Great One Myanmar Co., Ltd.	No. 70 corner of U Mohl St. and U Tun Nyo Street Industrial Zone 2, Hlaing Tharyar Township
			Gtig Hubo Co., Ltd.	Plot No. 147, 154, Myay Taing Block no. 49, Wartayar Industrial Zone
			Guohua Glory Co., Ltd.	Land No.138 ot of No.138/139/140, Wataya Industrial Zone. Shew Pyi TharTownership
			Huabo Times Textile and Clothing Co. Ltd.	No. 5 Delta Industrial Zone, Ayeyarwaddy Region
			K.H.M. Co., Ltd.	Plot No. 57 (Dayingauk) 146-147, Myay Taing Quarter
			Kfine International Garment (Myanmar) Co., Ltd.	East A Wine Village Group, Oo Paing No (1/1. Ka). Kwin/Akwat And Name. 652 Ga, Bago Township
			KPH Manufacturing Co., Ltd.	No. 7/8, Innwa Street, Shwe Packkan Industrial Zone, North Okkalapa TSP
			Meier Global Myanmar Company Limited	Plot No. 126, Survey Block No. 65 (IND), No. 4 Industrial Zone, Shwe Pyithar Township
			Myanmar Dongtai Garments Co., Ltd.	Plot No. 18 Myay Taing Quarter, No. 143/1 Lanthit Road, Kyansitthar Yeik Mon Industrial Zone
			Myanmar Longsheng Fashion Co., Ltd.	No. 229 Kanaung Min Thar Gyi Street, Hlaing Tharyar Industrial Zone 2
			Myanmar York Fashion Co., Ltd.	No. 168 Kyansitthar Street, Industrial Zone 4
			Nay Shwe Lin Co., Ltd.	Wartayar Industrial Zone, Plot No. 3 Myaytaing Block No. 49, Shwe Pyi Thar Township
			Newtop Lotus Co., Ltd.	No. 109 Makhayar Minthargyi Maung Pyoe Street, Industrial Zone (2), Hlaing Thar Yar Township
			Pada Myanmar Laundry Company Ltd.	No. 155, Mya Taung Wunn Kyi U Hmo Street, Hlaing Thar Yar Industrial Zone 2
			Sanyuan (Myanmar) Apparel Manufacturing Company Limited	Plot No. 87, Ayeyarwaddy Street, Shwe Than Lwin Industrial Zone, Hlaing Tharyar Township
			Sheng Mei Garment Co., Ltd.	No. 12, Myathaing (49), Warr Tayar Industrial Zone

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1.6	In how many of the supplier facilities where your company was sourcing <i>in January 2021</i> a labour union and/or labour rights organisation was (is) present or active?	# of #	<p>There were 5 factories with registered basic labour organisations (BLOs) in place, and 12 factories had informal worker organisations in place. Meanwhile, there were workplace coordination committees (WCC) were available in all factories.</p> <p>Please note that respect for Freedom of Association is a basic requirement under our Code of Conduct, which you can read here. Under this, the supplier must recognise the ILO conventions and the Universal Declaration of Human Rights on freedom of association, freedom of opinion and expression, the right to organise and collective bargaining. Suppliers will allow these rights, will not interfere with workers’ unions, and will not prevent workers from joining these unions.</p>						
1.7	In how many of the supplier facilities where your company is <i>currently</i> sourcing a labour union and/or labour rights organisation was (is) present or active?	# of #	<p>All factories have social dialogue mechanisms. In Myanmar, having a Workplace Coordination Committees (WCC) is a legal requirement, and therefore a requirement for any factory in our supply chain. Five out of the 26 factories have active Basic Labour Organization (BLO), which can be affiliated to the federal level Union. The remaining factories have Workplace Coordination Committees (WCC), which includes 3 employees’ representatives & 3 employer’s representatives.</p>						
1.8	Generally speaking, how do you assess and monitor human rights and labour rights risks and violations at supplier facilities in your supply chain?		<p>Our due diligence on social and labour rights risk, as well as chemical and environmental risk, has two stages.</p> <p><u>Onboarding process</u></p> <p>The first is a pre-onboarding assessment, whereby a supplier that wants to work with us must sign our Supplier Agreement, where they agree that all facilities involved in BESTSELLER production comply with our Code of Conduct. All suppliers are provided with an information pack and given access to our online supplier portal, which provides detailed guidelines for suppliers, describing our Factory Standards Programme, onboarding</p>						

			<p>and assessment criteria. Each of the suppliers' factories are also provided with a factory information pack, which provides guidance on our basic social and all our chemical and environment requirements, as well as our above and beyond social and labour sustainability indicators, as well as general and country-specific requirements for factories to check whether they have sufficient resources to handle our compliance and sustainability requirements.</p> <p>We then verify whether suppliers and their factories meet our basic requirement - all production facilities must pass our onsite assessment before starting production for BESTSELLER.</p> <p><u>Assessment methodology</u></p> <p>We have 170+ indicators for our Social & Labour verifications covering: 1. Management Systems & Licenses, 2. Ethics & Transparency, 3. Child labour, 4. Young Workers, 5. Forced Labour, 6. Discrimination, 7. Employment Practices (Hiring, Contracts etc.), 8. Working hours, 9. Wages and Benefits, 10. Employee Treatment (Disciplinary Practices, Harassment & Abuse), 11. Employee Involvement (Freedom of Association & Collective Bargaining, Employee Dialogue), 12. Health & Safety—Management & Training—Electrical safety—Building / structural safety—Emergency preparedness & Fire safety—Chemical safety & Management—Machine & Equipment safety, PPE—First aid, Health checks, Medical facilities—Dormitories, 13. Environment and 14. Region-specific BESTSELLER requirements (such as the ACCORD in Bangladesh).</p> <p>Our onsite assessment methodology includes onsite worker and management interviews and documentation review (payslips, safety certifications, etc).</p> <p>No factory is onboarded for BESTSELLER production before all Critical and Major concerns have been remediated. We have clearly defined escalation protocols for non-compliance, and these protocols apply from minor issues to the most serious cases. If suppliers resist remediation of critical issues, or in event of discovery of a zero-tolerance issue at a supplier's factory BESTSELLER will offboard the supplier. As of July 2021, all offboardings are conducted in accordance with our ACT-aligned Responsible Offboarding Policy Standard Operating Procedures. Such cases are, however, rare. In case of more serious concerns or labour dispute we handle the cases in collaboration with local or international labour unions and/or brand groups. In cases where there is room for</p>
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			<p>improvement, we immediately start on remediation, agreeing CAPs (Corrective Actions Plans) with the factory management and timelines for remediation.</p> <p><u>Monitoring</u></p> <p>Once onboarded, all our Tier 1 factories and Tier 2 tanneries and preferred materials suppliers are subject to regular assessments by our in-country teams or 3rd party auditors, to check that these factories are complying with our code of conduct and social and labour and environmental and chemical requirements. As mentioned above, we have our own local specialist Social & Labour Teams and Chemical & Environment Teams in our main sourcing countries (Turkey, China, Bangladesh, Pakistan, India, Myanmar and Cambodia), counting approximately 30 full-time colleagues, as well as the services of 3rd party auditors. To monitor violations of our Code of Conduct, we have an escalation protocol, which aligns BESTSELLER response and provides the required flexibility to handle each case according to its individual needs. All concerns from mild violations (e.g. to critical (threat to life) violations flagged through BESTSELLER assessments, local unions, NGOs, whistle-blowers etc are logged in our internal Incident Log and have a defined protocol for engagement (investigation and remediation). There are four levels of response, ultimately ending with factory offboarding if the party shows unwillingness to address the concerns, these cases are however, rare.</p> <p>Please find here our public policies:</p>
1.9	Do you have any country-specific policies concerning supplier facilities in Myanmar?	Yes	<p>Supplier Set-up in Myanmar</p> <ul style="list-style-type: none"> -All suppliers operating in Myanmar need to have a team on the ground in the region to oversee compliance with our code of Conduct in close cooperation with BESTSELLER teams <p>Factory Management and Transparency</p> <ul style="list-style-type: none"> -Factories must maintain no connection and utilise no services from military-owned companies or sanctioned individuals - All factories must have a dedicated compliance colleague on site who has continuous communication with BESTSELLER Myanmar team - Any cases that occur in the factory, for example workers unrest, must immediately be reported to BESTSELLER Myanmar team by the factory Production Management - Supplier and factory need to confirm the monthly capacity available and the number of lines dedicated to BESTSELLER production prior to order placement

			<p>- Supplier and buying teams work to secure that agreed capacity is filled monthly with no overbooking or significant under-booking</p> <p>Materials Management</p> <p>-Materials for Myanmar production must come from BESTSELLER Preferred or approved materials manufacturers – please see our Preferred Materials Supplier List for more details.</p> <p>- It is not possible to source any materials from unapproved materials, packaging or trims suppliers</p> <p>Health & safety and labour rights</p> <p>-All factories need to follow COVID-19 prevention guidance and regulations -Factories must report all compliance, H&S and labour rights issues to BESTSELLER directly (not only through the supplier) and work with BESTSELLER to mitigate issues transparently and diligently</p> <p>-Safety of workers while at the factory, and during the commute to and from the factory, must be constantly reviewed and maintained</p> <p>Due diligence re: Military Affiliation</p> <p>For all factories, the following procedure applies:</p> <p>–Factory must annually fill in a Self-Declaration disclosing ownership and land ownership information.</p> <p>–Factory must have a land and ownership due diligence report made by a law firm or service provider nominated by BESTSELLER. The report must conclude on whether there are any connections with the military – or with any companies owned by the military through lease of land and factory ownership. If factory can provide an existing report, we may accept it if the law firm is registered, well reputed, and the quality of the report is adequate, but we do not guarantee this. If the factory cannot provide an existing report, BESTSELLERs nominated law firm must be used.</p> <p>–We do not onboard new factories in high-risk zones on BESTSELLERs observation list.</p> <p>–We will not activate new factories before we have approved the ownership and land ownership due diligence report, concluding that there are no military affiliations.</p> <p>–If the factory is affiliated with / owned by / leases land from, the military, the factory must disconnect from the military affiliation (if possible) or be phased out from BESTSELLER production.</p> <p>–The Myanmar companies “Dirty List” must be consulted to check if name of factory, supplier or affiliated companies are on the list: https://burmacampaign.org.uk/take-action/dirty-list/</p>
1.10	Does your company have a policy in place	Yes	All factory offboardings across BESTSELLER's sourcing markets, as of July 2021, are done in line with our Responsible Offboarding Policy, which is fully aligned with ACT's

	with regard to responsible disengagement?		<p>definition of a responsible exit. The policy applies to all main tier 1 factories (i.e., excluding outsourced laundries, embroideries and the like) in cases where BESTSELLER or the supplier decide to end the relationship for business reasons. Under the policy, when BESTSELLER plans to end a business relationship with a factory, we consider how much of that factory's capacity we have taken up and give a corresponding notice period to ensure the supplier has sufficient notice to find customers to fill that capacity. That notice is clearly communicated to the supplier, and where applicable by the supplier to the factory. That notice includes a detailed timeline with information on the last shipment date. In cases where the factory is not able to maintain capacity due to our offboarding, we engage with the supplier on making sure all alternatives to employment termination are explored and that workers who are dismissed are treated fairly.</p> <p>Please note the policy is not applicable when we need to leave a factory immediately due to zero-tolerance cases or critical issues that the supplier is unwilling or unable to improve remediate.</p>
1.11	Is your company member of one/more MSI(s), improvement initiative(s), and/or certification scheme(s)?	Yes	<p>Yes</p> <p>Please see the list below of the organisations we partner with in our supply chain (in alphabetical order): Action, Collaboration, Transformation (ACT), The Alliance for Water Stewardship (AWS), Anne Cocuk Egitim Vakfi (ACEV, Turkey) The Apparel and Footwear International RSL Management Group (AFIRM), Better Cotton, BHive, BSR, ChemSec, Engineering Resources International (ERI, Bangladesh) Ethical Trading Initiative (ETI), EuroCham Myanmar, Institute of Public Affairs (IPE, China) International Accord, Organic Cotton Accelerator, RMG Sustainability Council (RSC, Bangladesh), Sustainable Apparel Coalition (SAC – we use the BRM, FEM, FSLM, MSI and PM), and QuizRR.</p> <p>Supply Chain Management: BESTSELLER uses the Higg Facility Environment Module (FEM) tool as one part of its environmental performance evaluation for factories in our supply chain. BESTSELLER is promoting SLCP and FSLM among our suppliers, however we do not require our suppliers to use the tools - the tools add value and drive impact for some types of suppliers but may not add value and drive impact for other types of suppliers. E.g., some</p>

			<p>of our suppliers have many customers and duplicative audits, other suppliers primarily work with us and do not need a tool to reduce the workload of duplicative audits. Consequently, it is up to BESTSELLER suppliers to decide if it is in their interest to use the tools, and we support them if that is the case.</p> <p>Social Impact Initiatives: In the supply chain, we partner with organisations to address our salient human rights risks. For example, gender-based discrimination is a well-documented risk in the garment industry – therefore we work with BSR and ACEV to conduct workplace women empowerment programmes. Below is a list of the salient human rights risks we address through collaboration and work with MSIs: Women Empowerment: BSR and ACEV. By 2021, 111.000 women working in our supply chain benefitted from trainings provided by these programmes. Social Dialogue: Action, Collaboration, Transformation (ACT), QuizRR OHS: International Accord, RSC Bangladesh, Life and Building Safety (LABS) Environmental and chemical management: BHive and IPE (China only)</p> <p>Historically in Myanmar we were also a part of the MYPOD scheme and SMART TAG. We also support the Myan Ku Fund, an EU fund managed and distributed to workers through the SMART TAG set up.</p> <p>You can read more details about our social impact initiatives in our 2020 and 2021 Sustainability Reports.</p>
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2. Questions about how the February 2021 coup influenced your company’s sourcing policies and practices

Question	Clarification of question	
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2.1	Did your company's sourcing practices in Myanmar change since the February 2021 coup? (Multiple responses possible)	<ul style="list-style-type: none"> a) Decrease of volumes sourced b) Suspension of orders c) Restart of temporarily suspended orders d) Amended contracts with suppliers e) Severing relations with one/more/all suppliers f) Stopping all sourcing from Myanmar g) Otherwise (please specify) 	<p>A) Our volumes haven't decreased. We are currently in a bridging solution whilst awaiting the result of an independent human rights impact assessment commissioned by the Ethical Trade Initiative. Please read our Sustainability Report 2021 for further information</p> <p>B) BESTSELLER temporarily suspended order placement twice in 2021, once from March to early May, and again from the end of August to early November. Further information can be found in our Sustainability Report 2021</p> <p>C) Order placement was restarted twice after temporary suspensions in May and then November.</p> <p>D) BESTSELLER requested all suppliers to sign a commitment to meet pre-conditions for supplying products. Please see the answer to question 1.9 for more details.</p> <p>E) Currently we have 26 factories under 17 suppliers in Myanmar cooperating with BESTSELLER, before the coup, the number was 36 factories under 29 suppliers.</p> <p>F) NA</p> <p>G) BESTSELLER doubled the number of compliance specialists in the country to conduct heightened due diligence, and more will be recruited.</p>
2.2	Did your company engage in investigating location and/or ownership (including beneficial ownership) of your company's suppliers facilities?	<ul style="list-style-type: none"> a) Number of supplier facilities owned by the Myanmar Economic Holdings Public Company Limited (MEHL) or the Myanmar Economic Holdings Public Company Limited (MEC) b) Number of state-owned enterprises - 	Yes - In 2019, the UN's Human Rights Council commissioned an independent fact-finding mission on Myanmar established consistent patterns of human right violations and concluded violations had been committed by the

	<p>If yes, what information did this investigation yield? (Multiple answers possible).</p>	<p>c) Number of suppliers facilities located in industrial zones owned or operated by the military? d) Number of supplier facilities owned by known military personnel?</p>	<p>Myanmar security forces, particularly the military. In 2019-2021 we increased our due diligence protocols and we screen all Myanmar factories for military affiliations. For example, factories that were in industrial zones have to provide a land and ownership due diligence report to establish whether there are any connections with the military, or companies owned by the military through lease of land or factory ownership. We only accept due diligence reports from well-reputed and registered law firms, and if the report was not to a sufficient standard BESTSELLER would pay for a report to be validated by a law firm or qualified advisor. In April 2020 BESTSELLER issued a policy banning BESTSELLER and its suppliers to do business with military affiliated companies</p> <p>a) None b) None c) None. As of February 2021, three of 36 factories approved factories were located in Ngwe Pinlae Industrial Zone, which some stakeholders believed to be owned by a military affiliated company. In April 2021 BESTSELLER initiated an independent investigation into the alleged military ownership as well as into BESTSELLER's due diligence procedures in general and</p>
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			<p>specifically on links to companies affiliated with the military. The independent investigation was headed by Jonas Christoffersen, the former CEO of the Danish Institute for Human Rights. Please find an English language summary of his conclusions here</p> <p>d) None</p>
<p>2.3</p>	<p>What changes have taken place in the situation of workers in your company's supplier facilities since the February 2021 coup? This question extends to the supplier factories where sourcing was suspended or stopped. (Multiple answers are possible).</p>	<p>a) Have the average working hours in supplier facilities changed?</p> <p>b) Has the average basic wage level of workers in supplier facilities changed (that is without overtime payments)?</p> <p>c) Has the workforce of supplier facilities been reduced? Have workers been dismissed?</p> <p>d) Are you aware of human rights and/or labour rights violations occurring in your company's supplier facilities (or in their vicinity)?</p> <p>e) Are you aware of military presence in your company's supplier facilities?</p>	<p>A) According to our social compliance team's monitoring, there have been no obvious changes in average working hours after the coup</p> <p>B) According to our social compliance team's monitoring, there has been no obvious change</p> <p>C) Most factories in Myanmar reduced their workforce once the coup occurred, through a combination of furloughs, layoffs or dismissals. However, since August, we have noted that factories started to recruit more workers. The average current workforce is currently 2% more than it was before the coup.</p> <p>D) We had regular communication with unions before ACT ceased operation in Myanmar, and resolved most labour disputes through ACT's dispute resolution mechanism. After ACT's phase-out, we kept our communication channels with labour unions/organizations open, to monitor all alleged labour disputes. Meanwhile, we enhanced our in-country monitoring by adding more local team members and strengthened systems with suppliers.</p> <p>E) There is no military presence in our supplier facilities. Please refer to our answer to question 1.9 for more details.</p>

2.4	In the current post-coup context, how do you collect reliable information on what is going on in your company's supplier facilities?		<p>As detailed in question 1.9, we maintain a close and personal relationship with our suppliers in Myanmar. We repetitively communicate the need for basic human rights such as freedom of expression, freedom of assembly, freedom of association to be respected, and that if the factory needs to terminate the labour contract, legal procedure should be followed and the full compensation should be paid to worker, as per our Code of Conduct.</p> <p>This is challenging to monitor with no active trade unions in the country. Trade Unions are one of the ways in which we learn about CoC violations. Workplace coordination committees are present at all factories, as per legal requirements.</p> <p>Our in-country teams regularly do onsite assessments at all factories and as part of the onsite assessment, conduct face to face interviews with factory workers. Since the pandemic began, we have been desk-check for payroll records on a monthly basis to ensure workers have been paid what they are entitled to.</p>
2.5	In the current post-coup context, what actions are undertaken to identify, address, mitigate and/or remediate potential human rights and labour rights violations in your company's supplier facilities in Myanmar?		We have strengthened our collaboration with several organizations to perform heightened due diligence, such as the Myanmar Centre for Responsible Business, ETI, OECD, SMART, EU Delegation in Myanmar, subject matter

			experts, etc. We doubled the capacity of our local team and are actively recruiting more. We have also introduced new mechanisms and routines to monitor our suppliers' factories. The new mechanisms aim to prevent, mitigate & remedy risks in our supply chain. We are also trying to find new grievance mechanisms to provide multiple avenues for securing labour rights.
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3. Questions about your company's plans and projections in terms of whether to continue sourcing from Myanmar

	Question	Clarification of question	Looked-for answer
3.1	In case your company plans to keep sourcing from Myanmar in the next 12 months, will sourcing continue from your current supplier facilities?	.	If we continue sourcing from Myanmar, we do not expect our list of suppliers to change greatly. We believe that long-term relationships with factories that are committed to upholding and respecting human rights is one of the best ways to safeguard workers in our supply chain
3.2	In case your company plans to keep sourcing from Myanmar in the next 12 months, what measures will be applied to ensure responsible sourcing from current/future suppliers?		Our sourcing strategy and due diligence protocols will be updated based on the outcomes of an independent human rights risk assessment, currently being conducted by the Ethical Trading Initiative, as well as any further developments.
3.3	In case your company has stopped, or will shortly stop, sourcing from Myanmar, what are the reasons for stopping?		NA

3.4	In case your company has stopped, or will shortly stop, sourcing from Myanmar, which measures for responsible exit/disengagement are being implemented? (Multiple answers possible).		NA
4.4	What guidance is provided by MSI, improvement initiative, or certification scheme that your company is part of?	.	We have received guidance on sourcing from Myanmar from this list of parties: ACT, Dansk Initiativ for Etisk Handel (DIEH), the Danish Embassy, the Ethical Trade Initiative (ETI), Institute for Human Rights and Business (IHRB), International Labour Organisation (ILO), United Nations, EuroCham, the Myanmar Centre for Responsible Business (MCRB), and various subject matter experts.
4.5	How is your company implementing that guidance?	.	The advice we took from the above sources was about what enhanced due diligence should look like in Myanmar. We have implemented it by agreeing to participate in and support the ETI's human rights risk assessment as well as incorporating advice on due diligence best practices into our enhanced due diligence for Myanmar factories and suppliers, which is detailed above