# TABLE OF CONTENTS

1. ORGANISATIONAL CHART  
2. GOALS AND ACHIEVEMENTS  
3. BUYING STRATEGY  
4. COHERENT SYSTEM FOR MONITORING AND REMEDIATION INTRODUCTION  
   - PRESIDENT SOLO GROUP - ALAIN MILGROM  
5. COUNTRY WISE MONITORING SYSTEM  
   - BANGLAD  
   - ESH  
   - CHINA  
   - MYANMAR  
   - PAKISTAN  
   - FRANCE  
   - CEO SOLO GROUP - AUDÉLIA KRIEF  
6. COMPLAINTS HANDLING  
7. TRAINING AND CAPACITY BUILDING  
8. INFORMATION MANAGEMENT  
9. CORPORATE SOCIAL RESPONSIBILITY  
   - QUALITY, R&D AND SUSTAINABILITY  
   - DIRECTOR SOLO GROUP - GEERT DE WAEL  
10. CODE OF CONDUCT  
11. WATER TREATMENT  
12. OUR IN BANGLADESH  
13. OUR FACTORIES IN CHINA  
14. OUR FACTORIES IN PAKISTAN
SOLO GROUP HAS BEEN WORKING WITH MOST SUPPLIERS SINCE DAY ONE FOR MORE THAN 30 YEARS.

These long partnerships have contributed to a better understanding of the needs and how to further improve the working conditions. Workers benefits and salary levels are under constant monitoring and easy to adjust because of the use of open costing calculation. Another focus point is the environment and the impact our industry has on the environment. Not only are we developing more sustainable products, but we’re also conscious about the use of renewable energy, water consumption and how to save energy and reduce green house gasses in general.

COVID 19 overshadowed 2021 and also here SOLO Group took it’s responsibility. Factories were closely monitored and in collaboration with the RSC (The New International ACCORD) a clear guideline was distributed and checked upon on monthly basis. All SOLO Group members were checked frequently in order to continue their inspections at the factory and safeguard themselves and the workers.

During 2021 SOLO Group received several complaints through FAIR FORCE. All complaints were settled within the same year. SOLO Group also worked together with other brands and through other platforms to deal and settle complaints.

We continue to involve the Quality Assurance Team and all visitors to be more involved in CSR and environmental related matters.
SOLO Group has teamed up with SAC (Sustainable Apparel Coalition) and is using the HIGG Index to communicate environmental impact figures on all his sustainable products.

SOLO Group also became a signatory to The Bangladesh ACCORD for Electrical, Fire and structural safety since 2019 and is still a member today.

SOLO Group became a FAIR WEAR LEADER brand in 2020. Being a FAIR WEAR member for more than 7 years and by implementing the FAIR WEAR Code of Labor Practices we made many changes and achieved a lot, but much more can and will be done.

Since 2021 SOLO Group also became an AMFORI member and 100% of its factories have been audited by BSCI.
QUALITY AND CONSISTENCY ARE KEY IN OUR BUSINESS

At SOLO Group we always work on open costing as this makes everything more transparent. Quality and consistency are key in our business and SOLO Group also focusses on the purchasing of raw materials and provides advance funding for this.

In almost all cases SOLO Group works directly with the supplier. For the few cases this is not possible we always make sure that we have inspected the factory prior to placing any orders, subcontracting is NOT allowed, not even after request. Factory locations must be inspected, and all required certifications and documents need to be in order. Production can never start without a visual inspection by the CSR team and also the standards according to The International Labour Organization (ILO) are checked.

At SOLO Group we have a very simple and straightforward buying process and despite the turnover and diversity of products a relative limited number of suppliers, what we are trying to further reduce.

By using an open costing calculation it was very easy to anticipate on the constant price increases of raw materials, but also on the salary increase. By adjusting the CMT we indirectly increased the workers wages throughout 2021. SOLO Group is also using the FAIR PRICE app to understanding the gap between the price we provide and real costing.

The Buying team is fully aware of the requirements SOLO Group has to meet and the approach it takes in order to be compliant with the FAIR WEAR Code of Labour Practices.

SOLO Group is well known in the market for his buying practice and our payment method but also for SOLO Group price is an issue in this ever-competitive and demanding market.
The Monitoring System of SOLO Group is controlled by a dedicated team and led by the Quality, Sustainability and R&D Director, who is supported by a dedicated team in Bangladesh and in China where we have recently opened an office in Hangzhou, Zhejiang Province. Country specific risks are at all times monitored and taken into count.

SOLO Group’s dedicated CSR team’s mission is to visit all factories, meet with factory management, collecting audit report and CAP’s from other sources, collecting regularly evidence of action in factories (committee report, fire drill, etc.), new possible suppliers to be screened by CSR in charge prior to sampling and order placement, closer contact with mid and top level Management.

Most important task is to go through the different CAP’s and make sure that the required changes are effectively implemented and kept at the required level. During 2021 there was of course also the additional monitoring and making sure COVID related safety measures were in place and used correctly at all times.

All these actions give us a better and closer contact with the top Management and improves the way we can handle remediation at all levels.

Our monitoring process includes the below:
- Regular visits of production units by CSR Responsible for follow up previous CAP and discuss new issues if any.
- Review other social compliance audit reports (BSCI, SEDEX, SAC etc.), identify noncompliant issues as per our Code of Conduct and take corrective action.
- Periodic review regarding quality, sustainability, sourcing practice etc.
- Collaborate with our management and with factory management to ensure the implementation of consistent disciplinary action strategies in cases of compliance standard violations.
- Collect and review QC team comments who visited production location on daily basis.
- Finally escalation/reduction process implement with supplier in case of improvement or non-remediation.
As a result of monitoring we found several re-occurring issues that need to be continuously addressed:
- Social Management System
- Fair Remuneration
- Working Hours
- Occupational Health and Safety matters
- Grievance Mechanism
- Environmental Management
- COVID-19 related safety measures

As per FWF Labour standard, nowadays, most important findings we found from below areas:
- Freedom of association and the right to collective bargaining
- Payment of a living wage
- Excessive working hours
- Safe and healthy working conditions

Fair Wear Wage Ladder is an integral instrument to measure living wage. In this regard we see that living wage is a very common finding. Among all our factories we can calculate that 35% to 40% of all employees are getting living wages which we should further increase in order to match with FWF wage ladder.

Regarding our sourcing and monitoring practice we added additional verifications:
- Checking other certifications (SAC, BSCI, ÖKO-TEX, GOTS, OCS, WRAP, ISO etc.)
- Do factories have a waste management system and using the FEM and FSLM reports from SAC
- What support does the factory give to local community and to physically impaired people
- Does the factory have a vertical set up, what would be preference.
- If factory is working with or engaged with any NGO's or working with any kind of environmental project (Zero discharge, ETP, etc.)
- Does the factory have any plans for green projects or already working to make green factory would be preference.

SOLO Group does not stop evaluating TIER 1, but has included the evaluation of TIER 2 and TIER 3 which we will further develop during the coming years. Our ultimate goal is offering full transparency and traceability to our clients, from raw material to finished garment.
“WHAT GOOD IS HAVING A HOUSE IF YOU DON’T HAVE AN ACCEPTABLE PLANET TO PUT IT IN?”
HENRY DAVID THOREAU

THIS IS WHAT WE CULTIVATE A LITTLE MORE EVERY DAY SO THAT THE PLANET WE LEAVE BEHIND IS A BETTER PLACE.

Alain Milgrom
President SOLO Group
SOLO Group sourced from more than 20 factories in Bangladesh a summarised monitoring system is defined below:

- The percentage of SOLO Group’s total production from Bangladesh in 2021 was 84.4%
- Factories are visited by Quality, Sustainability and R&D Director from Head Office. In addition to this, factories are monitored on a daily basis by either DLO Management Staff or QC Inspectors who visit factory during production. SOLO Group QC staffs are very attentive to even the smallest derogations to social standards that could lead to non-compliance. On top of this close monitoring, CSR topics, OT updates, CAP remediation were on the agenda of every meeting attended by SOLO Group Head Office and DLO staff.
- When any Complaints filed against factory through several internal complaints handling systems, were taken seriously and resolved promptly. Moreover, FWF’s helpline number works as a safety net ensuring that all complaints are heard and taken care of, even if the internal grievance handling mechanism falters.
- SOLO Group, in collaboration with FWF and the factory, has successfully played a central role in resolving cases and continues to do so. There is an active Workers Participation Committee (WPC) at all our factories which deals with proposals and complaints raised in the meeting. They usually take place every two months.
- Fair Wear conducted five monitoring and one verification audit throughout 2021 in our Bangladeshi factories. SOLO Group CSR responsible in DLO updated information from the CAP and proceeds according to its recommendations.
- Local Quality Control team is also part of the constant monitoring of factories and are trained by the CSR in charge to spot potential problems and reports these back to the CSR in charge.
SOLO Group sourced from 15 factories of China summarised monitoring systems are define below

- The percentage of SOLO Group’s total production from China in 2021 was 4.6%
- During 2021 we failed to personally visit all factories due to increased safety measures by the Chinese Government related to COVID 19
- Factories were visited on regular basis by our newly employed CSR responsible based in Hangzhou
- When any Complaints filed against factory through several internal complaints handling systems, were taken seriously and resolved promptly. Moreover, GLOBAL SERVICES helpline number works as a safety net ensuring that all complaints are well received and taken care of.
- GLOBAL SERVICES conducted two monitoring audits throughout 2021 in China.
- SOLO Group’s CSR responsible in China works in close collaboration with CSR responsible in Bangladesh, Mr. Ashikur Rahman who updates all information from the CAP’s and gives instructions accordingly to China.

SOLO Group sources from 1 factory in Pakistan

- The percentage of SOLO Group’s total production from Myanmar for 2021 was 8.6%
- Factories are visited by Quality, Sustainability and R&D Director from head Office
- In Pakistan there is unfortunately no FAIR WEAR presence, neither a help line, only a website, which workers can use to report a complaint.
- SOLO Group’s Buying team, including myself are in constant contact with the factory, which is operated by a European Management.
MYANMAR

SOLO Group sourced from 1 factory in Myanmar:

• The percentage of SOLO Group’s total production from Myanmar for 2021 was 1.3%

• Due to the ongoing unrest and unstable situation in Myanmar, SOLO Group had eventually to move out of Myanmar and place the orders mainly in Bangladesh.

• SOLO Group has tried to continuously working with Myanmar, but taking the country’s specific risks into account it became evident that there was no way under which we could guarantee the safety of the workers. In line with the HRDD (Human Rights Due Diligence) and following the UNGP (UN Guiding Principles on business and Human rights) we decided that, for now, it’s better to wait and see what the future for Myanmar will bring.

• At all times SOLO Group has taken into consideration the workers rights and the possible impact on workers.

• To us the safety of the workers and their families is our main priority.

• SOLO Group completed the last orders and tried to double up the orders, by placing the same quantity in an other country allowing Myanmar more lead time, but in the end we were not able to complete the orders and had to abandon Myanmar.

• We are constantly monitoring the situation and are still in contact with the factory and some of the workers and hope to return to Myanmar as soon as the situation allows.

FRANCE

• The percentage of SOLO Group’s total production from France for 2021 was 1%

• Factories are directly controlled by the Quality and Sustainability department from our Head office in Paris.

• Since 2020 SOLO Group added a new brand to it’s portfolio: ATF Atelier Français – MADE IN FRANCE
SOLO GROUP HAS BEEN WORKING WITH MOST SUPPLIERS SINCE DAY ONE: MORE THAN 30 YEARS. THESE LONG PARTNERSHIPS HAVE CONTRIBUTED TO A BETTER UNDERSTANDING BUT ALSO IMPROVED THE WORKING CONDITIONS. OUR NEXT STEP IS TO FURTHER IMPROVE WAGES FOR THE THOUSANDS OF WORKERS HANDLING DAILY SOLO GROUP’S ORDERS.

Audélica Krief  CEO
SOLO Group
An internal complaints mechanism is established in the majority of the factories used by SOLO Group and will be further extended during the following years. In factories where we do not yet have an internal complaints mechanism, we always make sure that the factory has a complaints box and a Social Worker so workers can also report their complaints.

SOLO Group also makes sure and checks that in each factory that several FAIR WEAR posters have been posted. Unfortunately, not all workers are willing to file a complaint and prefer resignation above complaining. This is a year by year re-occurring fact that we’re looking into.

During 2021, all FAIR WEAR posters were renewed for all factories, together with new posters of the SOLO Group Code of Conduct, which are displayed at production locations.

SOLO Group is constantly monitoring and guiding the factories to improve communication, remediation with their workers, and encourages them to give suggestions and advice.

SOLO Group stimulates factories to participate in the Work Education Program provided by FAIR WEAR - creating awareness and improving communication and stimulating an effective grievance mechanism. All complaints are always treated immediately.

During 2021, SOLO Group received several complaints through FAIR FORCE, which were all resolved. In order to achieve this, SOLO Group also worked together with other members and non FAIR WEAR member brands.
As a CSR-oriented company we try to make a change in the textile industry.

**Activities to Inform Staff Members**

All staff at SOLO Group is informed about CSR related matters during their first days starting with the company. All other staff, whether IT, salespersons or executives are constantly informed and updated on working conditions in high risk countries, and how, we as a CSR-oriented company, try to make a change in the textile industry.

SOLO Group’s WEAR & CARE program is partly dedicated to CSR and this program is not only explained to our sales force, internal and external, but also shared, demonstrated and explained to our resellers and clients.

Staff from SOLO Head Office also attends the half yearly FWF member seminar. This seminar is especially meant to train CSR staff. This way we can learn more about the FWF complaint procedures, methodologies, issues (like due diligence) and share experiences with other members.

Beside these we take following activities to inform and to train our staff about FWF membership:

- Personal Training
- Group Meeting
- Using Fair Wear Logo
- FWF Website Address
- Providing Fair Wear Brochure etc.
- All SOLO Group visitors to any production location must complete the basic FAIR WEAR health and safety check list

**Activities to Inform Agents**

SOLO Group mainly works directly with their production factories, this to guarantee a shorter communication line, less trouble and creates a better understanding with the factory and the factory Management.

Some initiatives taken to inform and train our agents are:

- Provide FWF COC, Code of Labor Practice and all other documents received from FWF.
- Provide internal training from the brand to the agent for introducing about FWF.
- Invite our agent to the training organised by FWF for the brand members.
ACTIVITIES TO INFORM MANUFACTURERS AND WORKERS

Since our suppliers and workers are key pillars on which we will build our future we are aware to protect and safeguard the most important asset to our success, our workers.

The suppliers and workers are contacted directly or indirectly by email, through the posting of Worker Information Sheet showing Code of Labor Practice with helpline number in local language also by offering training sessions for the staff and workforce of the factories.

Some of the following steps are taken to inform factories and Workers:
Train workers and staff by factory management, supervised by our own CSR team.
Posted worker information sheets with local complaint handler contact details in local language.
Provide FAIR WEAR leaflet and stickers, for China we provide GLOBAL SERVICE leaflets and stickers
Participate in WEP (Work Education Program) provided by Fair Wear.
100% OF SOLO GROUP’S PRODUCTION LOCATIONS ARE REGISTERED WITH FAIR WEAR.

In order to monitor our suppliers we keep our own tracking system, which is being updated on a monthly basis.

SOLO Group collects all necessary compliance certifications and double checks these with the factory management. We also verify and collect the remediation update of the audit findings.

100% of SOLO Group’s production locations are registered with FAIR WEAR.
The FAIR FORCE system is constantly updated.

SOLO Group does not allow any form of subcontracting, this to guarantee that none of our production can take place at non-compliant or unknown factories.

Since 2021 SOLO Group also has their own office in Hangzhou, China with a dedicated CSR responsible.
SOLO GROUP IS COMMITTED TO DO BUSINESS IN A MORE SUSTAINABLE MANNER.

SOLO Group is committed to do business in a more sustainable manner and according to the below basic principles that are meeting the Internationally recognised standards including the UNGP - UN Guiding Principles on Business and Human Rights.

- No forced labour
- No discrimination
- No child labour
- Freedom of association and religion
- Right to collective bargaining
- A salary higher than the minimum wage
- No excess overtime
- Healthy and safety working conditions and environment
- Legal employment contract

SOLO Group Buying team, Quality team, Sustainability and Management frequently visit all suppliers, inspect production locations and when necessary takes action.

SOLO Group is also a signatory to the New Bangladesh ACCORD / RSC (RMG Sustainable Council), AMFORI / BSCI, SAC (Sustainable Apparel Coalition) and using the HIGG Index to calculate and report Environmental Impact figures.
IT'S UP TO BRAND TO START COMMUNICATION WITH THE FACTORIES.

TRANSPARENCY AND TRACEABILITY ARE NOT EASY TOPICS BUT A KEY FACTOR IN CHANGING THE GARMENT INDUSTRY.

Geert de Wael
Quality, R&D and Sustainability Director SOLO Group
At SOLO Group we acknowledge our Social Responsibility, regardless of the location at which we conduct our business, whether this is in France, Europe, Asia or anywhere else in the World, and we have therefore drawn up this present Code of Conduct in recognition of this fact. It sets out the principles of business best practices that maintain a primary and constant focus on the need to observe Corporate Social Responsibility.

We acknowledge that Corporate Social Responsibility is one of the fundamental, core principles of business practice. SOLO Group Code of Conduct has been drafted to ensure that our products are manufactured under conditions that reflect our values, in compliance with National and International Laws and Regulations based on the Conventions of the International Labour Organisations (ILO) and the Universal Declaration of Human Rights (UDHR) convention.

SOLO Group firmly believes that all employees deserve to be treated with dignity and respect. This in each and every aspect of the employment relationship. Being directly employed by SOLO Group or by the factories we work with, their subcontractors and this throughout our supply chain. By undersigning this, the undersigning Company, acknowledges to support us in our Corporate Social Responsibility plan and the principles it has been based upon. Should it become apparent that the undersigning Company is in breach with these principles and when remediation does not work, SOLO Group will not hesitate to terminate the business relation. This can even lead to cancelling outstanding orders.
CODE OF CONDUCT

1. Employment in a Socially Responsible Manner

There shall be no form of social, religious, cultural or political discrimination in the workplace against any employee, and no form of social or political activity prohibited under national law, according to local custom or common sense.

2. Freedom of Association and the Right to Collective Bargaining

All employees have the right to form and join trade unions and to organize collectively in their workplace. Any such action shall not be penalized, and membership of trade unions or participation in union activities shall be voluntary.

3. Non-Discrimination in Employment

Employment decisions under any form shall not be based on religion, race, ethnicity, gender, sexual orientation, age, health status, genetic traits, political affiliation, martial status, membership in a trade union, or any other aspect of an employee's identity. This principle shall be applied to recruitment and promotion, and any other aspect of the employment relationship.

4. Right to Freedom of Expression

The right to freedom of expression in all forms shall not be violated. The right to access to information and the right to seek information or opinion in the workplace shall be respected.

5. Compensation and Benefits

Wages and benefits paid to an individual worker shall meet at least the cost of living or a standard of livelihood sufficient for the needs of workers and their families. Deductions for social security and other taxes shall be limited to what is necessary to maintain and improve the worker's health, safety, or Meeting the costs of their interests in education and training programs.

6. Social Responsibility of the Workplace

Social responsibility of the workplace shall extend to all aspects of the workplace, including the identification and correction of potential hazards, the implementation of codes of conduct, and the provision of adequate facilities for workers.

7. Social and Environmental Impact

The workplace shall not allow any form of social destruction, and shall not allow any form of environmental destruction. The workplace shall not allow any form of social or environmental damage to the environment, the community, or the individual.

8. Legal Liability and Employment Contract

Employment contracts shall be in compliance with national labor laws and regulations.

9. Financial Disclosure

The financial information of the workplace shall be disclosed to the public in a timely and transparent manner.

10. Code of Conduct

The Code of Conduct is a tool for ensuring that the workplace is socially responsible and environmentally sustainable. It is a commitment to the principles of sustainability and responsible business practices. It is a guide for all employees and stakeholders to ensure that the workplace is socially responsible and environmentally sustainable.
All partnering SOLO factories in Bangladesh, China, Cambodia, Myanmar and Pakistan have water treatment system in place to minimise the environmental impact of the (dyeing) process and ensure that water is treated as the invaluable resource it is.

Whenever possible and as much as possible we choose to produce our garments with organic cotton. Not only does organic cotton need less water in crop production: It’s also not polluted by harmful, contaminating pesticides and chemicals.

Proper water treatment at the fabrication and dyeing stage of the SOLO production process is a key concern to us. During the production process water is used for dyeing, washing and printing textiles. This inevitably generates water-based toxic waste. Legal requirements stipulate that waste water from this process must be treated in such a way that it can safely be released back into natural environment.

All our partnering factories in Bangladesh have state-of-the-art ETP’s with in-house specialists and testing facilities. SOLO periodically monitors the treated waste water by testing the water’s pH, DO, BOD, COD and TDS both in the factory and government laboratories to ensure it’s safe.
• Total 20 factories (25 units)
  • Smallest factory 350 employees
  • Biggest factory 11,350 employees
  • Average 2,000 employees

• 84.8% of our 2021 turnover

• Average leverage of 30%

• % of audit at our partner factories:
  • 80% Fair Wear (100% declared)
  • 100% BSCI
  • 95% Accord (100% declared)
  • 65% Smeta / Sedex

• Several factories are also audited by:
  • Fair Trade
  • BetterWork / ILO
  • SAC (FEM / FSLM)

• The styles we mainly produce:
• Total 15 factories (25 units)
  • Smallest factory 35 employees
  • Biggest factory 600 employees
  • Average 180 employees

• 4.6% of our 2021 turnover

• Average leverage of 6.4%

• % of audit at our partner factories:
  • 55%  Fair Wear (100% declared)
  • 80%  BSCI
  • 15%  Sedex

• The styles we mainly produce:
• Total 1 factory
  • 652 employees

• 8.6% of our 2021 turnover

• Average leverage of 20%

• % of audit at our partner factories:
  • 100% Fair Wear (100% declared)
  • 100% BSCI

• The styles we mainly produce: