

Impartiality Statement

ELEVATE is fully committed to impartiality when carrying out services and providing professional opinions. We avoid conflicts of interest to ensure our business activities are conducted in an impartial and nondiscriminatory manner. This is achieved by adhering to, but not limited to, the following:

ELEVATE provides improvement and consulting services to factories as requested by our clients. This represents a relatively small portion of ELEVATE’s turnover. We understand this service may present a potential conflict of interest with our assessment business. To address the issue, ELEVATE has established a firewall between assessment services and improvement services at project inception. A detailed work instruction identifies those factories that have engaged our improvement services and exempts them from our assessment services for a period of 12 months or longer depending on client specific requirements. Any exceptions must be expressly approved by client in writing.

ELEVATE will not market services at the risk of compromising quality and impartiality. This is safeguarded by the clear segregation of responsibilities between delivery and business development teams within our organizational structure.

When assigning service teams, ELEVATE ensures each service team member (including assessors, consultants and contractors) is free from any interests that might compromise impartiality during service delivery. Each service team member is obligated to disclose all real or potential conflicts of interest at the time the conflicts are apparent, and to disclose any existing or perceived relationship between themselves and the organization for whom the service will be provided; any exceptions must be reviewed and written approved by VP, Global Quality and Integrity.

ELEVATE guarantees the assessment conclusions and opinions are based on its independent review of onsite evidence, findings and observations. We also report supplemental information regarding factory performance to ensure clients have comprehensive insight into factory compliance status.

ELEVATE identifies, documents, assesses, and takes action as appropriate to mitigate or eliminate risks to impartiality on an ongoing basis.

Approved

Approved by Ian Spaulding, CEO, ELEVATE – 5 March 2018

Additional information

| Disclosure | Public |
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