



## SUPPLIER GRIEVANCE POLICY

**Clarks believe workers engaged in the production of our products should be treated fairly and with dignity and respect. There is recognition for the need for factories to have effective internal communication and grievance mechanisms. These must support both two way communication between management and workers and also to allow any worker in a factory to raise a grievance and for it to be dealt with in an appropriate way.**

If workers feels unhappy about the treatment they have received or about any aspect of their work or management, then an appropriate grievance policy and procedure must be in place to allow them to raise that and for it to be resolved as promptly, fairly and consistently as possible.

All facilities used in the production of Clarks products must have a written Grievance Policy that is signed by the senior manager at the facility and communicated to all workers in a way that they understand. The policy must however state that no one will suffer retaliation for raising a legitimate grievance.

### Grievance Procedure

The Grievance Policy & Procedure must be accessible to all workers. Where a grievance cannot be resolved informally there must be access for all workers to raise a formal grievance in a confidential way. This may include the use of;

- Secured confidential grievance boxes that are installed in private areas (such as bathrooms or dorms) and only accessed by nominated senior managers.
- Neutral grievance contacts such as union / worker representatives or guidance counsellors.
- Confidential email, telephone or message services through which a grievance may be reported. These may be provided internally by a supplier or through an external 3rd party.

The details of a Grievance Policy & Procedure will be specific to each supplier and facility however the guidelines below and below are the key elements that all policies should contain.

### Guidelines for a Supplier Grievance Policy & Process

- Where possible a grievance should be resolved informally.
- The Grievance procedure should be available to address most issues, including but not limited to, working environment or conditions, terms and conditions of employment, organisational change, treatment by management and equal opportunities.
- The Grievance procedure should not be used to complain about dismissal or disciplinary action.
- Grievances must be dealt with promptly, fairly and consistently.
- If a worker raises a grievance it must not prejudice their current employment or future career prospects.
- Through the grievance procedure the worker raising it should have the right to be accompanied to any meeting, by someone of their choice from within the workplace (either a trade union / worker representative or a work colleague).
- Formal grievances should initially be heard by the individual's Line Manager. If the Line Manager is the subject of the grievance, it should be heard by an appropriate manager in a more senior role.
- Records of the grievance proceedings and any notes made will be kept confidential unless

otherwise agreed with those involved.

- Grievances raised whilst an individual is subject to any disciplinary proceedings should be dealt with dependant on the nature of the grievance and its relation to the disciplinary proceedings.
- The grievance procedure should include an appeal procedure after which the grievance will be closed.
- When a grievance is received it must be investigated promptly by a suitably qualified & experienced person with appropriate discretion.
- Grievances should normally be acknowledged within 7 days and investigated and resolved within 4 weeks of being received.
- Records must be kept of all grievances, their investigation, outcome and any disciplinary action taken as a result. All documentation must be signed by the worker in question.

Through our audit programme we will increase the focus we place on the communication and grievance policies and procedures available within the supplier workplace to ensure they meet this criteria and are being operated effectively. In any organisation there may be situations where an worker does not feel able to raise an issue through the internal grievance or communication processes. This may be for reasons of confidentiality or fear of reprisal. For these situations an external, independent and anonymous reporting facility is offered through Clarks [ethics@clarks.com](mailto:ethics@clarks.com).

To support the internal communication and grievance procedures in our supplier factories it is proposed to make the [Clarks Integrity Line](#) available. Any issues reported through this route will only be accepted for investigation if they have either already been reported through the factory internal procedures or there are valid reasons for bypassing these. Issues reported will be investigated with the factory through the relevant Sourcing Operations and SWC teams in the respective country.

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We have a strong tradition of supporting the communities in which we live and work, because we believe it's important everybody is treated as the individual they are.

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We recognise the environmental challenges our planet faces. That's why we think it's important for us to act on issues like climate change swiftly and innovatively.

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## POLICY

We are committed to acting on issues like climate change, sustainability and workers' rights. Our policies are here to guide us during every stage of that journey.

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## PEOPLE. PLANET. POLICY.

Responsible business is part of our DNA. Which is why we do as much as we can to support the communities in which we live and work, as well as the planet we all call home. Our policies are there to guide us on this journey.

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