

LUPC's corporate strategy 2018-2021 emphasises the importance of Adding Value through Responsible Procurement, so environmental, social and economic aspects are now considered in all LUPC's new tenders. We are also looking closely at existing frameworks, examining the methods and supply chains behind our agreements.

Textiles is one of the areas we have examined recently, focusing particularly on graduation gowns. They are generally produced in factories in China, Bangladesh, India, Vietnam, Cambodia and Turkey. Risks to human rights include modern slavery, child labour, exposure to chemicals and harmful working conditions.

## Steps taken

We contacted all suppliers to request audit reports for their supply chains. We followed up with questions on the audit reports and asked what steps had been taken to implement changes recommended by the auditors.

## **Findings**

We asked all suppliers to provide their SMETA pillar 2 or similar audits as we were interested in labour standards, health and safety and environmental aspects.

J. Wippell & Co. Ltd, one of LUPC's approved gown providers, is a Made in Britain member as its entire manufacturing process is all in the UK. The other three approved suppliers have their gowns manufactured outside the UK, mainly in China. Some add finishing touches to the gowns in the UK.

J. Wippel & Co. explained that it does not audit its supply chain given that all its suppliers are based in the UK and therefore must comply with UK/EU legislation and guidance. However, it does audit its manufacturing location on health and safety risks as well as assessing its suppliers using a questionnaire, including areas such as sustainability, environmental impact, equality and diversity and quality control. Since the first time we contacted the supplier, it has made publicly available its



environmental policy and we suggested it makes all other policies publicly available.

The other three suppliers audit their manufacturing factories in China. We recognise that audits are only a meaningful process when companies follow up on their findings and support suppliers to improve working conditions. That is why we requested audit reports and progress plans with evidence of actions taken upon the noncompliance findings.

Graduation Attire (trading as Evess) provided two different audits from the same Chinese factory, one from early 2018 and the other from late 2019. This supplier used SMETA 2 pillar and an external third-party auditor. This supplier provided a detailed document with photographs of the health and safety improvements in the factory addressing 7 out of 11 non-compliance areas. It also showed an implementation plan in place at the factory with details of how it will address the remaining issues of the audit such as salary records and contract conditions. LUPC will be included in a live document in conjunction with the supplier's representative in China so that we can be updated, in real time, of the actions taken in the factory. This was an initiative by the supplier to demonstrate it is on the right path in achieving and supporting standards that LUPC is working towards. Graduation Attire will be auditing the supplier this year to check the implementations are still in place.

Marston Robing provided an audit report from late 2016. Marston assessed the factory's performance against the ETI Base Code and local applicable laws with an external

auditor. The audit report showed some non-compliance issues and Marston provided a follow-up report by the same third-party auditor which showed progress made by the factory. However, Marston has changed its main supplier to another factory with whom it has worked closely since 2008. An external audit with the same auditor was already booked for April 2020 for the manufacturing site. This audit will now take place as soon as circumstances permit and the results and any follow-up shared in full with LUPC.

<u>H Tempest</u> carried out an internal audit, reporting on employment terms and practices, working hours, factory conditions and health and safety. The supplier audits their manufacturing site by themselves and did not provide any further follow up information.

We welcome the collaborative approach and transparency shown by the suppliers and their commitment to audit their supply chains. We recognise how challenging it is to monitor supply chains, especially when suppliers are not located in the same country. However, corporations have a responsibility to respect human rights regardless of size or sector and at LUPC we will continue our due diligence to secure the best value for our members in the procurement of goods and services, without causing harm to others.

Our aim is to deliver LUPC's goal to become a leader in making ethical trading and sustainability available to our members.

Marisol Bernal, Category Manager Responsible Procurement.

Joyce Kadri, Category Manager

