

THE JUST GROUP

Tuesday, 14 April 2015

Dr Helen Szoke
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Dear Dr Szoke,

The Just Group has a history of over 40 years of ethical sourcing. The Group operates with strict Principles, our code supports the commitment to sourcing merchandise that is produced according to our strict principles regardless of origin. That is safe working conditions where human rights are respected and people have free right of association. The Group complies with all laws in the countries in which product is sourced. Our sourcing framework supports adherence, identifies non-compliance and supports corrective action and continuous improvement.

All suppliers are trained in the Code. Along with factory inspections, understanding and adherence to the Code is regularly monitored.

The Contracts we issue ensure it is legally binding on manufacturers to adhere to the Code.

We operate under clear Principles:

1. The Group complies with all relevant laws in the countries in which we source and operate.
2. The Group insists upon workers legal rights including worker empowerment and free association.
3. The Group has zero tolerance for child labour.
4. The Group has zero tolerance for bribery and corruption.

We have strong assurance practices:

1. The Group inspect all factories who manufacture for us.

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JACQUIE



portmans

smiggle

- i. Personal visits to all factories are conducted by senior management prior to commencing business and regularly thereafter to ensure our principles are strictly administered.
 - ii. Internationally recognised independent Qualified Assessment and Audit Firms verify all local laws, safety conditions including labour, fire and building integrity are complied with.
2. Thorough background and ongoing checks for compliance in factories are conducted by Li & Fung, the world's largest global sourcing agent and a publicly listed company.

Our activities support our Principles and Assurances generally, however, we have a particular focus on audit and compliance in Bangladesh where the RMG industry is approximately 80% of all export earnings, a major contribution to GDP and employing 4.2m workers, most of whom are women. Whilst Bangladesh is a very minor portion of our overall sourcing mission we have created a sourcing framework with strict guidelines and checks for that market. We joined the Alliance for Bangladesh Worker Safety (www.bangladeshworkersafety.org) in October 2013 together with some of the world's biggest and best known retailers including Nordstrom, Macys, Gap, Sears and JC Penny with whom we work to improve workplace safety in a results oriented, measurable and verifiable way in Bangladesh.

The detail around audit and compliance in Bangladesh is as follows:

Labour

Factories with which we do business are inspected by independent Qualified Assessment Firms for social compliance, wages, hours and training.

1. Personnel records including age contracts, leave register and infirmary logs.
2. Shifts, operating hours, breaks and average hours worked.
3. Emergency preparedness.
4. Payroll audit.

Worker representatives are invited to participate in factory inspections and shadow assessments.

The Group supports the worker's right to refuse unsafe work.

Safety

All factories are inspected by independent Qualified Assessment Firms to ensure they are compliant with agreed international standards for occupational health and safety for workers. All factories undergo relevant training. Follow up is conducted to ensure a safe environment.

Fire

All factories are inspected and audited for appropriate fire equipment and training. Sprinkler systems, egress, hydrants are all audited. Extensive training for all workers is scheduled and followed up to ensure it takes place.

To increase fire and safety awareness The Alliance has ensured over 1,000,000 workers and managers have been trained with 100% of the Group factories having been trained.

Follow up surveys are conducted to assess progress in work safety, with 97.8% of managers and workers trained who can now correctly identify what to do in case of a fire following the Alliance training.

Building Integrity

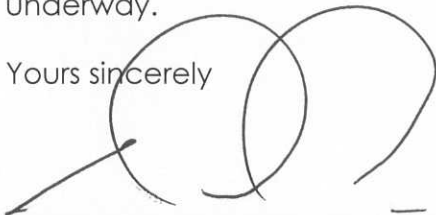
All factories are inspected and audited by independent Qualified Assessment Firms.

Certificate of occupancy are reviewed along with structural engineering and documentation for conformance with applicable international model codes, compliance with wind loading and storm surge loadings, expansion and extension integrity and approval, and structural configuration.

The Alliance for Bangladesh Worker Safety has developed and implemented the country's first harmonised Fire Safety and Structural Integrity Standard.

In summary the Just Group have over 40 years' experience in ethical sourcing, we have joined the Alliance for Bangladesh Worker Safety, our principles and assurances guide our every sourcing decision. We are fully engaged with a programme of audits, CAP meetings and training. We thank you for your invitation to join the Accord. As a current active member of the Alliance along globally respected retailers Nordstrom, Macys, Gap, Sears, Kohl's, Target USA, Hudson Bay Co, V.F. Corporation and JC Penny, we feel we are operating in a globally responsible manner, and are committed to the work programme we have underway.

Yours sincerely

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned over the text 'Yours sincerely'.

MARK McINNES

Chief Executive Officer
The Just Group