

Northern Group Retail Ltd.

Banners: Northern Reflections and Northern Getaway

Type of company: Private

Notes: Private companies have different internal organization from public companies. They are also not

required to publish annual reports.

Notes on Findings 1. Governance and Risk Management 1.1 Board level responsibility for ethical issues in the supply chain -No reported evidence of formal board sub-committee or board member with explicit responsibility for ethical issues in supply chain 1.2 Reporting of labour standards issues in the supply chain as a risk factor -No mention of labour standards issues as a risk factor 1.3 Risk analysis of labour standards issues in the company's existing supply chain -No mention of comprehensive risk analysis of labour standards issues in the company's supply chain Section total score / section weighting 2. Code for Labour Standards in the Supply Chain 2.1 Quality and scope of the code for labour standards in the supply chain -There is a list of "Global Sourcing Guidelines" -It does not meet the core ILO conventions with respect to child labour,	O O Company Score	Onestion 30 X 10%
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-" Workers may not be younger than 15 years of age (or l4 where local law permits)" -It covers the core ILO conventions but limits its commitment to more than one convention: -Freedom of association: "the right to choose to affiliate with legally sanctioned organizations or associations" -It does not meet hours of work standards -It does not have a living wage requirement	0	60
2.2 Publication and availability of the code for labour standards in the supply chain -Global Sourcing Guidelines are available on their website http://northernreflections.com/vr4-web-site/aboutGlobalSourcing.jsp.vr	100	20
2.3 Application of the code for supply chain labour standards -Applies to entire supply chain -"Each of the Company's suppliers agrees that, by accepting orders from the Company or any of its subsidiaries, it will abide by and implement the terms of these Global Sourcing Guidelines" http://northernreflections.com/vr4-web-site/aboutGlobalSourcing.jsp.vr	100	20
Section total score / section weighting	40	X 15%
		7.1570
3. Stakeholder Engagement		7, 1370

3.2 Engagement with NGOs and/or trade unions relating to labour standards in the supply chain

-No reported evidence

- No reported evidence

3.3 Worker and third party complaints

Section total score / section weighting

0

0

30

40

X 20%

4. Management

4.1 Resource Commitment -No reported evidence	0	25
4.2 Training for Buying agents -No reported evidence	0	25
4.3 Training for factory management personnel and workers -No reported evidence	0	25
4.4 Rewards and Incentives -No reported evidence	0	25
Section total score / section weighting	0	X 20%

5. Supply Chain Auditing and Reporting

3. Supply chain raditing and reporting		
5.1 Commitment to auditing labour standards in the supply chain -No reported evidence	0	15
5.2 Status of the audit schedule -No reported evidence	0	5
5.3 Public disclosure of manufacturing sites -No reported evidence	0	10
5.4 Transparency of the labour standards auditing methodology -No reported evidence	0	15
5.5 External verification of labour standard audits -No reported evidence	0	20
5.6 Reporting the results of audits of labour standards in the supply chain -No reported evidence	0	20
5.7 Dealing with non-compliance -No reported evidence	0	15

Section total score / section weighting 0

Total Score 6 /100

X 35%