

MOXIE GARMENTS MANUFACTURER L.L.C.

Garment manufacturer · Caps & Gowns · School Uniforms · Hospitality · Healthcare

Corporate Compliance & Responsible Business Policies

Company	Moxie Garments Manufacturer L.L.C.
Trading names	Moxie; Caps & Gowns
Divisions	Graduation caps and gowns; school uniforms; hospitality and corporate uniforms; healthcare uniforms
Production facility	Warehouse S.14 (Shed 14), 18th Street, Al Quoz Industrial Area 1, Dubai, United Arab Emirates
Workforce	A full-time team, plus part-time workers during peak seasons
Document version	1.0
Effective date	September 2026
Approved by	Ansar Yawar, Owner
Next scheduled review	September 2027
Review cycle	At least annually, or earlier when UAE law, customer requirements, operations or identified risks change

Moxie Garments Manufacturer L.L.C. (“Moxie”) is a Dubai garment manufacturer founded by Ansar Yawar, with Scandinavian roots in graduation wear. From its own production facility in Al Quoz, Moxie makes graduation caps and gowns (sold as Caps & Gowns), school uniforms, and hospitality, corporate and healthcare uniforms. It serves kindergartens, schools, colleges, universities, hotels and healthcare providers across the UAE through on-site measurement, online ordering for students and parents, and home delivery.

One of the main reasons Moxie invested in its own production facility is to take direct responsibility for how the people who make its garments are treated. Most production is carried out in-house, where Moxie itself sets and checks employment contracts, pay, working hours, safety and welfare. Where specialist work is outsourced, it goes only to trusted, approved partners who sign Moxie’s Supplier Code of Conduct and are held to the same standards.

This document sets out Moxie’s ten corporate policies. Policies 1 to 8 are the core policies that apply to the whole business. Policies 9 and 10 cover risks specific to working with schools and producing garments worn by children. How compliance is checked is described in the separate Compliance Monitoring Procedure.

Raising a concern

Anyone can raise a concern about a breach of these policies with their supervisor or directly with the Owner, Ansar Yawar, in person or in writing, in any language. Concerns involving the Owner can be raised with any Division Manager. Moxie investigates every concern and does not tolerate retaliation against anyone who raises one in good faith.

How these policies work

Who they apply to

- All employees, whether full-time, part-time or seasonal, including the measurement team and representatives.
- Where a policy says so, suppliers, subcontractors, external processing vendors and service providers.
- Every employee is briefed on the policies in a language they understand and signs the Policy Acknowledgement Register.

Licences and registrations

- A valid Dubai licence covering garment manufacturing, and registration in the Ministry of Industry and Advanced Technology's Industrial Registry, updated every year as Federal Decree-Law No. 25 of 2022 requires.
- MOHRE establishment registration, with a valid work permit for every employee.
- Emiratisation: manufacturing is one of the sectors covered by MOHRE's Emiratisation targets. Moxie checks its MOHRE-registered headcount, including part-time workers, against the Emiratisation thresholds and will meet any target that applies, using the Nafis programme.
- Dubai Civil Defence approval for the facility, and VAT and Corporate Tax registration with the Federal Tax Authority.
- The main UAE legal requirements and where each is covered are listed in the UAE legal requirements register at the end of this document.

Key responsibilities

Role	Compliance responsibilities
Owner (Ansar Yawar)	Overall accountability; approves policies; receives and investigates concerns; data protection lead; approves gifts above AED 250, sponsorships and any subcontracting; chairs the annual management review.
Division Managers (Caps & Gowns, School Uniforms, Hospitality & Corporate, Healthcare)	Customer relationships, site visits and measurement teams for their division. The Caps & Gowns and School Uniforms managers are responsible for safeguarding during school and university visits.
Production Supervisor	Health and safety on the production floor; monthly inspections; machine maintenance; fire drills; needle control; quality checks; supplier certificates; waste records.
HR / PRO	Employment contracts, visas and Emirates IDs; WPS payroll; working hours and overtime; new-hire checks; training and acknowledgement records.
Customer Service & Webshop Lead	Access to the Caps & Gowns webshop, the school uniform ordering system, the payment portal and email; data requests from students and parents; deletion of expired order data.
All employees	Follow the policies, take part in training, and report concerns, hazards and incidents.

Contents

1. Code of Conduct Policy
2. Ethics Policy
3. Corporate Social Responsibility Policy
4. Environment Policy
5. Health and Safety Policy
6. Anti-Bribery and Anti-Corruption Policy
7. Modern Slavery and Human Trafficking Policy
8. Data Protection Policy
9. Safeguarding and Child Protection Policy
10. Product Safety, Quality and Supplier Standards Policy

1. Code of Conduct Policy

Purpose	Sets the standard of behaviour expected of everyone who works for or represents Moxie — in the factory, online, and at schools, universities and client sites.
Applies to	All employees, including part-time and seasonal staff, the measurement team and representatives.
Policy owner	Owner

Respect at work

- Treat colleagues, students, parents, institution staff, suppliers and visitors with courtesy and respect.
- Harassment, bullying, discrimination (including on nationality, religion, gender, age or disability), intimidation, threats and violence are not tolerated, in line with Articles 4 and 14 of the labour law.
- Follow lawful management instructions, safe working procedures and the rules of any site you visit.

Representing Moxie at institutions

- Follow the institution's visitor, security and safeguarding rules, and wear Moxie identification.
- Behave professionally with students at all times, as set out in Policy 9 (Safeguarding and Child Protection).

Confidentiality

- Student, parent, institution and customer information is used only to fulfil orders and is never discussed or shared outside work.
- Order lists, measurement sheets and customer data must not be copied to personal phones, email or storage.

Company property and accurate records

- Machines, fabric, systems and information are used for company work only.
- Timesheets, measurements, quality results, invoices and all other records must be accurate. Records are never falsified or back-dated.

Conflicts of interest

- Declare in writing to the Owner any personal, family or financial link with an institution, supplier or competitor that could influence a decision — for example, a relative who works at a school that is choosing a gown supplier.
- Declarations are recorded in the conflicts of interest register and the person concerned steps back from the decision.

Social media

- Do not post photos of students, institution crests or customer orders on personal accounts.
- Official Caps & Gowns posts featuring an institution are published only with that institution's permission.

Speaking up

- Raise any suspected misconduct, unsafe behaviour, harassment, fraud or policy breach with your supervisor or directly with the Owner, in person or in writing, in any language.
- Moxie does not tolerate retaliation against anyone who raises a concern in good faith. Breaches of this Code may lead to disciplinary action in line with UAE labour law.

Records we keep

- Signed Policy Acknowledgement Register
- Conflicts of interest register
- Concern & Corrective Action Register

2. Ethics Policy

Purpose	Explains how Moxie does business honestly and fairly with institutions, students, parents, suppliers and competitors.
Applies to	All employees and representatives, especially those involved in sales, tenders, purchasing and customer service.
Policy owner	Owner

Honest selling

- Prices, fabrics, colours, sizes and delivery dates shown on quotations, tenders, the Caps & Gowns webshops and the school uniform ordering system are accurate and not misleading.
- If a delivery is at risk before a graduation ceremony or the start of a school term, the client and affected students or parents are told promptly, with a clear plan.

Fair terms

- Moxie publishes its Terms & Conditions and Refund Policy online and applies them consistently to every customer.
- Size exchanges, free alterations and complaints are handled promptly and fairly.

Institution names, crests and intellectual property

- Institution names, crests and colours are used only for that institution's orders and with its permission.
- Moxie respects the designs, trademarks and confidential information of institutions, competitors and other third parties.

Fair competition and tenders

- Moxie follows each institution's tender rules exactly and never seeks confidential information about competing bids.
- Employees must not agree prices, bids or market sharing with competitors.

Accurate financial records

- Quotations, orders, invoices and payments are recorded completely and accurately in the webshop and accounting records.
- VAT invoices are issued correctly and there are no off-book accounts or undisclosed payments.

Making the right decision

When unsure, ask three questions: Is it legal? Is it fair to the student and the institution? Would I be comfortable if the institution saw exactly what I did? If the answer to any is no or unsure, stop and ask the Owner.

Records we keep

- Quotation and tender files
- Customer complaints and refunds log
- Accounting and VAT records

3. Corporate Social Responsibility Policy

Purpose	Sets out Moxie's responsibilities to its employees, the students and institutions it serves, and the wider community.
Applies to	The whole business.
Policy owner	Owner

Why we make our own garments

One of the main reasons Moxie invested in its own production facility is to take direct responsibility for how the people who make its garments are treated. Most production is carried out in-house, where Moxie itself sets and checks employment contracts, pay, working hours, safety and welfare. Where specialist work is outsourced, it goes only to trusted, approved partners who sign Moxie's Supplier Code of Conduct and are held to the same standards.

Our people

- Employment is fair, lawful and freely chosen, as set out in Policy 7.
- The workplace is safe and healthy, as set out in Policy 5.
- Tailors and machine operators receive on-the-job training and are cross-trained on different machines and garment types to build their skills.

Students and institutions

- Graduation is a once-in-a-lifetime event, and a new school term cannot wait. Moxie plans production so that orders arrive before the ceremony or term start agreed with the school.
- On-site measurement, free alterations and size exchanges help every student receive a garment that fits well.
- Name or initial embroidery on school uniforms helps children and parents keep track of lost items.
- Student information is protected, as set out in Policy 8.

Responsible products

- Garments are made in Moxie's own Dubai facility, giving direct control over working conditions and quality.
- Materials meet the safety requirements in Policy 10, including for kindergarten and primary sizes.

Environment

- Moxie reduces waste and resource use, as set out in Policy 4.

Measuring progress

- CSR performance — including employee welfare, on-time delivery, customer complaints and environmental results — is reviewed at the annual management review.

Records we keep

- Training records
- On-time delivery and complaints records
- Annual management review minutes

4. Environment Policy

Purpose	Describes how Moxie minimises the environmental impact of its garment manufacturing.
Applies to	The Al Quoz production facility and, where stated, external processing vendors.
Policy owner	Owner, supported by the Production Supervisor
Legal framework	Federal Law No. 24 of 1999 on the Protection and Development of the Environment, and Dubai Municipality waste requirements.

Scope of our operations

- Moxie's Dubai facility carries out cutting, sewing, embroidery, pressing and assembly of graduation attire, school uniforms, and hospitality, corporate and healthcare uniforms.
- Moxie buys finished fabric. It does not dye, bleach or chemically treat fabric at its own facility. Where such processing is needed, it is carried out by licensed external vendors.

Using fabric efficiently

- Cutting lays are planned to minimise offcuts.
- Usable offcuts are kept for samples, repairs and small components where quality allows.

Waste

- Fabric offcuts and general waste are separated and collected by Averda Environmental Services, a licensed waste contractor.
- Waste collection records are kept. Waste is never burned or dumped.

Chemicals

- Chemicals on site are limited to machine oil, spot-cleaning products and adhesives. They are labelled, stored safely and have safety data sheets available.
- No industrial dyeing or bleaching chemicals are used or stored on site.

Energy, water and paper

- Machines, lights and air conditioning are switched off at the end of the working day and when areas are not in use, including during the midday break.
- Air-conditioning units are serviced to keep them efficient, and electricity and water use is reviewed from DEWA bills.
- Online measurement, webshop ordering and electronic invoicing reduce paper use.

Packaging

- Packaging is kept to what is needed to protect garments in transit and complies with Dubai's single-use plastic restrictions.

External vendors

- Dyeing, bleaching and other processing vendors must hold valid licences and comply with UAE environmental law. Moxie requests evidence at onboarding and reviews it annually.

Records we keep

- Averda waste collection records
- Safety data sheets
- DEWA bills
- External vendor licences

5. Health and Safety Policy

Purpose	Protects the health and safety of employees, visitors and contractors at Moxie's production facility.
Applies to	All employees, visitors and contractors on Moxie premises.
Policy owner	Owner, with day-to-day responsibility delegated to the Production Supervisor
Legal framework	Federal Decree-Law No. 33 of 2021 Regarding the Regulation of Employment Relationships, Ministerial Resolution No. 44 of 2022 on Occupational Health and Safety and Labour Accommodation, and Dubai Civil Defence and Dubai Municipality requirements.

Our commitment

Moxie complies with UAE health and safety law and, where its own rules are stricter, follows the stricter rule. Hazards are identified and controlled, performance is recorded and reviewed, and improvements are made continually.

Responsibilities

- **Owner:** provides resources and is accountable for health and safety.
- **Production Supervisor:** runs daily floor checks and monthly inspections, maintains machines, organises fire drills and records incidents.
- **Employees:** follow safe working procedures, keep guards in place, and report hazards, incidents and near misses immediately.

Risk assessment

- Written risk assessments cover each work area: fabric store, cutting, sewing and overlocking, embroidery, pressing and ironing, and packing and loading.
- Assessments are reviewed every year, after any serious incident and before a new machine or process is introduced.

Machinery and equipment

- The facility operates around 50 sewing machines and two embroidery machines, and runs multiple shifts when working at full capacity. Needle guards and belt guards are fitted and kept in place.
- Machines are switched off before threading, changing needles or cleaning. Faulty machines are tagged out of use until repaired.
- Only trained operators use embroidery machines and powered cutting equipment.
- Irons are kept on heat-resistant rests and switched off when unattended. Electrical cables and extension leads are checked and damaged items removed.

Personal protective equipment

- PPE is provided free of charge according to the task, including cut-resistant gloves for powered cutting and face masks for dusty or lint-heavy work.
- Garment operations do not normally create a significant risk of foot or eye injury. If a risk assessment identifies one, suitable protection is provided.

Fire and emergencies

- Fire alarms and extinguishers are maintained and serviced by a Civil Defence-approved contractor, and the facility is inspected by Dubai Civil Defence.
- Emergency exits and the aisles between machines are kept clear of fabric rolls, cartons and equipment at all times.
- The evacuation plan and assembly point are displayed, fire drills are held at least twice a year, and smoking is not permitted inside the facility.

First aid and welfare

- Stocked first-aid kits are available, with at least one trained first-aider present during working hours.

- Clean drinking water, toilets, a rest area, adequate lighting and air conditioning are provided.
- When production runs multiple shifts, a supervisor and a trained first-aider are present on every shift.
- Outdoor loading and delivery work is not scheduled during the UAE midday break (12:30 to 15:00, 15 June to 15 September).

Incidents

- All injuries — including needle-stick injuries — and near misses are recorded in the incident log on the same day.
- Work injuries are reported to MOHRE within 48 hours, as Ministerial Resolution No. 44 of 2022 requires, and every work injury and occupational illness is tracked in the incident log. Incidents are investigated and corrective action is taken.

Training, visitors and contractors

- Every new employee receives a safety induction on their first day covering machine safety, emergency exits, first aid and incident reporting, with a refresher every year.
- Visitors and contractors sign in, are accompanied on the production floor and follow site safety rules.

Records we keep

- Risk assessments
- Monthly workplace inspection checklists
- Machine maintenance log
- Fire equipment service certificates and drill log
- First-aid certificates
- Incident log
- Training records

6. Anti-Bribery and Anti-Corruption Policy

Purpose	Prohibits bribery and corruption in all of Moxie's dealings, including with schools, universities, suppliers and government authorities.
Applies to	All employees, representatives, agents and anyone acting on Moxie's behalf.
Policy owner	Owner
Legal framework	Federal Decree-Law No. 31 of 2021 (the UAE Crimes and Penalties Law), which prohibits bribery in both the public and private sectors.

Zero tolerance

- Never offer, promise, give, request or accept a bribe, kickback or improper payment, directly or through anyone else.
- Facilitation payments to speed up routine processes are not permitted.

Working with schools, universities and clients

School, university and client staff often decide which supplier provides graduation attire or uniforms, so these rules apply with particular care:

- Do not offer anyone involved in choosing a supplier personal gifts, cash, vouchers, commissions, trips, or free or discounted gowns or uniforms for themselves or their families.
- Any sponsorship, donation or discount to an institution is agreed in writing with the institution itself — never with an individual — approved by the Owner and recorded.
- Each institution's tender and procurement rules are followed exactly.

Gifts and hospitality

- Modest, occasional items — such as branded items or refreshments at a meeting — may be given or accepted when they are open and not intended to influence a decision.
- Any gift or hospitality worth more than **AED 250** must be approved by the Owner in advance and recorded in the gifts and hospitality register.
- Cash and cash equivalents, such as vouchers, are never given or accepted.

Suppliers and purchasing

- Fabric, trim and service suppliers are selected on quality, price and delivery. Employees must not accept personal benefits from suppliers.
- Every payment is supported by a purchase order, invoice and delivery record.

Government authorities

- Licence renewals, Civil Defence inspections, visa processing and other government matters are handled only through official channels, with official fees paid against receipts.

Reporting and consequences

- Report any suspected bribery, corruption or fraud to the Owner. Concerns are investigated confidentially and without retaliation.
- Breaches lead to disciplinary action, which may include dismissal, and may be reported to the authorities.

Records we keep

- Gifts and hospitality register
- Sponsorship and donation approvals
- Conflicts of interest register
- Purchase and payment records

7. Modern Slavery and Human Trafficking Policy

Purpose	Ensures that all work at Moxie and in its supply chain is freely chosen, fairly paid and free from forced labour, child labour and exploitation.
Applies to	All employees, recruitment agencies, suppliers, subcontractors and external processing vendors.
Policy owner	Owner, supported by HR / PRO
Legal framework	Federal Decree-Law No. 33 of 2021 Regarding the Regulation of Employment Relationships, Federal Decree-Law No. 24 of 2023 on Combating Human Trafficking, and Ministerial Resolution No. 44 of 2022 on Occupational Health and Safety and Labour Accommodation.

Our approach

Moxie carries out most of its production in its own facility, so that it is directly responsible for the people who make its garments. Specialist work outsourced to trusted partners is covered by the supply chain requirements below. This policy sets out the standards that commitment involves.

Zero tolerance

Forced labour, bonded labour, slavery, servitude, human trafficking, child labour and any form of coercion or exploitation are prohibited in Moxie's operations and supply chain.

Freely chosen employment

- Every employee holds a valid MOHRE work permit and a registered employment contract, explained in a language they understand before they start work.
- Women and men receive equal pay for the same work or work of equal value, as Article 4 of the labour law requires.
- Part-time and seasonal workers hold MOHRE part-time work permits, are paid through WPS, work only the hours agreed in their contracts unless they agree otherwise in writing, and receive the same protections as full-time staff.
- Employees are free to resign in line with their contract and UAE law, and are free to leave the premises at the end of their shift and during breaks.

Identity documents

- Employees keep their own passports and Emirates ID cards. Moxie does not hold them; withholding a worker's official documents is prohibited by Article 13 of the labour law.
- If an employee asks Moxie to store a document for safekeeping, this is done only with their written consent, and the document is returned immediately on request.

No recruitment fees

- No employee pays Moxie or any agent for recruitment, visa, medical, Emirates ID or other hiring costs, as Article 6 of the labour law requires.
- Recruitment agencies must confirm this in writing. If an employee is found to have paid such fees, Moxie reimburses them.

Wages and working hours

- Wages are paid in full and on time every month through the Wage Protection System (WPS). There are no unlawful deductions, deposits or bonds.
- Normal working hours do not exceed 8 hours a day or 48 hours a week, and are reduced by two hours a day during Ramadan. Every employee has at least one paid rest day each week.
- No one works more than 5 consecutive hours without breaks totalling at least one hour.
- Overtime is voluntary, recorded and limited to 2 hours a day, and total working time never exceeds 144 hours in any three weeks. Overtime is paid at the basic wage plus at least 25%, or plus at least 50% between 10 pm and 4 am for employees who are not on a scheduled shift pattern.

- When full capacity requires multiple shifts, every shift is scheduled within these limits. Overtime during the peak graduation and back-to-school seasons is planned and monitored.

Leave, insurance and end of service

- Employees receive paid annual leave of at least 30 days for each full year of service, together with sick, maternity and other leave as the labour law provides.
- Moxie provides and pays for health insurance for every employee, as Dubai law requires.
- End-of-service gratuity is calculated and paid as the law requires. Employees are reminded to keep their mandatory unemployment insurance (ILOE) subscription active.

Accommodation

- Where Moxie provides accommodation, it is licensed and meets Ministerial Resolution No. 44 of 2022. Otherwise, an accommodation allowance is paid or included in the wage, as Article 13 of the labour law allows.
- If Moxie employs 50 or more workers earning AED 1,500 a month or less, it provides accommodation for them and registers it in MOHRE's Labour Accommodation System.

Minimum age

- Moxie does not employ anyone under 18. Age is verified from the passport or Emirates ID at hiring, and a copy is kept in the personnel file.
- UAE law allows young people aged 15 to 17 to work under strict conditions; Moxie chooses not to employ them.

Grievances

- Employees can raise concerns about pay, hours, treatment or working conditions in person or in writing, in any language, without fear of retaliation.

Supply chain

- Fabric and trim suppliers, external dyeing and bleaching vendors, embroidery and other subcontractors, and couriers must sign Moxie's Supplier Code of Conduct, confirming no forced or child labour, no recruitment fees and lawful wages.
- External processing vendors are reviewed annually. Credible concerns are investigated, and the relationship is ended if they are not corrected.

Training

- Management and HR / PRO are briefed each year on the warning signs of forced labour and trafficking.

Records we keep

- Employment contracts and personnel files (including age verification)
- WPS salary transfer records
- Timesheets and overtime records
- Recruitment agency no-fee confirmations
- Signed Supplier Code of Conduct acknowledgements
- Grievance records

8. Data Protection Policy

Purpose	Protects the personal data of students, children, parents, graduates, client contacts and employees handled by Moxie, the Caps & Gowns webshops and the school uniform ordering system.
Applies to	All employees and service providers who handle personal data.
Policy owner	Owner (data protection lead), supported by the Customer Service & Webshop Lead
Legal framework	Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data, and the data protection terms of institution contracts.

Data we handle

- **Students and graduates:** first and last name, student ID, email address, institution, height, sizes and measurements, customisation details, delivery address and phone number.
- **Children ordering school uniforms (entered by parents):** child's name, school, class or year group, sizes, and name or initials for embroidery.
- **Parents and other purchasers:** name, contact details, delivery address and order history.
- **Client contacts:** name, role and business contact details at schools, universities, hotels and healthcare providers.
- **Employees:** personnel, visa, payroll and training records.

How we use it

- Personal data is used only to create online ordering accounts, take measurements, process orders, coordinate production and delivery, provide customer service, and meet legal and contractual obligations.
- Moxie collects only what is needed, never sells personal data, and does not send marketing to students without consent.

Card payments

- Card payments are processed by Amazon Payment Services (APS/PayFort), an authorised payment provider.
- Moxie does not store complete card numbers, CVV/CVC codes, PINs or OTPs in its webshop, Magento order records, email or customer-service records. Staff see only transaction status and reference information needed for orders, reconciliation and accounting.

Service providers

Moxie uses the following service providers. Each may access only the data needed for its service:

Service provider	Service	Personal data involved
Amazon Payment Services (APS/PayFort)	Card payment processing	Payment transaction data
Amazon Web Services (AWS), Frankfurt, Germany	Hosts the Caps & Gowns Magento webshop, the school uniform ordering system and their order databases	Student, child, parent and client order data
Simply.com (team.blue)	Business email	Order and customer-service correspondence
RSA Global	Home and institution delivery	Name, phone number and delivery address

Order data is hosted by Amazon Web Services in Frankfurt, Germany, where it is protected under EU data protection law (GDPR). Moxie transfers personal data outside the UAE only in line with the cross-border transfer rules of the UAE data protection law.

Access and security

- Webshop, uniform ordering system, payment portal and email accounts are personal to each user, with no shared passwords. Multi-factor authentication is used where available.
- Access is limited to what each role needs, reviewed every quarter and removed on the day an employee leaves.
- Paper order lists and measurement sheets are kept only on the production floor while needed and are shredded after dispatch.

Retention and deletion

- Student and child order data is kept for the current graduation season or school year plus 12 months, for exchanges, re-orders and queries, and is then deleted or anonymised — unless the school's contract requires otherwise.
- At the end of a contract, Moxie deletes the institution's student data on written request and confirms the deletion in writing.
- Accounting and tax records are kept for the periods required by UAE tax law. Employee files are kept for at least two years after employment ends, as Article 13 of the labour law requires.

Individual rights

- Students, parents and employees can ask to access, correct or delete their personal data by emailing customer-service@caps-gowns.com or contacting customer service by phone or WhatsApp on +971 4 344 9338. Requests are answered within 24 hours.

Data breaches

- Any suspected loss, unauthorised access or disclosure of personal data is reported to the Owner immediately.
- The Owner assesses and contains the incident. Affected institutions are notified without undue delay, and in any case within 72 hours of the breach being confirmed, and the UAE Data Office and affected individuals are notified as the law requires.

Training

- Employees with access to personal data receive data protection and payment security training at induction and every year.

Records we keep

- Access review log
- Data request log
- Deletion confirmations
- Data incident records
- Training records

9. Safeguarding and Child Protection Policy

Purpose	Protects the welfare of students, many of whom are under 18, whenever Moxie staff work with them — at schools and universities, during measurement visits and uniform fittings, online and during home deliveries.
Applies to	Division Managers, measurement and fitting teams, delivery staff, customer service and anyone who has contact with students.
Policy owner	Caps & Gowns and School Uniforms Division Managers, reporting to the Owner

Principles

- The welfare of students always comes first.
- At every institution, Moxie staff follow the institution's own safeguarding policy and the instructions of its Designated Safeguarding Lead (DSL). Where the institution's rules are stricter, they apply.

Safer recruitment

- Anyone who visits an institution or has direct contact with students holds a valid UAE police Good Conduct Certificate before their first visit, renewed at least every two years.
- References are checked, and staff are briefed on this policy before their first visit and before each graduation season.

At institutions and measurement visits

- Staff sign in, wear Moxie identification and go only where the institution allows.
- Measurements are taken over clothing, in an open area or a room with the door open, with institution staff present or nearby.
- Staff never stay alone with a student behind a closed door, and work in pairs wherever possible.
- Staff explain what they are doing and ask permission before measuring. Only the measurements needed for the garment are taken.

Photos and contact with students

- Staff do not take photos or videos of students on personal devices. Official photos are taken only with the institution's written permission.
- Staff do not contact students personally by phone, messaging apps or social media. Order communication uses official Caps & Gowns channels only.

Home deliveries

- Orders are delivered to the address on the order and handed to an adult wherever possible. Delivery staff do not enter customers' homes.

Reporting concerns

- Any concern about a student's welfare, or about the behaviour of anyone towards a student, is reported **the same day** to the institution's Designated Safeguarding Lead and to the Owner.
- Staff record the facts, do not investigate themselves and do not promise the student confidentiality.

Allegations against Moxie staff

- If a concern is raised about a Moxie employee, that person is removed from institution visits while the matter is investigated. Moxie cooperates fully with the institution and the authorities.

Records we keep

- Good Conduct Certificate register
- Safeguarding briefing sign-off
- Institution visit log
- Safeguarding concern records

10. Product Safety, Quality and Supplier Standards Policy

Purpose	Ensures that graduation attire and school uniforms — worn by children from kindergarten upwards — and all other Moxie garments are safe, well made and produced through a responsible supply chain.
Applies to	Production, purchasing, quality control, and all suppliers and subcontractors.
Policy owner	Production Supervisor, reporting to the Owner
Legal framework	UAE textile conformity requirements under Cabinet Resolution No. 54 of 2019, including limits on heavy metals in children's textiles. The European standard EN 14682 is followed as good practice for cords and drawstrings.

Safe materials

- Moxie buys finished fabric and trims. Before the first bulk order, each supplier provides an OEKO-TEX Standard 100 certificate or an independent laboratory report showing the material is free from harmful substances such as restricted azo dyes and excess formaldehyde. Certificates are kept on file and renewed before they expire.
- Garments and materials meet the UAE textile requirements of Cabinet Resolution No. 54 of 2019, including the limits for cadmium, copper, lead and nickel in children's textiles.
- Every fabric delivery is checked for colour against the approved sample or school colour standard, defects and width. Rejected rolls are labelled and kept apart from production.

Safety for young children

- Children's garments — including gowns, hoodies, jackets and trousers — follow the European standard EN 14682 (safety of children's clothing — cords and drawstrings) as good practice: no drawstrings or functional cords in the hood or neck area on sizes for children up to 7, no free cord ends there on sizes up to 14, and waist cords within the standard's length limits.
- Buttons, snaps, gown ties and cap tassels on kindergarten and primary sizes are checked for secure attachment.

Needle and sharps control

- Every broken needle is recorded in the broken-needle log, and all pieces are found. If a piece cannot be found, the garment is set aside and checked.
- Pins, hand needles and scissors are controlled, and no pins may remain in finished garments.

Quality control, traceability and complaints

- Every order receives a final inspection before dispatch: sizes against the order list, spelling of embroidered names, initials and crests, stitching, labels, and security of buttons, ties and tassels.
- Garments carry care and fibre-content labels, and each order can be traced to its fabric supplier and delivery, production date and quality check.
- Product complaints are logged. Any safety-related complaint is investigated within 48 hours, and if a safety defect is confirmed, the affected garments are withdrawn and the institution is informed.

Suppliers and subcontracting

- Moxie keeps an approved supplier list covering fabric and trim suppliers, external dyeing and bleaching vendors, embroidery providers and couriers.
- All approved suppliers sign Moxie's Supplier Code of Conduct covering labour rights, health and safety, environment and anti-bribery.
- No cutting, sewing or embroidery is subcontracted to another unit without the Owner's written approval, the unit's signed Supplier Code of Conduct and — where an institution's contract requires it — the institution's prior consent.

Records we keep

- Approved supplier list, signed Supplier Codes, certificates and test reports
- Incoming inspection, order quality control, broken-needle and complaints records

UAE legal requirements register

The main UAE laws and requirements that apply to Moxie's operations, and where each is covered. The register is reviewed every year and whenever the law changes. It is a management summary, not legal advice.

Law or requirement	What it requires of Moxie	Covered in
Federal Decree-Law No. 33 of 2021 Regarding the Regulation of Employment Relationships	Work permits; no recruitment fees (Art. 6); no withholding of documents and worker files kept 2 years (Art. 13); no forced labour or harassment (Art. 14); equal pay (Art. 4); hours, breaks, overtime and rest days (Arts. 17–21); annual leave (Art. 29)	Policies 1, 5 and 7
Federal Decree-Law No. 24 of 2023 on Combating Human Trafficking	Prohibits trafficking and the confiscation of workers' travel documents	Policy 7
Ministerial Resolution No. 44 of 2022 on Occupational Health and Safety and Labour Accommodation	Protective equipment; work injuries reported to MOHRE within 48 hours; injury monitoring; accommodation for 50+ workers earning AED 1,500 or less	Policies 5 and 7
MOHRE Wage Protection System	Salaries paid through WPS, in full and on time	Policy 7
MOHRE Emiratisation targets (Nafis)	Emirati hiring targets; manufacturing is a covered sector	How these policies work
Dubai health insurance law	Employer-paid health insurance for every employee	Policy 7
Unemployment insurance (ILOE) scheme	Employees must hold active unemployment insurance	Policy 7
Federal Decree-Law No. 25 of 2022 on the Regulation and Development of Industry	Industrial licensing and yearly Industrial Registry updates	How these policies work
Cabinet Resolution No. 54 of 2019 (textile conformity)	Safety and labelling of textile products, including heavy metal limits for children's textiles	Policy 10
Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data	Lawful and secure processing; breach notification to the UAE Data Office	Policy 8
Federal Decree-Law No. 31 of 2021 (Crimes and Penalties Law)	Prohibits bribery in the public and private sectors	Policy 6
Federal Law No. 24 of 1999 on the Protection and Development of the Environment; Dubai Municipality waste rules; Dubai single-use plastic restrictions	Lawful waste handling and disposal; restricted single-use plastics	Policy 4
Dubai Civil Defence requirements	Fire detection, firefighting equipment, exits and inspections	Policy 5
Federal Tax Authority (VAT and Corporate Tax)	Registration, accurate invoicing and record keeping	Policy 2

Approval and revision history

These documents are approved by the management of Moxie Garments Manufacturer L.L.C. Management provides the time, people and resources needed to apply them, and reviews them at least once a year.

Name	Ansar Yawar
Position	Owner
Signature	
Date	

Revision history

Version	Date	Description	Approved by
1.0	September 2026	First formal issue of Moxie's policy framework, documenting the company's workplace practices and adding the Safeguarding (9) and Product Safety, Quality and Supplier Standards (10) policies.	Ansar Yawar