



## LABOR LAW COMPLIANCE PROGRAM AND VENDOR CODE OF CONDUCT

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The Company is committed to conducting its business in accordance with the highest ethical standards and in compliance with the laws of the United States and other countries in which it does business. The Company will only do business with manufacturers whose practices conform to The Company's standards as set forth in this Code of conduct for Suppliers, the Fair Labor Standards Act ("FLSA") and similar state, local and foreign laws and will not do business with any manufacturer who knowingly violates the laws of the country in which it operates or permits its contract facilities to do so.

### **Wages, Hours and Overtime**

The Company requires its manufacturers and their subcontractors to pay wages and offer benefits and working conditions that comply with the wage and hour laws, rules and regulations, including overtime, of the country of manufacture.

- Workers must be paid at least the minimum legal wage or the local industry standard, whichever is greater. While it is understood that overtime is often required in garment production, factories are expected to carry out operations in ways that limit overtime to a level that ensures a humane working environment.
- Except in extraordinary business circumstances, workers shall 1) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime and 2) be entitled to at least one day off in every seven-day period.

### **Child Labor**

No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

- Factories must comply with all applicable child labor laws, including those relating to hiring, wages, hours worked, overtime and working conditions.
- Factories must maintain documentation for every worker that verifies the worker's date of birth.

### **Forced Labor**

There shall not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.



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### **Discrimination**

Workers must be employed on the basis of their ability to carry out the duties of a particular job without regard to race, color, gender, nationality, religion, age, disability, marital status or other personal characteristics or beliefs. No person shall be subjected to discrimination in any aspect of employment.

### **Environment**

Manufacturers and their subcontractors must comply with all applicable environmental laws and regulations.

- Factories must have procedures for notifying local community authorities in case of any environmental emergency.

### **Working Conditions**

Manufacturers and their subcontractors are expected to treat all workers with respect and dignity and provide them with a safe and healthy environment. Workers must not be subjected to corporal punishment or any other form of physical, psychological, sexual or verbal harassment.

- Factories must comply with all applicable laws and regulations relating to working conditions, including workers' health and safety.
- Lighting must be adequate in all areas.
- Factories must be well ventilated. There must be windows, fans, air conditioners or heaters in all work areas.
- Factories must have sufficient, clearly marked, accessible exits which allow for orderly evacuation of workers in case of any emergency.
- Factories must have adequate fire alarm systems. Fire extinguishers must be appropriate to the types of possible fires in the various areas of the factory; they must be regularly maintained and charged, the date of last inspection must be displayed and they must be mounted so they are visible and accessible in all areas.
- Factories should conduct evacuation drills annually.
- Machinery used in factories must be equipped with operational safety devices and must be inspected and serviced on a regular basis.



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- Factories must provide drinkable water for all workers and must allow reasonable access to it throughout the working day.
- Factories must have a minimum of one well-stocked first aid kit and one or more employees trained in basic first aid. A procedure must be in place for handling injuries that require further medical evaluation and/or hospitalization.
- Factories must maintain clean and sanitary toilet areas that are available to employees throughout their working hours. There must be no unreasonable restrictions on their use.
- If a factory has hazardous and combustible materials on its premises, they must be stored in secure, ventilated areas. All safety and legal requirements must be met when disposing of such materials.
- When manufacturers provide dormitory facilities for workers, they must ensure that those facilities meet all applicable laws and regulations related to the deductions from wages and to the health, safety and protection of employees, including fire, electrical, mechanical and structural safety and sanitation.

### **Freedom of Association**

Workers are free to choose whether or not to lawfully organize and join associations. Factories must not interfere with workers who wish to lawfully and peacefully associate, organize or bargain collectively.

### **Monitoring Program**

Manufacturers must have a program to monitor their subcontractors for compliance with the FLSA and/or the wage and hour and labor laws of the country of manufacture and with The Company's Code of Conduct for Suppliers.

- All manufacturers must submit to The Company a description of their compliance program which is used in the monitoring of their factories and their subcontractor factories for compliance with the FLSA or the applicable wage and hour and labor laws of the country of manufacture and The Company's Code of Conduct.
- Factories that manufacture goods for The Company must allow authorized representatives of The Company unrestricted access to their facilities and to all relevant records at all times, whether or not notified in advance.



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### **Enforcement of The Company's Labor Law Compliance Program and Code of Conduct**

The Company reserves the right to suspend, discontinue or terminate its relationship with any supplier which violates this Code of Conduct or any applicable law.

### **Corrective Action**

When violations are found, whether by voluntary disclosure, annual review or independent audit, The Company and the manufacturers, suppliers, contractors and sub-contractors will agree on a corrective action plan that eliminates the problem in a timely manner. If it is determined that a Manufacturers, suppliers, contractors and sub-contractors knowingly and /or repeatedly is in violation of this Code of Ethical Conduct, The Company shall take the appropriate corrective action, which may include cancellation of orders and/or termination of business with the manufacturers, suppliers, contractors and sub-contractors in question.

The Company

Manufacturer and or Supplier

Name: \_\_\_\_\_

Name: \_\_\_\_\_

Address:

Address:

Country:

Signature:

Signature:

Dated \_\_\_\_/\_\_\_\_/\_\_\_\_

Dated \_\_\_\_/\_\_\_\_/\_\_\_\_