

SOCIAL COMPLIANCE PROGRAM CODE OF CONDUCT

General Practice

Business associates shall comply with all applicable international, national, state, and local laws and regulations.

Employment Standards

CHILD LABOR

Business associates shall not use child labor. The term “child” refers to any person employed under the age of 15, under the age for completion of compulsory education, or under the minimum age for employment in the country of manufacture, whichever is higher. We support the development of legitimate workplace apprenticeship programs that comply with all laws and regulations applicable to such apprenticeship programs.

FORCED LABOR

Business associates shall not use forced or involuntary labor. Business associates shall not purchase materials that were produced by forced, bonded, indentured, or prison labor.

DISCRIMINATION

Business associates shall not discriminate in hiring and employment practices, which include but are not limited to compensation, advancement, discipline, termination, or retirement, on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion, or disability.

DISCIPLINE, HARASSMENT OR ABUSE

Business associates shall treat every employee with respect and dignity, and shall not use corporal punishment, threats of violence, or other forms of mental, physical, verbal, or sexual harassment, coercion, or abuse. In addition, business associates shall not use monetary fines as a disciplinary practice.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Business associates shall respect the rights of all employees to join organizations of their own choosing and to lawfully organize and bargain collectively without fear of penalty or interference. In all events, business associates shall develop procedures whereby their employees can express grievances without fear of retaliation.

WORKING HOURS AND OVERTIME

Business associates shall ensure that all work hours are in compliance with applicable national laws and regulations. In any event, employees shall not be required to work more than 48 hours per week with at least 24 consecutive hours of rest in every seven day period; overtime must be voluntary, and except in exceptional circumstances, not to exceed 12 hours per week on a regular basis.

WAGES AND BENEFITS

Business associates shall, at a minimum, comply with all applicable wage and hour laws, regulations and industry standards, including those relating to minimum wages, overtime wages, piece rates and other elements of compensation, and provide legally mandated benefits. Business associates are encouraged to provide wages and benefits that meet basic needs and provide some discretionary income for their employees.

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Health & Safety

Business associates shall provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations and designed to prevent accidents and injuries arising out of or occurring during the course of work. Business associates must provide the same standard of health and safety in any housing that they provide for employees.

Environment

Business associates shall comply with all applicable environmental laws, regulations and industry standards. Business associates are encouraged to adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

Subcontracting

Business associates shall not engage any sub-contractor to perform any work for our products or components without our written approval, and only after the sub-contractor has agreed to comply with this Code of Conduct. Any business associate utilizing an approved sub-contractor must ensure the sub-contractor's compliance with this Code of Conduct.

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Notification to Employees: Business associates shall notify employees of the terms of these standards and post the terms in the local language, in a prominent place accessible to all employees.

Management System: Business associates commit to develop implementation plans, training, third-party monitoring, and corrective action programs to effectuate the principles set forth in this Code of Conduct. Each business associate shall designate one or more of its management staff to be responsible for implementation and monitoring for compliance with the standards laid out in this Code of Conduct within production facilities, and the production facilities of its approved sub-contractors.

Inspections: We reserve the right to conduct or have our designee conduct unannounced inspections of business associates and their business practices, records, facilities, and, where provided by the business associate, housing accommodations, as well as private interviews with employees. Business associates shall keep all information necessary to document compliance with these standards readily accessible. Any business associate who refuses to allow such inspections or interviews, or refuses to take necessary corrective actions to promptly remediate any noncompliance, is subject to immediate termination of its status as an approved supplier, cancellation of current and future purchase orders, chargebacks for audit costs and other costs and penalties incurred, and other legal remedies.