

Roark requires all of its factories and suppliers to comply with Roark's Code of Ethics and Business Conduct. Consistent with these values, Roark seeks to do business with business partners, including manufacturers, licensees, agents and their subcontractors (hereinafter collectively calls "suppliers") that share these values, strive for continuous and sustainable improvement in working conditions and practices, and comply with this Supplier Code of Conduct (the "Code") and all applicable laws. Suppliers shall collaborate with Roark and their subcontractors to assess current practices, identify opportunities for improvement, and implement improvement plans.

Roark suppliers and their subcontractors must deal with their employees and their teams, in a legal, ethical and equitable manner. Roark seeks to do business with suppliers and subcontractors that comply with the laws of the United States, the countries in which Roark produces their components and materials are produced, distributed, bought and sold, and the code. Any violation of these laws or the code may be viewed as a breach of the Manufacturing Agreement and could lead to the termination of the business relationship between Roark and the supplier.

## **NONDISCRIMINATION**

Roark suppliers and their subcontractors shall not subject any person to discrimination in employment including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin. Additionally, suppliers and their subcontractors must implement effective measures to protect migrant employees against any form of discrimination and provide appropriate support services to them.

## **HARASSMENT OR ABUSE**

Roark suppliers and their subcontractors must treat their employees with respect and dignity. No employee shall be subject to physical, sexual, psychological or verbal harassment or abuse.

## **FORCED LABOR**

Roark suppliers and their subcontractors shall not use forced labor, whether in the form of prison labor, indentured labor or bonded labor, or other forms of forced labor to make or perform work on Roark products or their components or materials or permit their suppliers to do so.

## **CHILD LABOR**

Roark suppliers and their subcontractors shall not employ persons under the age of 17 or under the age for completing compulsory education, whichever is higher. All employees must have signed government employment contracts.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Roark suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining. Employers must use mechanisms to resolve industrial disputes, including employee grievances and ensure effective communication with employees.

## **HEALTH AND SAFETY**

Roark suppliers and their subcontractors must provide their employees with a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities. Employers must fully comply with all applicable workplace conditions, safety and environmental laws rules, regulations and standards. Employers must effectively implement health and safety policies and procedures within their operations, workplaces and related residential facilities and jointly share responsibility for, and ownership of, them with appropriately trained employees. Where residential housing is provided to their employees, suppliers and their subcontractors must apply these standards to them and ensure that such housing provides a safe, healthy and sanitary living environment.

## **SUSTAINABLE BUSINESS PRACTICES**

Employers shall implement responsible measures to mitigate negative workplace and operational impacts on the environment and their community. This includes: integrating sustainability principles into business decisions; improving environmental performance by responsibly using natural resources; reducing waste, increasing energy efficiency; adopting cleaner production and pollution prevention measures and sustainably designing, developing and building products, materials and technologies.

## **HOURS OF WORK**

Roark suppliers and their subcontractors shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular workweek shall not exceed 48 hours. Roark suppliers and their subcontractors shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Roark suppliers and their subcontractors shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

## **COMPENSATION**

Every worker has a right to compensation for a regular workweek that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers basic needs and provide some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does.

## **LEGAL AND ETHICAL BUSINESS PRACTICES**

Roark suppliers and their subcontractors must fully comply with all applicable local, state, federal, national and international laws, rules and regulations including those relating to child labor, wages, hours, labor, health and safety, slavery, human trafficking and immigration. Roark suppliers and their subcontractors must be ethical in their business practices.

## **GIFTS/CONFLICTS OF INTEREST**

Roark relationships with its business partners are built on trust, value, quality and service. Suppliers and subcontractors must abide by Roark's policies on gifts and conflicts of interest. Roark employees may not accept gifts, meals and entertainment from

suppliers or subcontractors. Ordinary business meals generally are acceptable, but suppliers and subcontractors should avoid offering Roark teammates travel and frequent meals. Gifts of cash or cash equivalents and commissions are not permitted. Any violation of these laws or the code may be viewed as a breach of the Manufacturing Agreement and could lead to the termination of the business relationship between Roark and the supplier.

## **RECORDKEEPING**

Roark strives for fairness and accuracy in all our records and reports. Roark expects its suppliers and subcontractors to maintain accurate financial books and business records in accordance with all applicable requirements.

## **ANTI-BRIBERY AND ANTI-CORRUPTION**

Roark is committed to conducting business free from corrupt practices. Suppliers and subcontractors must comply with applicable anti-corruption laws, including the United States Foreign Corrupt Practices Act and the UK Bribery Act of 2010. Suppliers and subcontractors may not offer anything of value, either directly themselves or through a third party, to government officials in order to obtain or retain business.

## **EXPORTS**

Suppliers and subcontractors must transfer Roark products across borders in a lawful manner and in compliance with the US. Export Administration Act and Export Administration Regulations.

## **NON-RETALIATION**

Roark suppliers and subcontractors must effectively implement a non-retaliation policy, procedures and reporting channels that enable workers to express anonymously and safely their concerns about workplace conditions directly to factory management and to other parties without fear of retribution, retaliation or any other adverse action.