



KUIU CODE OF CONDUCT

KUIU, LLC has chosen to be a company based on core values of maintaining and fostering the health of both people and the planet we all live on. Implicit in that decision was the determination that we would build our business with each of our partners based on these expectations of using environmentally conscious, sustainably sourced material and the ethical treatment and respect of all partners and employees involved in the production of the KUIU goods. KUIU strives to be a leader as a global Hunting, Outdoor and lifestyle brand. In every step, we are driven to do not only what is required, but also what is expected of a leadership company. We expect our business partners to do the same. Specifically, KUIU seeks partners that share our commitment to the promotion of the best practices and continuous improvement in management practices that recognize the dignity of the individual, health & safety, the environment, the right to a workplace free of harassment, abuse, discrimination or corporal punishment and the rights of free association.

KUIU operates around the globe, we are guided by this Code of Conduct. We bind our business partners to these principles. It is the responsibility of the management of our sourcing and manufacturing business partners translate it into the language of the worker, and inform workers on the rights and obligations as defined by this Code and applicable labor laws. KUIU holds its partners accountable for complying with all applicable laws in their respective country, in addition to this Code.

While these principles establish the spirit of our partnerships, we also bind these partners to specific standard of conduct. These standards are set forth below:

1. Forced Labor. The business partner does not use forced labor in any form - prison, indentured, bonded or otherwise.

2. Child Labor. The business partner does not employ any person below the age of 16 to produce KUIU products. Where local standards are higher, no person under the legal minimum age will be employed.

3. Compensation. The business partner provides each employee at least the minimum wage, or the prevailing industry wage, whichever is higher, provides each employee a clear, written accounting for every pay period; and does not deduct from worker pay for disciplinary infractions.

4. Non-discrimination. The business partner does not discriminate in hiring and employment practices and will make decisions about hiring, salary, benefits, advancement, termination and retirement solely on the basis of a person's ability to do the job. Women should not be barred from working or otherwise disadvantaged because of pregnancy or menstrual leave.

5. Benefits. The business partner provides each employee all legally mandated benefits. Benefits vary by country, but may include meals or meal subsidies; transportation or transportation subsidies; other cash allowances; health care; child care; emergency, pregnancy or sick leave; vacation, religious, bereavement or holiday leave; and contributions for social security and other insurance, including life, health and worker's compensation.

6. Hours of Work/Overtime. The business partner complies with legally mandated work hours, uses overtime only when each employee is fully compensated according to local law; informs each employee at the time of hiring if mandatory overtime is a condition of employment; and, on a regularly scheduled basis,

provides one day off in seven, and requires no more than 60 hours of work per week, or complies with local limits if they are lower.

7. Management of Environment, Safety and Health. The business partner has written health and safety guidelines, including those applying to employee residential facilities, where applicable; has a factory safety committee; complies with **KUIU** environmental, safety and health standard; limit organic vapor concentration at or below the Permissible Exposure Limits mandated by U.S. Occupational Safety and Health Administration (OSHA); provides Personal Protective Equipment (PPE) free of charge, and mandates its use; and complies with all applicable local environmental, safety and health regulations.

8. Freedom of Association. The business partner shares our commitment to the right of employees to establish and join organizations of their own choosing. **KUIU** recognizes and respects the right of all employees to organize and bargain collectively.

9. Documentation and Inspection. The business partner maintains on file all documentation needed to demonstrate compliance with this Code of Conduct; agree to make these documents available for **KUIU** or its designated auditor to inspect upon request; and agrees to submit to labor practices audits or inspections with or without prior notice.

10. Monitoring and fair treatment of home workers/the cottage industry. The business partner shares our commitment to the fair and equal treatment of any workers engaged in home based work. Guidelines are set up to ensure that the home worker is treated in a manner consistent with the purpose of this Code and applicable local laws. The business partner is also committed to working to verify that this provision is implemented.