

# BEARBOTTOM

## VENDOR CODES OF ETHICS A COLLECTIVE RESPONSIBILITY

Our Vendor Codes of Ethics (VCOE) apply to all our business partners including facilities that produce goods for us, vendors, contractors, agents and licensees. These codes manifest our obligation towards workers that produce our merchandise as well as the surrounding communities. Those who wish to pursue business with our company and their business partners, in our supply chain, shall adhere to the labor standards and working conditions, as reflected in these codes.

Bearbottom Clothing recognizes that there are different legal and cultural environments in which facilities operate throughout the world. These Codes set forth the minimum requirements that all facilities shall meet in order to establish, maintain or continue a business relationship with us.

These Codes are based on globally recognized labor standards including the International Labour Organization (ILO's) core conventions, the Universal Declaration of Human Rights, and the United Nations (UN) Guiding Principles for Business and Human Rights. The Codes provide the foundation for our ongoing evaluation of production facilities that produce goods for us, towards their employment practices, health, safety and environmental compliance.

### COMPLIANCE WITH LAWS:

We require our business associates to comply with and adhere to the letter and spirit of all laws, rules, regulations and legislations, as applicable to the region in which they operate, towards the conduct of their business. The employment relationship, shall, at the minimum, safe-guard the rights of workers under all applicable statutes. Where our codes of conduct and local law might differ we would expect the higher of the two standards to be adopted.

### UNRESTRICTED ACCESS:

Production facilities manufacturing or handling our goods shall allow Bearbottom Clothing staff, agents or monitoring companies engaged by us, unrestricted access to facilities, workers for interviews, and review of relevant records at all times, without prior notice.

### COMPENSATION, BENEFITS AND WORKING HOURS:

Our business associates shall not require workers to work more than 48 hours in a regular work-week or less, as may be permissible by applicable legislation of the geography they operate in. Overtime work, if required, shall be consensual and shall not exceed 12 hours per week or the applicable law whichever is more stringent. Total working hours in a week shall not exceed 60 except during unforeseen business circumstances. All overtime work shall be compensated at a premium rate as required by law and under no circumstances shall be less than the applicable legal wage. Employees shall be provided a consecutive 24-hours weekly day of rest, at the least, in a seven days period.

We encourage employers to take appropriate steps towards achieving a local living wage. One that allows employees to meet the cost of their basic living needs as well as provides for discretionary spending. Under no circumstances shall any worker be remunerated at a wage lower than the applicable minimum wage for his/her skill category.

All legally mandated benefits including but not limited to social security, medical insurance, superannuation, annual bonus, vacation/earned leaves as well as national/state/festival holidays, as applicable, shall be complied with.

### CHILD LABOR IS PROHIBITED:

Our business associates shall not employ workers below 15 years of age or the age for completing compulsory education or the local legal working age, whichever is higher. All legal requirements for the work of authorized minors, including but not limited to, those pertaining to hours of work, wages, work type and working conditions shall be complied with.

### FORCED LABOR IS PROHIBITED:

Our business associates shall not engage forced labor in any form, in recruitment, hiring, or employment, including but not limited to involuntary overtime, human trafficking, prison labor, indentured, servitude, or similar. Mental and physical coercion of any kind is prohibited.

### PREVENTION OF HARASSMENT AND ABUSE:

Our business associates shall treat every employee with respect and dignity. There shall be no room or tolerance for verbal, psychological, physical, or sexual harassment, abuse, threats, or intimidation at the workplace

### NO DISCRIMINATION:

Our business associates shall not discriminate in employment, with regard to recruitment, compensation, termination and retirement, advancement or promotions and discipline on the basis of race, color, gender, age, maturity, marital status, caste, creed, religion, political opinion and affiliation, social class or ethnic origin. Migrant, temporary and seasonal workers shall receive the same protection as employees and as applicable under the prevalent legislation.

### OCCUPATIONAL HEALTH, SAFETY & HYGIENE:

Our business associates shall be committed to provide healthy and safe working conditions and comply with all applicable legislation and regulations as well as continuously aim to improve health and safety performance. Workers compensation in the event of injury or mortality shall be provided as required and laid down by applicable legislation. Hygiene standards in ablution blocks, cafeteria and work places shall be appropriately maintained.

### RESPONSIBILITY TOWARDS ENVIRONMENT:

Our business associates are required to comply with all applicable environmental laws, rules and regulations, at their facilities and in the surrounding communities, particularly with respect to water, energy, hazardous chemicals, air quality, noise pollution and waste. They shall mitigate any negative impacts to the best of their abilities and shall frame policies and procedures for implementation, towards waste management in their facilities.

### FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING:

Our business associates shall recognize and respect the right of their employees to freedom of association and collective bargaining. Employees should be free to join organizations of their choice. Employees should not be subjected to intimidation or harassment in the exercise of their right to join or to refrain from joining any organization. In those situations in which the right to freedom of association and collective bargaining are restricted under law, facilitate parallel means of independent and free association and bargaining for all workers. Workers' representatives shall not be the subject of discrimination or harassment and shall have access to all workplaces necessary to carry out their representation functions.

### INDUSTRIAL RELATIONS:

Our business associates shall ensure that appropriate systems are in place towards workers grievance redressal at the work-place and well established channels of communication to foster a harmonious work environment, thereby leading to healthy Industrial Relations. It goes without saying that a happy worker is a productive worker.

### SUB-CONTRACTING:

Our business associates shall ensure that production of our merchandise is undertaken only in facilities approved by Bearbottom Clothing. They shall disclose and seek approval, prior to engaging any external sub-contractor, for any production related process they might not have in-house.

### ANTI BRIBERY:

Our business associates shall not permit, tolerate or engage in bribery, corruption, fraud or unethical practices to benefit by way of unfair advantages or financial gain.

**Robert Felder**  
**Founder & CEO**