



Vendor Code of Ethics & Conduct

The Code reflects Marine Layer's values and mission as a company. First and foremost, we aim to treat our employees, partners, and customers with respect at all times. We view ourselves as a close-knit team, and as such, we value teamwork and respect within the organization, and with our supply partners.

We believe in our brand, and acknowledge that our brand would be nothing without the strong support of our vendors. The following is the Vendor Code of Ethics & Conduct, comprising the aspects of the Marine Layer Code of Ethics and other conduct policies pertaining to vendors. The expectation is of 100% compliance with the Code below. It is expected to be followed by all Marine Layer employees and partners at all times.

It is also expected that all suppliers utilized by the vendor also comply with the standards of the code below. It is the vendor's responsibility to ensure that compliance.

WE PROHIBIT ANY CHILD LABOR AND FORCED LABOR

No worker should be employed at an age younger than 15, or under the age for completing compulsory education, or under the minimum age for employment in the country of manufacture, whichever is greater. We will not allow forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise.

WE PROHIBIT ANY FORM OF DISCRIMINATION

We have zero tolerance for any form of discrimination. No person should be subject to any 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. All employment decisions are to be made without regard to race, color, age, gender, gender identity, sexual orientation, religion, marital status, pregnancy, national origin/ancestry, citizenship, physical/mental disability, military status or any other basis prohibited by law.

WE PROHIBIT ANY FORM OF ABUSE, VIOLENCE, OR RETALIATION

We have zero tolerance for any workplace violence or retaliation. We will not tolerate any act or threat of physical violence (including intimidation, harassment and/or coercion), or threat of violence. This includes severe, offensive or intimidating conduct that creates a hostile, abusive, or intimidating work environment for anyone.

WE PROHIBIT ANY FORM OF HARASSMENT

We have zero tolerance for any form of harassment. Harassment may take many forms, but the most common forms include: verbal, physical, visual, and sexual.

Verbal harassment includes jokes, epithets, slurs, unwelcome remarks about an individual's body, dress, clothing, color, physical appearance or talents, derogatory comments or name calling, questions about a person's sexual practices, and patronizing terms or remarks that related to a protected characteristic.

Physical harassment includes physical interference with normal work, impeding or blocking normal movement, assault, unwelcome physical contact or touching, threatening, intimidating or hostile acts that relate to a protected characteristic.

Visual harassment includes leering, making sexual gestures, displaying offensive or obscene photographs, videos, calendars, posters, cards, cartoons, drawings and sexually suggestive lewd objects, unwelcome letters or notes, or any other graphic material that denigrates, ridicules or shows hostility or aversion toward an individual because of a protected characteristic.

Sexual harassment occurs when submission to or rejection of unwelcome sexual conduct by an individual is used as a basis for employment decisions affecting that individual. This form of harassment also occurs when submission to sexual conduct is made a condition for receiving concrete employment benefits, or when a reprisal is made or threatened after a negative response to sexual advances. Sexual harassment also occurs when unwelcome sexual conduct reasonably interferes with an individual's job performance or creates an intimidating, hostile or offensive working environment, even if it does not lead to tangible or economic job consequences.

WE RESPECT WORKERS' RIGHT TO BARGAIN COLLECTIVELY AND FREEDOM OF ASSOCIATION

We support the right of workers to bargain collectively. We support workers' freedom of association. There shall be no unlawful interference with the right of employees to choose, or not to choose, to affiliate with legally sanctioned organizations or associations.

WE PROHIBIT ANY ACTS OF CORRUPTION, BRIBERY, OR DISHONESTY

We do not tolerate corruption, theft, dishonesty, falsification, or misrepresentation of any kind. Marine Layer prohibits bribes in any form, including bribery like kickbacks or gifts, on any portion of contract payments or soft dollar practices. Marine Layer is committed to complying with all regulations governing anti-corruption, specifically, the United States Foreign Corrupt Practices Act (FCPA). As such, neither the supplier nor anyone acting on behalf of the supplier will violate the FCPA or any other applicable anti-bribery law for the benefit of Marine Layer or the supplier.

WE SUPPORT ALL MEASURES OF REGULATORY COMPLIANCE

We're building a responsible and sustainable business that takes care of our community and our planet. Marine Layer products must comply with many governmental and non-governmental regulations. Suppliers are expected to adhere to their local and national laws regarding the protection and preservation of the environment. Marine Layer is committed to conducting its business in compliance with all applicable environmental and workplace health and safety laws and regulations.

WE PROMOTE WORKPLACE HEALTH AND SAFETY

A healthy and safe work environment must be provided to prevent accidents and injury occurring in the course of work, or as a result of the operation of employer facilities. Suppliers who provide residential facilities for their employees must keep those facilities clean and safe, and consistent with all applicable laws and regulations regarding health and safety. We expect all our vendor partners to meet the highest accountability standards in the industry, and we actively support our smaller partners in their certification processes related to their impact or operational standards.

WE SUPPORT FAIR WAGES AND BENEFITS

Employees must be compensated fairly. At the very minimum, employees must be compensated at a rate stipulated by the local government or must match the average local industry wage, whichever is higher and

must be provided legally mandated benefits. In addition to their compensation for regular hours of work, employees must be compensated for overtime hours at such a premium rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.

WE SUPPORT REASONABLE WORKING HOURS

Except in extraordinary business circumstances, workers shall not be required to work (inclusive of overtime) more than the legally prescribed limits or 60 hours, whichever is less, and one day off in every seven day period shall be provided. Production facilities shall comply with applicable laws that entitle workers to vacation time, leave periods and holidays.

WE SUPPORT ENVIRONMENTAL STEWARDSHIP

Suppliers must adhere to their local and national laws regarding the protection and preservation of the environment. The vendor must seek to use environmentally preferable, non-toxic materials, and for its practices to seek minimal negative environmental impact in production.

Vendor is expected to cooperate with all requests from Marine Layer around data relating to environmental impact associated with ML products (resource use such as energy, water, or waste produced). The vendor must disclose any operations that are high risk environmentally, such as in relation to local biodiversity.

WE EXPECT RESPONSIBLE SOURCING

Marine Layer is committed to complying with federal laws and regulations requiring disclosure of the use of conflict minerals in our products. Thus, we expect suppliers to responsibly source and report in accordance with the vendor manual (e.g. restricted substances list).

GEOGRAPHIC OPERATION DISCLOSURE

The vendor must disclose any operation (of that of the vendor, or the vendor's suppliers) in global conflict zones or areas of high risk for human rights violations. This includes, but is not limited to, any sourcing and/or production in the Xinjiang region of China.