

CODE OF CONDUCT

6.1 VENDOR CODE OF CONDUCT

As a member of the global community, Marine Layer takes an interest in the standards of our Vendors throughout the world. It is Marine Layer's belief that higher quality work environments lead to higher quality products. Accordingly, we have outlined certain principles in our Vendor Code of Conduct to articulate our minimum expectations for the businesses in our supply chain.

6.1.1 CHILD 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.

6.1.2 FORCED LABOR

We will not allow forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.

6.1.3 HARASSMENT OR ABUSE

No worker should be subject to any physical, sexual, psychological, or verbal harassment or abuse.

6.1.4 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.

6.1.5 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.

6.1.6 NONDISCRIMINATION

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.

6.1.7 FREEDOM OF ASSOCIATION

There should be no unlawful interference with the right of employees to choose, or not to choose, to affiliate with legally sanctioned organizations or associations.

6.1.8 ENVIRONMENT

Suppliers should adhere to their local and national laws regarding the protection and preservation of the environment.

6.1.9 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.

6.1.10 ANTI-CORRUPTION

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.

6.1.11 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.