



CODE OF CONDUCT

Flylow Sports Inc. (“Flylow”) is committed to conducting its business in a socially responsible manner and expects its suppliers and business partners to meet the standards set forth in the Flylow Code of Conduct. The Flylow Code is based on the International Labor Organization (ILO) standards, the United Nations (UN) Universal Declaration of Human Rights, and internationally accepted workplace practices. Where the provisions of law and this Code address the same subject, Flylow suppliers and business partners are expected to apply that provision which affords the greater protection. The components of this Code constitute minimum standards and shall not be used to prevent Flylow suppliers and business partners from exceeding these standards.

All Flylow suppliers and business partners comply with the following requirements:

1. Legal Compliance

Conduct business operations in compliance with national and local laws, rules, regulations, and any other relevant statutory requirements applicable to business operations, including but not limited to transparency and accountability, labor and employment rights, health and safety practices, and the environment.

2. Transparency

Provide Flylow with transparent communication about business practices, including but not limited to employee records, payroll history, audit reports, and employee grievances.

3. Anti-corruption

Comply with applicable anti-corruption, anti-bribery, and antitrust laws that regulate competition and trade. Compete for business fairly, ethically and legally and follow generally accepted international practices to prevent bribery and corruption.

4. Forced Labor

Offer employment freely, and do not use involuntary labor, forced, indentured, bonded or otherwise. Do not permit forms of slavery or practices similar to slavery, such as the sale and trafficking of children or adults, debt bondage, withholding of personal documentation, employment fees, forced overtime, serfdom, or other forms of compulsory labor.

5. Child Labor

Do not employ children younger than the age for completing their compulsory education, and in any case, not below the age of 16 years. Comply with local regulations on the limitation of young workers working conditions, including hiring, hours of work, proof of age documentation, and overtime. Do not



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permit children under the age of 18 to perform hazardous work, i.e. work which is likely to harm their health, safety, or morals.

6. Non-discrimination

Treat all people with fairness, dignity and respect. Employment-related decisions, such as recruitment, hiring, compensation, training, promotion, termination, and retirement shall be based on the qualifications of an individual and not on the basis of any characteristic, including race, caste, national origin, color, religion, marital status, gender, pregnancy, sexual orientation, gender identity or expression, disability, age, political affiliation, or union membership.

7. Harassment and Abuse

Create an environment free of harassment and abuse. Physical, sexual, verbal, or psychological harassment, abuse, torment, discipline, or threat thereof, and other forms of intimidation such as unusual punishment shall be prohibited.

8. Freedom of Association and Collective Bargaining

Recognize the rights of employees to associate freely regarding collective bargaining. Do not discriminate, harass, intimidate, or retaliate against any person who is exercising their right to associate freely or bargain collectively, even when the right to freely associate is restricted by law.

9. Fair Wages and Benefits

Compensate all employees fairly by providing compensation packages comprising wages and benefits that at a minimum comply with legally mandated standards. Compensate employees for overtime at a premium rate which meet or exceed legal minimum and/or industry benchmark standards and/or collective agreements.

10. Regular Employment and Hours of Work

Ensure work is performed on the basis of recognized employment relationships established through national law and practice. Companies shall not avoid the legal obligations of regular employment through the use of labor-only contracting, sub-contracting, or home-working arrangements, or through the use of apprenticeship programs or excessive fixed-term contracts that do not lead to regular employment. Working hours will comply with all local regulations and laws and will not exceed, on a regularly scheduled basis, the legal limitations of regular and overtime hours.

11. Health and Safety

Provide a clean, safe and healthy work environment, reasonably designed to prevent accidents and health injuries that arise out of known hazards in the workplace, and where workers are encouraged to



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report any safety and health concerns. Facilities must meet all applicable, legally mandated standards for workplace health and safety in the country in which they operate. In the event of pandemic or other general health issue, facilities must follow all local and/or international guidance. Where residential facilities are provided to workers, the same health and safety standards apply. This includes but is not limited to:

- **Fire safety:** Maintain proper and adequate fire safety conditions in the workplace, including emergency evacuation plans and fire drills, fire safety inspections and worker training, fire-fighting equipment, and the maintenance of clear walkways and exits.
- **Heating, Ventilation, and Air Conditioning (HVAC):** Ensure all HVAC systems are fully functional. Follow international guidance and industry best-practice to ensure adequate ventilation, especially related to the use of toxic chemicals or during health emergencies.
- **Sanitation:** Provide access to adequate and clean sanitary facilities.

12. Environmental Standards

Seek to mitigate negative impacts on human health and the environment. Comply with all applicable environmental rules, regulations, and standards, and obtain and comply with all required permits, especially pertaining to:

- **Air emissions:** Comply with all legal requirements for air emissions and follow international air quality standards, especially for particulate matter and hazardous air pollutants.
- **Wastewater management:** Safely treat and dispose of wastewater in compliance with local laws and regulations.
- **Waste management:** Properly manage, transport, and dispose of all waste in accordance with local laws and regulations.
- **Chemical management:** Comply with all applicable laws and regulations for storing, handling and using chemicals. Obtain required permits for chemicals that are legally restricted.

13. Employee Training

Provide employees with written workplace policies and procedures in their local language(s) and post information in common spaces. Deliver and document relevant worker training programs and update programs on a regular basis. Employee education should include, but is not limited to, all workplace standards mentioned in these guidelines.



ANIMAL WELFARE POLICY

Flylow Sports Inc. (“Flylow”) prohibits the use of animal down, leather, wool, and other animal-derived materials from animals that have been treated inhumanely.

All Flylow suppliers and business partners comply with the following requirements:

Down: All down and down products supplied to Flylow are certified to the Responsible Down Standard; sourcing from ducks and/or geese that are live-plucked or force-fed is prohibited.

Wool: All wool and wool products supplied to Flylow are not sourced from sheep that have been mulesed. Suppliers are encouraged to source wool certified to the Responsible Wool Standard.

Leather: All products supplied to Flylow are free of exotic leather. Acceptable animals include cows, sheep, goats, pigs, deer, bison or kangaroo.

Animal Fur: All products supplied to Flylow are free of animal fur.

The Five Freedoms: All animal-derived material sources must comply with the Five Freedoms, the industry standard for animal welfare. The Five Freedoms include:

1. Freedom from hunger or thirst.
2. Freedom from discomfort.
3. Freedom from pain, injury or disease.
4. Freedom to express most normal behavior.
5. Freedom from fear and distress.



CHEMICALS MANAGEMENT AND RESTRICTED SUBSTANCES LIST (RSL) POLICY

Flylow Sports Inc. (“Flylow”) seeks to mitigate the harmful impacts of our products on human and environmental health. We ensure that our products do not include banned chemicals, restricted chemicals, or chemicals of concern. These standards pertain to both chemicals and chemical classes.

All Flylow suppliers and business partners comply with the following requirements:

Prohibited Substances:

- Per- and Polyfluoroalkyl Substances (PFAS): All products supplied to Flylow are free of long-chain PFAS. Suppliers are encouraged to source materials free of all PFAS.
- Chemicals of Concern: All products supplied to Flylow are free of chemicals with the following hazardous properties: Carcinogenicity, Mutagenicity, Reproductive toxicity, Persistence in the environment, and Bioaccumulation.
- Leather Processing: All leather products supplied to Flylow are free of Chromium VI. Suppliers are encouraged to source leather certified to the Leather Working Group Standards.

Restricted Substances List (RSL):

- Flylow adheres to the bluesign® RSL. Find the current bluesign® RSL and Usage Ranges [here](#).
- We require our suppliers to adhere to the bluesign® RSL or an equivalent broadly accepted RSL that we approve (such as AAFA and AFIRM). Suppliers are responsible for tracking annual updates to RSLs.



PREFERRED SUSTAINABILITY PRACTICES MATERIALS, PACKAGING, SOURCING

Flylow Sports Inc. (“Flylow”) recognizes that materials, packaging, and sourcing decisions contribute significantly to the environmental and human impact of our operation. Flylow commits to maximize the procurement of sustainably sourced product materials and packaging and also to include social and environmental performance of manufacturers in sourcing and manufacturing decisions.

Preferred sustainability practices for materials, packaging, and sourcing refers to those products and manufacturers whose manufacturing, use, and disposal practices result in relatively less environmental and social harm than comparable products or processes. Where functional alternatives to harmful products or impacts exist, they are to be strongly preferred.

Materials

Flylow commits to purchasing bluesign® and recycled materials for apparel and gear where they exist as functional alternatives. Flylow utilizes bluesign® for chemicals management testing. Refer to the Chemicals Management and Restricted Substances List for details on chemical management.

Packaging

Flylow commits to purchasing packaging materials that are FSC certified, recycled materials, or recyclable packaging where they exist as functional alternatives. We are working on alternatives to individual polybags.

Sourcing

Flylow commits to utilizing social and/or environmental performance data in sourcing decisions. Flylow reviews factory audits on a bi-annual basis and uses audit performance to guide future sourcing decisions. When issues arise, Flylow commits to working with factories to bring them into compliance to the best of our ability.