



FREE FLY SUPPLIER CODE OF CONDUCT

Free Fly is committed to responsible business conduct. Respect for human rights and environmental stewardship are fundamental principles of our business practices and standards. We expect our suppliers to share those principles and uphold our standards. Suppliers must conduct their business with a high level of integrity and maintain transparent and accurate records.

We require all vendors, suppliers, third-party sellers, manufacturers, contractors, subcontractors and their agents (collectively, "suppliers") to abide by the following standards. Potential or actual violations of this Supplier Code of Conduct and other ethical irregularities are to be reported directly to Free Fly by email: ethicshotline@freeflyapparel.com.

ETHICAL BUSINESS PRACTICES

NO BRIBERY: We seek business partners who adhere to the highest ethical standards in their business practices and their interaction with Free Fly. Free Fly does not allow any exchange of favors, money, gifts, entertainment or travel with our team members with intent to influence business decisions. As with the other standards outlined, Free Fly Team Members are held to the same standards and are strictly prohibited from engaging in solicitation of anything of value from business partners.

NO UNAUTHORIZED SUBCONTRACTING: We do not tolerate unauthorized subcontracting. All production locations must be disclosed to and approved by Free Fly before production begins.

SOCIAL AND LABOR

NO FORCED LABOR AND HUMAN TRAFFICKING: We condemn forced labor and human trafficking and will not knowingly work with suppliers who engage in these practices. All workers have the right to engage in work willingly, without surrendering identification and without the payment of fees. Workers have the right to freedom of movement and our suppliers must ensure it is afforded to them. Workers have the right to terminate their employment without penalty upon providing reasonable notice. Suppliers must also procure their raw materials and /or components for products solely from sources that do not utilize forced labor or engage in human trafficking.

NO UNDERAGE LABOR: We do not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. We define underage worker as any individual younger than the local minimum working age or the age of 15, whichever older, and/or those not abiding by the international standards as defined by the International Labor Organization (ILO) regarding age appropriate work governing family farming. Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age appropriate work.

HEALTH AND SAFETY: Suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. If suppliers provide residential facilities for their workers, they must be safe and sanitary.

NO DISCRIMINATION: We respect cultural and individual differences, and believe discrimination should not be tolerated. Suppliers are expected to maintain a discrimination-free workplace and to employ legally-eligible workers based upon on their abilities, rather than their race, color, sex, pregnancy status, gender identity, marital status, political opinions, religion, age, disability, sexual orientation, social origin, national origin or any other characteristics unrelated to an individual's ability to perform the work required by the job.

NO HARASSMENT: We believe that all workers should be treated with dignity, Suppliers must not engage in, condone, or tolerate physical, verbal, mental or sexual harassment against or among their workers.

WORKING HOURS AND OVERTIME: Suppliers must not allow working hours that exceed the applicable legal limit, or 60 hours per week, whichever is less. Regularly paid hours must not exceed 48 hours per week and overtime hours must not exceed 12 hours per week or the amount specified by local law, whichever is less. Only in exceptional cases, may working hours exceed 60 hours per week. Overtime work must always be voluntary and paid at a premium rate, Workers must have a least 1 full non-working day in every 7-day period.

WAGES: Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live.

FREEDOM OF ASSOCIATION: We see suppliers who productively engage workers and value them as critical assets to sustainable business success. This includes respecting the rights of workers to make an informed decision as to whether to associate or not with any group, consistent with all applicable laws.

LICENSES AND PERMITTING: Suppliers must acquire and maintain all legally required environmental permits and business operating licenses necessary for the production of their products and operations of their facilities. We will not tolerate suppliers operating without valid current permits.

ENVIRONMENTAL SUSTAINABILITY

ENVIRONMENTAL MANAGEMENT AND MONITORING SYSTEM: Suppliers must have environmental monitoring systems which accurately measure and track operational and production impacts to air, water and any other environmental system which may be deemed necessary.

WATER STEWARDSHIP: Suppliers must identify, characterize and inventory all wastewater streams on an ongoing basis. In addition, suppliers must install and maintain appropriately sized wastewater treatment systems to ensure pollutants are at or below legally required levels. We will not tolerate suppliers with undersized, bypassed, or inoperable wastewater treatment systems.

WASTE REDUCTION AND DISPOSAL: Suppliers must handle, store, transport, and dispose of hazardous waste legally. We will not tolerate suppliers that engage in illegal waste dumping. We seek suppliers who demonstrate they actively work to reduce waste throughout the production process.

ENERGY MANAGEMENT: With respect to both production facilities and processes, suppliers must identify all applicable energy sources and energy consumption. Suppliers must also periodically set clear goals to improve energy efficiency and document progress made toward achieving those goals.

EMISSIONS TO AIR: With respect to both production facilities and processes, suppliers must monitor and document all air emissions in accordance with the applicable regulatory requirements. In addition, suppliers must install and maintain appropriate air emissions control devices to ensure air emissions' pollutants are at or below legally required