



## Duluth Trading Company Standards of Business Conduct

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

**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.

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

**Harassment or Abuse.** No worker should be subject to any corporal punishment or physical, sexual, psychological or verbal harassment or abuse.

**Wages and Benefits.** Employees must be compensated fairly to meet a living wage; this includes insuring compensation is enough to meet basic needs, provides some discretionary income and is not subject to deductions, except as otherwise authorized by the employee and permitted by applicable law. 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.

**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.

**Nondiscrimination.** No person should be subject to any discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, based on gender, gender identity or expression, race, religion, age, disability, marital



status, pregnancy, sexual orientation, nationality, political opinion or social or ethnic origin.

**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.

**Environment.** Suppliers must adhere to local, national and international laws regarding the protection and preservation of the environment. Suppliers must take the necessary measures to avoid environmental degradation.

**Health and Safety.** A healthy and safe work environment must be provided to prevent accidents and injury occurring in the course of work, or because of the operation of employer facilities. Suppliers who provide residential facilities for their employees must provide acceptable living conditions, i.e., keep those facilities clean and safe, and consistent with all applicable laws and regulations regarding health and safety (including fire safety, sanitation, risk protection; and electrical, mechanical and structural safety).

**Anti-Corruption.** Duluth Trading Company 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 Duluth Trading Company or the supplier.

**Responsible Sourcing.** Duluth Trading Company 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 Supplier Agreement.

Our suppliers are required to provide full access to their facilities and to relevant records relating to employment practices. Duluth Trading Company, or its authorized agent, will conduct on-site inspections including unannounced visits, of facilities to monitor these standards and assure the quality of our products. Failure or refusal to comply with such requests may be considered a material breach of contract and can result in the termination of our agreement.

Duluth Trading Company will use discretion in evaluating compliance with these standards and may terminate business with any supplier found violating the intent or spirit of our agreement.