



A P P A R E L G R O U P
A L O L L Y T O G S C O M P A N Y

Code of Conduct

At LT Apparel Group, we are committed to:

- A standard of excellence in every aspect of our business and in every corner of the world;
- Ethical and responsible conduct in all of our operations; and
- Respect for the rights of all individuals.

We expect these same commitments to be shared by all manufacturers of LT Apparel Group' merchandise. In the selection of our suppliers, LT Apparel Group works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of LT Apparel Group.

This Code of Conduct applies to factories that produce goods for LT Apparel Group, or any of its subsidiaries, divisions or agents ("**LT Apparel Group' Suppliers**").

While LT Apparel Group recognizes that there are different legal and cultural environments in which factories operate throughout the world, this Code of Conduct sets forth the basic minimum requirements all factories must meet in order to do business with LT Apparel Group.

While providing opportunities of remediation, ultimately, LT Apparel Group will not do business with facilities that are unwilling or unable to meet the standards in this "**Code of Conduct**".

Laws and Regulations

LT Apparel Group' Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate, LT Apparel Group only produce merchandise in facilities that we consider reputable and whose business and labor practices conform to the requirements of applicable law and our Program Requirements. Where our Program sets a higher standard, it will prevail. LT Apparel Group will not do business with companies that violate the law, and will terminate factories that do.

Child Labor

LT Apparel Group' Suppliers must not employ workers younger than the greater of 15 years of age -- or 14 where the local law allows such exception consistent with International Labor Organization guidelines -- or the age for completing compulsory education or the minimum age established by law in the country of the manufacture.

Forced / Slave Labour or Human Trafficking

LT Apparel Group' Suppliers must not use involuntary or forced / slave labor, LT Apparel Group will not allow forced or involuntary labor whether in the form of prison labor, indentured labor, or bonded labor. Overtime hours must be voluntary. Migrant workers should be provided with contracts, treatment, and wages that equal those of local workers.



A P P A R E L G R O U P
A L O L L Y T O G S C O M P A N Y

Wage and Benefits

LT Apparel Group' Suppliers must compensate their workers fairly by paying workers at least the minimum wage required by local law and providing legally mandated benefits. In addition, LT Apparel Group' Suppliers must compensate employees for overtime hours at such premium rate as is legally required in the country of manufacture. In those countries where such laws do not exist, employees must be compensated for overtime at a rate at least equal to their regular hourly compensation rate.

Hours of Work

LT Apparel Group Suppliers must ensure that their workers are not required to work more than the limits on regular and overtime hours allowed by the laws and regulations in the jurisdiction in which they manufacture or except in extraordinary business circumstances, workers shall not be required to work more than 60 hours per week (including overtime). Except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every seven day period.

Health and Safety

LT Apparel Group' Suppliers must provide their workers with a clean, safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring during the course of work. LT Apparel Group' Suppliers are required to comply with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate. This includes dormitory facilities, if applicable.

Nondiscrimination

While LT Apparel Group recognizes and respects cultural differences, LT Apparel Group' Suppliers must ensure employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, or retirement on the basis of gender, race, ethnicity, social origin, religion, age, disability, sexual orientation, national origin, or political opinion is prohibited. Discrimination in employment strictly prohibited.

Women's Rights

LT Apparel Group' Suppliers will ensure women workers receive equal treatment in all aspects of the employment. Pregnancy tests will not be a condition of employment, and pregnancy testing – to the extent provided – will be voluntary and the option of the worker. In addition, workers will not be forced to use contraception.



A P P A R E L G R O U P
A L O L L Y T O G S C O M P A N Y

Freedom of Association

LT Apparel Group' Suppliers must recognize and respect the right of workers to exercise lawful rights of free association, including joining or not joining any association.

Harassment or Abuse

LT Apparel Group' Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, LT Apparel Group' Suppliers will not use monetary fines as a disciplinary practice.

Communication

LT Apparel Group' Suppliers must post the vendor code of conduct inside the factory and communicate this Code and the provisions thereof to Management Staff, workers, supervisors, and securities.

Subcontracting

LT Apparel Group' Suppliers must not use subcontractors in the manufacture of LT Apparel Group' products or components thereof without LT Apparel Group' written approval, and only after the subcontractor has agreed to comply with this Code of Conduct.

Monitoring and Compliance

LT Apparel Group will undertake affirmative measures, such as announced and unannounced on-site inspections of production facilities, to monitor compliance with this Code of Conduct. LT Apparel Group Suppliers must maintain on site all documentation necessary to demonstrate compliance with the Code of Conduct, and LT Apparel Group' Suppliers must allow LT Apparel Group' representatives full access to production facilities, worker records and workers for confidential interviews in connection with monitoring visits.

Environment

Adherence to all local laws protecting the environment is required. Factories must conduct business so as to minimize the impact on the environment, including reducing waste and maximizing recycling initiatives.

Factory Security

LTAG expects factories to implement security criteria and best practices to help secure our supply chain from terrorist activity. The criteria are based on a set of recommendations developed as a result of the **Customs-Trade Partnership against Terrorism** initiative with US importers.



A P P A R E L G R O U P
A L O L L Y T O G S C O M P A N Y

Transshipment

LT Apparel Group expects the suppliers to meet the US customs requirement to prove the country of origin. Under any circumstances no Transshipments allowed.

Conflict Minerals

LT Apparel Group is committed to sourcing responsibly and considers mining activities that fuel conflict as unacceptable. We are committed to ensure that MINERALS contained in our products are sourced with due respect for human rights, the need to avoid contributing to conflict, and the desire to support development through our supply chain practices. Pls refer to separate communication for details on this policy.

Brand Protection

LT Apparel Group is committed to the protection of owned and licensed brands. Please refer spate brand protection policy documentation. LTAG expects complete adherence to the policy.

Undue Influence Policy:

LT Apparel Group is committed to complying with the Undue Influence requirements of the Consumer Product Safety Improvement Act and the Final Rule on Testing and Certification of Children’s Products, issued by the Consumer Product Safety Commission. The Undue Influence requirements prohibit manufacturers from exercising undue influence on a third-party conformity assessment body (i.e., a CPSC-accredited, third-party testing laboratory). LT Apparel Group will not tolerate any efforts to unduly influence third-party conformity assessment bodies.

LT Apparel Group’ Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance. LT Apparel Group reserves the right to terminate its business relationship with any LT Apparel Group’ Supplier who is unwilling to comply with this Code.