

## Supplier Workplace Code of Conduct

At LT Apparel Group (LTAG), we are committed to:

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

We expect these same commitments to be shared by all manufacturers of LTAG's merchandise. In the selection of our suppliers, we work hard to choose reputable business partners who are committed to ethical standards and business practices consistent with that of LTAG.

This Code of Conduct applies to factories (**Suppliers**) that produce goods for LTAG, or any of its subsidiaries, divisions or agents.

While LTAG 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 us.

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

### 1. Compliance with Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations (including but not limited to - labor laws, worker health and safety regulations and environmental laws) of the countries in which they operate. Where local laws differ or conflict, factory must comply with the highest standard.

### 2. Child Labor

Suppliers must not employ workers younger than 15 years of age; or the age for completing compulsory education; or the minimum age established by law in the country of the manufacture, whichever is greater. Supplier must maintain verifiable and legal documentation to validate the worker age.

### 3. Forced Labor and Human Trafficking

Suppliers must not use involuntary, forced or trafficked labor or labor obtained in the form of prison labor, indentured labor, or bonded labor. Overtime hours must be voluntary.

### 4. Foreign or Migrant Workers

If foreign or migrant workers are engaged, they are to be employed in full compliance with the labor and immigration laws of the host country. Migrant workers should be provided with

contracts, treatment, and wages that equal those of local workers. Suppliers need to adopt and adhere to LTAG's migrant worker policy.

## **5. Hours of Work**

Suppliers must ensure that their workers are not required to work more than the limits specified by the laws and regulations of the countries in which they operate. All workers will be provided at least one day off in every seven-day period, except as required to meet exceptional and urgent business needs. Suppliers should also control that workers do not work more than 60 hours per week (including overtime), except to meet exceptional and urgent business needs.

## **6. Wage and Benefits**

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 legally mandated rate in the country of manufacture. In countries, where such laws do not exist, employees must be compensated for overtime at a rate at least equal to one and half times their regular hourly compensation rate.

## **7. Health and Safety**

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 work. 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, cafeteria, etc. if applicable.

## **8. Non-Discrimination**

Suppliers must ensure that employment, training, working conditions, job assignments, pay, benefits, promotions, disciplinary action, termination, or retirement is not based on personal characteristics or religious and cultural beliefs of the workers. Discrimination based on gender, race, ethnicity, social origin, religion, age, disability, sexual orientation, national origin, political opinion is not acceptable.

## **9. Women's Rights**

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.

## **10. Modern Slavery/Prohibition of Harassment or Abuse**

Suppliers must treat all workers with respect and dignity. No worker shall be subject to physical, sexual, psychological or verbal harassment or abuse or monetary fines. Suppliers need to ensure that the workers are not mistreated. Some indicators of Modern slavery are abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence,

intimidation and threats, retention of identify documents, withholding of wages, debt Bondage, abusive working and living conditions and excessive overtime.

#### **11. Freedom of Association**

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

#### **12. Subcontracting**

Any use of unauthorized subcontractors in the manufacture of LT Apparel Group products or components is prohibited and will be considered a zero-tolerance violation. LT Apparel Group's express and written prior approval is needed for sub-contracting. Suppliers need to adhere to LTAG's sub-contracting policy.

#### **13. Environment**

LT Apparel Group suppliers need to comply with all environmental laws and standards applicable to their business in the locations they operate. Suppliers must also conduct their business in a manner that helps minimize the impact on the environment – Conservation of energy and water; Waste management; Reduction of noise, air and water pollution; Setting up of water treatment plants; Hazardous waste disposal, etc.

#### **14. Security**

Suppliers are required to maintain adequate security procedures to prevent against introduction of non-manifested cargo (example – Drugs, Weapons, explosives, Biohazards, any other contraband) in export shipments. Suppliers are also required to co-operate and provide support to LTAG on meeting C-TPAT requirements.

#### **15. Transshipment**

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

#### **16. Conflict Minerals**

LTAG 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. Refer LTAG Product Integrity Manual for details.

#### **17. Source of Cotton Fiber**

Due to the use of forced and child labor in countries like Uzbekistan and Turkmenistan for growing and harvesting cotton, LTAG prohibits use of Uzbekistan and Turkmenistan sourced cotton in its products. We will periodically request suppliers to confirm that cotton fiber was not sourced from

Uzbekistan and Turkmenistan. We might also require information from the suppliers on the sources for fabrics, yarns and threads.

### **18. Brand Protection**

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

### **19. 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.

### **20. Communication**

LT Apparel Group's Suppliers must post the vendor code of conduct inside the factory in strategic locations so that every member of the supplier organization has access to it.

### **21. Monitoring and Compliance**

LT Apparel Group reserves the right to make announced and unannounced on-site inspections of production facilities where LTAG product is produced. Suppliers must allow LT Apparel Group's representatives full access to production facilities, worker records and workers during these visits. These visits may be conducted by LTAG employees or by Third party auditors.

**Suppliers are expected to take necessary corrective actions to promptly remediate any non-compliance. LT Apparel Group reserves the right to terminate its business relationship with any LT Apparel Group's Supplier who is unwilling to comply with this Code.**