

## Factory Workplace Code of Conduct

Eddie Bauer takes respect for human rights and compliance with laws very seriously. We select business partners that share our commitment to ethical practices and agree to operate under our standards of business conduct, including our Factory Workplace Code of Conduct (the “Code”).

Each factory that manufactures product for Eddie Bauer must understand and agree to operate its factory in compliance with our Code. This is required in order for you to continue doing business with Eddie Bauer. From time to time, we will conduct unannounced audits, using our a third party auditor, to ensure compliance with the Code. These audits will examine in detail various aspects of working conditions, safety conditions and maintained documentation to ensure compliance with the letter and spirit of the Code. Any factory not in compliance with the Code will be notified of the elements of noncompliance, and may be afforded a limited period of time in which to bring operations into compliance. Any factory not in compliance after such period (if granted) will be removed from our approved factory list until compliance is confirmed. Any purchase orders placed with a factory not in compliance with the Code may be cancelled without penalty to Eddie Bauer.

### **The Eddie Bauer Workplace Code of Conduct**

All employees must be treated fairly, in accordance with law, and with dignity and respect. Specifically, this means that factories manufacturing Eddie Bauer product shall comply with the following conditions:

**Forced Labor.** You shall not use forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. “Forced labor” is labor that is not paid lawful wages for its work, is not working voluntarily, or may not quit at will. In addition, you shall not use any materials for the manufacture of products for Eddie Bauer that you know were produced by factories using forced labor.

**Child Labor.** You shall not employ any worker who is:

- younger than 15 (or 14 where the law of the country of manufacture allows) or
- younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

**Harassment or Abuse.** You will treat every employee with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Any complaints of harassment or abuse shall be promptly investigated and appropriate action taken to discipline or remove any person engaged in harassment or abuse. No employee shall be retaliated against for complaining about harassment or abuse.

**Nondiscrimination.** No person shall be subject to discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin. Any complaints of discrimination shall be promptly investigated and appropriate action taken to discipline or remove any person engaged in discrimination. No employee shall be retaliated against for complaining about discrimination.

**Health and Safety.** You will provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities. Equipment shall have all safety guards in place, and employees shall be instructed on the safe operation of the equipment. Factories shall comply with the environmental laws and regulations of the local region or country in which they operate, including laws related to protective gear for employees, discharge of wastewater and air emissions.

**Freedom of Association and Collective Bargaining.** Employees shall have the right to freedom of association and collective bargaining.

**Wages and Benefits.** Employers recognize that wages are essential to meeting employees’ basic needs. Employers shall pay employees, as a floor, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits. Employees shall be paid for all hours worked. Employees shall not be brought on as temporary workers or terminated for periods of time for the purpose of avoiding the payment of mandatory benefits.

**Hours of Work.** Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime and (ii) be entitled to at least one day off in every seven day period.

**Overtime Compensation.** In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at such 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.

### **No Subcontracting**

To ensure that our manufacturers do not transfer responsibility for compliance with the Code to other parties, Eddie Bauer does not allow its manufacturers to use subcontractors, or factories owned by the manufacturer but not previously approved by Eddie Bauer, to perform work on Eddie Bauer product unless: (1) the identity and location of the subcontractor has been disclosed in advance to Eddie Bauer; (2) Eddie Bauer or the manufacturer has had an independent third party perform an audit of the subcontractor to verify compliance with the standards articulated in this Code to Eddie Bauer’s satisfaction; and (3) Eddie Bauer approves the subcontracting of work to the subcontractor. **PLEASE NOTE THAT EACH PRODUCTION UNIT OR FACTORY OF A MANUFACTURER MUST BE APPROVED BY EDDIE BAUER – APPROVAL OF ONE FACTORY DOES NOT MEAN THAT ALL OTHER FACTORIES OWNED BY THE MANUFACTURER ARE APPROVED.**

FACTORY WORKPLACE CODE OF CONDUCT CERTIFICATION

As a representative of the factory indicated below, I certify that:

1. The Eddie Bauer Factory Labor Workplace Code of Conduct standards are being met
2. The factory listed below is in compliance with all applicable laws of the country of manufacture,
3. Factory employees have been informed about the Workplace Code of Conduct standards through oral and written means. The factory has been supplied with a poster in the primary language of the factory for posting; and,
4. The factory acknowledges that Eddie Bauer may perform periodic audits for compliance to the standards, including unannounced audits by external monitors, and understand that compliance is a condition of doing business with Eddie Bauer.

Vendor Name: \_\_\_\_\_ Factory Name: \_\_\_\_\_

Factory Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Mailing/ Zip Code: \_\_\_\_\_

Province: \_\_\_\_\_ Country: \_\_\_\_\_

Signature \_\_\_\_\_ Date \_\_\_\_\_

Name \_\_\_\_\_ Title \_\_\_\_\_

Fax your completed form to your Eddie Bauer contact or to Jeannine Greener at 425-755-7626 or e-mail it in a pdf file to [jeannine.greener@eddiebauer.com](mailto:jeannine.greener@eddiebauer.com). If you have any questions, contact [legaldept@eddiebauer.com](mailto:legaldept@eddiebauer.com)