

KATHMANDU GROUP - WORKPLACE CODE OF CONDUCT

This code defines labour standards that aim to achieve decent and humane working conditions. The Code's standards are based on International Labour Organization standards and internationally accepted good labour practices. As an organization that promotes continuous improvement, the Kathmandu Group strives to establish best practices for respectful and ethical treatment of workers, and in promoting sustainable conditions through which workers earn fair wages in safe and healthy workplaces. The Code applies to the entire family of brands owned by the companies in the Kathmandu Group. The "Kathmandu Group" includes Kathmandu Holdings Limited, Kathmandu Pty Limited, Kathmandu Limited, Kathmandu (U.K.) Limited, Milford Group Holdings Limited, Kathmandu US Holdings LLC, Oboz Footwear LLC and any of their Subsidiaries or Related Companies (as those terms are defined in the Companies Act 1993 (New Zealand)).

TRANSPARENCY

In order to do business with any member of the Kathmandu Group, Suppliers must commit to full transparency in their Supply Chain. The Supplier must seek the approval of the relevant member of the Kathmandu Group for all primary and/or subcontracted facilities prior to production. In addition, the Kathmandu Group may seek to extend transparency further down the Supply Chain.

COMPLIANCE WITH THE LAW

In order to do business with any member of the Kathmandu Group, a Supplier is expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Workplace Code in their applicable facilities. When differences or conflicts in standards arise, Suppliers are expected to apply the highest standard.

EMPLOYMENT RELATIONSHIP

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations.

NONDISCRIMINATION

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

HARASSMENT OR ABUSE

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

RESPONSIBLE RECRUITMENT

No worker shall pay for their job; all workers shall retain control of their travel documents and have full freedom of movement; and all workers shall be informed of the basic terms of their employment before leaving their home country or region.

MODERN SLAVERY

There shall be no slavery of any kind in the Supplier's supply chain. This includes the use of forced labor, human trafficking, prison labor, indentured labor, bonded labor or other forms of labor facilitated by any form of coercion or deception. Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

CHILD LABOR

No person shall be employed under the age of 16 or under the age for completion of compulsory education, whichever is higher.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

HEALTH, SAFETY, AND WORKPLACE ENVIRONMENT

Employers shall provide a safe and healthy workplace setting 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 employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace environment has on the workers.

HOURS OF WORK

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be voluntary and consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

COMPENSATION

Every worker has a right to compensation for a regular work week that is sufficient to meet the workers' basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with the Kathmandu Group to take appropriate actions that seek to progressively realize a level of compensation that does.

ENVIRONMENT

Business partners of all members of the Kathmandu Group are required to comply with all applicable environmental laws, rules and regulations at their facilities and in the communities in which they operate, particularly with respect to water, energy, hazardous chemicals, air quality and waste. Further, the Kathmandu Group expects its business partners to incorporate environmentally responsible practices into all of their activities that relate to their business with the Kathmandu Group.

CONTACT: If any worker or business partner believes this Codes has or may have been violated, please contact the Kathmandu Group at:

Email: workers.rights@kathmandu.co.nz