

## Code of Conduct

We at Brooks Sports, Inc. enjoy the outdoors and love our local communities. We are a passionate team dedicated to inspiring people all over the world to run and be active. Running is an activity that challenges, rejuvenates, strengthens, calms, and unites us.

We know that running and being active requires freedom of movement and a healthy, natural environment, so the well-being of people and the planet and our role in nurturing both is at the heart of our Running Responsibly commitment. Values of integrity, respect, transparency and authenticity are applied to our business relationships around the world. As such, ensuring and the people who make our products have fair and safe workplaces and that manufacturing process are environmentally responsible are part of our commitment to Running Responsibly.

We have established a Code of Conduct so that our expectations of workplace standards are clear to our Suppliers. We only engage with Suppliers who demonstrate a commitment to contribute to the improvement of working conditions and strive to meet our requirements stated in our Supplier Guidelines.

### Respect for People

Compliance with Laws and Workplace Regulations: Suppliers must adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor laws. Suppliers shall abide by any policies from Brooks, whether in this document, the Supplier Guidelines, or on a case by case basis.

Health and Safety: Suppliers will provide 1) a safe and healthy working environment, 2) written safety and health policies and procedures, 3) training and adequate equipment to ensure workplace safety practices. Where residential housing is provided for workers, suppliers will provide safe and healthy housing.

Child Labor: No person shall be employed at an age younger than 16 or younger than the age for completing compulsory education in the country of manufacture, whichever is higher. Factory shall afford juvenile workers (under 18) all rights of protected workers, including but not limited to: working hour limitations and restrictions from performing hazardous tasks.

Forced Labor: There shall be no use of forced labor, prison labor, indentured labor, slave labor, or bonded labor in any part of Brooks production. Suppliers will adopt measures to ensure that no part of their organization is complicit in human trafficking.

Harassment or Abuse: Every employee shall be treated with respect and dignity. Suppliers will have procedures in place to ensure that no worker is subject to any physical, sexual, psychological, or verbal harassment or abuse.

Non-Discrimination: Employees will be hired, paid, promoted and terminated on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. No person shall be subject to discrimination in employment, including hiring, compensation, benefits, working conditions, access to training, job assignments, advancements, discipline, termination or retirement on the basis of gender, age, religion, race, marital status, disability, pregnancy, membership in worker organizations including unions, political affiliation, nationality, sexual orientation, or social or ethnic origin.

Working Hours: Suppliers shall not require employees to work more than the regular and overtime hours allowed by the law of the country of manufacture where the workers are employed. The regular work week shall not exceed 48 hours and employees must have at least one day of rest in every seven day period. All overtime work shall be consensual. Except in extraordinary circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Wages and Benefits: Every worker has a right to compensation for a regular work week that is sufficient to meet the employee's basic needs and provide some discretionary income. Suppliers will 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. 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. Where compensation does not meet workers' basic needs and provide some discretionary income, Suppliers will work with a local or national labor association to take appropriate actions that seek to progressively realize a level of compensation that does. Suppliers may not use deductions from wages or other monetary fines as a disciplinary practice.

Freedom of Association and Collective Bargaining: Workers shall have the right to meet, form labor groups and collectively bargain with factory management. Supplier shall not oppress or infringe upon this right. Where the right to freedom of association is restricted under law, employees are free to join organizations of their own choice without penalty or reprisal. Labor group information and access to labor representatives shall be available to Brooks or a third party auditor upon request

## **Respect for Planet**

Compliance with Environmental Laws and Regulations: Suppliers will maintain compliance with all local and applicable international environmental laws. Suppliers will maintain accurate measurements of their relevant environmental impacts, and take actions to continually make improvements in those areas.

## **General Matters**

Subcontractors: Suppliers shall only use subcontractors with prior Brooks approval and only after the subcontractor has agreed to comply with Brooks Code of Conduct. Supplier shall be responsible for all subcontractors and shall maintain and provide all proper documentation to Brooks or a third party auditor upon request.

Customs Compliance: Suppliers will comply with all applicable customs laws and establish and maintain programs to safeguard against the illegal transshipment of products.

Security: Suppliers will maintain security procedures to guard against the introduction of non-manifested cargo into shipments of the Corporation's products, including, but not limited to, compliance with Customs-Trade Partnership Against Terrorism (C-TPAT) requirements for shipments to the United States.

Posting Requirements: Suppliers will post this Code of Conduct in a visible location accessible to all

employees and visitors (in the appropriate local language and the appropriate language for migrant workers that make up more than 10% of the workforce). Suppliers will communicate and train all workers annually concerning the elements of this Code of Conduct.

Record Keeping: Suppliers will maintain complete and accurate records with respect to each of the elements of this Code of Conduct to allow for verification of compliance.

Enforcement: The Corporation employs internal and independent auditors to conduct on-site inspections to ensure compliance with this Code of Conduct. Detailed compliance records are maintained on all facilities.

Violations: If Suppliers are violating any of these codes, we would like to know about it. Please bring these issues to our attention by emailing Brooks at [RunningResponsibly@brooksrunning.com](mailto:RunningResponsibly@brooksrunning.com). Please feel free to write in your local language. All information we receive will be kept in strict confidence and your identity will be protected. Brooks will not allow retaliation against you for such reporting.

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