

## Brooks Sports Inc. Supplier Code of Conduct

The Brooks Sports Inc. Supplier Code of Conduct defines our expectations of supply chain partners. As a member of the Brooks supply chain, suppliers must adhere to these expectations as a prerequisite to doing business with Brooks. We understand that in certain situations, the Brooks Code goes above and beyond local law, and it is only meant to supersede local law if its standards are more stringent.

These standards apply to all Brooks contract manufacturers and licensee manufacturers, as well as their materials and trim suppliers, and their subcontractors. All supply chain partners subject to these standards must agree to comply with all assessments and requests for information from Brooks or third-party acting on our behalf. If we identify non-compliance, Brooks expects suppliers to find the root cause of the issue, take corrective actions to address the issue, and build management systems to ensure ongoing compliance and continuous improvement.

All suppliers must be fully transparent with Brooks and any third-parties working on our behalf. We seek to partner with suppliers who go above and beyond these basic standards towards being responsible leaders in our global supply chain.

## Social Responsibility

**Compliance with Laws and Workplace Regulations:** Suppliers shall adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under local, state, provincial, national, and international labor laws. If there is a conflict between any law and the Code, the highest standard (most in favor of employees) governs.

**Health and Safety:** Suppliers will provide a safe, healthy, and hygienic working environment, with systems, policies, and training programs in place to prevent workplace accidents, injuries, and protect the health and well-being of workers. Where residential housing is provided for workers, suppliers will provide safe and hygienic housing.

**Child Labor:** No person shall work in the Brooks supply chain if they are under the age of 16, or under the age for completing compulsory education in the country of manufacture, whichever is higher. Juvenile workers (ages 16-17) shall have all the rights of protected workers, including but not limited to: limited working hours and restrictions from performing hazardous tasks. Suppliers must maintain official documentation to verify each worker's date of birth.

**Forced Labor:** There shall be no use of forced labor, prison labor, indentured labor, slave labor, or bonded labor. Suppliers are required to monitor their internal practices and any labor recruitment agencies to ensure employees are not compelled to work through force, deception, intimidation, or punishment. Suppliers are responsible for any employment eligibility fees for migrant workers, including recruitment fees. All work must be voluntary and workers must be free to terminate their employment at any time, without penalty. Suppliers shall adopt policies and procedures to ensure there is no human trafficking in the Brooks supply chain.

**Harassment, Abuse and Discipline:** Employees shall be treated with respect and dignity. Employees shall not be subject to physical, sexual, psychological or verbal harassment or abuse. Disciplinary policies and procedures shall be clearly defined and communicated to all workers in a language they understand. Suppliers may not use deductions from wages or other monetary fines as a disciplinary practice (unless authorized by law are permitted and deductions shall only occur with the fully informed written consent of workers).

**Non-Discrimination:** Employees shall 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 such as age, gender, religion, race, marital status, disability, pregnancy, membership in worker organizations including unions, political affiliation, nationality, sexual orientation, social or ethnic origin, migrant status, or any other status protected by country law.

**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. The regular work week shall not exceed 48 hours and employees must have at least 24 consecutive hours of rest in every seven day period. All overtime work shall be consensual. The sum of regular and overtime hours in a week shall not exceed 60 hours and overtime shall not exceed 3 hours per day. All work shall be recorded accurately and completed on premises during regular business hours.

**Wages and Benefits:** Suppliers shall pay employees for all work performed, and shall pay wages which equal or exceed the minimum wage, or when there is no minimum wage the prevailing industry wage. Suppliers shall 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. Wage payments shall be made at regular intervals and directly to workers, in accordance with country law, and shall not be delayed, deferred, or withheld. Clear and transparent information in writing shall be provided to workers for hours worked, rates of pay, and the calculation of legal deductions in a language they understand for every pay cycle.

**Freedom of Association and Collective Bargaining:** Suppliers shall not oppress or infringe upon the employee's right to meet, form labor groups and collectively bargain. 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. All suppliers must develop and fully implement effective grievance mechanisms which resolve internal industrial disputes, employee complaints, and ensure effective, respectful and transparent communication between employees, their representatives and management.

## Environmental Responsibility

**Regulatory Compliance:** Suppliers must be in compliance of all applicable environmental regulations at all times, and have access to all necessary permits and test reports on-site. All suppliers are responsible for ensuring the environmental regulatory compliance of all sub-contractors.

**Environmental Management:** Suppliers will undertake necessary actions to ensure the responsible management of environmental impacts at their facilities, ensuring the safety of workers, local communities and the surrounding environment.

**Restricted Substances Compliance:** All materials must comply with the Brooks Restricted Substances List at all times and suppliers must be able to demonstrate compliance upon request from Brooks.

**Responsible Sourcing of Materials:** Suppliers must respect animal welfare and adopt responsible and ethical practices based on best available standards.

## General Matters

**Code Implementation:** As a condition of doing business with Brooks, suppliers shall fully implement this Code of Conduct, upholding these standards and accompanying Corporate Responsibility Standards at all internal facilities and subcontractors. 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. These standards shall be enforced through the use of internal and or independent third party assessments.

**Subcontractors:** Suppliers shall only use subcontractors with prior Brooks approval and only after the subcontractor has agreed to comply with this Code of Conduct. Suppliers are required to continuously monitor approved subcontractors for social and environmental responsibility and take all the necessary steps to ensure its subcontractors adhere to this Code of Conduct.

**Traceability:** All suppliers are required to map and continuously track all locations in all levels of their supply chain and upon request provide transparent information into the owned and/or outsourced farms, mills, smelters, and other facilities that are involved in the production of our products. This may include chemical, trim, and raw material suppliers. This information shall be available to Brooks upon request.

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

**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 [running.responsibly@brooksrunning.com](mailto:running.responsibly@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.

More information about Brooks' Corporate Responsibility program can be found at:  
[www.brooksrunning.com/runningresponsibly](http://www.brooksrunning.com/runningresponsibly)