

BROOKS RUNNING SUPPLIER CODE OF CONDUCT

The Brooks Supplier Code of Conduct (Code) is the foundation of the Brooks Responsible Sourcing program. Together with local law and international labor standards, it sets the standards for all suppliers and production facilities in the Brooks manufacturing supply chain. The Code is focused on protecting workers' rights, creating a safe workplace, and protecting the environment.

As part of the purchase agreement, the Code must be signed by all suppliers manufacturing Brooks product and materials to ensure a common vision, accountability, and transparency. Production approval is only granted after Brooks determines that a facility is in compliance with these standards.

The Code is organized around the following principles:

- Transparent partnerships and collaboration
- Compliance to local and national laws and regulations
- A safe and healthy working environment
- Fair compensation
- Sustainable manufacturing

Transparent Partnership and Collaboration

Code Implementation: The Code outlines the minimum standards each supplier and production facility is expected to meet in order to manufacture Brooks product and materials. If a non-compliance is identified, 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. Additionally, we seek to partner with suppliers who go above and beyond these standards and act as responsible leaders in the global supply chain. Suppliers must post this Code in a visible location accessible to all workers 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 on the elements of this Code. These standards will be enforced during 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. Suppliers are required to continuously monitor approved subcontractors for social and environmental responsibility and take all necessary steps to ensure subcontractors adhere to this Code.

Traceability: All suppliers are required to map and continuously track all facilities 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 includes, but is not limited to, chemical, trim, and raw material suppliers. This information shall be available to Brooks upon request.

Transparency: We believe that trust and transparency are the foundation for true collaboration and partnership, thus Brooks will only work with suppliers who are open and honest with us. Facilities shall maintain complete and accurate records, so that compliance to our standards can be

effectively assessed. Facilities must not falsify or misstate any aspects of their operations to Brooks or our third-party representatives (e.g., auditors, verifiers).

Compliance to Local and National Laws and Regulations

Compliance to 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 Brooks Code, the highest standard (most in favor of workers) governs.

Trade Compliance: Suppliers are to comply fully with all applicable trade laws, regulations and policies of all countries where Brooks does business. This includes always declaring accurately the value, country of origin and customs classification of Brooks products and materials on import and export shipping documentation. Suppliers must maintain accurate and transparent records related to import and export transactions for at least five years or as according to local Customs laws.

Supply Chain Security: Tier one suppliers shall meet US Customs' minimum security criteria laid out in Brooks' CTPAT Program Supplier Guidelines and are to be subject to regular Brooks and/or third-party assessments to verify supply chain security compliance. Suppliers and their employees shall report security incidents and/or suspicious activities related to supply chain security, such as drug trafficking, terrorism, human smuggling, theft and illegal contraband, to Brooks Trade Compliance team at customs@brooksrunning.com.

Anti-Corruption and Anti-Bribery: Suppliers must comply with all applicable local and international anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. Additionally, all suppliers must ensure that all workers are aware of such laws and regulations and ensure records are accurate, and no unlawful payments are made or accepted.

A Safe and Healthy Working Environment

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 of 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 workers are not compelled to work through force, deception, intimidation, or punishment. Suppliers must ensure no workers pay for their job, workers retain control of their travel documents and have full freedom of movement and all workers are informed of the basic terms of their employment before leaving home. 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: Workers shall be treated with respect and dignity. Workers 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 and with the fully informed written consent of workers).

Non-Discrimination: No worker should be subject to discrimination in any part of employment including in hiring, compensation, promotions and terminations on the basis of age, gender identity, religion, race, marital status, physical or mental 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.

Fair Compensation

Working Hours: Suppliers shall not require workers 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. All working hours shall be recorded accurately and completed on premises during regular business hours.

Wages and Benefits: Suppliers shall pay workers 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 regarding wages and provide any fringe benefits required by law or contract. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at such a 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 worker's right to meet, form labor groups and collectively bargain. Where the right to freedom of association is restricted under law, workers 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, worker complaints, and ensure effective, respectful and transparent communication between workers, their representatives and management.

Sustainable Manufacturing

Environmental Responsibility: Suppliers shall comply with all applicable environmental regulations, maintain environmental management systems, continuously monitor energy consumption, water use, wastewater, air emissions, waste, and ensure appropriate management of wastewater, waste and chemicals. Suppliers shall take proactive efforts to continuously improve to achieve higher levels of environmental management and impact reduction.

Chemical Management: All materials in Brooks product and all finished product must comply with the Brooks Restricted Substance List (RSL). Suppliers shall manage chemical use from an input, output and facility management perspective as outlined in the Brooks Responsible Chemicals program to ensure factories manufacturing Brooks product and materials use only chemicals that are safe for people and the planet.

Contact Us

If suppliers are violating any of the standards in this Code, please bring these issues to our attention by emailing Brooks at responsible.sourcing@brooksrunning.com. Please feel free to write in your local language. Brooks will not retaliate against you for such reporting.

More information about Brooks' Corporate Responsibility program can be found at:
https://www.brooksrunning.com/en_us/meet-brooks/running-responsibly/

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