

# *Sewing Concepts*

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# WORKPLACE CODE OF CONDUCT

POLICY TITLE	WORKPLACE CODE OF CONDUCT
POLICY OWNER	HUMAN RESOURCES
POLICY APPROVER(S)	OWNER
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## PURPOSE

THE PURPOSE OF THE CODE OF CONDUCT POLICY IS TO STRENGTHEN THE ETHICAL ENVIRONMENT OF SEWING CONCEPTS' SUPPLY CHAIN BY PROVIDING GUIDANCE ON THE PRINCIPLES, STANDARDS, AND RESPONSIBILITIES OF CONDUCT FOR ALL EMPLOYERS IN THE PERFORMANCE OF THEIR DUTIES. THESE BEHAVIORAL EXPECTATIONS ARE DIRECTLY DERIVED FROM SEWING CONCEPTS' CORE VALUES, WHICH ARE:

- TO PROVIDE QUALITY PRODUCTS
- SAFE AND FUN WORKING ENVIRONMENT

## SCOPE

SEWING CONCEPTS' CODE OF CONDUCT POLICY APPLIES TO ALL EMPLOYERS, SUBCONTRACTORS OR MANUFACTURERS THAT PRODUCE, ASSEMBLE, OR PACKAGE FINISHED ARTICLES. OUR COMMITMENT IS TO IMPROVE THE LABOR CONDITIONS THROUGHOUT THE SEWING CONCEPTS SUPPLY CHAIN.

THIS CODE OF CONDUCT REPRESENTS GUIDING PRINCIPLES ONLY – IT CANNOT ANTICIPATE ALL CIRCUMSTANCES AND SITUATIONS THAT EMPLOYERS MAY ENCOUNTER. THE EXERCISE OF GOOD JUDGMENT IS STILL EXPECTED FROM EMPLOYERS AT ALL TIMES. IF IN DOUBT IN REGARDS TO APPROPRIATE BEHAVIOR OR COURSE OF ACTION, SEWING CONCEPTS STRONGLY ENCOURAGES EMPLOYERS AND EMPLOYEES TO SEEK OUT GUIDANCE FROM OTHERS IN THEIR ORGANIZATION INCLUDING SUPERVISORS, AND OWNERS.

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## RESPONSIBILITY AND AUTHORITY

ALL MEMBERS OF MANAGEMENT ARE RESPONSIBLE FOR IMPLEMENTING AND ENFORCING THE CODE OF CONDUCT IN CONSULTATION WITH THEIR MANAGEMENT.

IF AN EMPLOYEE BECOMES AWARE OF A SERIOUS BREACH OF THIS CODE OF CONDUCT, THEY HAVE A RESPONSIBILITY TO REPORT THAT BREACH TO MANAGEMENT. ANY EMPLOYEE WHO REPORTS A BREACH IN GOOD FAITH IS PROTECTED FROM REPRISAL FOR DOING SO, EVEN IF THE REPORTED BREACH IS NOT CONFIRMED THROUGH INVESTIGATION.

ANY QUESTIONS REGARDING THE SCOPE, INTERPRETATION, OR APPLICATION OF CODE OF CONDUCT SHOULD BE REFERRED TO MANAGEMENT.

## INTENT

THE ETHICAL BEHAVIOR OF SEWING CONCEPTS' AND ITS SUPPLIERS IS ESSENTIAL TO MAINTAINING EMPLOYEE CONFIDENCE AND TRUST. THIS CODE EMPHASIZES THAT SEWING CONCEPTS' AND ITS SUPPLIERS ARE PROFESSIONALS WHO ARE RESOLVED TO UPHOLD THE REQUIREMENTS.

WHILE EMPLOYERS MUST ALWAYS BE GUIDED BY THEIR OWN PROFESSIONAL JUDGMENT, SEWING CONCEPTS HOPES THAT CONSIDERATION OF THIS CODE WILL HELP WHEN DIFFICULTIES ARISE.

## COMPLIANCE WITH LAWS AND REGULATIONS

EMPLOYEES AND SUPPLIERS MUST COMPLY WITH THE LAWS AND REGULATIONS THAT IMPACT SEWING CONCEPTS AND HOW THEY DO THEIR JOBS. ALL EFFORTS SHOULD BE MADE BY SEWING CONCEPTS AND SUPPLIERS TO ENSURE THEIR EMPLOYEES DO THE SAME.

## CONFIDENTIALITY AND PRIVACY

EMPLOYEES AND SUPPLIERS MAY COME INTO CONTACT WITH PRIVILEGED INFORMATION. THEY HAVE A DUTY TO THE OWNERS OF THE INFORMATION TO PROTECT THE CONFIDENTIALITY OF ALL SUCH INFORMATION.

ALL APPROPRIATE EFFORT SHOULD BE MADE TO ENFORCE SECURITY MEASURES TO PROTECT CONFIDENTIAL INFORMATION AND PERSONAL EMPLOYEE INFORMATION.

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## RESPECT

SEWING CONCEPTS VALUES COURTESY, HONESTY, DIVERSITY, TOLERANCE, EQUITY AND DIGNITY. ALL EMPLOYEES HAVE THE RIGHT TO FEEL SAFE AND COMFORTABLE IN THEIR PLACE OF WORK. EMPLOYEES MUST BEHAVE RESPECTFULLY AND PROFESSIONALLY IN ALL INTERACTIONS WITH COLLEAGUES, SUPPLIERS, CUSTOMERS, OR THE PUBLIC AT LARGE. DISCRIMINATORY, OFFENSIVE, INTIMIDATING, HUMILIATING AND OTHERWISE DISRESPECTFUL BEHAVIOR WILL NOT BE TOLERATED.

## PROTECTION OF ASSETS

EMPLOYEES AND SUPPLIERS ARE PROVIDED ACCESS TO SEWING CONCEPTS ASSETS AND MATERIALS FOR THE PURPOSE OF PERFORMING WORK-RELATED ACTIVITIES. SEWING CONCEPTS' NAME ASSETS WILL NOT BE USED FOR ANYTHING OTHER THAN LEGITIMATE BUSINESS. EMPLOYERS AND EMPLOYEES ARE EXPECTED TO TAKE GOOD CARE OF SEWING CONCEPTS' ASSETS IN THEIR POSSESSION AND WILL TAKE REASONABLE ACTIONS TO PROTECT THESE ASSETS FROM DAMAGE, LOSS, MISUSE OR THEFT.

## HEALTH, SAFETY AND ENVIRONMENT

LEADERSHIP AT SEWING CONCEPTS IS COMMITTED TO PROVIDING A CLEAN, SAFE, AND HEALTHY WORKPLACE FOR ALL EMPLOYEES. EMPLOYEES AND SUPPLIERS MUST COMPLY WITH ALL SAFETY POLICIES AND DIRECTIVES AND MUST TAKE REASONABLE PRECAUTIONS TO ENSURE NOT ONLY THEIR OWN SAFETY AND HEALTH, BUT ALSO THAT OF OTHERS AFFECTED BY THEIR WORK. EMPLOYEES ARE OBLIGATED TO REPORT ANY UNSAFE CONDITIONS TO MANAGEMENT. EMPLOYERS SHALL ADOPT RESPONSIBLE MEASURES TO MITIGATE NEGATIVE IMPACTS THAT THE WORKPLACE HAS ON THE ENVIRONMENT.

VISITORS MUST BE ESCORTED BY AN EMPLOYEE AT ALL TIMES WHILE ON THE PREMISES.

## CONFLICT OF INTEREST

A CONFLICT OF INTEREST EXISTS IF AN EMPLOYEE OR SUPPLIER ENGAGES IN ACTIVITIES OR HAS ANY PERSONAL INTERESTS WHICH MIGHT CONFLICT WITH, OR EVEN HAVE THE APPEARANCE OF CONFLICTING WITH, THE INTERESTS, OBLIGATIONS OR DUTIES OF SEWING CONCEPTS SUPPLIERS. A CONFLICT OF INTEREST MAY ARISE DUE TO THE FOLLOWING CIRCUMSTANCES: ACCESS TO

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INFORMATION, COMMUNITY ACTIVITIES, DEALINGS WITH COMPETITORS, CONSULTING, ENDORSEMENTS, AND FINANCIAL INTEREST IN ANOTHER COMPANY, GIVING OR RECEIVING OF GIFTS OR HOSPITALITY, AND OTHER EMPLOYMENT.

EMPLOYEES AND SUPPLIERS MUST AVOID HAVING FINANCIAL INTERESTS IN ENTITIES THAT COULD JEOPARDIZE THEIR OBJECTIVITY OR CREATE THE APPEARANCE OF IMPROPRIETY IN THEIR DEALINGS ON BEHALF OF SEWING CONCEPTS. IF A CONFLICT OF INTEREST EXISTS OR AN EMPLOYER/EMPLOYEE KNOWS OF A CONFLICT OF INTEREST EXISTING WITH ANOTHER PARTY, THIS INFORMATION MUST BE DISCLOSED IMMEDIATELY.

## COMMUNICATION

SEWING CONCEPTS AND SUPPLIERS MUST KEEP EMPLOYEES INFORMED ABOUT MATTERS THAT MAY AFFECT THEM. THIS INFORMATION MUST BE PRESENTED IN A MANNER DESIGNED TO ENSURE UNDERSTANDING AND AWARENESS.

SEWING CONCEPTS WILL ANSWER QUESTIONS AND GIVE SUPPORT IN A TIMELY AND EFFECTIVE MANNER, WHILE OPENLY DECLARING ANY LIMITATIONS OF PERSONAL KNOWLEDGE AND CONFLICTS OF INTEREST.

## MEDIA RELATIONS

ALL SEWING CONCEPT RELATED MEDIA INQUIRIES MUST BE DIRECTED TO BETTY OR ROBERT VANDENBERG. SEWING CONCEPTS' CONFIDENTIALITY, PRIVACY, AND SECURITY POLICIES MUST BE TAKEN INTO CONSIDERATION BEFORE ANY INFORMATION IS PUBLICALLY DISCLOSED.

## WORK ETHIC

A TOP-NOTCH WORK ETHIC WILL BE REQUIRED TO MAINTAIN HIGH LEVELS OF QUALITY IN THE WORK PERFORMED. EMPLOYEES AND SUPPLIERS ARE PLACED IN SUCH A POSITION OF IMPACT UPON THE BUSINESS OF SEWING CONCEPTS THAT THE REQUIRED LEVEL OF TRUST CAN ONLY BE MAINTAINED BY OUTSTANDING PERFORMANCE AND MORAL CONDUCT.

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## PROFESSIONALISM

DEALING WITH CUSTOMERS, CO-EMPLOYEES, VENDORS, CONSULTANTS, AND UPPER MANAGEMENT REQUIRES THE UTMOST CARE AND PATIENCE TO ENSURE THAT THE HIGHEST LEVEL OF RESPECT IS MAINTAINED.

ACTIONS THAT ENHANCE THE IMAGE OF THE PROFESSION ARE HIGHLY ENCOURAGED. EMPLOYEES WILL COOPERATE WITH AND SUPPORT THEIR FELLOW PROFESSIONALS.

## RIGHTS

EMPLOYEES MAY BE EXPOSED TO POTENTIAL ABUSE FROM CUSTOMERS, CO-EMPLOYEES, AND BUSINESS PARTNERS. ALL EMPLOYEES HAVE THE RIGHT TO DEMAND FAIR AND COURTEOUS BEHAVIOR FROM EVERYONE, INCLUDING SENIOR MANAGEMENT THAT MIGHT CONTROL THEIR POSITIONS AND MANAGE THEIR PAYCHECKS. EMPLOYEES SHOULD NOT TOLERATE IRATE OR OTHERWISE DISRESPECTFUL BEHAVIOR FROM ANYONE. IF A EMPLOYEE FEELS AS THOUGH HE OR SHE HAS BEEN TREATED BADLY, DOCUMENT THE EVENT AND PRESENT IT TO THE IMMEDIATE SUPERVISOR (IF APPROPRIATE).

## FORCED LABOR

SEWING CONCEPTS AND SUPPLIERS SHALL NOT USE (OR PURCHASE MATERIALS THAT ARE PRODUCED USING) ANY FORM OF FORCED LABOR, WHETHER IN THE FORM OF PRISON LABOR, INDENTURED LABOR, BONDED LABOR, OR OTHERWISE.

## CHILD LABOR

NO PERSON SHALL BE EMPLOYED AT AN AGE YOUNGER THAN 16.

SUPPLIERS AGREE TO CONSULT WITH GOVERNMENTAL, HUMAN RIGHTS, AND NON-GOVERNMENTAL ORGANIZATIONS, AND TO TAKE REASONABLE STEPS TO MINIMIZE THE NEGATIVE IMPACT ON CHILDREN RELEASED FROM EMPLOYMENT AS A RESULT OF IMPLEMENTATION OR ENFORCEMENT OF THE CODE.

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## NON DISCRIMINATION

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 DIGNITY AND RESPECT. NO EMPLOYEE SHALL BE SUBJECT TO ANY PHYSICAL, SEXUAL, PSYCHOLOGICAL OR VERBAL HARASSMENT OR ABUSE. EMPLOYERS WILL NOT USE OR TOLERATE ANY FORM OF CORPORAL PUNISHMENT.

NONDISCRIMINATION – NO PERSON SHALL BE SUBJECT TO ANY DISCRIMINATION IN EMPLOYMENT, INCLUDING HIRING, SALARY, BENEFITS, ADVANCEMENT, DISCIPLINE, TERMINATION OR RETIREMENT, ON THE BASIS OF GENDER, RACE, MARITAL STATUS, REPRODUCTIVE OR FAMILIAL SITUATION, RELIGION, AGE, DISABILITY, SEXUAL ORIENTATION, NATIONALITY, POLITICAL OPINION, OR SOCIAL OR ETHNIC ORIGIN.

## WOMEN'S RIGHTS

WOMEN'S RIGHTS ARE INCLUDED IN THE PREVIOUS SECTIONS OF THIS CODE OF CONDUCT. WITHOUT RESTRICTING THE GENERALITY OF THE FOREGOING AND FOR PURPOSES OF GREATER CLARITY AND SPECIFICITY, EMPLOYERS SHALL ABIDE BY THE FOLLOWING CONDITIONS:

1. FEMALE WORKERS SHALL HAVE THE SAME WORK OPPORTUNITIES AS MEN, WITHOUT ARBITRARY RESTRICTION ON THE TYPES OF JOBS OR SPECIAL LIMITS ON HOURS OF WORK;
2. EMPLOYERS SHALL NOT USE CRITERIA RELATED TO MARITAL OR REPRODUCTIVE STATUS (FOR EXAMPLE, PREGNANCY TESTS, THE USE OF CONTRACEPTION, FERTILITY STATUS) AS CONDITIONS OF EMPLOYMENT;
3. NEW MOTHERS SHALL BE ENTITLED TO LEAVES OF ABSENCE (WITH THE RIGHT TO RETURN TO WORK) FOR CHILDBIRTH AND RECOVERY FROM CHILDBIRTH.

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## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

SEWING CONCEPTS AND SUPPLIERS SHALL RECOGNIZE AND RESPECT THE RIGHT OF EMPLOYEES TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING.

## HOURS OF WORK AND OVERTIME

SEWING CONCEPTS AND SUPPLIERS SHALL COMPLY WITH APPLICABLE LAWS AND INDUSTRY STANDARDS ON WORKING HOURS. IN ANY EVENT, PERSONNEL SHALL NOT, ON A REGULAR BASIS, BE REQUIRED TO WORK IN EXCESS OF 48 HOURS PER WEEK AND SHALL BE PROVIDED WITH AT LEAST ONE DAY OFF IN EVERY SEVEN-DAY PERIOD. MANDATORY OVERTIME SHALL BE LIMITED TO EXTRAORDINARY AND SHORT-TERM BUSINESS CIRCUMSTANCES AND THE POLICY CONCERNING MANDATORY OVERTIME SHALL BE EXPLAINED TO EMPLOYEES BEFORE THEY ARE HIRED. REGULAR WORKING HOURS PLUS MANDATORY OVERTIME SHALL NOT EXCEED 60 HOURS PER WEEK. ALL OVERTIME SHALL BE REMUNERATED AT AN APPROPRIATE PREMIUM RATE.

## COMPENSATION

SEWING CONCEPTS AND SUPPLIERS RECOGNIZE THAT WAGES ARE THE PRINCIPAL MEANS OF MEETING THE BASIC NEEDS OF EMPLOYEES AND THEIR FAMILIES, AND THEREFORE SHALL PAY A WAGE THAT ENABLES EMPLOYEES TO SATISFY THEIR BASIC NEEDS AND PROVIDE LEGALLY MANDATED BENEFITS. EMPLOYERS SHALL ENSURE THAT WAGES AND BENEFITS FOR A STANDARD WORKING WEEK MEET AT LEAST LEGAL MINIMUM STANDARDS AND INDUSTRY AVERAGES, WHICHEVER IS GREATER, AND THAT NET COMPENSATION IS AT LEAST SUFFICIENT TO MEET THE WORKER'S BASIC NEEDS. COMPENSATION STANDARDS WILL BE ADJUSTED PERIODICALLY BASED ON EXPERIENCE AND INCREASED KNOWLEDGE CONCERNING LOCAL LABOR MARKETS AND LIVING CONDITIONS.

## REMEDICATION

WHEN A VIOLATION OF THE CODE OF CONDUCT OCCURS, REMEDIATION OF THE VIOLATION BY THE EMPLOYER IS EXPECTED. IF AN EMPLOYER HAS FAILED TO SELF-CORRECT A VIOLATION OF THE CODE, SEWING CONCEPTS WILL CONSULT WITH THE EMPLOYER (FOR ITSELF AND ON BEHALF OF ITS



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CONTRACTORS, SUBCONTRACTORS, OR MANUFACTURERS) TO DETERMINE APPROPRIATE CORRECTIVE ACTION. THE REMEDY WILL, AT A MINIMUM, INCLUDE REQUIRING THE EMPLOYER TO TAKE ALL STEPS NECESSARY TO CORRECT SUCH VIOLATIONS TO SEWING CONCEPTS SATISFACTION. IF AGREEMENT ON CORRECTIVE ACTION IS NOT REACHED AND/OR THE ACTION DOES NOT RESULT IN CORRECTION OF THE VIOLATION WITHIN A SPECIFIED REASONABLE TIME PERIOD, SEWING CONCEPTS RESERVES THE RIGHT TO TERMINATE OR NOT RENEW ITS RELATIONSHIP WITH ANY EMPLOYER, AS PROVIDED IN THE EMPLOYER'S AGREEMENT WITH SEWING CONCEPTS.

## INFRINGEMENT

EMPLOYEES WILL NOT ACT WITH, NOR TOLERATE FROM OTHERS, DISCRIMINATION AGAINST EMPLOYEES IN THE PERFORMANCE OF THEIR WORK DUTIES.

EMPLOYEES WILL NOT EXERCISE THEIR AUTHORITY OTHER THAN IS NECESSARY FOR THEIR ROLE, AND THEN ONLY TO A DEGREE THAT IS NECESSARY TO PERFORM THAT ROLE, WHILE REMAINING WITHIN ESTABLISHED POLICIES. ANY PRIVATE INFORMATION OBTAINED BY THE EMPLOYEE MUST BE KEPT CONFIDENTIAL.

## ENFORCEMENT

ANY EMPLOYEE OR SUPPLIER WHO IS FOUND TO HAVE VIOLATED THIS POLICY MAY BE SUBJECT TO DISCIPLINARY ACTION, UP TO AND INCLUDING TERMINATION OF CONTRACT OR EMPLOYMENT.