



## The Burton Corporation Manufacturing Code of Conduct 2.0

At The Burton Corporation (“Burton”), we are committed to:

- A standard of excellence in every aspect of our business and in every corner of the world;
- Ethical and responsible conduct in all of our operations;
- Respect for the rights of all individuals; and
- Respect for the environment.

We expect these same commitments to be shared by all manufacturers and suppliers of Burton products. Violations of the Burton Code of Conduct will be appropriately remediated at the cost of the manufacturer. Failure to comply with the Burton Code of Conduct may ultimately result in termination of the relationship between Burton and the manufacturer, including termination of any manufacturing and license agreements. *At a minimum*, we require all suppliers to meet the following standards:

### **Child Labor**

Manufacturers will not use child labor. An employee must not be under the age of 15 or under the age for completing compulsory education, whichever is higher. Juvenile workers (aged 15-17) may not conduct work that compromises their health and safety. (ILO Conventions 138 and 182)

### **Involuntary Labor**

Manufacturers will not use any forced labor including prison labor, bonded labor, indentured labor, or otherwise. Any act of human trafficking is also prohibited. Suppliers must monitor any third party that assists them with recruiting or hiring employees to make sure those employees do not work under conditions of force, coercion, deception, intimidation or punishment. (ILO Conventions 29, 105, and 182)

### **Coercion and Harassment**

Manufacturers will treat each employee with dignity and respect, and will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse. (ILO Conventions 100 and 111)

### **Non-discrimination**

Manufacturers will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, union affiliation, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion, medical condition, disability or any other classification protected under applicable law. All employment decisions must be made based on the principle of equal employment opportunity, and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination. (ILO Conventions 100 and 111)

### **Association**

Manufacturers will recognize and respect the freedom of employees to exercise their lawful rights of free association and collective bargaining. When the rights to freedom of association are restricted under law,

vendors must allow their employees to share any related grievances the employees may have without any penalty or reprisal. (ILO Convention 87)

### **Health and Safety**

Manufacturers will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations, ensuring at a minimum: reasonable access to potable water and sanitary facilities; fire and other safety; and adequate lighting and ventilation. Manufacturers will also ensure that the same standards of health and safety are applied in any housing that they provide for employees. (ILO Convention 155)

### **Women's Rights**

Manufacturers must ensure that women workers will receive equal benefits, treatment, evaluation of the quality of their work, and opportunity to fill all positions open to male workers. Pregnancy tests will not be a condition of employment, nor will they be demanded of employees. Workers who take maternity leave (of a duration determined by local and national laws) will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits. Workers will not be forced or pressured to use contraception. Workers will not be exposed to hazards, including glues and solvents that may endanger their safety, including their reproductive health. Manufacturers shall provide appropriate services and accommodation to women workers in connection with pregnancy. (ILO Convention 100)

### **Hours of Work**

Manufacturers 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. Except in extraordinary business circumstances, manufacturers will not require employees to work more than the lesser of (a) 48 hours per week and 12 hours overtime, or (b) the limits on regular and overtime hours allowed by local law, where local law does not limit the hours of work, the regular work week plus 12 hours overtime. In addition, except in extraordinary business circumstances, employees will be entitled to at least one day off in every seven-day period. (ILO Convention 1)

### **Compensation**

We expect manufacturers to recognize that wages are essential to meeting employees' basic needs. Manufacturers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation, and provide legally mandated benefits.

Manufacturers will compensate employees for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate at least equal to the regular hourly compensation rate.

Where local industry standards are higher than applicable legal requirements, we expect manufacturers to meet higher standards. (ILO Convention 26 and 131)

### **Protection of the Environment**

Manufacturers recognize that environmental responsibility is integral to producing world-class products. Suppliers shall maintain written environmental policies and standards and must comply with all applicable environmental laws, our Restricted Substances List ("RSL"), and agree to be monitored separately for environmental responsibility. Factories shall continuously monitor and disclose to Burton their energy and natural resource usage, emissions, discharges, carbon footprint, and disposal of wastes and take a progressive

approach to minimize negative impacts on the environment. Manufacturers are expected to make sustainable improvements in environmental performance and require the same of their suppliers.

### **Conflict Minerals**

Burton is committed to ethical practices and compliance with all applicable laws and regulations requiring disclosure and the use of Conflict Minerals that may be linked to the abuse of human rights. Burton requires that our vendors responsibly source the materials and components that are used in manufacturing our products, which can potentially contain these minerals. Burton expects our vendors to have in place policies and due diligence measures that will enable us to assure the products that are supplied to us are Conflict Mineral and Conflict Area free. For more information regarding Conflict Materials, see <http://www.sec.gov/News/Article/Detail/Article/1365171562058>

### **Subcontracting**

Burton does not permit unapproved sub-contracting under any circumstances. All sample and production orders must be placed within manufacturers that have been pre-approved in writing by Burton.

### **Ethical Business Behavior**

Bribery, including but not limited to – the promising, offering, giving or accepting of any improper monetary incentive or any act of corruption, extortion, or embezzlement during the general course of business is absolutely unacceptable and not tolerated. No member of Burton or any third party groups representing Burton will accept bribes, kickbacks, gifts, or any other kind of improper payment.

### **Other Laws**

Manufacturers will comply with all laws and regulations in all locations where they conduct business.

### **Code Communication**

Manufacturers will at all times maintain on-site all documentation that is needed to demonstrate compliance with this Code of Conduct. All manufacturers are required to inform employees about this Code of Conduct orally and by posting the Burton Code of Conduct in a conspicuous place frequented by all employees in the local language spoken by employees, supervisors and managers.

Burton will undertake affirmative measures, such as announced and unannounced on-site inspections of production facilities, to monitor compliance with this Code of Conduct (as detailed in the Burton Social Responsibility Policy). Manufacturers must allow Burton representatives full access to production facilities, employee records and employees for confidential interviews in connection with monitoring visits.