



## Code of Conduct Agreement

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At Vantage Apparel we are committed to:

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

The purpose of the Code of Conduct is to establish a standard of performance, to educate, and to define our commitment to human rights, fair labor standards, and responsible manufacturing to which we are committed. Vantage and its suppliers confirm to the commitments below:

The Agent/Supplier provides merchandise upon the terms and conditions below, specifically with adherence to all labor, workplace, individual and environmental compliance standards set forth to provide a safe, humane, and legal working condition for all employees.

### **Employment Relationship**

Vantage and its suppliers have adopted and adhere to the rules and conditions of employment that respects workers, and their rights will be safeguarded under the applicable local laws and regulations. Where local laws conflict or set a different standard of protection to the international standards, the business partner shall abide by the principles that provide the highest protection to the worker(s) and environment.

### **Child Labor**

Vantage and its suppliers will not use child labor in any stage of manufacturing. The term “child” refers to a person younger than 15 or, if higher, the local legitimate minimum age for employment or the age for completing compulsory education. Young persons shall be protected against conditions of work which are prejudicial to their health, safety, morals, and development.

### **Forced Labor**

Vantage and its suppliers will not use any forced, trafficked or non-voluntary labor, whether prison, bonded, indentured or otherwise. No workers will 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. Workers are free to leave once their shift ends, and guards are posted for normal security purposes.

### **Harassment or Abuse**

Vantage and its suppliers 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.

### **Nondiscrimination**

Vantage and its suppliers will not discriminate in hiring and employment practices, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability.

### **Free Association and Collective Bargaining**

Vantage and its suppliers will respect the rights of employees to associate, organize, and bargain collectively in a lawful and peaceful manner.

### **Health and Safety**

Vantage and its suppliers will provide employees with a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of operation of employer’s facilities; and will ensure the

stability and safety of equipment and buildings and the protection of workers against foreseeable emergency.

**Compensation** Vantage and its suppliers recognize that wages are essential to meeting employees' basic needs. We 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 to compensation, and provide legally mandated benefits as required by law or contract. Wages will be paid in a timely manner, regularly, and fully in legal tender. Where compensation does not meet workers' basic needs and provide some discretionary income, Vantage and its suppliers will take appropriate actions that seek to progressively realize a level of compensation that does.

**Hours of Work** Employers will not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week will not exceed 48 hours. Employers will allow workers at least 24 consecutive hours of rest in every seven-day period (a day is defined as 24 hours). All overtime work will be consensual and voluntary. Employers will not request overtime on a regular basis and will compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

**Environmental Laws** Vantage and its suppliers will comply with all applicable environmental laws and regulations. Vantage and its suppliers will adopt responsible measures to mitigate negative environmental impacts as a result of its operations.

**Subcontracting and Transparency** Vantage requires comprehensive supplier transparency, including the disclosure and transfer of credible and accurate information throughout the chain of materials, products, and services. Vantage prohibits supplier to engage in any cover-up or concealment of actual Production Facility conditions or manipulate records of Production Facilities or their operations to prevent discovery of activities prohibited by Vantage social compliance standards. Vantage does not permit the unauthorized use of component suppliers or subcontractors for the manufacture of merchandise. Eligible subcontractors and suppliers may request consideration for approval based on compliance with Vantage's supplier pre-qualification guidelines.

**Publication** Vantage and its suppliers will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees, including the prominent posting of a copy of this Code of Conduct, in a place readily accessible to employees, in the local language at all times.

**Other Workplace Practices** Vantage and its suppliers will provide workers with understandable information about their rights, responsibilities, and employment conditions. Workplace practice and conditions that violate basic human rights are not permitted.

**Other Laws** Vantage and its suppliers will comply with all applicable laws and regulations, those pertaining to the manufacture, pricing, labeling, sale and distribution of merchandise including local, national and foreign codes, rules and regulations: Uyghur Forced Labor Prevention Act (UFLPA) and U.S. Customs and Border Protection (CBP) guidelines, applicable treaties, and voluntary industry standards; and cooperate with local, national and foreign customs and drug enforcement agencies to guard against illegal shipment of drug.

An annual statement of compliance with this Code must be signed by each Vantage Agent and each qualified manufacturing company or Supplier. Vantage retains the right to inspect or send a third-party agency to inspect all facilities and records to confirm compliance to the Code of Conduct. Agent/Supplier will allow access at any time for the purpose of these inspections to any Vantage and its Suppliers' employee or representative thereof.

Vantage is committed to continuous improvement in all aspects of our business through transparent and open communication with its agents, suppliers, and downstream materials/component providers. To the extent that Vantage is or becomes aware of violations to the Code of Conduct anywhere along the supply chain, Vantage will actively investigate and follow-up on the identified non-compliance and impose remedies as appropriate.