

January 10, 2024

## **SUPPLIER WORKPLACE CODE OF CONDUCT**

### **INTRODUCTION**

Stormtech Performance Apparel Ltd. (“Stormtech”) believes in doing the right thing by taking the responsibility to incorporate internationally recognized labor practices, social compliance standards and environmental responsibility into our business practices. The Stormtech Supplier Workplace Code of Conduct (the “Code”) defines standards for fair, safe and healthy working conditions, and environmental responsibility throughout our supply chain. Requirements in the Code apply to the entire supply chain (collectively the Suppliers, Suppliers, subcontractors, agents, etc.).

Stormtech is committed to working with Suppliers that deal with their employees in a legal, ethical, and equitable manner. All Stormtech suppliers are expected to comply with all relevant and applicable laws and regulations of the country in which workers are employed and to implement the Code in their facilities.

### **1. LAW AND CODE COMPLIANCE**

All Suppliers are expected to comply with and will be monitored to all relevant and applicable national and local laws and regulation of the country of manufacture or exportation. All Suppliers are expected to adhere to the Code and are expected to have a program in place to assure that all these policies are rigorously adhered to by all their subcontractors.

### **2. NON-DISCRIMINATION**

Stormtech respects and recognizes cultural differences. Suppliers shall not discriminate in any aspect of employment based on gender, race, religion, age, disability, nationality, political opinion, sexual orientation, ethnic group etc.

### **3. HUMAN TRAFFICKING**

Stormtech is committed to uphold the **Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children** <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons>, supplementing the **United Nations Convention against Transnational Organized Crime** <https://www.unodc.org/documents/treaties/UNTOC/Publications/TOC%20Convention/TOCebook-e.pdf>

Stormtech expects that all our supplier and their sub-contractors to respect their employees’ workplace rights and take steps to mitigate human trafficking risks and monitor compliance of labour and human rights in their supply chain. All our suppliers’ employees will work voluntarily and not be subjected to any form of exploitation, such as human trafficking for the purpose of forced labour or sexual exploitation. Suppliers and their sub-contractors will not engage in any form of human trafficking activities.

#### **4. FORCED LABOR**

Suppliers and their sub-contractors will comply with **Canada's Import Prohibition on Goods Produced by Forced Labour**. This includes forced or compulsory child labour and applies to all goods, regardless of their country of origin.

Every worker shall be treated with respect and dignity. There shall be no use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.

#### **5. CHILD LABOR**

All employees of our business partners must be of at least the legal minimum age based on the applicable laws and regulations in the country of manufacture or exportation.

Workers under the age of 18 shall not perform hazardous work that may jeopardize their health or safety. Hazardous work includes, but is not limited to, work which exposes children to physical, psychological or sexual abuse; work underground, under water, at dangerous heights or in confined spaces; work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; work which may expose children to an unhealthy environment; work under difficult conditions, including long hours of work or work where the child is unreasonably confined to the premises of the employer.

Stormtech has a ZERO tolerance policy for child labor; our policy is based upon UN Convention on the right of the child, article 32.1, for more information;

<http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

#### **6. HEALTH AND SAFETY STANDARDS**

Suppliers must provide a safe and healthy workplace. Unsafe buildings or hazardous equipment are NOT acceptable environments for the manufacture of Stormtech product. All equipment must be properly safeguarded to prevent injury and safety procedures must also be provided for equipment requiring special operation. All our business partners must comply with all national and local laws and regulations concerning health and safety in the workplace, providing all required and appropriate worker's compensation coverage in the event of any fatality or injury. All Factories must establish a Fire and Safety Team to assist in the execution of building and fire safety throughout the year.

#### **7. FACTORY CONDITIONS/HYGIENIC WORKPLACE**

The factory environment shall be kept clean and free from any kind of pollution for the employees well-being. The temperature in the factory should be within acceptable tolerances of working environment, the lighting should be enough for the work performed, and sanitary facilities should be kept clean.

#### **8. ENVIRONMENTAL CONCERNS**

All our Suppliers must comply with all applicable environmental laws and regulations in the country of operation. Stormtech promotes environmental stewardship in all aspects of the product procurement and manufacturing process. We encourage our whole supply chain to reduce the use of natural resources, to reuse where feasible and to recycle whenever is possible. There is ZERO tolerance for use of prohibited chemicals or restricted substances during the manufacturing process of Stormtech products as per RSL, Prop 65 and REACH.

## **9. HOUSING FACILITIES**

For Suppliers that provide housing facilities for staff, the requirements regarding safety and factory conditions/hygienic workplace (points 5 and 6 above), should also cover the housing area. Most importantly the housing facilities must be built in compliance with fire alarms, fire extinguishers, unobstructed emergency exits and evacuation drills in dormitory and all local safety and environmental laws and regulations.

## **10. COMPENSATION AND BENEFITS**

Every worker has a right to compensation for a regular work week that is enough to meet the worker's basic needs and provide some discretionary income. Our Suppliers must pay at least the minimum wage required by local law or the prevailing industry wage, whichever is higher.

## **11. HOURS OF WORK**

Suppliers and business partners are required to adhere to the legal limitations on hours of work set forth by the countries in which they operate.

Suppliers must ensure that all employees are provided with at least one day (24 hours) off in every seven-day period, unless compelled by urgent business needs.

All overtime work must be consensual and compensated at a premium rate. Overtime should be utilized as an exception to meet short-term business demands and not as a regular practice. Working hours must not exceed 60 hours in any seven-day period, except in exceptional or unforeseeable circumstance and if the following requirements are met:

- it is allowed by national law,
- it is allowed by a collective agreement, and
- safeguards are taken to protect the health and safety of workers.

Suppliers and business partners are responsible for implementing measures to safeguard the health and safety of workers during extended working hours. This includes providing adequate breaks, rest facilities, and any other necessary accommodations to mitigate potential health risks.

## **12. TRANSSHIPMENT**

Suppliers must comply with applicable customs laws and must establish and maintain programs to comply with the customs law regarding transshipment of sewn products.

## **13. MONITORING AND ENFORCEMENT**

Stormtech expects all Suppliers to respect the Code and to actively do their utmost to achieve and exceed the standards set forth in the Code. Stormtech reserves the right to make unannounced visits to all factories producing Stormtech goods at any time and will have ZERO tolerances for any noncompliance with the Code.

## **14. HARASSMENT OR ABUSE**

Suppliers and their sub-contractors will ensure that all their interactions with their employees uphold the principles of dignity and respect. Physical, sexual, verbal harassment and/or violence, bullying, teasing or other aggressive behaviour are strictly prohibited.

Suppliers and their sub-contractors are expected to foster and encourage a positive, harmonious, and professional work environment in their interactions with their workers.

**15. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Supplier will recognize and respect the right of workers to form or join unions in a free and democratic way. The employer adopts an open attitude towards the activities of trade unions and their organizational activities. No discrimination against workers because of trade union membership and respect workers' right to bargain collectively.

**16. CUSTOMS COMPLIANCE**

Supplier will establish and maintain system to comply with customs laws to meet all the requirements governing the movement of their merchandise across border. Factory will provide true, accurate and complete customs information including a proper description of the goods; keep records for all materials and orders, also maintain detailed production records.

**17. POLICY AGREEMENT DOCUMENT**

It is mandatory for all Stormtech Suppliers to acknowledge and sign the Policy Agreement Document, as this action reaffirms their intention to comply with all National and Local laws, and with the policies set forth in this Code.

*For any violation of local laws or regulations related to Stormtech's Workplace Code of Conduct, or unethical behavior, reports can be submitted confidentially to Stormtech by emailing to [compliance@stormtech.ca](mailto:compliance@stormtech.ca)*