**Koozie Group Code of Conduct**

**1. Statement of Principles**

Koozie Group, a special place to work, with an atmosphere of mutual respect and professionalism. Koozie Group and its finished product manufacturers have a responsibility to uphold these principles by creating an atmosphere in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. The Koozie Group Code of Conduct (“*Code of Conduct*”) enables us to conduct our business, source products and manage our supply chain in a manner that is both profitable and socially responsible.

Implementation of this Code of Conduct enables Koozie Group to continually improve performance on worker’s rights, labor standards, work place safety and other human rights issues integral to the production process and the overall supply chain.

Compliance with this Code of Conduct is mandatory for all Koozie Group entities (collectively, “*Koozie Group*”) and for all Koozie Group finished product suppliers (“*Suppliers*”). Employers should adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labor and social security laws and regulations. When differences or conflicts in standards arise, the highest standard shall apply. Further, as a fundamental part of our Code of Conduct, we align our practices to the ETI Base Code and expect the same of our Suppliers. Koozie Group reserves the right to immediately terminate its business relationship and cancel all orders with any Supplier or supply chain partner who does not comply with this Code of Conduct.

**2. Work Environment**

Koozie Group is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean and well‐lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. Koozie Group expects its Suppliers to maintain the same standards in their factories and operations. Koozie Group and its Suppliers must comply with all applicable national, regional, state and local laws, rules and regulations (collectively, “*Laws*”) governing labor and employment practices and working conditions. If housing is provided for employees, all housing must be maintained in a clean and safe fashion. Koozie Group strictly forbids the use of cruel and unusual disciplinary practices in the workplace.

**3. Engage in Fair and Ethical Employment Practices**

Fair Wages: Koozie Group and its Suppliers must fairly compensate their employees by providing wages, benefits and reasonable working hours in compliance with all Laws of the countries in which Koozie Group and its Suppliers operate a business. Every worker shall have the right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. Koozie Group and its Suppliers must compensate their employees at a rate at least equal to the local minimum wage or prevailing wage, whichever is higher, including piece rate workers. In addition to their compensation for regular hours of work, Koozie Group and its Suppliers should compensate employees for overtime hours at the premium rate required by applicable Law. Where compensation does not meet workers’ basic needs and provide some discretionary income, each Supplier shall work with Koozie Group to take appropriate actions that seek to progressively realize a level of compensation that does.

Working Hours: At Koozie Group, our employee’s regular work week shall not be scheduled in excess of 48 hours and we will ensure that employees are entitled to 24 hours of rest in every seven-day period. Except in extraordinary business circumstances, we will not ask employees to work more than 60 hours a week, and compensation for all overtime hours worked will be paid at a premium rate. Koozie Group intends to plan staffing levels to avoid the regular request of overtime. All overtime worked will be consensual.

Child Labor: Koozie Group will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any contract manufacturer that uses child labor. In determining whether a laborer is a “child,” Koozie Group will refer to the local legal minimum age for employment or the age for completing compulsory education in the country of manufacture, whichever is higher. However, in no case will the minimum age be younger than 15 years of age. Although Koozie Group strictly prohibits the use of child labor, Koozie Group supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

Forced or Compulsory Labor: Koozie Group will not support trafficking in human beings or accept the use of forced, compulsory, bonded, indentured or prison labor in its operations under any circumstances and will not purchase product(s) from any contract manufacturer or utilize any supply chain partner that supports trafficking in human beings or utilizes forced, compulsory, bonded, indentured or prison labor. Every employee must be a voluntary worker with the freedom to leave the workplace outside of work hours and terminate employment at any time without penalty after notice of reasonable length. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden. No employee shall be subject to any form of harsh or inhumane treatment, corporal punishment, threats of physical or sexual violence or abuse, or other forms of psychological or physical harassment, intimidation, abuse, coercion or sanctions that result in wage deductions, reductions in benefits or compulsory labor. No part of an employee’s salary, benefits, property, or documents shall be withheld in order to force such personnel to continue working.

Discrimination: Koozie Group employs workers based upon their ability to perform the applicable job responsibilities, not on the basis of personal characteristics, beliefs or any form of discrimination. Koozie Group will not subject any persons 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. Koozie Group and its Suppliers shall comply with all anti‐discrimination Laws.

Freedom of Association: Koozie Group recognizes and respects the rights of employees to associate, organize, and bargain collectively, without penalty or interference, and expects its Suppliers to respect those same rights.

Legal Compliance: Koozie Group and its Suppliers shall comply with the Laws of the country in which in which Koozie Group and/or its Suppliers are doing business. Koozie Group and its Suppliers shall comply with all applicable export and import Laws. Necessary invoices and required documentation must be provided in compliance with applicable Laws. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable Laws.

**4. Animal Testing**

Koozie Group is committed to providing consumers with the highest quality products that comply with all applicable product safety standards and Laws. Koozie Group will not purchase products from Suppliers that use animal testing as part of their product development and production. If a Koozie Group Supplier believes that alternative testing cannot provide sufficient assurance that a product is safe for consumer use, it should advise Koozie Group in writing.

**5. Environment, Health and Safety**

Koozie Group has maintained a long-standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbors and consumers. Koozie Group recognizes that nearly every aspect of a manufacturing business has the potential to impact the environment, human health and safety. It is Koozie Group’s responsibility to minimize those impacts and develop solutions that protect people and the environment and allow Koozie Group to maintain the product quality and value that consumers expect. Koozie Group’s approach is to collaborate with its employees, Suppliers, carriers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from Koozie Group’s manufacturing and supply chain operations and the manufacturing and supply chain operations of Koozie Group’s Suppliers.

**6. Monitor Compliance**

Koozie Group conducts regular assessments of its facilities and the facilities of its Suppliers to ensure compliance with this Code of Conduct. All Koozie Group Suppliers will authorize Koozie Group’s independent third party monitor to inspect their facilities to ensure compliance with this Code of Conduct.

**7. Publication**

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

**8. Certification**

The Koozie Group Code of Conduct clearly states Koozie Group’s commitment to legal, ethical and appropriate working conditions worldwide. The undersigned authorized representative of the below‐named Company has read the standards described in the Koozie Group Code of Conduct and understands that a continuing business relationship with Koozie Group is dependent upon adherence to the standards set forth therein. Any failure to follow these standards may result in the cancellation by Koozie Group of outstanding purchase orders, refusal by Koozie Group to accept delivery of merchandise and the termination of Koozie Group’s business relationship with you.