



## Introduction

Kahtoola Inc. is a manufacturer of equipment for outdoor recreation. By building innovative products and actively preserving and protecting the natural environment, Kahtoola has assumed a leadership role in the outdoor community. Consistent with this role, we expect our partners—contractors, subcontractors, and suppliers to ensure the safe and fair treatment of all employees while protecting the environment in the countries where Kahtoola products are made.

This Code sets forth the fundamental requirements that all partners must meet in order to do business with Kahtoola. Additionally, the Code provides the foundation for Kahtoola's continuing evaluation of a partner's employment practices and environmental compliance. Kahtoola expects all its business partners to enforce the Code and will assist them in meeting the requirements. However, Kahtoola is prepared to end partnerships with those who do not comply.

### **Updated Content found in the following sections:**

- **II**
- **V**

### **New Content found in the following sections:**

- **VII**
- **VIII**

## Kahtoola Vendor Code of Conduct

### I. Scope

Kahtoola's Vendor Code of Conduct applies to all parties that manufacture or assemble any product bearing the Kahtoola logo.

### II. General Principle

Business partners shall comply fully with all legal requirements of their respective countries and with all other applicable laws, rules and regulations. When differences or conflicts in standards arise, suppliers are expected to comply with the highest standards.

### III. Employment Standards

#### A. Discrimination

While we recognize and respect cultural differences, vendors shall hire and compensate employees on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

Kahtoola will seek business partners that share this value, and that do not discriminate in hiring and employment practices on grounds of race, color, sex, gender or gender expression, religion, political opinion, nationality, social origin, ethnic origin, social status, indigenous status, disability, sexual orientation, age (except for children), or other status of the individual unrelated to the individual's ability to perform their job.

#### **B. Forced Labor**

Vendors shall not use forced labor of any kind; this includes prison, indentured, bonded, and otherwise. No employee shall be made to work through force or intimidation of any kind.

#### **C. Child Labor**

Vendors shall employ only workers who meet the applicable minimum legal age requirement or are at least 15 years of age, whichever is greater. Vendors shall comply with all applicable child labor laws including those related to hiring, wages, hours worked, overtime and working conditions. Vendors shall maintain official documentation for every employee that verifies the employee's date of birth. In those countries where official documents are not available to confirm the exact date of birth, the vendor shall confirm age using an appropriate and reliable evaluation method.

#### **D. Wages and Benefits**

Wages must equal or exceed the minimum wage or the prevailing industry wage, whichever is higher, and legally mandated benefits shall also be provided. Wages shall be paid directly to the employee in cash, check or the equivalent, and written information relating to wages shall be provided to employees in a form they understand. This written wage statement must include days worked, wage or piece rate earned per day, hours of overtime at each specified rate, bonuses, allowances and legal or contractual deductions.

#### **E. Hours of Work/Overtime**

While it is understood that overtime is often required in a manufacturing environment, vendors shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions. Employees shall not be required, except in extraordinary circumstances, to work more than sixty hours per week, including overtime, or the local legal requirement, whichever is less.

Employees shall be fully compensated for all overtime hours according to local law. Each employee will be informed at the time of hiring if mandatory overtime is a condition of employment. All employees receive a minimum of one day off in seven.

#### **F. Freedom of Association**

Participants will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining. Where the right to freedom of association is restricted under law, vendors must allow their employees to raise with the vendors' representatives any job-related grievances the employees may have, without penalty or reprisal.

#### **G. Disciplinary Practices**

No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse. This includes, but is not limited to, corporal punishment, threats of violence, sexual harassment, and screaming or other verbal abuse.

#### **IV. Health & Safety**

Vendors must treat all employees with respect and dignity and comply with all applicable laws and regulations regarding working conditions. A safe and hygienic working environment shall be provided, and occupational health and safety practices shall be promoted. This includes protection from fire, accidents, and toxic substances. Lighting, heating, and ventilation systems should be adequate. Employees should always have access to sanitary facilities, which should be adequate and clean. The factory must have safety and health policies that are clearly communicated to the workers. These should apply to employee residential facilities, where provided by employers.

#### **V. Environmental Requirements**

Vendors must comply with all applicable environmental laws and regulations including, but not limited to, those related to water discharges and air emissions. Vendors must have a current environmental system or plan that includes procedures for handling environmental emergencies. Hazardous waste must be properly contained, stored, and only disposed of at approved facilities. Trained environmental personnel shall be assigned to manage air and water emissions and waste management.

In addition, vendors should aim for progressive improvement in their environmental performance, not only in their own operations, but also in their operations with partners, suppliers, and subcontractors. This includes adoption of cleaner production and pollution prevention measures. To this end, Suppliers should maintain written environmental policies and standards and agree to be monitored separately for environmental responsibility. Factories shall continuously monitor, and disclose to Kahtoola upon request, 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.

#### **VI. Documentation & Monitoring**

The vendor maintains all documentation needed to demonstrate compliance with this Vendor Code of Conduct, agrees to make these documents available for Kahtoola or its designated monitor, and agrees to submit to inspections with or without prior notice.

#### **VII. Community**

Kahtoola encourages all suppliers and their employees to get involved in local social and environmental community charity efforts by volunteering time and/or providing other types of support. Kahtoola has a solid history of supporting grass roots environmental non-profits and environmental advocacy. We seek long-term partnerships with suppliers that share these same philanthropic values.

#### **VIII. Transparency in the Supply Chain**

Kahtoola and our suppliers are jointly responsible for ensuring social and environmental responsibility and the integrity of our product content claims from the extraction through the finished goods factory level. The only way to work towards this goal is to have transparency and traceability into all levels of our supply chain. Kahtoola expects suppliers to map and continuously track and monitor all locations in all levels of their supply chain and upon request provide transparency information into the owned and/or

subcontracted mines, mills, plants, factories and other sites that are involved in the production of our products.

**Contact Us:** If suppliers are violating any of these Code elements, we would like to know about it. Please bring these issues to our attention by emailing us at [betsy@kahtoola.com](mailto:betsy@kahtoola.com). Please feel free to write in your local language. All information we receive will be kept in strict confidence and your identity protected.