



SPECTOR & CO.
YOUR BRAND'S BEST FRIEND

Code of Conduct

At **Spector & Co.** 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.
- Respect for the environment.
- Being bound by applicable laws and regulations at all times.

We expect these same commitments to be shared by all manufacturers of our merchandise. At a minimum, we require that all **Spector & Co.** manufacturers meet the same standards that we follow:

Product Safety

We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet all applicable recognized voluntary industry standards for our products and processes.

Child Labor

We will not use child labor.

The term "child" refers to a person younger than 16 (or 15 where local law allows) or, if higher, the local legal minimum age for employment or the age for completing compulsory education.

Involuntary Labor

We will not use any forced or involuntary labor, whether prison, bonded, indentured or otherwise.

Bribery and Corruption

We do not offer, give, solicit, or receive any form of bribe, kickback or improper inducement in order to secure business or regulatory approval. This applies to all **Spector & Co.** transactions anywhere in the world, even when the practice is widely considered "a way of doing business".

Fraud, protection of company assets, accounting

We must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of

Spector & Co. or any third party.

Confidential Information

We value and protect our confidential information and we respect the confidential information entrusted to us by our customers.

Coercion and Harassment

We 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

We will not discriminate in hiring and employment practices, including 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.

Association

We will respect the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference.

Workplace Conditions - Health & Safety

We 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 safety and adequate lighting and ventilation.

Compensation - Hours and Wages

We 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 of compensation, and provide legally mandated benefits. If local laws do not provide for overtime pay, we will pay at least regular wages for overtime work.

Protection of the Environment

We will comply with all applicable environmental laws and regulations. Manufacturers will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.

Subcontractors and Sources

We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all of the same policies stated in our Commitment to Ethical and Responsible Conduct Policy. All subcontractors and suppliers are required to comply with all applicable and national laws.

Absence of Applicable laws and regulations

In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.

Reporting illegal or non-compliant conduct

We take responsibility for ensuring that we all act with integrity in all situations. Employees shall report any practices or actions believed to be inappropriate under this Code or even illegal to their Supervisors or HR Department or Compliance Department. If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Executive.

Where appropriate, complaints may be made on a confidential basis or through the suggestion boxes.

All complaints shall be properly investigated.

Failure to comply

To "do the right thing" and to ensure the highest standards of integrity is each employee's personal responsibility that cannot be delegated.

Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal / termination and, if warranted, legal proceedings or criminal sanctions.