



# WEYCOGROUP

## SOCIAL AND ENVIRONMENTAL COMPLIANCE PROGRAM

### SUPPLIER CODE OF CONDUCT

*Florsheim*  
SHOE COMPANY

 FORSAKE

**NUNN BUSH**  
DISCOVER TRUE COMFORT

**BOGS**<sup>o</sup>

 **STACY ADAMS**  
EST. 1975



### INTRODUCTION

Weyco Group, Inc. designs and markets quality footwear for men, women, and children under a variety of well-known brands, including Florsheim, Nunn Bush, Stacy Adams, Bogs, and Forsake. Weyco Group and its brands are committed to conducting and managing our business in a manner that reflects our high ethical and moral values. We expect our suppliers to respect and adhere to the same philosophy in the operation and management of their businesses.

As part of this commitment, Weyco has developed this Supplier Code of Conduct (“Code”) which establishes standards for all of its suppliers. In addition to complying with local laws and regulations, Weyco requires suppliers to be honest, transparent and committed to making continuous improvements against these standards. For the purposes of the Code, a supplier is any manufacturer or subcontractor engaged in a manufacturing process, including cutting, sewing, assembling and packing that results in a finished product for the consumer.

Weyco will monitor compliance with this Code, and we, or our representatives, may visit suppliers and their subcontractors to ensure compliance with this policy. Any violations of our Code will be reported to the supplier for follow up and corrective action. Suppliers are required to cooperate with the entire process. Where there are Zero Tolerance violations and/or the supplier does not demonstrate a willingness to comply, Weyco reserves the right to discontinue business with the supplier.

### COMPLIANCE WITH THE LAW

Weyco expects its suppliers to comply, at a minimum, with the applicable labor and environmental laws and regulations of the country where the merchandise is produced. Where the Code requirements are stricter than the law, compliance with the Code is required.

## **CHILD LABOR**

Suppliers will comply with the minimum employment age limit defined by national law or by International Labor Organization (ILO) Convention 138, whichever is higher. The ILO Convention 138 minimum employment age is the local mandatory schooling age, but not less than 15 years of age, subject to exceptions allowed by the ILO and national law. In addition, suppliers must observe all legal requirements for work of authorized minors, particularly those pertaining to hours of work, wages, minimum education and working conditions.

## **FORCED LABOR, SLAVERY, AND HUMAN TRAFFICKING**

Suppliers shall not use any type of forced labor, which means any work or service performed involuntarily under threat of physical or other penalty, such as prison, indentured, bonded or other compulsory labor. In addition, suppliers will ensure there is no slave labor or human trafficking in its supply chain.

Further, they shall respect the freedom of movement of its workers, ensure contracts are written in workers' spoken language, and not restrict worker movement by controlling identity papers, holding money deposits, or taking any other action to prevent workers from terminating their employment.

## **HARASSMENT AND ABUSE**

Workers shall be treated with dignity and respect. In particular, suppliers will not permit physical, sexual, psychological or others forms of mental or physical coercion, harassment, abuse or intimidation. Further, the use of fines as a disciplinary practice is not permitted.

## **DISCRIMINATION**

Discrimination in employment, including hiring, pay, benefits, job assignments, working conditions, training, recruitment, promotion, discipline, termination, and retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion and social or ethnic origin is prohibited. Workers should be provided with an environment where they can work without distress or interference caused by harassment, discrimination or any other inappropriate workplace behavior.

## HEALTH AND SAFETY

Conditions in all production and residential facilities must be safe, clean and consistent with all applicable laws and regulations, and the supplemental guidelines of this Code, in order to avoid preventable work related accidents and injuries. Where higher than the law or the Code requirement, suppliers are encouraged to implement industry best practices.

## WAGES AND BENEFITS

Suppliers must comply with all laws regulating local wages, overtime compensation, and legally mandated benefits. Wage and benefit policies must satisfy all applicable laws and regulations.

## WORKING HOURS

All work shall be voluntary. Except in extraordinary business circumstances, workers shall not be required to work (inclusive of overtime) more than the legally prescribed limits or 60 hours, whichever is less, and one day off in every seven day period shall be provided.

## FREEDOM OF ASSOCIATION

Suppliers should respect the rights of employees to lawfully associate or not to associate with groups of their choosing, as long as such groups are legal in the country where the merchandise is manufactured. Suppliers should not interfere with, obstruct or prevent legitimate related activities, and ensure workers are not penalized for their non-violent exercise of these rights.

## ENVIRONMENTAL PRACTICES

Suppliers, at a minimum, will meet all relevant local and national environmental protection laws and regulations, and will strive to comply with international environment protection standards. All required environmental permits shall be kept current and available on premise for review.

## **RECORDKEEPING**

Suppliers must maintain current and sufficiently detailed records that enable Weyco to determine their compliance with the Code and all applicable laws and regulations of the country where the merchandise is produced. All such records must be accurate and transparent and made available to representatives of Weyco promptly and upon request.

## **BUSINESS INTEGRITY**

Suppliers must demonstrate a high degree of professionalism and have a close affinity with our business ethics, as outlined in our Code of Business Ethics. Any and all forms of bribery, corruption, deception and records falsification are strictly prohibited, whether given to obtain business or otherwise. The business relationship may be immediately impacted by any such finding. The retaliation or reprisal against any person who, in good faith, reports unlawful or inappropriate activity related to the Code and/or the audit process may also give cause to interrupt the business relationship.

## **SUBCONTRACTING**

Suppliers may not subcontract any operation in the manufacturing process without prior written consent from Weyco, and only after the subcontractor has agreed to comply with Weyco's Code. Suppliers are responsible for ensuring compliance with Weyco's Code by all of their subcontractors who produce or provide materials or services which are used in the manufacturing, processing, harvesting or production of merchandise sold to Weyco.