

1. Annual reviews

The company reviews all Suppliers and ensures that all Suppliers agree to and sign the Code of Ethical Conduct as detailed below, on an annual basis. The review occurs in February/March, and the findings will be reported to the VP of the Swimming Division at the end of the financial year.

2. Policy statement

Zoggs has, through the **Code of Ethical Conduct**, taken steps to ensure slavery and human trafficking is not taking place in any part of its own business or its supply chains.

3. General principles

Zoggs is committed to ethical business practices in its own facilities and its supplier's facilities. To define these practices and provide a means of monitoring adherence to these practices, Zoggs has adopted the guiding principles laid out by the **World Federation of the Sporting Goods Industry (WFSGI)** in devising its Code of Conduct. The ideals of the WFSGI are the ideals of sport and the organisation seeks to promote fairness, honesty, mutual understanding and high ethical standards not only on the sports field, but also in the factories, which make sports products. Adherence to this Code will not only enhance the communities in which our products are manufactured, but will also strengthen the relationships with our mutual customers.

4. Code of ethical conduct

- 4.1 The principles of this Code are based in the International labour standards outlined in the relevant Conventions of the International Labour Organisation (ILO).
- 4.2 This Code applies to the suppliers of all products manufactured under the Zoggs brand. This Code applies equally to the prime factories as it does to subcontractor and supplier factories (collectively, "Suppliers").
- 4.3 This Code defines the minimum requirements for Suppliers who manufacture products under the Zoggs brand. In all cases, the demonstrated actions should meet or exceed those that are required by the laws and regulations of the applicable country. In addition, Zoggs encourages Suppliers to take additional steps not covered in this Code to improve working conditions, employment practices and environmental protection. We expect our Suppliers, at a minimum, to do the following:
 - Comply with all applicable laws and regulations of the countries in which they operate. Local industry standards should prevail where these are higher than local legal requirements.

- Abide by fair and humane employment practices.
- Provide safe and healthy working conditions.
- Undertake reasonable measures to protect the environment.

5. Inspections

At any time, with advance notice, Zoggs reserves the right to inspect and/or authorise a third party to inspect and audit, without any restrictions, its Suppliers. Inspections will include interviews with several employees of Supplier selected by the inspector to confirm adherence to this Code. If Zoggs determines that any Supplier is in violation of these principles, Zoggs, at its option, reserves the right to:

- Require corrective actions within an acceptable time period in order for the business relationship to continue or to resume; and
- In the case of violations of applicable law, or in the event that other violations of the principals in this Code continue after a reasonable opportunity to remedy such violations, to terminate the business relationship with the Supplier, including cancellation of outstanding purchase orders.

6. Documentation

Suppliers are to maintain on site all documentation that may be needed to verify compliance with the laws and regulations of the applicable country of manufacture and this Code. All such documentation is to be made available to Zoggs and/or its designated third party inspector upon request.

7. Employment standards

Suppliers shall comply with applicable laws and industry standards for all employment practices, including working hours, wages and employee benefits. At the time of hiring, all workers shall be clearly informed of the terms of employment as mandated by law, and the Supplier's own policies and regulations. Suppliers shall not engage in the use of corporal punishment, mental or physical abuse, or verbal abuse. Suppliers shall not use any prison, indentured, bonded or forced labour. No employee can be compelled to work through force, the threat of force or intimidation of any form.

8. Freedom of association

Suppliers shall recognize and respect the rights of workers to join worker's organisations and associations of their choosing and to bargain collectively to the extent permitted by local law

9. Wages and benefits

Suppliers recognise that wages are essential to meeting employees' basic needs and that employees should be compensated for all time worked at rates that meet or exceed the minimum wage or the prevailing industry wage whichever is the higher. In addition to the compensation for regular hours of work, employees shall be compensated for overtime hours at rates laid down by law or industry standard where no law exists. Each employee will be provided with all legally required benefits.

10. Working hours

Workers shall not be required, except in extraordinary business circumstances, to work in excess of 60 hours per week, including overtime, or the local legal requirement whichever is less. Employees shall be entitled to at least one day off in every seven-day period.

11. Non-discrimination

No person shall be subject to any discrimination in employment, included in hiring, salary, benefits, advancement, disciplines, termination or retirement based on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion or social or ethnic origin.

12. Child labour

Suppliers shall employ only workers who meet the legal minimum working age, but in no event less than 14 years of age. For jobs requiring greater maturity, or pose a higher safety risk, workers shall be 18 years of age or older. Suppliers shall have legitimate substantiation of the date of birth of each worker.

13. Health and safety

13.1 In addition to meeting or exceeding the general health and safe working conditions (and in the case of workers living in Supplier provided dormitories, living conditions) as required by law, Suppliers are to ensure the following at a minimum:

13.2 Health and safety education

Workers are to be educated routinely on the importance of health and safety, and good sanitation. Suppliers are to take steps and adopt procedures to prevent accidents and injury including appropriate warning and instruction signs. Workers who use hazardous or flammable materials or operate dangerous equipment must be properly trained.

13.3 Emergency exits and evacuations

Easily accessible exits shall be adequate in number, clearly marked and free of obstructions. Emergency exits shall not be locked during working hours. Trained supervisors shall periodically conduct fire and emergency evacuation drills.

13.4 First aid and emergency care

On-site trained first aid personnel are to be available at all times and first aid services are to be provided to the workers at no cost.

13.5 Additional safety measures

Work areas are to have both suitable and adequate lighting, effective and appropriate ventilation. In areas where excessive dust or airborne chemicals are present appropriate dust masks or respirators must be provided. In areas where the work may pose physical dangers, appropriate protective equipment and clothing shall be provided to the workers at no cost.

13.6 Potable water and toilet facilities

Safe drinking water shall be provided at all times with no restrictions on the consumption of drinking water. Adequate and clean toilet and hand-washing facilities are to be provided.

13.7 Freedom of movement

Except for customary curfew hours in factory dormitories, workers must be free to leave factory grounds during non-working hours.

14. Environmental protection

At a minimum, Suppliers are to comply with all applicable environmental laws and regulations of the applicable country of manufacture. In the absence of any applicable laws, Suppliers are to take responsible actions to adopt procedures to ensure the proper protection of the environment through better management, policies, technology and equipment that promote responsible use of natural resources and minimization of pollution. Whenever possible, Suppliers shall exceed these minimum requirements and ensure the following at a minimum:

- All hazardous materials and chemicals must be disposed of properly and Suppliers must meet or exceed all wastewater treatment and recycling requirements;
- Factories are to install the appropriate equipment for proper ventilation and air circulation; and

- In the event that hazardous or polluting materials are discharged improperly, Suppliers must notify the appropriate authorities and take immediate actions to contain and clean the discharge.

15. Agreement to follow the code of ethical conduct

Zoggs, by requiring Suppliers to agree to the terms of the Zoggs Code of Ethical Conduct, as detailed above, are taking steps to ensure that slavery and human trafficking is not taking place in any part of its supply chain. The company aims to prevent any of the offences of 'slavery, servitude and forced or compulsory labour' and 'human trafficking' involved in the supply chain, **but** it cannot guarantee that it is not taking place.