



## CODE OF CONDUCT

We believe in the power of an individual to make a difference in the world where we live and work. One voice can and must make a difference. We believe that speaking up for a courageous idea or voicing a grievance strengthens Timberland and builds our community.

We respect and promote the Universal Declaration of Human Rights and the International Labor Organization (ILO) conventions that establish international human and labor rights. Timberland strives to provide the opportunity for all employees to work in fair, safe and non-discriminatory environments, and we define “employee” as any individual working in an enterprise. We believe that companies must provide opportunities for employee development. We seek to apply both the letter and the spirit of all applicable local laws and to promote continuous improvement in our operations. We hold our business partners to these same standards and actively seek partners who share our beliefs. The following requirements are meant to ensure that these standards are maintained.

### **Human Rights**

**Voluntary Employment:** Each employee’s presence must be voluntary. This specifically prohibits all forms of prison labor, indentured labor, slave labor, or any other forms of compulsory labor. Employees must have the option to leave employment.

**Freedom of Association:** Employees must be given the right to decide how their best interests will be represented in the workplace. This includes the right to freely associate and bargain collectively. Where the right to freedom of association is restricted under law, there must be an equivalent means of independent representation for employees.

**Fair and Equal Treatment:** Work environments must be free of intolerance, harassment, abuse, retribution for grievances, and corporal punishment. There cannot be discrimination based on race, color, sex, religion, political opinion, nationality, social origin, social status, indigenous heritage, disability, age, marital status, capacity to bear children, pregnancy, sexual orientation, genetic features, or other status of the individual unrelated to the ability to perform the job.

**Child Labor:** The labor of children cannot be used. We define “child” as younger than 16 years of age or the compulsory age for school attendance, whichever is greater. Laws on restrictions for employees of certain ages must be followed.

**Compensation:** For regular work hours, employees must receive wages and benefits that *at a minimum* meet all applicable laws governing minimum wage and mandated benefits. For overtime hours, employees must receive a *premium* rate, which must be no lower than local law. Wages must be paid on a regular schedule and employees must receive an understandable payslip that shows how wages are calculated. There cannot be conditional employment practices, such as training or apprenticeship wages, pre-employment fees, deposits, or other practices that effectively lower an employee’s pay below the legal minimum wage.

**Working Hours:** The regular work schedule (excluding appropriately compensated overtime) must not exceed 48 hours per six-day period. Total working hours (including overtime) cannot exceed 60 hours in a given week or 12 hours in a given day. Employees shall receive *at least* 1 day off of rest after working 6 consecutive days. All overtime must be voluntary.

**Health and Safety:** The workplace must be safe and healthy based on the recognized standards of the ILO and national laws. This requirement applies to any residential facilities provided. Employees must receive training on workplace safety practices.

### **Environment**

We expect a strong environmental commitment and aggressive efforts to protect and restore the natural environment. We will favor partners who: 1) have a management system demonstrating environmental commitment; 2) publicly disclose environmental impacts and activities through regular reporting; 3) eliminate toxic and hazardous substances from products and operations; 4) increase efficiency and thereby minimize pollution and waste; 5) reduce use of natural resources including raw materials, energy and water; 6) take responsibility for proper waste management and any environmental problems associated with disposal of wastes. We require a continuous effort to improve environmental performance along a defined path towards clean production.

### **Right of Review**

To measure our compliance and the compliance of our business partners, we conduct ongoing audits and reviews of facilities. We require full and open access (for our staff and representatives) to the facilities and operations involved in our business. Employees must have the opportunity to notify us anonymously on any violations of standards at a workplace, and they must not receive any retribution for this action. We will make information on our compliance program available publicly.