



WORKPLACE CODE OF CONDUCT FOR CONTRACT PRODUCTION FACILITIES

FORCED OR COMPULSORY LABOR. There shall not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. KEEN will not work with contract production facilities that use forced or compulsory labor, including labor that is required as a means of political coercion or as punishment for holding or for peacefully expressing political views, in the manufacture of its products. KEEN will not purchase materials that were produced by forced prison or other compulsory labor and will immediately terminate business relationships with any sources found to utilize such labor.

CHILD LABOR. KEEN will not work with contract production facilities that use child labor. No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture* allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

HARASSMENT OR ABUSE. Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

NON-DISCRIMINATION. KEEN will seek contract production facilities which do not discriminate in hiring and employment practices. No employee or applicants shall be subject to any discrimination in employment, including, without limitation, hiring, promotion, salary, benefits, advancement, discipline, termination, or retirement on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion or social or ethnic origin.

SAFE AND HEALTHY WORKING ENVIRONMENT. KEEN will seek contract production facilities who strive to assure employees a safe and healthy workplace and that do not expose workers to hazardous conditions. These contract production facilities shall provide a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facility/factory operations.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING. Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

FAIR WAGES AND BENEFITS. KEEN will seek contract production facilities who share our commitment to the betterment of wage and benefit levels that address the basic needs of workers and their families so far as possible and appropriate in light of national practices and conditions. Contract production facilities shall pay employees, as a floor, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher; and shall provide legally mandated benefits.

HOURS OF WORK. Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such

country plus 12 hours overtime and (ii) be entitled to at least one day off in every seven day period.

OVERTIME COMPENSATION. In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate. Workers shall not work more than 60 hours per week, including overtime, except in extraordinary business circumstances. In countries where the maximum work week is less, that standard shall apply. Workers shall be entitled to at least one day off in every seven day period.

ENVIRONMENTAL COMPLIANCE. Contract production facilities must comply with all applicable environmental laws regulations and rules of the country in which they operate. KEEN expects management of contract production facilities to make progressive improvements in the environmental performance in their own operations and require the same of their partners, suppliers and subcontractors. This includes: integrating principles of sustainability into business decisions; responsible use of natural resources; adoption of cleaner production and pollution prevention measures; and designing and developing products, materials and technologies according to the principles of sustainability.

NON-RETALIATION POLICY. Contract production facilities producing KEEN products will publicize and enforce a non-retaliation policy that permits factory workers to speak with KEEN staff without fear of retaliation by factory management.

GENDER EQUITY. Female workers shall receive equal remuneration, including wages, benefits, allowance and given the same opportunities, inclusive of promotion, available to male employees with the same qualifications. Female workers will not be pressured to use contraceptives. Those taking the legally mandated “Maternity Leave” shall not be unlawfully impacted.

LEGAL AND ETHICAL BUSINESS PRACTICE. Contract production facilities and service providers must comply with all applicable laws of the country in which they operate, including but not limited to laws, regulations and rules relating to salaries/wages, working hours, conditions of employment, health and safety, the environment and immigration. Also, contract production facilities and service providers must comply with applicable United States laws relating to child and/or prison labor. Employers and employees must be ethical in their business practice and not offer nor accept bribes or gratuities.

FACILITY SECURITY. It is KEEN policy that all contract production facilities establish facility security procedures to guard against the introduction of non-manifested cargo into outbound shipments. This includes without limitation: drugs, biological agents, explosives, weapons, radioactive materials, other contraband or humans.

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KEEN, Inc. shall, in addition to complying with all applicable laws of the country of manufacture, comply with and support the Workplace Code of Conduct, and shall apply the higher standard in cases of differences or conflicts. KEEN, Inc. shall also require the same of its licensees and contractors

*All references to local law throughout the KEEN Workplace Code of Conduct for Contract Production Facilities shall include regulations implemented in accordance with applicable local law.