



**SPECTOR & CO.**  
YOUR BRAND'S BEST FRIEND

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## 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.

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.

### 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.