

Supplier Code of Conduct

Seventh Avenue, Inc., its affiliates, and its subsidiaries (hereinafter referred to as Seventh Avenue) are in the business of buying and selling merchandise. Seventh Avenue does not own, operate, or manage any of the factories that manufacture its non-food merchandise – but instead purchases goods from hundreds of independent Suppliers in the United States and throughout the world.

In selecting Suppliers, Seventh Avenue tries to identify reputable companies that have the willingness and ability to conduct their business with high ethical, legal, and socially responsible standards as identified by Seventh Avenue. This Supplier Code of Conduct sets forth the commitment of Seventh Avenue to do business only with those Suppliers that share its commitment to fair and safe business practices.

While Seventh Avenue recognizes that there are different cultural and legal environments in which its Suppliers may operate throughout the world, this Supplier Code of Conduct sets forth the basic minimum requirements Suppliers must meet in order to do business with Seventh Avenue. Additionally, this Supplier Code of Conduct provides the foundation for Seventh Avenue's on-going evaluation of Supplier compliance with these requirements. Failure to adhere to these requirements by a Supplier may result in the cancellation of all outstanding purchase orders and/or termination of the Supplier's business relationship with Seventh Avenue.

Note that Suppliers are defined as agents, vendors, and manufacturers, as well as any of their respective contractors, subcontractors, or other suppliers, sources, and agents who provide Seventh Avenue with contracted goods or services.

Please review the below Supplier Code of Conduct. Should you have any questions, please feel free to contact your respective Buyer, Inventory Manager, or the Seventh Avenue Global Compliance Group.

Compliance with Applicable Laws & Regulations: Suppliers will comply with all applicable local and national laws and regulations of the jurisdictions in which they are doing business. In addition, Suppliers will comply with all applicable United States Laws, Codes, Regulations, and Industry Standards governing the manufacture, sale, labeling, branding, packaging, shipment, importation, and distribution of Seventh Avenue product.

Forced & Indentured Labor – Suppliers will not permit the use of forced or involuntary labor of any kind including indentured, bonded, prison, or otherwise. All work must be voluntary and workers shall be free to leave work or terminate their employment with reasonable notice. Workers must not be required to surrender any government issued identification, passports, or work permits as a condition of employment.

Child Labor – Suppliers will not engage in the use of child labor. The minimum admission to employment or work shall not be less than the age of completion of compulsory education, normally not less than 15 years or 14 where the local law of the country permits. Seventh Avenue will not accept product from Suppliers who use or permit the use of child labor.

Harassment or Abuse – Suppliers shall commit to a workplace free of harassment. Suppliers will not threaten, use, or permit the use of corporal punishment, physical, sexual, psychological, or verbal harassment, threats of violence, or other forms of physical or mental abuse, intimidation, or coercion.

Health and Safety – Suppliers will follow all relevant legislation, regulations, and directives in the countries in which they operate to ensure their workers have a clean, safe, and healthy work environment. Suppliers will also ensure these same standards apply to residential facilities, if provided. Additionally, Suppliers must comply with all applicable laws and regulations regarding occupational health and safety.

Non-Discrimination – Suppliers will employ workers on the basis of their ability to perform a job, rather than on the basis of gender, age, sexual orientation, disability, nationality, social or ethnic origin, political affiliation, opinion, race, cultural or religious beliefs, maternity, marital beliefs, or similar factors.

Women's Rights – Suppliers will ensure that workers who are women receive equal treatment in all aspects of employment.

Freedom of Association & Collective Bargaining – Suppliers will recognize and respect the rights of employees to peacefully and freely associate, organize, and bargain collectively in accordance with the laws of the countries in which they are employed. Suppliers shall not interfere with, obstruct, or prevent legitimate related activities. Workers shall not be subject to intimidation or harassment in the peaceful exercise of their legal rights to join or to refrain from joining an organization.

Wages and Benefits – Suppliers will fairly compensate their workers by complying with all local and national wage and hour laws and regulations of the jurisdictions in which they operate, including those pertaining to minimum wages, overtime wages, piece rates, and other elements of compensation. In addition to their compensation for regular hours of work, workers shall be compensated for overtime hours at the premium rate required by applicable laws and regulations, or if no legal requirement exists, the employee at minimum will be compensated at their regular hourly rate. All legally mandated benefits must be provided.

Working Hours - Suppliers will limit the hours employees may work on a regularly scheduled basis to the legal limit on regular and overtime hours established by local laws and regulations in the jurisdiction in which they operate or, if no legal requirements exist, to sixty (60) hours in a seven (7) day work period. All overtime must be voluntary and must be fully compensated in accordance with the requirements of local law, and except in extraordinary circumstances, employees must be entitled to at least one day of rest in every seven-day period. Suppliers shall comply with all applicable laws that entitle workers to vacation time, leave periods, and holidays.

Ethical Standards - Suppliers must be committed to the highest standards of ethical conduct when dealing with workers, suppliers, manufacturers, and customers. Corruption, extortion, and embezzlement, in any form, are strictly prohibited. Suppliers shall not violate the Foreign Corrupt Practices Act (FCPA), any international anti-corruption conventions, and applicable anti-corruption laws and regulations of the countries in which they operate, and shall not engage in corruption, extortion or embezzlement in any form. Suppliers shall not offer or accept bribes or other means to obtain an undue or improper advantage. Suppliers must uphold fair business standards in advertising, sales, and competition.

U.S. Customs & Border Protection – Suppliers will comply with all applicable U.S. Customs & Border Protection laws and regulations governing the importation of product into the United States and will establish and maintain programs and documentation to support such regulations. Suppliers will educate themselves regarding both U.S. Customs & Border Protection and Seventh Avenue Customs-Trade Partnership Against Terrorism (C-TPAT) security recommendations and requirements and take the necessary steps to comply. Each Supplier facility (whether production or warehousing) must have written security procedures and maintain documented proof of the adequate controls implemented to guard against the introduction of non-manifested cargo into the supply chain.

Environment – Suppliers will comply with all applicable legislation and regulations regarding the protection of the environment. Suppliers shall commit to reducing the environmental impact of their designs, manufacturing processes, and waste emissions. Factories shall work to eliminate the use of toxic and hazardous substances from the production process. Seventh Avenue encourages Suppliers to reduce excess packaging and to use non-toxic, environmentally friendly materials whenever possible. Seventh Avenue's policy specifically prohibits the use of ozone depleting substances and requires compliance with the United States Endangered Species Act of 1973.

Subcontractors – Any subcontractors retained by Seventh Avenue Suppliers must be in compliance with this Supplier Code of Conduct. Each Supplier is responsible for ensuring its subcontractor's compliance and will be held accountable for any breaches in policy.

Record Keeping / Monitoring – All Suppliers will maintain documentation to demonstrate compliance with the above Code and shall make it available for review purposes at any time. Each factory agrees to allow Seventh Avenue and its agents (including third parties) to engage in assessment activities including unannounced inspections with or without prior notice.

Seventh Avenue's representatives have been asked to look for violations of the enclosed Supplier Code of Conduct on visits to factories or manufacturing facilities and to report questionable business practices to management for follow up and potential corrective action.

For questions or comments regarding the above, please contact michaelw@sccompanies.com. To report a suspected violation of this Supplier Code of Conduct contact the Seventh Avenue Global Compliance Department. Call (608)-328-8747, email michaelw@sccompanies.com, or write to Seventh Avenue, Inc., Attn: Global Compliance Department, 1112 7th Avenue, Monroe, Wisconsin 53566 USA