



## SOCIAL RESPONSIBILITY POLICY AND CODE OF CONDUCT

### 1.0 Social Responsibility Policy

UST Brands is committed to conducting all of its business with integrity and in a socially responsible manner; meeting all federal and local laws; and complying with all ethical and environmental standards in the countries we conduct business. UST Brands is also committed to protecting the environment and ensuring the health and safety of our employees, vendors, and customers.

UST Brands' Social Responsibility Code of Conduct, which we require all our vendors and supply chain partners to strictly comply by, abides with all related national, local, or international laws and regulations. We recognize that by integrating this code of conduct, along with environmental and health and safety management practices, we can offer safe innovative products and provide a safe and secure working environment, while conserving and enhancing resources for future generations.

### 2.0 Social Responsibility Code of Conduct

- 2.1 In order to make an impact and promote socially acceptable production conditions, UST Brands has adopted the Outdoor Industry Association (OIA) Fair Labor Code of Conduct as its own Social Responsibility Code of Conduct.
- 2.2 UST Brands declares its support for the OIA Fair Labor Code of Conduct and seeks to conform to the Code and its standards.
- 2.3 The Code of Conduct outlines standards to ensure that working conditions in the UST Brands supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible.
- 2.4 UST Brands considers itself responsible for all of the activities carried out in its name worldwide. We feel a particular responsibility to provide decent working conditions for the employees producing our products. UST Brands acknowledges that this responsibility extends to all employees who make products for UST Brands, regardless of whether they are directly employed by UST Brands or by its third party subcontractors or its suppliers.
- 2.5 In accordance with the International Labour Organization conventions, the United Nations' Universal Declaration of Human Rights and the UN's conventions on children's rights and the elimination of all forms of discrimination against women, UST Brands aims to attain compliance with certain social and environmental standards. The following requirements are of particular importance:

#### 2.5.1 **Compliance with Laws and Workplace Regulations**

UST Brands, its vendors, and supply chain partners will comply with laws and regulations in all locations where they conduct business.

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### **2.5.2 Prohibition of Forced Labor**

There shall be no use of forced labor, including prison labor, indentured labor, bonded labor, human trafficking, slavery or other forms of forced labor.

### **2.5.3 Prohibition of Child Labor**

UST Brands, its vendors, and supply chain partners will not hire any employee under the age of 16. If the legal age for employment is higher than 16, then the higher age shall apply. In the case of hazardous work, the minimum age is 18.

### **2.5.4 Prohibition of 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.

### **2.5.5 Compensation and Benefits**

UST Brands, its vendors, and supply chain partners recognize that wages are essential to meeting employees' basic needs. Employees shall be paid, 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. 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.

### **2.5.6 Hours of Work**

UST Brands, its vendors, and supply chain partners shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. UST Brands, its vendors, and supply chain partners shall allow workers at least one day of rest in every seven-day period. All overtime work shall be consensual. Except in extraordinary business circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

### **2.5.7 Prohibition of Discrimination**

Employees will be hired, paid, promoted and terminated on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. No person shall be subject to discrimination in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement on the basis of gender, race, religion, age, disability, sexual orientation, marital status, pregnancy, nationality, political opinion, social or ethnic origin.

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### 2.5.8 Health and Safety

UST Brands, its vendors, and supply chain partners will provide 1) a safe and healthy work environment, 2) written safety and health policies and procedures, 3) provide training and adequate equipment to ensure workplace safety practices. Where residential housing is provided for workers, UST Brands, its vendors, and supply chain partners will provide safe and healthy housing.

### 2.5.9 Freedom of Association and Collective Bargaining

UST Brands, its vendors, and supply chain partners will recognize and respect the freedom of employees to exercise their lawful rights of free association and collective bargaining. Where the right to freedom of association is restricted under law, vendors must allow their employees to raise with the vendors' representatives any job related grievances the employees may have, without penalty or reprisal.

### 2.5.10 Environment

UST Brands, its vendors, and supply chain partners recognize that environmental responsibility is integral to producing world-class products. In manufacturing operations, adverse effects on the environment and natural resources are to be minimized while safeguarding the health and safety of the public. UST Brands, its vendors, and supply chain partners will comply with environmental rules, regulations and standards applicable to their operations, and will observe environmentally conscious practices in all locations where they operate.

2.6 UST Brands, its vendors, and supply chain partners will encourage compliance with the requirements above, defining and implementing appropriate procedures and monitoring their suppliers' compliance.

### 3.0 References

Outdoor Industry Association (OIA)  
Fair Labor Code of Conduct  
[www.outdoorindustry.org](http://www.outdoorindustry.org)

The Global Social Compliance Programme (GSCP)  
Reference Code  
[www.gscpnet.com](http://www.gscpnet.com)

Fair Labor Association (FLA)  
Workplace Code of Conduct  
[www.fairlabor.org](http://www.fairlabor.org)

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Social Accountability International  
SA8000 Standard  
[www.sa-intl.org](http://www.sa-intl.org)

### **4.0 Social Responsibility Contact**

#### **UST Brands**

Attention: Martin J. Schwartz  
EVP, Safety & Compliance  
7720 Philips Highway  
Jacksonville, Florida 32256 USA  
Tel: 904-786-0033  
Fax: 904-786-0890  
Email: [marty.s@ustbrands.com](mailto:marty.s@ustbrands.com)

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