

PURPOSE

Ethics are fundamentally about what actions we consider right and what we ought to do, or not do, in different situations. At Stronger, the laws and regulations applying in the countries where we operate are the obvious starting-point, but there are areas where Stronger has higher ambitions.

Stronger has a clear aim in terms of ethics: zero ethical breaches. For example, we do not tolerate any form of corruption, inducement, bribery, actions that limit competition, discrimination, harassment or unnecessary environmental impact. We care for human rights, basic working conditions, caring for the environment and business integrity.

The Code applies to all companies providing products and/or services to Stronger. It includes the suppliers (and its sub-contractors), its employees and consultants.

Suppliers are liable for ensuring that their employees, and those of potential sub-contractors engaged in the delivery to Stronger, have read, understood and undertaken to comply with the principles of the Code.

The Supplier shall have a process in place to verify compliance with this Code and is liable for following up compliance with its sub-contractors.

The Code is an essential part of the agreement between Stronger and the Supplier and non-compliance with the Code might result in termination of the collaboration with the Supplier.

INTRODUCTION

This Code of Conduct is written in accordance with the World Federation of the Sporting Goods Industry's (WFSGI) Code of Conduct guiding principles and UN's Principles of The Global Compact.

For Stronger human rights is one of the principles that guides the company in its daily thoughts and actions.

Stronger has set up a Code of Conduct that will guide the company and its employees. At the same time this code clarifies our intent to take responsibility for all our actions in the world. It is a non-negotiable requirement from Stronger that all our suppliers and their subcontractors follow this Code of Conduct.



THE CODE

1. Legal requirements

All Stronger's suppliers must comply in all their activities with the national laws within the countries they operate.

Should any of the following requirements of this Code of Conduct be in violation with the national law in any country or territory, the law must be followed.

It is important to understand that Stronger's requirements may not be limited to the requirements of the national law.

2. Child labour

Stronger supports the UN convention of the Rights of the Child and base our policy on child labour on article 32.1;

"States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to

interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development".

Therefore child labour shall not be used in any activity associated with Stronger's suppliers. This requirement implies that all suppliers follow the local laws of the country of manufacture and the UN Convention on the Rights of the Child.

Stronger requires that:

- Employees must meet the applicable minimum legal age requirement.
- Factories shall meet all applicable laws concerning child labour.
- Documentation regarding age shall be held by the factory. In those cases where
 this requirement can not be met, the factory must use appropriate methods
 according to local practice and law.
 - If any of our suppliers fail to meet these requirements regarding child labour, Stronger will cancel its co-operation with the concerned supplier.

2.1 Recommendations

According to the UN Convention on the Rights of the Child, a child is defined as a person less than 18 years of age. Stronger, therefore recommends all suppliers to make sure that children between the ages of 15-18 are treated according to their age.

3. Workers' rights

Employees are entitled to his or her basic rights:

- Bonded workers, prisoners or illegal workers are not acceptable for the production of goods for Stronger.
- If foreign workers are employed on contract basis, they must never be required to remain employed for any period of time against their own will. Commissions and other fees shall be paid to the agency by the employer.
- Employees must under all circumstances be treated with respect and have the rights to a workplace free from physical, sexual, psychological or verbal harassment and abuse.
- Employees shall have their rights to collective barging and lawfully organize or join any association.
- Discrimination is under no circumstances allowed against race, gender, religion, ethnic or social background, disabilities, political opinions or sexual orientation.
- Employees shall be entitled to an employment contract.
 The employees must be allowed annual leave, sick leave, maternity leave and other holidays required by law or other industry standards, without any form of repercussions.
- Dismissal of a female worker, due to pregnancy, is not acceptable.

Stronger recognize the importance of wages to fulfill the employees' basic needs and therefore recommends the following procedures:

- Wages are to be paid regularly, on time and be fair in respect of work performance. Workers with the same experience and qualifications should receive equal pay for equal work.
- The employees' should be paid the minimum legal wages or in accordance with local industry standards, whichever is larger.
- Weekly working time should not exceed the legal limit. The workers' should be able to refuse overtime or be properly compensated.

4. Working Conditions

Stronger's suppliers must apply and follow the local industry standards when higher than legal requirements. In countries where the legal requirements fall short of international recognized standards it is required that suppliers comply with the following minimum criteria's.

4.1 Health and Safety

Workers' safety is a priority at all times. Therefore, hazardous equipment or unsafe buildings are not accepted and the factory must clearly communicate their safety and health policies to all employees.

- First aid equipment must be available in each factory. At least one person on every department in the factory shall receive adequate training in basic first aid. Procedures for serious injury shall be communicated to all employees.
- All workers should be aware of the safety arrangements in the factory, emergency exits, fire extinguishers, first aid equipment, etc. Exits are required to be well marked and kept free from any obstacles.
- The factory temperature shall be kept at a tolerable level and ventilation must be adequate.
- Lighting at the workplace shall at all times be sufficient for the task being performed
- Sanitary facilities shall not be a private nuisance and all workers must have access to them without unreasonable restrictions.

- Drinking water must be provided for all workers at any time.
 If a factory provides housing facilities for its staff, all above mentioned requirements for health and safety are applicable. Furthermore Stronger recommends that:
- All workers are provided with their own individual bed.
- Living space per worker must meet the minimum legal requirement and local standards.
- Separate dormitories, toilets and showers should be provided for men and women.
- Workers should have access to laundry facilities.
- There should be no restrictions concerning the workers' right to leave the dormitory during off hours.
- Areas for food storing, preparation and eating should be kept clean and in good condition.

5. Environment

With the global and serious environmental issues of today, Stronger expects that all their suppliers and contractors take their responsibility for these aspects.

This implies that:

- Suppliers comply with the environmental legislation in those countries in which they operate.
- Hired transporters and hauliers are certified by the standard ISO 14001, and that the agent can verify the certificate.
- It also is the responsibility of each supplier/contractor to put demands, inspect and follow up their suppliers in the supply chain.
- Suppliers shall strive to minimize the environmental impact from all their activities.
 - That all activities, which can be associated with Stronger and their suppliers,

and which counteract a sustainable developement, must be implemented with careful measures. Sustainable development is here defined as: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs" (Brundtland, 1987).

6. Monitoring and enforcement

Each supplier must comply with this Code of Conduct. Stronger has the right to, unannounced as well as announced, visit all factories at any time. Stronger has the right to upon request receive documents concerning the suppliers' facilities and properties of manufacturing.

If this Code of Conduct is violated Stronger has the right to cancel any business relationships with the concerned supplier.

I have read and understand this Code of Conduct:

Signature:
Date:
Name:
Title:
Company name:
Street Address:
City/State/Zip:
Phone:
E-mail:

