



Feel The World Inc. dba Xero Shoes Manufacturer Code of Conduct

The Code of Conduct defines our minimum expectations. We expect our manufacturers to ensure that no exploitive or unsafe working conditions exist at the facilities where our merchandise is manufactured.

This Manufacturer Code of Conduct expresses the commitment of Xero Shoes to do business with only those manufacturers and suppliers who share its commitment to fair and safe labor practices.

Employment Practices

Compliance with Local Laws

- All standards set forth in this Code of Conduct are subject to compliance with applicable national and local laws. All vendors shall operate in full compliance with the laws of their respective countries of manufacture.

Child Labor

- No person shall be employed at an age younger than 16 (or 15 where the governing law allows for such employment), or younger than the age for completing compulsory education if that age in the country of manufacture is greater than 16.
- All facilities are required to maintain official documentation allowing for verification of each worker's date of birth.
- All facilities must comply with all local regulations regarding the employment of young workers. These regulations shall include types of work, work schedules, and labor intensity as applicable under local labor law.

Harassment or Abuse

- Workers shall be treated with respect and dignity. Workers shall not be subject to any physical, verbal, sexual, or psychological harassment or abuse in connection with their employment.
- There shall be no corporal punishment.
- Behavior that is sexually coercive, threatening, abusive, or exploitative shall not be permitted.

Health and Safety

- Employers shall provide a safe and sanitary working environment using local health and safety laws as a benchmark to avoid preventable work-related accidents and injuries.

Nondiscrimination

- All employment decisions must be made in a nondiscriminatory manner.
- Workers shall be employed, promoted, and compensated based on their ability to perform their job, rather than on the basis of gender, race, caste, sexual orientation, marital status, religious, or cultural beliefs.
- There shall be no pre-employment or during-employment screening for pregnancy.
- There shall be no discrimination against workers based on political affiliation or union membership.

Wages and Benefits

- Employers shall pay workers for all work completed and shall pay at least the minimum wage required by law or the prevailing industry wage, consistent with the local area statistics, whichever is higher and shall provide legally mandated benefits.
- There shall be no deductions of wages for disciplinary purposes.
- The employer shall not engage in false apprenticeship practices that are used to avoid payment of compensation.

Work Hours

- As a part of normal business operations including those countries where domestic law does not limit work hours, suppliers shall not require an excess of a 60-hour workweek or 12-hour workday on a regularly scheduled basis.
- Workers shall be entitled to one full day off out of each seven-day week.
- Workers shall not be asked or required to take work home or off-premises.

Overtime

- Exceptional business circumstances requiring a workweek in excess of the local official workweek (or a 48-hour workweek, whichever is lower) shall be subject to the laws regarding the payment of overtime in addition to compensation for regular hours of work.
- In countries where there is no legal standard regarding overtime premiums, industry standards shall be the model. In no event shall this be at a rate less than the regular hourly rate.
- Factories shall carry out operations in ways that limit overtime to a level that complies with national labor laws and ensures productive and humane working conditions.

Freedom of Association

- Employers shall respect the right of workers to join and organize associations and to bargain collectively. Where local law limits the right of freedom of association, employers shall not obstruct legal alternative means of free association, and shall, in all cases, implement effective systems to assure open communication with employees.

Forced Labor

- There shall not be any use of forced labor, whether in the form of prison labor, indentured labor, bonded labor, or otherwise. There shall be no penalties or fines for declining overtime.
- Workers shall not be locked inside of factory premises for any reason.

Environmental Conditions

- All facilities shall comply with all local environmental laws. Manufacturers, subcontractors, and suppliers must certify compliance with all applicable environmental regulations in their country.

Subcontractors

- This Code of Conduct applies to all subcontractors utilized by Xero Shoes manufacturers and suppliers.
- All Manufacturers are required to take all necessary steps to ensure that their subcontractors adhere to the Code of Conduct. No subcontractors will be used without Xero Shoes' prior approval

Compliance Monitoring

- Xero Shoes utilizes an independent external resource to conduct unannounced periodic social compliance audits of our business partners to evaluate and address risks pertaining to slavery and human trafficking in accordance with Worldwide Responsible Accredited Production principles. Xero also conducts unannounced audits to ensure compliance with labor and employment requirements for our manufacturing business partners. Any failure of employees or business partners to abide by the Code of Conduct will result in corrective action or termination of contract.

In the event of any willful, non-compliance with the Code of Conduct, Xero Shoes may terminate or refuse to renew or supply agreements with manufacturers based on manufacturers' awareness of the code of conduct.