

This Production Code of Conduct (the “Code”) clarifies the minimum standards that factories and suppliers (the “Production Partners”) with whom Wolverine World Wide, Inc. (“Wolverine”) conducts business are to satisfy in conducting their operations.

## **BUSINESS INTEGRITY**

Business must be carried out with a high degree of ethics, honesty and fair dealings. All Production Partners are required to conduct their business in compliance with all applicable legal requirements.

- **Anti-Bribery.** The offering, paying, soliciting or accepting of bribes or kick-backs is strictly prohibited. Production Partners must comply with all applicable anti-bribery and corruption laws.
- **Subcontracting.** Production Partners may not subcontract any operation in the manufacturing process without prior written consent from Wolverine. Production Partners are responsible for ensuring all approved subcontractors comply with this Code

## **ENVIRONMENT**

Manufacturing processes should minimize the adverse effects on the community, environment and natural resources while safeguarding the health and safety of the public. This includes meeting all relevant local and national environmental protection laws, with the goal of meeting international environment protection standards.

## **LABOR**

Production Partners must commit to upholding the human rights of workers, to treat them with dignity and respect, and to improve working conditions within their supply chain.

- **Employment is freely chosen**  
Use of forced labor, bonded labor, prison labor, indentured labor, slave labor, involuntary labor, or victims of human trafficking in the production of the products is prohibited.
- **Collective Bargaining**  
The rights of workers to freely and peacefully associate and collectively bargain must be respected.
- **Working conditions**  
A safe, hygienic and healthy working and living (if housing is provided) environment that complies with applicable laws shall be provided to all employees. The structure of the Production Partner’s facility, including any residential facilities provided by the Production Partner, is stable and safe and does not put people in jeopardy.
- **Child labor**  
There must be no recruitment of “child labor” defined as any work by a person under the minimum working age set by local law. Production facilities must comply with all local laws and ILO standards regarding the working conditions and restrictions for “young persons.”
- **Wages and benefits**  
Production Partners are expected to adhere to all local and national laws governing wages, overtime, and time off. Any wage deductions must comply with applicable law and be clearly communicated to employees.
- **Working hours**  
Production Partners are expected to adhere to all local and national laws governing working hours. Except for extraordinary business circumstances, employee working hours are expected to not exceed 60 working hours in a given week and employees are to be provided one day off for every seven-day period. Overtime must be on a voluntary basis and shall not be demanded on a regular basis and shall be compensated at a premium rate as required by local laws.
- **No discrimination**  
Production Partners shall not engage in, support or tolerate discrimination in employment including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination or retirement on the basis of gender, age, religion, marital status, race, caste, social background, diseases, disability, pregnancy, ethnic and national origin, nationality, membership in worker organizations including unions, political affiliation, sexual orientation, or any other personal characteristics.
- **Regular employment**  
Work performed must be on the basis of a recognized employment relationship established in compliance with national legislation and practice and international labor standards, whichever affords the greater protection.
- **No harsh or inhumane treatment**  
Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

## **SECURITY**

Production Partners must comply with applicable U.S. Customs importing laws and security processes, including without limitation C-TPAT, or any other applicable importing laws or securing processes of jurisdiction where the products will be shipped.

## **RECORDS AND INSPECTIONS**

All Production Partners will maintain accurate records and information and permit Wolverine or its representatives to periodically conduct announced and unannounced audits of such records and information.