



Code of Conduct

Russell Brands, LLC ("the Company") is committed to conducting its business in accordance with the highest standard of business ethics and respect for human rights, and in compliance with all applicable laws. We require our suppliers, licensees, distributors and other business partners to meet these high standards.

While the Company recognizes that different cultural, legal and ethical systems exist in the countries in which merchandise may be manufactured, this Code of Conduct sets forth certain basic requirements that all facilities domestic and foreign, whether owned by the Company or our contractors, licensees or other business partners, must satisfy.

Compliance with Law: The Company requires all manufacturing facilities to operate in conformance with the requirements of applicable law.

Safety and Health: Conditions throughout the facilities must be safe, clean and meet or exceed requirements of all applicable laws and regulations regarding safety and health. Workers must be trained and equipped to perform their jobs safely.

Child Labor: No person shall be employed at an age younger than the age for completing compulsory schooling in the country of manufacture, or the age consistent with International Labor Organization guidelines, whichever is greater. All Company authorized facilities must observe all legal requirements for work of all employees, particularly those pertaining to hours of work and working conditions.

Forced Labor: The use of forced or compulsory, indentured, or bonded labor is prohibited.

Harassment or Abuse: Corporal punishment or other forms of harassment, abuse or coercion, whether mental or physical, are strictly forbidden.

Discrimination: Discrimination in hiring, pay, promotions, discipline, termination or other terms and conditions of employment based on personal characteristics, beliefs or other legally protected criteria, is prohibited.

Working Hours: Except in extraordinary business circumstances, employees shall (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture and (ii) be entitled to at least one day off in every seven day period.

Wages and Benefits: The Company requires that employees be fairly compensated by providing wages, including overtime pay, and benefits that meet or exceed all applicable laws and regulations.

Freedom of Association: The Company recognizes and respects the rights of employees to freedom of association and collective bargaining.

Environmental Compliance: The Company requires compliance with all local laws protecting the environment. In addition, business should be conducted in a manner that minimizes all waste and maximizes recycling, and which results in proper storage and disposal of hazardous substances.

Customs Compliance: The Company will comply with all applicable customs laws and establish and maintain programs to safeguard against the illegal transshipment of products.

Security: The Company will maintain security procedures to guard against the introduction of non-manifested cargo (drugs and other contraband) into shipments of our products.

Notice and Record Keeping: This Code of Conduct must be posted in a location accessible to all employees and visitors (in the appropriate language).

Enforcement: The Company employs internal, as well as third party auditors to ensure compliance with this code at all locations conducting business for the Company. The Company maintains detailed records of all facilities to determine compliance with this policy.

Violations: To report suspected violations of this Code of Conduct, contact the Company at P.O. Box 90015, Bowling Green, KY 42102-9015 or call the Human Resource department at 270-781-6400.