



**Spirit Products Ltd. 88 Essex St. Haverhill, MA 01832-5675**  
**P.O. Box 729 Haverhill, MA 01831-0910**  
**phone: 978.372.2022 fax: 978.372.5399**

## **Code of Conduct**

### **COMPENSATION & BENEFITS**

Spirit Products Ltd will seek vendors who share our commitment to the betterment of wage and benefit levels that address the basic needs of workers and their families so far as possible and appropriate in light of national laws, practices and conditions.

### **WORKING HOURS**

Spirit Products Ltd will seek vendors whose hourly and/or quota-based wage employees, except in extraordinary business circumstances, 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 or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least one day off in every seven day period.

### **OVERTIME COMPENSATION**

Spirit Products Ltd will seek vendors that compensate workers for overtime hours at such a 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.

### **CHILD LABOR**

Spirit Products Ltd will seek vendors who do not use child labor. Spirit Products Ltd will seek vendors who recognize the need for all children to be educated and to enjoy their childhood years free from the responsibility of employment, and agree to not employ any worker younger than 15 years old (14 years in countries where 14 is the legal minimum age) or under any age interfering with the age of compulsory education.

### **FORCED LABOR**

Spirit Products Ltd will not knowingly work with vendors that use forced or other compulsory labor in the manufacture of our products. This includes labor that is required as a means of political coercion or as punishment for holding or for peacefully expressing political views.

### **HEALTH & SAFETY**

Spirit Products Ltd will seek vendors who provide their employees with a safe and healthy workplace in compliance with local laws.

### **DISCRIMINATION**

Spirit Products Ltd will seek vendors who do not discriminate in employment, including hiring, salary, benefits, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, politics, or social or ethnic origin.

### **HARASSMENT OR ABUSE**

Spirit Products Ltd will seek vendors who treat every employee with dignity and respect. Where no employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Where corporal punishment is neither used or tolerated in any form.

### **FREEDOM OF ASSOCIATION**

Spirit Products Ltd will seek vendors who recognize the rights of all workers to exercise their lawful rights to freedom of association and collective bargaining.

These are our minimum standards. Spirit Products Ltd., reserves the right to terminate any relationship where these standards are not being upheld.