



1901 South 5070 West
Salt Lake City, UT 84104
Office: 888.447.6840 | Fax: 888.467.6840

www.snugzusa.com

Code of Ethical Conduct and Social Accountability Policy

The company is committed to ethical and socially responsible conduct in our workplace. We have adopted standards for the safety, quality and integrity of our products and processes and for protecting the environment. As a part of this commitment, the company upholds the following code of conduct for its manufacturing operations:

- **Child Labor Prohibited.** The company has a strict policy against any form of child labor. The company employs only persons 18 years old and older. Should the company ever decide to change this policy and begin to employ persons younger than 18 years of age, it would follow all the local, state, and federal laws/working restrictions regarding Youth Employment in the United States including the prohibitions against minors working in any job or occupation declared hazardous by the United States Secretary of Labor. Additionally, if the company ever decided to employ minors it would follow any and all restrictions on hours of work as well as break and meal period requirements. Under no circumstances will the company ever hire or cause anyone to work who is under the age of 16. The company verifies date of birth at the time of hire to ensure this code of conduct is upheld. Furthermore, the company does not permit any employee to take production work home; all work related to the company must be performed only by employees onsite whose age has been verified at time of hire.
- **Compensation Practices in Compliance with Laws.** The company complies with all federal and state wage and hour laws including minimum wage, overtime, piece rates, hiring, etc. and provides legally mandated benefits. The company does not permit any employees to engage in "off the clock" work and ensures that the minimum wage paid to any employee is the legally mandated minimum wage. The company compensates employees for overtime hours at the legally required premium rate of time and one half. Though days off are not legally mandated in the state of Utah or in federal law, employees are normally allowed two days off in each seven-day period. In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.
- **Health and Safety in the Workplace.** The company provides employees with a safe, healthy and secure workplace and complies with all applicable OSHA standards. The company provides access to clean drinking water, proper sanitation, adequate lighting and ventilation, safety training, fire extinguishers and fire evacuation escape routes.
- **Coercion and Harassment Prohibited.** The company will treat each employee with dignity and respect. The company will not use physical or bodily punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.).



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- **Prison Labor/Reform Labor Prohibited.** The company does not use any prison or reform labor of any kind in its operations.
- **Forced Labor Prohibited.** All employees of the company may terminate their employment with the company at any time, with or without notice.
- **Human Trafficking and Slavery Prohibited (California Transparency in Supply Chains Act of 2010).** The company prohibits slavery and human trafficking of any kind in its operations.
 - We engage in the verification of product supply chains through a third party to evaluate and address risks of human trafficking and slavery.
 - We conduct independent, unannounced audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.
 - We require direct suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
 - We maintain internal accountability standards and procedures for employees or contractors failing to meet The company standards regarding slavery and trafficking.
 - We provide company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.
- **Freedom of Association Allowed.** The company will allow employees all the protections afforded by law to associate, organize, and bargain collectively in a lawful and peaceful manner without interference or punishment.
- **Nondiscrimination Policy Upheld.** The company will not discriminate in employment practices including wage, benefits, discipline, promotions, access to training etc. on the basis of race, religion, age, national origin, gender, disability or social or ethnic orientation.
- **Product Safety.** We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet applicable recognized voluntary industry standards for our products and processes.
- **Environment.** We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.
- **Subcontractors and Sources.** We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all of the same policies stated in our Code of Ethical Conduct and Social Accountability Policy. All subcontractors and suppliers are required to comply with all applicable and national laws.