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www.snugzusa.com



## SnugZ USA Code of Ethical Conduct & Social Accountability Policy

SnugZ USA 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.

- Child Labor Prohibited. SnugZ USA employs only persons 18 years old and older. On occasion, the company has hired persons between 16 years old and 18 years old and follows all local, state, and federal laws/working restrictions regarding youth employment in the United States of America. However, should SnugZ hire a person under the age of 18, SnugZ would never allow them to work with dangerous equipment as outlined in youth employment regulations in the United States of America. SnugZ will not hire or cause anyone to work who is under the age of 16. SnugZ verified date of birth at the time of hire to ensure this code of conduct is upheld. Furthermore, SnugZ does not permit any employee to take production work home; all work related to SnugZ must be performed only by employees onsite.
- Compensation Practices in Compliance with Laws. SnugZ USA complies with all federal and state wage and hour laws including minimum wage, overtime, piece rates, hiring, etc. and provides legally mandated benefits. SnugZ does not permit any employees to engage in "off the clock" work and ensures that the minimum wage paid to any employee is equal to or higher than the mandated minimum wage. SnugZ 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 sevenday 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. SnugZ USA provides employees with a safe, healthy and secure workplace and complies with all applicable OSHA standards. SnugZ 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.** SnugZ USA will treat each employee with dignity and respect. SnugZ will not use physical or bodily punishment, threats of violence or other forms of physical, sexual, psychological, or verbal harassment or abuse.
- **Prison Labor / Reform Labor Prohibited.** SnugZ USA does not use any prison or reform labor of any kind in its operations.

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- **Forced Labor Prohibited.** All employees of SnugZ USA may terminate their employment with SnugZ at any time, with or without notice.
- Human Trafficking and Slavery Prohibited (California Transparency in Supply Chains Act of 2010). SnugZ USA 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 SnugZ USA 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. SnugZ USA 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. SnugZ USA 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.
- Subcontractors and Sources. We require all businesses that support SnugZ USA 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 state and federal laws.