



FOOTWEAR DISTRIBUTORS AND RETAILERS OF AMERICA

PRODUCTION CODE OF CONDUCT SUMMARY

ZERO TOLERANCE ISSUES

- *Human Trafficking*
- *Slavery*
- *Forced Labor*
- *Child Labor*

TRANSPARENCY

Production Units shall maintain complete as well as accurate records and information so that compliance can be effectively assessed. Production Units must not falsify or understate any aspects of their operations to FDRA or our representatives

MANAGEMENT SYSTEMS

Policies and procedures are in place to ensure the Production Unit and their subcontractors are aware of and comply with applicable laws, regulations and, where stricter, the FDRA Guidance Tool.

BUSINESS INTEGRITY

Business must be carried out with a high degree of ethics, honesty and fair dealings; ensuring staff is familiar with the FDRA Guidance Tool and does not engage in threats, bribery or corruption practices. The supplier can be held responsible for unethical actions committed by their external partners. Therefore, it is very important that suppliers only work with well-qualified companies and representatives with a good reputation.

- **Anti-Bribery**
The offering, paying, soliciting or accepting of bribes or kick-backs, including facilitation payments, is strictly prohibited. Suppliers, representatives and their employees must comply with all applicable anti-bribery and corruption laws.
- **Compliance with the Law**
FDRA requires all suppliers and Production Units to comply fully with the legal requirements of the countries in which they operate. The standards set forth in this document are a supplement that is also expected to be followed.
- **Compliance with our Guidance Tool**
FDRA member companies reserve the right to conduct announced and unannounced inspections of all Production Units. Suppliers and Production Units are required to cooperate with the entire process
- **Subcontracting**
Suppliers or Production Units may not subcontract any operation in the manufacturing process without prior written consent from FDRA, and only after the subcontractor has agreed to comply with the FDRA Guidance Tool. Suppliers and Production Units are responsible for ensuring compliance with the FDRA Guidance Tool by all approved subcontractors who produce merchandise for sale at FDRA including but not limited to: cutting, sewing, embroidery, printing, laundry/washing, dry processing, garment dyeing, panel knitting, linking, and final assembly/packing.

ENVIRONMENT

In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. At a minimum, this includes meeting all relevant local and national environmental protection laws, with a goal to meet international environment protection standards. FDRA expects its Suppliers and Production Units to work towards the elimination of discharge of hazardous chemicals in the supply chain.

LABOR

Suppliers 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**
Production unit does not utilize forced labor, bonded labor, prison labor, slave labor, or victims of human trafficking in the production of the products.
- **Collective Bargaining**
Production Unit respects the rights of workers to freely and peacefully associate and collectively bargain.
- **Working conditions**
A safe and hygienic working environment shall be provided. The structure of the Production Units, including residential facilities provided by the Production Unit, 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 child under the age of 14, or the minimum working age set by local law, whichever is greater. Production facilities must comply with all local laws and ILO standards regarding the working conditions and restrictions for “young persons,” also known as “juvenile workers.”
- **Wages and benefits**
Suppliers are expected to adhere to all local and national laws governing wages, overtime, and time off. It is vitally important that suppliers are transparent upfront about any challenges they face complying with any wage and benefit laws.
- **Working hours**
Suppliers are expected to adhere to all local and national laws governing working hours. Factories are expected to not exceed 60 working hours in a given week and provide 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 stipulated by local laws.
- **No discrimination**
Suppliers 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. Regardless of the worker type (part time, student worker, etc.), all employees receive at least minimum wage.
- **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 shall be prohibited.