

BUSINESS PARTNER'S GUIDE TO

# CODE OF BUSINESS CONDUCT



**WORKWEAR  
OUTFITTERS™**

A Resource for Our Vendors, Contractors,  
Third Parties and Suppliers



**WE CHAMPION AND  
EMPOWER WORKERS  
WHO MAKE OUR WORLD  
WORK BETTER.**



# WE WILL LEAD WITH INTEGRITY

This Business Partner's Guide to our Code of Business Conduct is designed to help you understand the standards for doing business with WWOOF. We hope to enjoy a successful business relationship, and **we believe that doing business the right way is an excellent way to start.**

## CODE OF CONDUCT ESSENTIALS

Workwear Outfitter's Code of Business Conduct sets the standards on how we do business around the world. Because we aim to only work with business partners that share our exacting standards, we expect the same of you.

## KEY BUSINESS PARTNER RESPONSIBILITIES

- Be clear about our expectations for ethical business conduct. Access a copy of our Code of Conduct at [www.wwof.com](http://www.wwof.com).
- Have the courage to speak up if you observe behavior that falls short of our standards, and make sure that others in your organization who work with WWOOF know how to raise concerns too.
- Understand that we may terminate our relationship with any business partner who violates our Code or the law or fails to report unethical behavior related to WWOOF's business.

## GOOD TO KNOW!

### METHODS FOR RAISING A CONCERN

*If you have an ethical question or concern, or suspect a violation of Workwear Outfitter's Code of Conduct, you are required to raise it with WWOOF. You can use any of the following methods. It doesn't matter which method you choose – it only matters that you choose to make the report.*

- *Discuss the issue with your WWOOF business contact.*
- *Contact WWOOF Ethics and Compliance at [ethics@wwof.com](mailto:ethics@wwof.com).*



# WE WILL TREAT EVERYONE WITH **DIGNITY AND RESPECT**

## KEY BUSINESS PARTNER RESPONSIBILITIES

- Treat all colleagues with dignity and respect; never discriminate based on race, gender, sexual orientation, religion, or other personal characteristics no matter where you do business.
- Avoid jokes, remarks, or physical contact that make others uncomfortable – even if no one has expressly voiced concerns.
- Never engage in or allow unwanted touching, requests for sexual favors, intimidating gestures or other offensive behavior.
- Provide a safe workplace free of physical and health hazards.
- Comply with all applicable child and forced labor, worker safety, human trafficking, and other labor laws designed to safeguard worker well-being.
- Take appropriate steps to prevent, investigate, and remediate instances of these behaviors in your organization.

## GOOD TO KNOW!

*Whether you are part of a large business partner organization or a team of one, we count on you to contribute to a workplace environment that is safe, free of harassment and discrimination, and that embraces inclusion and diversity. This applies to your interactions with colleagues at WWOF and within your own organization.*

DO	DON'T
Support an environment where people treat each other respectfully and professionally, and where individual differences are valued.	Create a hostile, intimidating or humiliating environment.
Be sensitive to how others may perceive your actions and remember that your actions reflect on your organization and business partners like WWOF.	Dismiss concerns or fail to speak up because you think the behaviors are common in the industry or region where you do business.
Respond respectfully if a colleague or business partner tells you that you've done something to offend.	Treat colleagues or business partners adversely for having raised a concern.

# WE WILL COMPETE FAIRLY AND HONESTLY

## KEY BUSINESS PARTNER RESPONSIBILITIES

- Fully understand the common types of situations that could pose a conflict of interest, including improper gifts and entertainment, and avoid them.
- Disclose all potential conflicts or any request for gifts or entertainment from a WWOFF associate.
- Immediately report any loss or misuse of Workwear Outfitter's confidential information.

**WE CHAMPION AND  
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WHO MAKE OUR WORLD  
WORK BETTER.**

	Pay Close Attention If...	Examples of Actions to Avoid	Our Expectations
Conflicts of Interest	Your dealings with WWOFF appear to be driven by factors other than legitimate, ethical business reasons.	You loan money to a WWOFF associate who is involved in managing your company's relationship with WWOFF. --- Someone at your organization has a romantic relationship with a decision-maker at WWOFF.	Disclose any potential conflict of interest to your WWOFF business contact or WWOFF Ethics and Compliance.
Gifts and Entertainment	A gift or entertainment (e.g., dinner, bottle of wine, golf outing or sports event) is intended to influence a business decision.	Treating a WWOFF associate and family to a lavish dinner in the middle of a contract negotiation.	Before offering or accepting any gift or entertainment, consider whether its purpose is to influence a pending business decision. If so, don't do it.
Protecting WWOFF's Information	You are provided access to WWOFF's information, regardless of whether it's marked as confidential or proprietary.	You share WWOFF's confidential pricing information with a competitor. --- You sell WWOFF consumer data to an unauthorized third-party. --- You are given access to WWOFF's proprietary product designs then copy them to make similar products under your company's branding	Do not share, collect, or use WWOFF's confidential information with anyone inside or outside your organization without authorization from WWOFF. --- Apply adequate security controls to protect WWOFF information. --- Notify WWOFF immediately if your organization experiences a breach that could impact WWOFF's information.

# WE WILL FOLLOW THE LAW EVERYWHERE WE DO BUSINESS.

	Pay Close Attention If...	Examples of Actions to Avoid	Our Expectations
<b>Fair Competition (or Antitrust)</b>	Engaging in activities that may result in splitting the market, influencing the price of products or improperly influencing the bidding process.	Speaking with a competitor at a trade association meeting about WWOFF's pricing. --- Agreeing to split territories while working on WWOFF's behalf.	When speaking with competitors, whether yours or WWOFF's, avoid any anti-competitive discussions about territories, pricing or customer bids. --- If a competitor brings up these topics in a discussion about WWOFF, leave the conversation immediately.
<b>Anti-Corruption (or Anti-Bribery)</b>	Something of value is requested, given, or offered in exchange for a favorable business decision or other advantage when doing business on behalf of WWOFF; be extra vigilant in transactions involving government officials.	Providing a kickback to a business contact to secure a sale or order. --- Paying a bribe to a customs official to persuade the official to allow WWOFF's product into or out of a country. --- Making an off-books payment to a government official to resolve a regulatory issue at a facility that manufactures or distributes WWOFF products.	Do not offer or give anything of value to win business on behalf of WWOFF. --- Do not offer "grease payments" or "facilitating payments" for WWOFF's benefit. --- Alert your WWOFF contact or WWOFF Ethics and Compliance if you learn that your company has been pressured to pay or may have made a questionable payment on WWOFF's behalf, even if unintentionally.
<b>Financial Integrity</b>	Your invoices contain errors, inaccuracies or overly vague or unsubstantiated charges.	Including entries for excessive meals, entertainment or travel. --- Paying a bribe to win business on behalf of WWOFF and hiding it by invoicing it in general terms	Be transparent in all financial dealings and ensure your invoices are sufficiently detailed and accurately reflect the work performed and expenses incurred. --- Never agree to any request to manipulate financial data.

(continued)

Having a global footprint means that we must comply with relevant laws, wherever we operate. Our standards require that we not only respect the letter of the law, but also its spirit. This requirement extends to our business partners when conducting business with or on behalf of WWOF.

#### KEY BUSINESS PARTNER RESPONSIBILITIES

- Understand that “anything of value” can mean cash, gifts, entertainment, hospitality, job opportunities, charity donations, favors or any other benefit.
- Make sure that no one from your organization offers anything on WWOF’s behalf that could appear to be a bribe or improperly influence a business decision.
- Never engage in any WWOF-related transaction that involves a sanctioned party or embargoed country. Contact your WWOF business contact if you are uncertain about the status of a country, entity or individual.



**WE WILL STRIVE TO  
MAKE OUR  
COMMUNITIES  
BETTER.**

#### KEY BUSINESS PARTNER RESPONSIBILITIES

- Adhere to WWOF’s Terms of Engagement, which govern our relationships with business partners.
- Follow WWOF’s Global Compliance Principles. These principles cover our expectations for legal and ethical business practices, including humane labor practices, fair compensation, safe and healthy work environments, rights to non-discrimination and freedom from harassment, human rights, and environmental preservation principles.

#### WE COUNT ON YOU

We cannot uphold our ethical standards without the same commitment from the thousands of business partners we rely on around the world. By adhering to these standards, we can all achieve sustainable, long-term business success, while making our world a better place for generations to come.

## GOOD TO KNOW!

*Business courtesies are not expected and should only be exchanged for legitimate business reasons. Never offer gifts, entertainment or other business courtesies to improperly influence a business decision. To be considered acceptable, a business courtesy:*

- *May not be extravagant*
- *May not be cash or a cash equivalent, such as a gift card*
- *Should be infrequent, typically less than twice per year and*
- *May not have been requested by a WWOF associate.*

*If you are uncertain about whether a particular business courtesy is appropriate, seek guidance. Some WWOF departments may have a policy prohibiting gifts, so be sure to check with your WWOF business contact before offering a business courtesy.*



## RESOURCES

**WWOF ETHICS AND  
COMPLIANCE:**

*[ethics@wwof.com](mailto:ethics@wwof.com)*

**FIND UPDATED POLICIES,  
ONLINE AT:**

[www.wwof.com](http://www.wwof.com)



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