

SPORTSMAN'S GUIDE SUPPLIER CODE OF CONDUCT

Adherence to the following Supplier Code of Conduct is a mandatory condition of the commercial relationship with Sportsman's Guide.

CHILD LABOR:

Child labor is not permissible. Workers cannot be less than 16 years of age and should not be younger than the mandatory age to be in school per local laws. Workers under 18 years of age shall not be employed except as allowed by local governing laws in accordance with child labor regulations.

FORCED LABOR OR PRISON LABOR:

Slavery and human trafficking are prohibited. Employment must be voluntary and respect the right of individuals to choose to work or not work. Forced labor is prohibited whether in the form of prison, indentured, bonded, or compulsory labor or otherwise. Workers must be allowed to travel freely outside the facility with their identity documents and voluntarily terminate their employment.

DISCRIMINATION:

Employment decisions must be made entirely on the basis of knowledge, skill, efficiency and ability to do the job and meet it's requirements. Workers must not be subject to discrimination of employment in recruiting, hiring, salary, benefits, advancement, discipline, termination or retirement.

DISCIPLINARY PRACTICES, HARASSMENT, OR ABUSE:

Every worker must be treated with respect and dignity. All disciplinary procedures must be established in writing and are to be explained verbally to workers in clear understandable terms. Workers must not be exposed to physical punishment, threats of violence, harassment or maltreatment of any kind.

FREEDOM OF ASSOCIATION:

Suppliers shall respect the right of workers to affiliate with legally sanctioned organizations or associates and to bargain collectively in accordance with local laws, without unlawful interference, discrimination, retaliation or harassment.

WORKING HOURS AND OVERTIME:

Suppliers must maintain reasonable work hours and abide by all local governing laws. Workers are to have at least one day off in seven days on a regularly scheduled work week. Any hours above the standard work week are considered overtime. Overtime is to be voluntary and paid at a premium rate as defined by local governing laws.

WAGES AND BENEFITS:

Suppliers are expected to comply with national and local wage laws for both regular and overtime pay. Wages are to be paid in a timely manner, on a regular basis, and issued without any disciplinary deductions. Female workers must not be terminated in case of pregnancy and must be given their legally required maternity leave.

HEALTH AND SAFETY:

Suppliers must provide a healthy and safe environment for all workers and promote awareness of health and safety issues. Worker housing and dining facilities, where provided by the supplier, must meet a reasonable standard of health and safety.

ENVIRONMENT:

Suppliers must comply with all applicable laws and regulations in respect to the environment and the disposal of hazardous waste in a safe and controlled manner. Suppliers are to implement adequate measures to prevent or minimize adverse effects on the community, natural resources, and the environment.

COMMUNICATION:

Suppliers will communicate these ethical standards to workers both verbally and in writing as well as undertake efforts to educate workers on a periodic basis. Suppliers must ensure that workers have an effective process to report grievances without fear of retaliation.

FACTORY PROFILE

FACTORY INFORMATION

Factory Name: _____
 Factory Building/Street Address: _____
 Factory Zone/District/City: _____
 Factory Province/County/State/Postal Code: _____
 Factory Country (country of origin): _____ Factory FOB Port: _____

IF OFFICE IS AT DIFFERENT ADDRESS THAN FACTORY, PLEASE PROVIDE OFFICE ADDRESS BELOW:

Office Building/Street Address: _____
 Office Zone/District/City: _____
 Office Province/County/State/Postal Code: _____
 Office Country: _____

Factory Phone Number: _____
 Factory Contact Name: _____ Factory Contact Email: _____
 Factory in Business Since Year: _____ Factory Business License Number: _____
 Does your factory have a license to export goods to the US?
 If Yes, provide export license number; if no - please complete export agent information section below. _____
 List primary product types manufactured at factory: _____
 Check peak months of production: JAN FEB MAR APR MAY JUN JUL AUG SEPT OCT NOV DEC

AFFILIATES & SUBCONTRACTORS INFORMATION

Are affiliates or subcontractors used for Sportsman's Guide orders? _____ If Yes, provide the information below along with a BPA for each:
 Name: _____
 Tasks and processes performed: _____
 Name: _____
 Tasks and processes performed: _____
 Name: _____
 Tasks and processes performed: _____

EXPORT AGENT INFORMATION

Export License Number: _____
 Export Agent Name: _____
 Export Agent Building/Street Address: _____
 Export Agent Zone/District/City: _____
 Export Agent Province/County/State/Postal Code: _____
 Export Agent Country: _____ Export Agent Phone Number: _____
 Export Agent Contact Name: _____ Export Agent Contact Email: _____

OTHER THIRD PARTY INFORMATION (Selling Agent/Sales Representative/Intermediary)

Name: _____
 Address: _____
 Contact Name: _____ Contact Email: _____
 Tasks and processes performed: _____
 Name: _____
 Address: _____
 Contact Name: _____ Contact Email: _____
 Tasks and processes performed: _____

FACTORY SELF-ASSESSMENT

EMPLOYEE DEMOGRAPHICS

- 1.1 How many workers are employed at your factory?
1.2 How many of those employed are non-management workers?
1.3 How many of those employed are Chinese national migrant workers?
1.4 How many of those employed are foreign immigrant workers?
1.5 How many of those employed are temporary contract workers?
1.6 Does the factory have any workers younger than 18?

QUALITY ASSURANCE

- 2.1A Is the factory ISO certified or have an equivalent certification?
2.1B If yes, please specify:
2.2 Is there a Quality Assurance or Quality Control Manager?
2.3 Are there formal quality assurance training programs for employees?
2.4 Is there in-process statistical quality control?
2.5 Is there a 100% inspection done for each order?
2.6 Are there specific quality records kept for each operator?
2.7 Are product and packaging specifications readily available?
2.8 Does the factory test the functionality of the product?
2.9 Does the factory organize and permanently store production receipts for each production run?
2.10 APPAREL ONLY: Is all production measured at mil 2.5 Level II AQL per our quality assurance standards?
2.11 APPAREL ONLY: Does the factory check appearance and fabric stability after garment wash?

HUMAN RESOURCE PRACTICES

- 3.1 Are workers paid by the hour or on a piece rate system?
3.2 Are workers paid at least the legal minimum wage for standard working hours?
3.3 Does the factory pay workers per the legally required overtime rates?
3.4 Do workers have the right to refuse overtime?
3.5 How frequently are workers paid?
3.6 Are workers provided all legally required benefits?
3.7A Does the factory voluntarily provide any additional benefits to workers?
3.7B If yes, please specify:
3.8 Are there procedures in place for tracking if workers are provided all the benefits they qualify for?
3.9 Are workers free to leave the facility during non-working hours or at the end of their shift?

WORKING HOURS

- 4.1 What is the start time and end time for a regular shift?
4.2 How many total minutes do workers have for lunch and breaks per regular shift? (minutes)
4.3 Are workers able to have at least one day in seven off of work?
4.4 How many hours a week does the factory schedule a worker at regular pay?
4.5 Please specify what the maximum number of overtime hours are allowed by law?
4.6 What is the average number of overtime hours worked each week?

FACTORY SELF-ASSESSMENT (continued)

PHYSICAL PLANT

5.1A How many buildings make up the factory complex?

5.1B Please complete the chart below for each building:

	Square Meters	Number of Floors	Purpose/Function
Building 1			
Building 2			
Building 3			
Building 4			
Building 5			
Building 6			
Building 7			

If you have more buildings, please provide the information in a separate document.

HEALTH & SAFETY

- 6.1 Do all buildings meet all governing laws and regulations for first aid equipment?
- 6.2 Are there any safety education training programs?
- 6.3 Are records kept of injuries and accidents?
- 6.4A Do government officials make regular inspections?
- 6.4B How many times per year are the government inspections?
- 6.5 Are there any residential or overnight accommodation facilities provided to workers?
- 6.6 Are all buildings maintained, safe, clean, structurally sound and in compliance with local building codes?
- 6.7 Do all buildings meet all governing laws and regulations for fire safety equipment including alarms?
- 6.8 Do all fire alarms in all buildings have a back-up power source (such as a battery)?
- 6.9 Does the factory have systems in place to detect, assess, avoid and respond to potential threats to the health and safety of workers?

SECURITY AND SOCIAL COMPLIANCE

- 7.1A Please indicate when the last third party security compliance audit was completed at this factory?
- 7.1B Would you be willing to share the results from the security compliance audit upon request?
- 7.2A Please indicate when the last third party social compliance audit was completed at this factory?
- 7.2B Would you be willing to share the results from the social compliance audit upon request?
- 7.3A Is your business a member of the US Customs & Trade Partnership Against Terrorism (CTPAT)?
- 7.3B If yes, please provide a copy of your CTPAT membership certificate when submitting this BPA.

CTPAT/SECURITY SELF-ASSESSMENT

PHYSICAL SECURITY

- 8.1 Are buildings constructed of materials that resist unlawful entry?
- 8.2 Are entrances and exits to the warehouse/distribution center monitored?
- 8.3 Are external and internal doors, windows, and fences protected by appropriate means?
- 8.4 Are intrusion alarms used to detect unauthorized entry after hours?
- 8.5 Are all points of possible unauthorized entry linked to the alarm system?
- 8.6 Is lighting both inside and outside the facility adequate to eliminate dark corners?
- 8.7 Is there backup power for lighting and security devices?
- 8.8 Are exit doors and dock doors constructed to prevent unlawful entry?
- 8.9 Are dock doors closed and locked unless a shipment is being received or dispatched?
- 8.10 Is parking for employees & visitors separate from the dock and cargo areas?
- 8.11 Is there a security guard(s) on duty 24 hours a day, seven days a week?
- 8.12 Are clear zones maintained around the facility (i.e. are brush and growth cleared from the perimeter barrier)?
- 8.13 Are systems and procedures in place to contact internal security personnel or local law enforcement officers in the event of an emergency?
- 8.14 Is international and domestic cargo segregated and marked?
- 8.15 Is dangerous goods cargo segregated and stored in a safe area?
- 8.16 Is high-value cargo segregated and stored in a safe, caged or fenced-in area?

ACCESS CONTROLS

- 9.1 Does factory issue ID badges/cards for all employees?
- 9.2 Do the ID badges display both the employee's name and a photo?
- 9.3 Must employees show their badge upon entering the workplace?
- 9.4 Are badges color-coded to help distinguish workers' assigned areas?
- 9.5 Are employees required to wear uniforms?
- 9.6 Is there a controlled access gate to monitor activity coming in and out of the facility?
- 9.7 Is there a formal registration process to document visitors to the facility?
- 9.8 Is access to loading docks limited to those employees approved or scheduled to work on the loading docks?
- 9.9 Do employees escort visitors while in a loading facility or warehouse?
- 9.10 Do employees and security personnel challenge unauthorized/unidentified persons in the facility?
- 9.11 Are truck drivers granted limited access to the facility and supervised at all times?
- 9.12 Are all networks containing sensitive data secured with limited access to prevent unauthorized access to such data?
- 9.13 Is access to sensitive information, records, and information technology systems limited based on job description or assigned duties?
- 9.14 Is access to IT systems safeguarded with individually assigned accounts with passwords changing regularly?
- 9.15 If information is available in the public domain (i.e. the Internet), is it protected by a firewall?
- 9.16 Is security software current and does it receive regular security updates?
- 9.17 Are access logs for computer access and building access maintained?
- 9.18 Is a procedure in place to ensure all physical and cyber access rights are revoked and ID badges, etc. are returned when employment is terminated?

CTPAT/SECURITY SELF-ASSESSMENT

PROCEDURAL SECURITY

- 10.1 Does a supervisor or security officer oversee the loading or unloading of Instruments of International Traffic (IIT) for example shipping containers?
- 10.2 Do you ensure that all merchandise is properly marked, counted, weighed and documented?
- 10.3 Do you have a procedure to detect and report shortages and overages?
- 10.4 Are all IIT's entering or leaving the facility recorded with the name of the driver?
- 10.5 Does the facility properly monitor and store empty and full IIT's to prevent unauthorized access?
- 10.6 Do you utilize the CTPAT 7 point inspection process to ensure the integrity of IIT's prior to loading?
- 10.7 Do you utilize high security seals on outbound IIT's?
- 10.8 Do you have a procedure for storing, recording, tracking, and affixing seals?
- 10.9 Does the facility perform and document random security assessments?
- 10.10 Are there written cybersecurity policies and/or procedures to identify, protect, detect, respond and recover information technology (IT) systems and their network?
- 10.11 Are cybersecurity policies and procedures reviewed at least annually?
- 10.12 If subcontractor is noted on page 2, are adequate steps taken to insure they meet minimum security requirements?

PERSONNEL SECURITY

- 11.1 Are all candidates pre-screened before employment by verifying information on the application and past employment? ..
- 11.2 As permissible by law, are background checks (including criminal records), and drug testing conducted on all candidates before employment?
- 11.3 Are photographs of employees held on file?
- 11.4 Are records kept for every employee tracking their training and security access?

EDUCATION, TRAINING & THREAT AWARENESS

- 12.1 Are there formal security training programs covering all physical and cyber security requirements as well as informing employees about security vulnerabilities to facilities, Instruments of International Traffic (IIT's), and cargo at each point in the supply chain?
- 12.2 Is the training program administered to employees at the time of hire and at least once a year thereafter?
- 12.3 Is training provided to employees as required based on their job description and responsibilities?
- 12.4 Do relevant employees receive comprehensive security training including inspecting IIT's, reporting security incidents and suspicious activities, or analysis of shipment documents as applicable to their position?
- 12.5 Is proof that an employee has completed the training maintained in the employee's file?
- 12.6 Do you offer incentives for employees to participate in security controls (rewards for reporting wrongdoing)?
- 12.7 Do employees routinely receive briefings or other educational communications illustrating threats within the supply chain?

**WE AFFIRM WE HAVE READ, UNDERSTOOD, AND WILL FOLLOW THE IMPORT PROCEDURES
IN THE SPORTSMAN'S GUIDE IMPORT PORTAL FOUND AT: navegate.com/sportsmans**

PAYMENT, SHIPPING & DOCUMENT COMPLIANCE:

- We affirm our responsibility for securing sufficient quota and complying with US safeguard requirements with respect to filling Sportsman’s Guide orders.
- We certify all requirements for the US Customs Importer Security Filing (ISF) document will be properly completed and submitted to Sportsman’s Guide’s designated forwarder within 48 hours after a booking is made.
- We affirm that shipping documents will be submitted as defined in the Shipping, Payments Document Manual found in the IMPORT PORTAL.
- We affirm shipping delays resulting from supplier non-compliance, Sportsman's Guide may result in cancellation or chargeback.
- We affirm the use of subcontractors to manufacture Sportsman's Guide product is strictly prohibited without disclosure on this Business Partnership Agreement and Sportsman's Guide approval.

PRODUCT COMPLIANCE

- We will comply with all of the requirements, testing, carton marking and labeling details for each shipment per the documents in the IMPORT PORTAL
- We affirm our products and packaging will comply with all applicable rules, bans, regulations or standards for importation or sale in the US.
- We affirm that the manufacturer or subcontractor will not be changed without the prior knowledge and consent of Sportsman's Guide.
- We affirm that no material change will be made to any item, including packaging, without the prior knowledge and consent of the Sportsman’s Guide.

FACTORY COMPLIANCE

- We affirm that the factory named on this Business Partnership Agreement is financially sound and able to fulfill all order requirements. If requested, we agree to provide a Balance Sheet less than two years old, showing detailed assets, liability and net worth.
- We understand the factory must perform a 7 Point Inspection on all containers loaded from their facility and maintain a record of same. Upon request, the factory must provide a copy to Sportsman’s Guide.
- We confirm supplier personnel have been trained using the “7 Point Container Inspection” document (example training video: www.sealock.com/educational-material).
- We will comply to the Sportsman's Guide third party audit guidelines for social and CTPAT compliance in the IMPORT PORTAL.

COMPLIANCE ACKNOWLEDGEMENTS

- We affirm we will abide by the Sportsman's Guide Supplier Code of Conduct as a condition to doing business.
- We affirm that the factory, and any affiliated factories and/or sub-contractors, named on this Annual Business Partnership Agreement is/are not included on the US Treasury Department Office of Foreign Assets Control, Specially Designated Nationals list.
- We affirm that the factory, and any affiliated factories and/or sub-contractors, named on this Annual Business Partnership Agreement is/are financially sound and able to fulfill the requirements of the specified purchase order(s).
- We affirm all terms and conditions of this BPA will remain in effect until a new BPA is signed and dated by the vendor and approved by Sportsman's Guide.
- We understand failure to complete a BPA with Sportsman's Guide approval, may result in payment and/or shipment hold.
- We acknowledge by signing this agreement that we will comply with all of its terms and conditions. If we fail to do so, Sportsman's Guide shall be entitled to cancel/return orders, withhold payments, and/or charge us for damages, losses, penalties, and legal fees it incurs as a result of any such failure.

By signing below we certify the information provided is true and correct; we have read, understood and will comply with the Sportsman's Guide Supplier Code of Conduct and the Compliance requirements provided in this Business Partnership Agreement.

Printed Name and Title of Factory Officer
(person who is authorized to sign on behalf of the company)

Printed Name and Title of Vendor Officer
(person who is authorized to sign on behalf of the company)

Factory Officer Signature

Vendor Officer Signature

Date Signed:

Date Signed: