

## **Code of Conduct**

iClick is committed to providing our customers with high quality products that are safe, that are manufactured in an ethical and socially responsible way, and that are compliant with legal and regulatory requirements. We have a Product Safety/Compliance committee which includes two members of senior management and is overseen by the company president. This committee stays current on all product safety issues and researches new federal and state regulatory requirements as they become available.

We require our factory partners to provide compliance and testing certificates showing adherence to applicable safety and regulatory standards, and to complete and sign a social responsibility scorecard.

Here at iClick, we know the issues of product safety and social compliance are serious and we believe in taking a proactive stance. We take all necessary steps so that our customers can feel confident that the products we ship are safe, compliant, and of high quality that exceed expectations.

We commit to do business with the following guidelines as our core Code of Conduct:

- Product Safety We are passionate about making sure our products are safe and of high quality. We will comply with all applicable laws and regulations regarding the products we sell.
- No Abuse of Labor We are firm in this position and we will not use, or allow our factories to use, any form of forced labor; including indentured, prison, or slave labor. We treat our employees with utmost respect and will never use physical or verbal harassment, or abuse to discipline employees.
- No Child Labor We will not use use child labor, nor work with factories who do use child labor. No person shall be employed under the age of 15.
- Freedom of Association We respect the rights of employees to associate or organize without fear of reprisal or interference. If employees are represented by an organization recognized under law, we respect the right to bargain collectively.
- No Discrimination We will not discriminate in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender or disability.
- Hours and Wages Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate.
- Workplace Conditions We will provide a safe, healthy and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation and fire safety protection will be provided.
- Environment We are committed to managing 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. We abide by all applicable environmental laws and regulations.
- Subcontractors and Sources We are committed to only working with partners who share our vision and values. 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 Conduct Policy. All subcontractors and suppliers are also required to comply with all applicable and national laws.

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