

# MANUFACTURING CODE OF CONDUCT

It is important that all suppliers for Ethan Allen review and understand this document. Facilities manufacturing Ethan Allen Products must implement a labor compliance program and meet or exceed the standards given here.

## **CHILD LABOR**

Use of child labor is not permissible. The term "child" refers to a person younger than 15, or, if higher, the local country's legal minimum age of employment or age to complete compulsory education. The minimum age for hazardous work is 18 (16 under certain strict conditions).

## **INVOLUNTARY LABOR**

Use of any forced and/or involuntary labor is not permissible. The term forced and/or involuntary labor refers to any individual who has been hired in any form of coercive and deceptive recruitment, bonded, or indentured, or the said person has not offered himself voluntarily for employment.

## **COERCION & HARASSMENT**

All workers must be treated fairly and with respect. Physical punishment, threats of violence, or any other forms of mental, sexual, or verbal harassment of abuse are not permissible.

## **NONDISCRIMINATION**

Discrimination in hiring and employment practices on the basis of race, religion, age, nationality, social or ethnic origin, gender, disability, sexual orientation, or political opinion is not permissible. Discrimination in employment practices includes salary, benefits, advancement, discipline, termination, and/or retirement.

## **FREEDOM OF ASSOCIATION**

The right of employees to freedom of association and collective bargaining shall be recognized and respected.

## **HEALTH AND SAFETY**

A safe and healthy environment in all workspaces shall be provided. Any housing/dormitories that are made available to employees shall be safe and healthy. This shall include access to potable water and sanitary facilities, fire safety, adequate lighting, ventilation, personal safety equipment, and proper handling and storage of chemicals.

## **COMPENSATION**

All local wage and hour laws and regulations relating to minimum wages, overtime wages, holiday wages, maximum hours, piece rates, and any other form of compensation shall be complied with. Employees shall be provided with legally mandated benefits. Except in extraordinary business circumstances, an employer will not require employees to work more than the lesser of (a) a 48-hour week plus 12 hours overtime or (b) the limits of regular and overtime hours allowed by local labor law. Also, except in extraordinary business circumstances or as explicitly permitted by local labor law, employees shall be entitled to at least one day off in a seven-day period. Employers shall compensate employees for overtime hours at such rate as is required by local labor laws.

## **ENVIRONMENTAL PROTECTION**

All applicable environmental laws and regulations shall be enforced strictly.

## **OTHER LAWS**

All applicable laws and regulations, including local and national codes, rules, and regulations as well as applicable treaties and voluntary industry standards shall be enforced strictly.

## **COMPLIANCE PROGRAM MAINTENANCE**

Each manufacturing facility must maintain its compliance program. A committee of employees who are trained on factory compliance standards and procedures must be established. This committee shall use a checklist to regularly review the status of these standards. Checklists shall be retained for a period of not less than 7 years.

## **MONITORING TRANSPARENCY**

All employers shall authorize Ethan Allen and/or its designated agents (including third-party auditing companies) to engage in monitoring activities to confirm compliance with this Code of Conduct. This includes: unannounced on-site inspections of manufacturing facilities and employer-provided dormitories; reviews of books and records relating to employment matters (all of which must be retained for a period of not less than 7 years); and private interviews with employees. Employers will retain all documentation on site that may be needed to demonstrate compliance with this Code of Conduct for a period of not less than 7 years. At all times, employers shall be transparent with all documents and records requested during the audit.

## **SUBCONTRACTING**

The use of subcontractors to manufacture any Ethan Allen Product is prohibited. Each facility manufacturing Ethan Allen Products must be registered with Ethan Allen, receive prior written consent to start production, and comply with this Code of Conduct.