

This Production Code of Conduct (the “Code”) clarifies the minimum standards that all manufacturers, factories, and suppliers (the “Production Partners”) with whom Wolverine World Wide, Inc. (“Wolverine”) conducts business must adhere to while conducting their operations. Production Partners will at all times act ethically and are expected to comply with applicable laws, industry norms, and the standards described in the Code.

Wolverine has established a secure and effective complaint management system where Production Partners can confidentially and anonymously report suspected unethical behavior or practices. The Wolverine Ethics Report Line is located at [WolverineReportLine.com](http://WolverineReportLine.com). Any violation of the Code is to be reported to Wolverine immediately upon discovery.

## WORKING CONDITIONS

Production Partners must commit to upholding the human rights of workers, treat workers with dignity and respect, and improve working conditions within their supply chain.

- **Prohibitions**
  - **No Forced Labor** – Use of forced labor, prison labor, slave labor, or labor performed by victims of human trafficking in the production of products is prohibited.
  - **No Child Labor** – Use or recruitment of “child labor” defined as any work by a person under the age of 15 or the minimum working age set by local law, whichever is greater, is prohibited. Production Partners must comply with all local laws and ILO standards regarding the working conditions and restrictions for “young persons.”
  - **No Discrimination** – Production Partners shall not engage in, support, or tolerate discrimination in pre-employment recruitment process and with respect to all terms and conditions of the employment relationship—including hiring, onboarding, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, retirement, or any other term or condition of employment—on the basis of gender or gender identity, sex, sexual orientation, pregnancy, age, religion, race, color, ethnicity, national origin, disability, membership in worker organizations including unions, military or veteran status, or any other protected characteristic under applicable law.
  - **No Harassment, Abusive, or Inhumane Conduct** – Physical abuse or discipline, the threat of physical abuse or discipline, sexual or other harassment, verbal abuse, and other forms of intimidation are prohibited.
- **General Health & Safety**
  - **General Practices** - Production Partners are expected to comply with all applicable health and safety laws, rules, and regulations and provide healthy and safe working conditions while bearing in mind the prevailing knowledge of the industry and of any specific hazards.
  - **Building Safety** - Production Partners must provide stable and safe building structures, including residential facilities and dormitories, and not put their workers and others in jeopardy.
  - **Emergency/Fire Preparedness** - Production Partners must communicate fire and emergency evacuation plans to workers and post the diagrams in the local language in various locations around the production facilities.
- **The Employment Relationship**
  - **Regular Employment** - Work performed for Production Partners must be based on a recognized employment relationship established in compliance with national legislation, practice, and international labor standards, whichever affords the greater protection.
  - **Wage and Benefits** - Production Partners are expected to adhere to all local and national laws and regulations governing wages, working hours, overtime, time off (paid or unpaid), and legally mandated benefits without seeking waivers of minimum wage requirements. Wages must equal or exceed the minimum wage required by law and all workers must receive at least minimum wage. Production Partners agree to provide equal pay for same or similar jobs based on relevant experience.
  - **Working Hours** - Production Partners are expected to adhere to all local and national laws governing working hours in the jurisdiction in which they work. Production Partners must have a written policy for working hours and overtime that is in accordance with legal requirements and is communicated to all workers, legal working hours and working hours/schedules must be made available to all workers, and workers should not regularly exceed 60 working hours in a given week and should be provided one day off for every seven-day period.
  - **Diverse, Inclusive, and Equitable Work Environment** - Wolverine wants to make a positive contribution to human rights and society and believes that diversity, equity, and inclusion are social

and economic imperatives. Production Partners are expected to share this commitment in their operations, workforces, and within their supply chains.

- o **Collective Bargaining** - Production Partners are expected to respect the rights of workers to freely and peacefully associate and collectively bargain. Production Partners must not harass or intimidate workers who wish to join unions and participate in legitimate union activities. Workers must be free not to join unions as well.

## ENVIRONMENTAL SAFETY AND IMPACT

Production Partners should implement processes to identify and manage risks and opportunities related to climate change, to minimize the overproduction of environmental waste, the overuse of natural resources, and to strive to protect the health and safety of the public and preserve natural resources. Production Partners are expected to meet all relevant local and national environmental protection laws with a goal to meet international environment protection standards. Production Partners are also expected to protect animal welfare and to support ongoing animal welfare standards, transparency in the industry, and responsible sourcing.

## BUSINESS AND COMMERCIAL INTEGRITY

Production Partners are expected to conduct business with a high degree of ethics, honesty, integrity, and fair dealings. All Production Partners are required to fully comply with the legal requirements of the countries in which they operate.

- **Anti-Bribery and Anti-Corruption** - Wolverine has zero tolerance for bribery or corruption. Production Partners must comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, as well as all local anti-bribery and anti-corruption laws where Production Partners operate.
- **Gifts and Hospitality** - Production Partners are prohibited from offering any gifts or hospitality to government officials on Wolverine's behalf, providing or paying for travel expenses of government officials on Wolverine's behalf, or providing any gifts or hospitality on Wolverine's behalf that violate any local laws or regulations.
- **Economic Sanctions & Export Controls** - Production Partners may not make transactions that violate economic sanctions laws and regulations. Production Partners must screen applicable counterparties against the various sanctions lists of prohibited and restricted entities and individuals maintained by the U.S. and other applicable governments. Production Partners will not conduct any type of business with any U.S. embargoed countries/regions. Production Partners must comply with all applicable export controls laws and regulations.
- **Supply Chain Security** - Production Partners must ensure their supply chain security policies, practices, and procedures minimally meet the security criteria set forth by the Customs Trade Partnership Against Terrorism ("CTPAT") program or any other applicable supply chain policies of the relevant jurisdiction.
- **Conflicts of Interest** - Production Partners must not have any direct or indirect ownership, employment, consulting, financial, or other arrangement or relationship with any Wolverine director, officer, or employee that could potentially influence decisions related to the supplier or its products or otherwise give rise to a conflict of interest with Wolverine.
- **Protection of Consumer Information** - Production Partners must comply with all applicable privacy/data protection and information security laws and regulations. Production Partners must maintain an industry-standard information security program designed to detect, prevent, and respond to cybersecurity threats and include controls to protect personal and other confidential information from unauthorized access, use, or disclosure.
- **Subcontracting** - Production Partners may not subcontract any operation in the manufacturing process without prior written consent from an authorized representative of Wolverine and only after the subcontractor has agreed to comply with this Code.
- **Records & Inspections.** All Production Partners will maintain complete and accurate records and information so that compliance with the Code can be evaluated. Production Partners must always be cooperative and transparent during audits conducted by Wolverine or by an independent third party on Wolverine's behalf. Wolverine may conduct announced or unannounced inspections of all Production Partners' facilities.