



Supplier Code of Conduct

The Warnaco Inc. Supplier Code of Conduct establishes the key principles under which Warnaco Inc. (Warnaco) and our worldwide suppliers are required to operate.

Warnaco will only do business with suppliers who share our commitment to conduct business fairly, honestly, and with respect to people's dignity and rights.

This Supplier Code of Conduct is intended to clearly establish Warnaco's expectations in all factories in which our products are manufactured. Warnaco products will be manufactured in a manner compatible with the high standards that have contributed to the outstanding reputation of Warnaco and our brands.

Warnaco strongly encourages suppliers to exceed the requirements of the Supplier Code of Conduct and promote best practices and continuous improvement throughout their operations.

Warnaco is committed to remediation in response to identified compliance issues. Warnaco will work with existing suppliers and factories that meet threshold requirements and demonstrate a commitment to remediating identified issues.

This Supplier Code of Conduct applies to all Suppliers – factories involved in the production of products for Warnaco or any of our subsidiaries, vendors or agents.

Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate.

Child Labor

Suppliers must not employ workers younger than the greater of 15 years of age -- or 14 where the local law allows such exception consistent with International Labor Organization guidelines -- or the age for completing compulsory education or the minimum age established by law in the country of manufacture.

In addition, Suppliers must comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.

Forced Labor

Suppliers must not use involuntary or forced labor, whether indentured, bonded, prison or otherwise.

Harassment

Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, Suppliers will not use monetary fines as a disciplinary practice.

Wage and Benefits

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to their compensation for regular hours of work, workers must be compensated for overtime hours at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly compensation rate.

Hours of Work

Suppliers must ensure that, except in extraordinary business circumstances, on a regularly scheduled basis, workers shall not be required to work more than the lesser of (a) sixty (60) hours per week, including overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture. In addition, except in extraordinary business circumstances, all workers shall be entitled to at least one day off in every consecutive seven day period.

Health and Safety

Suppliers must provide their workers with a clean, safe and healthy work environment in compliance with all applicable, legally mandated standards for workplace health and safety in the countries in which they operate. This includes residential factories, if applicable.

Nondiscrimination

While Warnaco recognizes and respects cultural differences, Suppliers must ensure employment – including hiring, remuneration, benefits, advancement, termination and retirement – is based on ability and not on belief or any other personal characteristics.

Women's Rights

Suppliers will ensure women workers receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment, and pregnancy testing – to the extent provided – will be voluntary and the option of the worker. In addition, workers will not be forced to use contraception.

Freedom of Association and Collective Bargaining

Suppliers must recognize and respect the rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers must also respect the legal right of workers to bargain collectively.

Environmental

Suppliers must comply with all local environmental laws applicable to the workplace.

Subcontracting

Suppliers must not use subcontractors in the manufacture of Warnaco products or product components without approval from Warnaco, and only after the subcontractor has adequately demonstrated compliance with this Supplier Code of Conduct.

Communication

Suppliers must prominently display - in the languages of workers and supervisors - the Warnaco Supplier Code of Conduct poster and communicate the provisions of the Supplier Code of Conduct to workers and supervisors.

Monitoring and Compliance

Warnaco will undertake affirmative measures, such as announced and unannounced on-site inspections of production factories, to monitor compliance with this Code of Conduct. Suppliers must maintain on site all documentation necessary to demonstrate compliance with the Code of Conduct, and Suppliers must allow representatives from Warnaco full access to production factories, worker records and workers for confidential interviews in connection with monitoring visits.

Suppliers are expected to take necessary corrective actions to promptly remediate any noncompliance. Warnaco reserves the right to terminate its business relationship with any Warnaco Supplier who is unwilling to comply with this Code.