

# Code of Conduct

This code of conduct applies to all factories utilized in the production of merchandise sourced by Coldwater Creek, Inc., or any of its subsidiaries, agents or affiliates.

Coldwater Creek, Inc. recognizes that local customs and laws vary from one region of the world to another. However, the issue of human rights, as it pertains to the relationship of an employer and employee, transcend geographical boundaries. The intention of this Code is to communicate our expectations of our business partners.

- **General Principle –**  
Coldwater Creek, Inc. requires all vendors and factories to abide by all local laws and regulations, and for the purpose of supporting this Code specifically those relating to labor and environmental issues of the country in which they operate.
- **Child Labor –**  
No person shall be employed who does not meet the applicable minimum legal age requirement or be an age younger than 16, or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 16.  
  
Participating factories shall maintain official documentation that proves the date of birth of each worker. In cases where such official documentation is not available, the factory shall establish a reliable method of assessment of age.
- **Forced Labor –**  
Employers will not use involuntary labor of any kind, including involuntary prison labor, debt bondage or forced labor by governments.
- **Wages and Benefits –**  
Employers will set the level of wages to be equal with either local law or the accepted industry standard whichever is greater. All legally required benefits must be provided.  
  
Only deductions that are required or explicitly permitted by law are allowed to be taken against wages.  
  
Employees will be paid for overtime hours at such a rate as is legally required, or if no legal requirement exists the employee will be compensated at their regular hourly wage.
- **Working Hours –**  
Employers will abide by all regulations and laws governing hours worked. Each employee shall be allowed one day off in every seven. All overtime must be voluntary and be compensated for under the guidelines stated above.
- **Non-Discrimination –**  
Employers shall not discriminate on the basis of race, religion, sex, nationality, political opinions, age, disability, sexual orientation, maternity or marital status. Employees will be hired on their ability to perform the job.
- **Disciplinary Practices / Coercion –**  
All employees will be treated with dignity and respect. No employee will be subjected to physical or corporal punishment. Nor will any employee be subjected to sexual or psychological abuse, or verbal harassment.
- **Health and Safety –**  
Employers will provide a working environment that complies with all local rules, regulations and laws as they relate to the health, welfare and safety of the employees.

- **Freedom of Association –**  
Employers will not impede an employee’s right to peacefully and freely associate, organize or bargain collectively.
  
- **Environment –**  
Employers will abide by all applicable environmental laws and regulations as they relate to the safe and lawful handling of and removal of hazardous chemicals, and other industrial waste.  
Factories shall work to eliminate the use of toxic and hazardous substances from the production process.
  
- **Documentation and Inspection –**  
Employers shall maintain on file documentation needed to demonstrate compliance with this Code and shall make it available for review upon request. The factory agrees to submit to labor practices assessments or inspections with or without prior notice.