



317-566-9750 • Fax 317-566-9751
14300 Clay Terrace Blvd., Suite 249 • Carmel, IN 46032

Ethical Social Compliance

Statement of Principles

Heartland strives to make its facilities a special place to work, with an atmosphere of mutual respect and professionalism. Heartland and its Partners all have a responsibility to uphold these principles by creating an atmosphere in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. Heartlands Code of Conduct enables us to conduct our business and to source production in a manner that is both profitable and socially responsible.

Implementation of this Code of Conduct enables Heartland and its Partners to continually improve performance on worker's rights, labor standards, and other human rights issues integral to the production process.

Compliance with this Code of Conduct is mandatory for all Heartland partners. Heartland reserves the right to immediately terminate its business relationship and cancel all orders with any partner who does not comply with this Code of Conduct.

Work Environment

Heartland is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. Heartland expects its Partners to maintain the same standards in their factories. All Heartland entities and all Heartland Partners must comply with all applicable local laws and regulations governing working conditions. If housing is provided by Heartland or its Partners for employees, all housing must be maintained in a clean, safe fashion. Heartland strictly forbids the use of cruel and unusual disciplinary practices in the workplace.

Engage in Fair and Ethical Employment Practices

Fair Wages and Reasonable Working Hours: Heartland and its Partners must fairly compensate their employees by providing wages and benefits and reasonable work hours in compliance with local standards and applicable laws of the countries in which Heartland and its Partners are doing business. Heartland and its Partners must compensate their employees at a rate equal to, or greater than, the prevailing local minimum wage, including piece rate workers. Heartland and its Partners must not require employees to work more hours than the limits on regular and overtime hours prescribed by applicable law.

Child Labor: Heartland will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any Partner that uses child labor. In determining whether a laborer is a "child," Heartland will refer to the local legal minimum age for employment or the age for completing compulsory education in the country of manufacture.



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Migrant Labor: Heartland expects all workers, including foreign and domestic migrant workers, to be provided wages, benefits and working conditions that are fair, comparable to local workers and in accordance with local law. Heartland does not condone holding workers' passports or other personal documents, charging any type of fee or deposit for employment, allowing labor agents or brokers to charge fees or engaging in deceptive recruitment practices. Heartland reviews these policies in detail during our audit process and expect our vendors to share these views and comply.

Forced or Compulsory Labor: Heartland will not accept forced or compulsory labor in its operations under any circumstances and will not purchase product(s) from any Partner that utilizes forced or compulsory labor. Every employee must be a voluntary worker. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden. No employee shall be subject to corporal punishment, threats of violence, or other forms of psychological or physical harassment, abuse or coercion.

Our Employees: Heartland believes hiring decisions are based on selecting the most qualified candidate following the Equal Employment Opportunity principle that all people should have the right to work and advance on the bases of merit and ability, regardless of their race, sex, color, religion, disability, national origin, or age.

Heartland employees treat each other with dignity and respect across various cultural dimensions guided by the servant leadership model of Friendly, Competent, and Available.

Human Trafficking: Heartland will maintain and commit to maintaining a work environment that is free from human trafficking. Heartland will not tolerate employment practices that include the recruitment, transportation, transfer, harboring or receipt of persons or through the use of force or the threat of force or through other forms of coercion, abduction, fraud, deception, abuse of power or by giving or receiving payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

Discrimination: Heartland employs workers based on ability to perform a job task, not on the basis of personal characteristics, beliefs or any form of discrimination and expects its Partners to employ workers on the same basis. Heartland and its Partners shall comply with all local anti-discrimination laws and regulations.

Freedom of Association: Heartland respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference, and expects its Partners to respect the same rights.



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Legal Compliance: Heartland and its Partners shall comply with the legal requirements and standards of their industry and the laws of the countries in which Heartland and/or its Partners are doing business. Heartland and its Partners shall comply with all applicable export and import requirements. Necessary invoices and required documentation must be provided in compliance with applicable law. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable law.

Anti-Bribery: Heartland shall not engage in any form of bribery, kickbacks, corruption, extortion or embezzlement. Heartland shall not take any action that would violate, or cause customers to violate, any applicable anti-bribery law or regulation, including the U.S. Foreign Corrupt Practices Act.

Gift & Gratuity Policy: Heartland employees are prohibited from soliciting or accepting any gifts, gratuities or other monetary incentives that are designed to improperly influence business decisions or as a condition of doing business. The Supplier has an affirmative duty to report any such request or demand immediately to Heartland. Certain business courtesies are not prohibited. Employees may accept gifts that are infrequent and nominal in value; occasional and reasonably priced meals with a business contact or which are otherwise reasonable and customary, in countries where custom requires such courtesies so long as the receipt of these gifts does not suggest a conflict of interest or give the appearance of an improper attempt to influence business decisions. Heartland expects our suppliers to adhere to these gift giving guidelines.

Animal Testing

Heartland is committed to providing consumers with the highest quality products, which comply with all applicable product safety standards. Our goal is to ensure that our products are of the highest quality through the use of non-animal testing alternatives. Heartland has declared a worldwide moratorium on all animal testing. If a Heartland Partner believes that alternative testing cannot provide sufficient assurance that a new product is safe for consumer use, they should advise Heartland in writing.

Environment, Health and Safety

Heartland has maintained a long-standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbors and consumers. Heartland recognizes that nearly every aspect of a manufacturing business has a potential to impact the environment, human health or safety. It is Heartland's responsibility to minimize those impacts and develop solutions that protect people and the environment and allow Heartland to maintain the product quality and value that consumers demand. Heartland's approach is to collaborate with its employees, suppliers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from Heartland's manufacturing operations and the manufacturing operations of Heartland's Partners.

Monitor Compliance

Heartland conducts regular assessments of its facilities and the facilities of its Partners to ensure compliance with this Code of Conduct.