

WORKPLACE CODE OF CONDUCT FOR SUPPLIERS TO TIMEX AND ITS AFFILIATES

Timex Group is firm in its resolve to do business only with suppliers who share our commitment to safe and fair labor practices, compliance with applicable laws, and ethical behavior.

A condition of doing business with Timex Group is that suppliers comply with applicable laws, including but not limited to laws against child or forced labor and unsafe working and housing conditions.

Timex will not do business with any supplier who knowingly engages in or contracts with companies who knowingly violate applicable laws nor will we do business with suppliers who violate the standards described in this Code of Conduct or any other standards Timex may provide (including, but not limited to, those of its licensors or customers). If Timex Group determines that these principles have been violated, it may terminate the business relationship, suspend current production, cancel outstanding orders, refuse or return shipments or require immediate corrective action.

To further the objective of ensuring the protection of workers, Timex Group may require its suppliers to permit or provide regular survey of employment and working conditions in their facilities and to acknowledge in writing their compliance with the policies set forth in this code. Timex Group further requires its suppliers to permit Timex Group's customers or their designees to inspect and audit the suppliers' facilities. Timex Group may require suppliers to post this code or the code of its customers in the supplier's workplace.

Our suppliers must agree to adhere, at the minimum, to the following policies. Timex Group may require certain suppliers to comply with additional special requirements:

Compliance with Applicable Laws

Suppliers must comply with the applicable legal requirements of any country in which the supplier does business. This includes compliance with applicable United States laws relating to import of products, bribery and/or corruption.

Wages and Hours

Suppliers must pay workers at least the applicable minimum legal wage established by the country in which the work is performed. The minimum wage must be observed for work performed exclusive of overtime, which must be compensated for at a rate higher than regular working hours in compliance with applicable local law.

Personnel shall be provided with at least one day off in every seven-day period.

Suppliers may not force workers to work beyond the regular working hours and no disciplinary measure may be imposed for those who decline to work overtime.

Business Integrity

Suppliers shall have and enforce policies that prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). Such policies shall be consistent with the Timex Group's Foreign Corrupt Practices Act Compliance Guidelines. All business dealings should be transparently performed and accurately reflected on a

Supplier's business books and records. Monitoring and enforcement procedures shall be implemented to ensure conformance with anti-corruption laws.

Child Labor

Suppliers will only employ workers that meet the greater of (i) the minimum legal working age; (ii) the age for completing compulsory education; or (iii) 16 years of age, if the following restrictions or the local law (whichever is more strict) are observed:

- No work will be performed during hours that would interfere with school attendance, if applicable.
- No work between the hours of 11:00 pm and 7:00 am.
- No work in any hazardous occupation.

Accurate employment records shall be kept which confirm the age of each worker.

Voluntary Labor

Suppliers will not utilize forced or prison labor or deal with suppliers who utilize forced or prison labor.

Disciplinary Practices

Suppliers will not engage in or permit corporal punishment or other forms of physical or mental coercion.

No excessive deductions to wages will be made for workplace penalties or infractions of company rules.

Suppliers shall have a communicated process for their personnel to be able to raise concerns without fear of retaliation.

Discrimination

Suppliers must not discriminate on the basis of race, color, religion, national origin, ethnicity, disability, union membership, gender, age or any other unlawful basis in hiring and employment practices such as promotions, rewards, and access to training.

Worker Health and Safety

Suppliers must provide employees with a safe and healthy workplace in compliance with applicable laws and regulations, ensuring, at minimum, access to potable water and sanitary facilities, medical facilities, safety equipment, fire safety, adequate lighting, ventilation and temperature control. If the supplier also provides housing facilities, the same standards for health and safety will also be applied to workers' living quarters.

Environment

Suppliers must comply with all applicable environmental laws, including laws and regulations regarding prohibition or restriction of specific substances, labeling for recycling and disposal of waste and hazardous materials. All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

Compliance and Security

Timex Group is committed to creating a more secure and efficient supply chain. To this end, Timex Group companies have partnered with U.S. Customs and Border Protection under the Department of Homeland Security in the Customs-Trade Partnership Against Terrorism (C-TPAT). To support this effort, the company strongly encourages vendors to adopt procedures and take actions to maximize the security of their facilities, including procedural security, physical security, personnel security, physical access controls and security training and threat awareness.