At Strategic Partners, Inc. (SPI), we are committed to maintaining a standard of excellence in every aspect of our supply chain. We continually strive to achieve the goal of ensuring that the working conditions of SPI's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally responsible. SPI's suppliers must commit in all their activities to operate in full compliance with the local laws and regulations in the countries in which they operate.

VERIFICATION
Prior to partnering with any new suppliers, and annually thereafter, we require suppliers to sign our Code of Conduct for Suppliers certifying that they do not engage in human trafficking and/or forced labor. Our process is managed by our own risk-management.

SUPPLIER AUDITS
Each year we conduct announced and unannounced audits of each supplier to determine if they are complying with our company standards aimed at ensuring human trafficking and/or forced labor is not tainting our products. Since we began auditing our suppliers, we have found all of them to be in compliance with our standards. Our risk-management team or 3rd party audit firms conduct the audits. Audits consist of reviewing time cards, going on an extensive facility tour and conducting individual interviews with employees.

CERTIFICATION
As a condition of doing business with SPI all suppliers must sign SPI’s Code of Conduct for Suppliers and answer specific questions certifying that: (1) No employee is less than the legal minimum working age, but in no event is less than 15 years of age; (2) That all workers are there voluntarily; (3) That all employees are free to leave once their shift ends; (4) That the lowest hourly wage is at least the minimum required by government standards; (5) That no employee works more hours in a given week than the legal maximum; and (6) That employees are given adequate time for meals during each shift. Each supplier must sign SPI’s Code of Conduct for Suppliers annually and records are maintained at SPI’s offices in Chatsworth, CA.

INTERNAL ACCOUNTABILITY
Non-compliance with our company standards regarding slavery and trafficking will result in termination of a business relationship with an employee or contractor.

TRAINING
Although at this time SPI does not provide employees or contractors with formal training on human trafficking and slavery, it has devoted resources to providing supply chain oversight by hiring a Director of Social Compliance and empowering its EVP of Sourcing and Procurement to take all necessary steps with SPI’s suppliers.

* The above disclosures only apply to the apparel products SPI designs, manufactures and distributes. SPI does not have policies or procedures in place for the other products it manufactures and/or purchases from vendors for the purpose of distributing such products (e.g., footwear, legwear, accessories and gift-with-purchase items (GWP)). This page will be updated when such policies and procedures have been finalized.