

CODE OF CONDUCT POLICY

Starline is committed to providing our clients with products of the highest quality – this includes not only the quality of the product, but also the process quality used to produce the final product. This encompasses labor, the work environment the product was manufactured in, and the environmental impact of its production. To this end we have adopted the standards for quality and integrity of our products as well as ethical socially responsible production of our products both in the United States and abroad.

This Code sets minimum standards that Starline commits itself to, as such Starline requires all vendor partners to meet these standards as well. Starline asks that our vendor partners confirm their commitment by signing Starline's Code of Conduct prior to engaging in any business transaction. For vendor partners with a continuing relationship we ask they reaffirm their commitment to these standards every 2 years.

CODE OF CONDUCT STANDARDS

LEGAL COMPLIANCE

All laws and regulations in the country of business and manufacture shall be complied with; this includes legislation on product quality, product safety, labor and employment, health and safety, supply chain security, and the environment.

PRODUCT COMPLIANCE

Starline requires the manufactures to meet or exceed all product safety requirements for Canada and The United States of America in relation to the product being produced. We require that the following requirements are followed for our products:

California Prop 65 – all products must be compliant with California Prop 65. This law restricts or limits chemicals known by the State of California to cause serious health problems, including: cancer, birth defects and other reproductive damage.

CPSIA (Consumer Product Safety Information Act) – all applicable products must comply with the Consumer Products Safety Information Act. General Certificates of Conformity must be given for applicable products based on a reasonable testing program.

Country of Origin – All products must be marked in compliance to USA and Canadian requirements for country of origin.

Any required third party testing will be discussed upon receipt of purchase order to determine which party will bear the costs of the test.

ETHICAL BUSINESS PRACTICES

Any vendor that sells to Starline shall conduct its business in accordance with the highest standards of ethical behavior. According to Starline's company policy, no money, assets, gifts, fees or compensation of any kind may be given to employees or its affiliates' employees. Should such incidence arise, an official claim will be filed with the competent authorities, while the employee concerned will be dismissed for cause and Starline will discontinue doing business with the vendor concerned.

PRODUCT SAFETY

We will comply with all applicable laws and regulations regarding safety of products we sell. We will meet applicable recognized voluntary industry standards for our products and processes.

NO ABUSE OF LABOR

We will not use any form of forced labor, including indentured, prison, bonded or slave labor. We will not use physical or verbal harassment or abuse to discipline employees.

NO CHILD LABOR

We will not use child labor. We will comply with all minimum age provisions of applicable laws and regulations. Where laws and regulations do not meet standards established under the UN Global Compact (a minimum age for admission to employment or work that must not be less than the age for completing compulsory schooling, and in any case not less than 15 years) Starline requires our partners to comply with that standard.

NO DISCRIMINATION

We will not discriminate in hiring and employment practices on the basis of age, nationality, race, religion, social or ethnic orientation, gender or disability.

FREEDOM OF ASSOCIATION

We respect the rights of employees to associate or organize without fear of reprisal or interference. If employees are represented by an organization recognized under law, we respect the right to bargain collectively.

HOURS AND WAGES

We will comply with all applicable wage, work hours, hiring, benefits, and overtime laws and regulations. In the absence of law in a particular location relating to product safety, labor, employment, environment or working conditions, the spirit and intent of these policies shall be met.

WORKPLACE CONDITIONS

We will provide a safe, healthy and secure workplace. We will abide by all applicable laws and regulations for safety and health. Proper sanitation, lighting, ventilation and fire safety protection will be provided.

ENVIRONMENT

We abide by all applicable environmental laws and regulations. We will manage our environmental footprint to minimize the adverse impact on the environment. We will manage our energy, water and waste systems for maximum efficiency and minimal adverse impact on the environment.

SUBCONTRACTORS AND SOURCES

We require all businesses that support our business as subcontractors, manufacturers or sources of goods to comply with all the same policies stated in our Code of Conduct policy. All subcontractors and suppliers are required to comply with all applicable and national laws. We expect those businesses to develop and implement internal business procedures to ensure compliance with our policy.

RIGHT TO INSPECT

Starline or its representatives may conduct announced or unannounced monitoring activities to confirm the vendor's compliance to this Code of Conduct. As a condition of doing business with Starline, the vendor must grant Starline and its representative's access to vendor facilities and company records to perform audits, including confidential employee interviews.

IMPLEMENTATION

Starline requires all its vendor partners to contractually obligate themselves to compliance with this Code.



CORRECTIVE ACTION

Unsatisfactory monitoring results shall be addressed through corrective actions and within a time frame that will both be agreed upon between Starline and the affected factory partner.

NON-COMPLIANCE

Starline reserves the right to suspend any purchase orders and contracts with its vendor partners until corrective actions have been implemented, or to terminate the business relationship if gross non-compliance with this code should come to light.

By signature below, Vendor agrees to comply with the standards provided in the above Code. Furthermore, Vendor shall implement this Code at its locations where Starline's products are made, and shall promptly correct any deficiencies that are determined to exist either through our own monitoring or by third-party audits.

COMPANY _____

DATE _____

SIGNATURE _____

PRINT NAME _____

TITLE _____