
SOCIAL ACCOUNTABILITY POLICY

The Kitchen Collection, LLC (“Kitchen Collection”) is committed to achieving the highest standards of legal and ethical conduct for itself and its directors, officers and employees. Kitchen Collection expects the factories and business partners (each a “Factory” and collectively, the “Factories”) that help bring Kitchen Collection products to market to maintain a high level of conduct compatible with this philosophy. While Kitchen Collection recognizes and respects the cultural and legal differences found throughout the world, this Social Accountability Policy (this “Policy”) sets forth the minimum requirements all Factories must meet in order to do business with Kitchen Collection.

Applicability:

This Policy is applicable to all Factories manufacturing and supplying Kitchen Collection with finished goods and will serve as the basis for the ongoing assessment, monitoring, and evaluation of a Factory’s employment practices and legal compliance. All Factories are expected to operate in full compliance with all applicable laws, rules and regulations of the country(ies) of manufacture, including, but not limited to, those related to labor, employee health and safety, and the environment. Where there are differences or conflicts between this Policy and the laws of the country(ies) of manufacture, we expect our Factories to adhere to the more stringent standard.

Child Labor (Zero Tolerance – see below):

Factories shall not employ any person younger than 16 years of age. If the age of completing compulsory education is higher than 16 years, this higher age shall apply and Factories shall not employ any person younger than such age. Factories shall also comply with any and all other applicable child labor laws in the country(ies) of manufacture. Kitchen Collection will NOT utilize any Factory that uses child labor as defined by the criteria above.

Forced Labor (Zero Tolerance – see below):

Factories shall not use any forced, prison or indentured labor.

Harassment or Abuse (Zero Tolerance – see below):

Factories shall treat every employee with dignity and respect. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse. Factories shall not use or tolerate any form of corporal punishment.

Transshipment / Country of Origin (Zero Tolerance – see below):

Factories shall comply with all applicable United States Customs importation laws. Factories shall establish and maintain programs and documentation to support country of origin production verification to avoid illegal transshipments. Factories shall provide Kitchen Collection with timely and accurate information about the country (countries) in which products are made. All labels, hangtags, and documents that contain country of origin information shall be accurate.

Factories shall not use transshipment from second tier suppliers or subcontractors as a means to avoid this Policy. Kitchen Collection suggests that the Factory implement a social accountability program supporting this Policy with its suppliers and subcontractors.

Discrimination:

Kitchen Collection firmly believes that all people are entitled to equal opportunity in employment and will not initiate, maintain or renew business relationships with Factories that discriminate in employment including, hiring, salary, benefits, advancement, discipline, termination, or retirement, on the basis of gender, race, age, nationality, marital or maternity status, work or personal affiliations, or social or ethnic origin.

Female employees shall receive equal remuneration (including benefits), equal treatment, equal evaluation of their work, and equal opportunity to fill all positions open to male employees. Employees taking maternity leave shall not face dismissal or the threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits. Factories shall provide appropriate services and accommodation to women employees in connection with pregnancy.

Compensation and Benefits:

Factories shall set normal wages, overtime wages, and legally mandated benefits/allowances in compliance with all applicable laws, rules and regulations of the country (ies) of manufacture. All employees shall be paid at least the legal minimum wage or a wage that meets the local industry standard. Hourly and/or quota-based (piece rate) wage employees shall be compensated for overtime hours at a premium rate as is legally required in the country (ies) of manufacture.

Hours of Work and Overtime:

Factories shall maintain reasonable employee working hours. While Kitchen Collection favors factories that do not regularly engage in excessive overtime hours, it is understood that overtime may be required in some production circumstances. Except in extraordinary circumstances, factories shall not require employees to work more than 12 hours a day, 60 hours a week during normal production periods, or 72 hours per week in peak performance periods. In addition, employees shall be permitted at least one day off for every seven-day period.

Working Conditions / Health & Safety:

Factories shall comply with all applicable laws, rules and regulations of the country (ies) of manufacture related to employee health and safety. Factories shall provide written standards for safe and healthy work environments for their employees, including adequate facilities and protections from exposure to hazardous conditions or materials. (See Appendix 1 for specific Health & Safety guidelines.)

Environment:

Factories must demonstrate a regard for the environment and shall comply with all applicable environmental laws, rules and regulations of the country (ies) of manufacture. All hazardous materials shall be disposed of in accordance with local laws and regulations.

Management Systems:

All Factories shall have procedures ("Management Systems") that cover and are consistent with the requirements of this Policy. The Management Systems must be effectively and clearly documented, implemented, maintained and communicated to all employees, whether directly employed or contracted. This will help ensure compliance and consistent behavior of all employees. The Management Systems must be fully supported and promoted by the highest level of Factory Management.

Some examples of Management Systems are as follows:

- ◆ New Employee Orientation and Administrative Processes (required paperwork, age verification, contract, etc.);
- ◆ New Employee Training Procedures;
- ◆ Fire Safety Training;
- ◆ General Safety Training;
- ◆ Disciplinary Procedures;
- ◆ Emergency Procedures;
- ◆ Payroll Procedures;
- ◆ Medical Treatment; and
- ◆ Employee Benefits, Overtime Policy, and Sick Day Policy

Documentation:

All documentation necessary to verify compliance with this Policy and with all applicable laws, rules and regulations of the country (ies) of manufacture must be maintained on-site at the facility. All such documentation is to be made available upon the request of Kitchen Collection or its third party auditor. Duplicate sets of documents, books and records, false documents, books and records, as well as inconsistent documents, books and records, will not be tolerated and will count as a violation of this policy.

Annual Certification: Each Factory shall certify compliance with the terms of this Policy on an annual basis. See Appendix 2 for the blank certification form. Each factory shall mail or FAX a completed and signed certification form to Kitchen Collection’s designated auditing provider annually before the 30th of January. Certifications will be collected by the auditing provider and provided to Kitchen Collection for review.

Facility Audits:

Each and every Factory shall comply with this Policy as a condition of doing business with Kitchen Collection. Kitchen Collection reserves the right, at any time, with or without advance notice, to audit and/or authorize a third party to audit compliance with this Policy. In general, Kitchen Collection will perform an audit cycle every 2 years. An audit cycle consists of an initial audit, corrective action plan (if necessary) submitted by the Factory to Kitchen Collection, review and approval of the corrective action plan, and a re-audit (if necessary) to confirm implementation of the corrective action plan. Factory management will be expected to provide unfettered access to the subject facility and all books and records to allow for a comprehensive audit to be conducted, including an opportunity for confidential and private interviews with Factory workers selected by the auditor. No retaliation of any kind shall be taken against any employees or auditors. Kitchen Collection will review the results of a social audit of a Factory conducted by a third party (e.g., other customer, retailer) during the same audit cycle and, if such results warrant, may determine that a separate audit of such Factory by or on behalf of Kitchen Collection pursuant to this Policy is not necessary.

Audit Results and Consequences:

Non-compliance with this Policy will be divided into two categories: “Zero Tolerance,” and “Needs Improvement” with the resulting consequences as set forth in the table below.

Category of Non-Compliance	Shipment(s) On-Hold	Supplier Response	KCLLC Review & Response	Re-Audit
Zero Tolerance <ul style="list-style-type: none"> • Child Labor • Forced Labor • Abuse • Transshipment 	Yes	<ul style="list-style-type: none"> • Factory has 2 business days, after receipt of the report, to provide KCLLC China Office a written response and explanation 	<ul style="list-style-type: none"> • KCLLC Review / Verification • KCLLC notifies Factory of results of review in 1 week • KCLLC reserves the right without penalty or liability to: <ul style="list-style-type: none"> o Terminate relationship with Factory o Cancel Purchase Order(s) o Return product o Revoke acceptance of product o Require Corrective Actions o Release shipment • Factory liable for all related damage, cost and expense incurred by KCLLC 	Within 3 months at factory's expense

Category of Non-Compliance	Shipment(s) On-Hold	Supplier Response	KCLLC Review & Response	Re-Audit (if necessary)
Needs Improvement <ul style="list-style-type: none"> • Discrimination • Wages • Benefits • Work Hours / OT • Safety • Documentation • All other 	No	<ul style="list-style-type: none"> • Factory has 4 weeks, after receipt of the report, to provide KCLLC China Office a written response and Corrective Action Plan (including timing) • If KCLLC rejects all or part of the proposed Corrective Action Plan, Factory has 2 weeks to submit revisions 	<ul style="list-style-type: none"> • KCLLC review and acceptance / rejection of Corrective Action Plan within a reasonable period of time • KCLLC reserves the right without penalty or liability to: <ul style="list-style-type: none"> o Terminate relationship with Factory o Cancel Purchase Order(s) o Return product o Revoke acceptance of product o Require additional Corrective Actions • Factory liable for all related damage , cost and expense incurred by KCLLC 	Timing based upon Corrective Action Plan, at factory's expense

This Policy may be amended by Kitchen Collection and its enforcement and/or interpretation rests solely with Kitchen Collection. This Policy does not create any rights in favor of any party other than Kitchen Collection. Kitchen Collection reserves the right to cease doing business with any Factory who fails to comply with this Policy.

Schedule 1

WORKING CONDITIONS / HEALTH & SAFETY

Factories shall establish and maintain written standards for safe and healthy work environments in compliance with local health and safety laws and standards. The Factory standards shall include provisions for safe, healthy and adequate facilities (including dormitories and residential facilities) and protection from exposure to hazardous conditions or materials.

Ventilation:

Poor ventilation can damage employee health and decrease productivity. Facilities should make all reasonable efforts to maintain reasonable air circulation, reduce temperature extremes, and remove toxic and particulate matter from the air. Temperatures maintained between 60 degrees and 86 degrees F are preferred.

Ventilation tips include:

- ◆ appropriate ventilation to remove toxic fumes from areas where hazardous chemicals are mixed and used, to remove toxic vapors;
- ◆ mechanical ventilation devices in areas where welding and soldering takes place, again to remove toxic fumes;
- ◆ maximize ventilation in enclosed spaces where heat-generating equipment is operated;
- ◆ ventilation in restrooms; and
- ◆ appropriate ventilation in enclosed areas where workers engage in strenuous activity such as continuous lifting of heavy objects.

Confined Spaces:

Confined spaces present distinct challenges. Hazards of confined spaces include:

- ◆ Oxygen deficiency;
- ◆ Toxic gases;
- ◆ Flammable materials;
- ◆ Substantial steam and moisture;
- ◆ Slippery work surfaces;
- ◆ Electrical hazards;
- ◆ Increased noise; and
- ◆ High temperatures.

The hazards presented by confined spaces can be minimized with:

- ◆ Enhanced ventilation;
- ◆ Periodic testing of ventilation;
- ◆ Increased rotation of employees in confined spaces;
- ◆ Provision of protective equipment; and
- ◆ Training employees in safe practices.

Mezzanines:

Use the following guidelines to evaluate mezzanine safety:

- ◆ Mezzanines should be built to support the weight of equipment, personnel, and product to be stored on the floor;
- ◆ Structurally appropriate stairs, with necessary room for an exit, should be present;

- ◆ Guardrails should be present to prevent falling; and
- ◆ Care should be taken to ensure sufficient ceiling height in buildings with mezzanines;

Stairways:

Use the following guidelines to evaluate stairway safety:

- ◆ Stairs should have a depth of at least ten inches (10");
- ◆ Stairways should be at least 22" wide;
- ◆ Stairway surfaces should have a non-slip surface;
- ◆ Stairs should be built to carry a load of 1,000 pounds; and
- ◆ Any stairway with four or more (4+) steps should have a secure handrail.

Exits:

Obstructed, locked, or an insufficient number of exits are a safety hazard. In many cases, fixing the problem is inexpensive, and may make the difference between life and death. There should be a minimum of three (3) exits per story for a facility with up to 1,000 employees and no employee should have to travel more than 200 feet to an exit.

Use the following guidelines to evaluate the adequacy of exit doors:

- ◆ All exit doors should be clear/unobstructed;
- ◆ Exit doors should swing out, not in;
- ◆ Exit doors should not be locked; and
- ◆ Exits should open directly to the outdoors.

Use the following guidelines to evaluate evacuation routes:

- ◆ All exit routes should be clear/unobstructed;
- ◆ Corridors leading to exits should be at least 44" wide;
- ◆ All exits should be marked with signs visible for up to 100 feet;
- ◆ All exit routes should be adequately lighted;
- ◆ Emergency lighting should be provided for up to 90 minutes;
- ◆ Evacuation paths should be marked on the floor;
- ◆ Evacuation paths should be posted prominently and clearly in several places throughout the factory;
- ◆ All employees should be trained in evacuation procedures; and
- ◆ New employees should be trained before beginning work.

Fire Safety:

Fire extinguishers present one of the most frequently violated and most easily and inexpensively remedied aspects of factory safety.

Use the following guidelines to evaluate the adequacy of fire extinguishers:

- ◆ There should be no less than 1 fire extinguisher for every 25 people;
- ◆ A fire extinguisher should be no further than 75 feet from any employee;
- ◆ Fire extinguishers should be placed in accessible, clearly marked locations;
- ◆ Operating instructions in local language(s) should be placed on the front of each fire extinguisher;
- ◆ An adequate number of employees should be trained to use fire extinguishers;
- ◆ Fire extinguishers should be checked frequently to ensure that proper pressure is maintained (under-charged or over-charged fire extinguishers should be avoided);
- ◆ Fire extinguishers should be inspected periodically (every month); and
- ◆ Fire extinguishers should be serviced every six months by qualified personnel (outside agency).

To maintain proper fire safety, each Factory should have a fire alarm system and an evacuation plan.

Use the following guidelines to evaluate the adequacy of the fire alarm system:

- ◆ The fire alarm should be audible throughout the facility;
- ◆ The fire alarm should have a sound distinct from any other similar notice system;
- ◆ All alarm devices should be tested regularly, preferably, in conjunction with evacuation drills;
- ◆ Qualified personnel should perform testing of the fire alarm system; and
- ◆ All new employees should be notified of the fire alarm system prior to beginning work.

Electrical Wiring:

Electrical safety is tied directly to fire safety. Overloaded or improperly maintained electrical wiring can lead to a fire.

Use the following to minimize the risk from electrical equipment:

- ◆ Electrical cords on smaller machines should be in good condition, continuous in length without cuts, splices, or taped repairs;
- ◆ Electrical equipment should be grounded, i.e., containing a third prong;
- ◆ Electrical wiring should be encased;
- ◆ Permanent equipment should have permanent wiring;
- ◆ Electrical panels that are excessively warm may indicate potential overloading; and
- ◆ Cords should not run across the floor in such a way as to create a potential tripping hazard. All cords that cross a walkway should be securely taped to the floor.

Protective Equipment:

Protective equipment is not a substitute for engineering solutions. Not all equipment is 100% effective. However, some basic protective equipment can help to reduce hazards. Although, employees may be reluctant to use protective equipment factories should make basic protective equipment and training in the use of such equipment available to employees. In situations where workers are using hazardous materials, or where they are steadily exposed to toxics such as glue-based solvents, protective equipment shall be mandatory.

Protective equipment includes:

- ◆ **EYE PROTECTION:** Impact-resistant goggles or other eyewear should be provided to workers subject to flying objects, metal tailings, persistent glare, toxic/hazardous liquids, or a high degree of dust.
- ◆ **FACE SHIELDS:** Employees applying solvents should have mouth guards. Note that paper guards may not screen out dangerous substances.
- ◆ **EAR PLUGS:** Workers routinely subject to noise measured at more than 80 decibels should be provided earplugs. But noise reduction should also be considered.
- ◆ **GLOVES:** Workers using sharp objects should be provided metal gloves. Workers subjected to toxic substances such as solvents should also be provided gloves.
- ◆ **EQUIPMENT GUARDS:** Dangerous machinery should be operated only with two-handed equipment.
- ◆ **FOOTWEAR:** Employees working on wet surfaces should wear appropriate footwear. Workers operating or moving heavy items should have reinforced shoes. Open-toe shoes are not recommended in most work environments.

Ergonomics

A number of daily activities present a risk of injury. Factories should take proactive actions necessary to minimize risk factors associated with:

- ◆ Repetitive and/or prolonged activities;
- ◆ Awkward postures;
- ◆ Contact with surfaces;
- ◆ Excessive vibration;
- ◆ Cold temperatures;
- ◆ Inappropriate tools and/or equipment;
- ◆ Lifting or moving heavy objects;
- ◆ Prolonged static postures;
- ◆ Lack of adjustable chairs, work station/key boards, foot rests, and body supports;
- ◆ Poor handle grips; and
- ◆ Slippery footings.

Lighting

Factories should provide 300 to 500 foot candles in the cutting and inspection areas and 30 to 50 foot candles in storage areas.

Noise

Consistent exposure to noise levels at 80-85 decibels (db) or higher can cause significant hearing loss and may also cause stress-related health problems. Noise levels can be monitored to determine whether workers in a particular function face these problems. If unhealthful noise levels are inevitable, employee exposure to noise may be minimized by:

- ◆ **Personal Protective Equipment:** Earplugs and hearing protectors will reduce exposure to noise. These devices may, however, present different risks if workers are thereby made less aware of other workplace hazards.
- ◆ **Administrative Controls / Work Practice:** Job rotation can limit the time individual employees are exposed to hazardous noise levels. Exposure can also be limited by performing high noise tasks at times when the fewest number of workers are exposed to the noise.
- ◆ **Engineering Controls:** Mechanical options include installing newer, quieter machines, running machines at a slower rate, using plastic gears, erecting acoustic baffles, isolating extremely noisy machines, or increasing maintenance.

First Aid

All employees should have access to, be encouraged to, and know how to seek first aid whenever necessary. A basic first aid policy should include the following:

- ◆ Training of some employees in administering first aid. The number of trained employees should correspond to, or exceed, the number of first aid kits and must never be less than 1 per shift;
- ◆ First aid kits should be available at a ratio of one (1) stocked first aid kit for every 100 employees;
- ◆ First aid kits should be inspected periodically, and restocked whenever necessary. There should be a designated person(s) responsible for the re-stocking of first aid kits.

First aid kits should include at least the following:

- ◆ Eye wash;
- ◆ Disposable gloves;
- ◆ Bandages / Gauze & Adhesive Tape;
- ◆ Cold Compress; and
- ◆ Anti-Bacterial Ointment

Housekeeping

Reasonable housekeeping practices reduce the hazards of unforeseen events and chronic dangers such as slippery work areas.

- ◆ Main corridors (primary aisles) should be at least 1.5 meters wide; other secondary aisles should be at least 1 meter wide;
- ◆ Floors, aisles and stairs should be kept unobstructed; regular sweeping is particularly important in crowded workplaces;
- ◆ Work surfaces should be kept dry;
- ◆ Trash and excess material should be disposed of regularly in a stable manner;
- ◆ Machinery should not be left running unattended;
- ◆ Tools should be stored in their proper places;
- ◆ Hazardous materials and chemicals in particular should be stored and disposed of according to instructions;
- ◆ Employees should be trained in the proper housekeeping for their areas; and
- ◆ Temporary holes in floors, such as uncovered drains or incomplete floor alterations, should be clearly marked to prevent potential tripping hazards and should be filled in as quickly as possible to minimize risk.

Sanitation

Sanitation is especially important with respect to restroom, food preparation and dining facilities.

Use the following guidelines to evaluate the adequacy of restroom sanitation:

- ◆ Clean, sufficient restroom facilities should be made available;
- ◆ Restrooms should be cleaned regularly;
- ◆ Restrooms should provide appropriate privacy;
- ◆ Restrooms should have water, soap, toilet paper and hand drying capabilities;
- ◆ Access to restrooms should not be unnecessarily restricted; and
- ◆ Employees should have access to running water with which to wash, they should be encouraged to do so.

Use the following guidelines to evaluate the adequacy of food preparation and dining facilities sanitation:

- ◆ Dining facilities should be protected from environmental elements (sun and rain);
- ◆ Food preparation facilities should be cleaned after each meal;
- ◆ Food should be stored in a sanitary manner; and
- ◆ Potable water shall be provided to employees without unnecessary restriction.

Outdoor Storage

All outdoor storage should be kept at least 25 feet from the main facility.

Dormitories

Many of the standards applicable to the factory apply to the dormitories.

Use the following guidelines to evaluate dormitory health and safety:

- ◆ The exterior of the building is structurally sound;
- ◆ Potable water and/or facilities to boil water are available to dormitory residents;
- ◆ Windows, fans, air conditioners or heaters are operational for air circulation and ventilation and provide an acceptable temperature (depending on the local environment);
- ◆ There are a sufficient number of toilets (approximately 1 for every 25 workers), showers and Mandis (prayer rooms);
- ◆ Access to clean water for washing within nearby proximity to toilets;
- ◆ The toilets are plumbed with running water and supplies (soap, toilet paper, and towels);
- ◆ The dormitory owners maintain clean, safe and sanitary toilet areas; toilets are cleaned daily;
- ◆ The toilet area is well lighted and ventilated; window and/or exhaust fan;
- ◆ The toilets are provided with appropriate privacy (stalls with doors);

- ◆ The toilets, and showers or mandis are segregated by sex;
- ◆ Electrical panels with circuit breakers are installed and maintained in satisfactory condition;
- ◆ Emergency candles and/or flashlights are kept on the premises;
- ◆ Fire drills should be held in the dormitory at least two times a year;
- ◆ Fire alarms are audible throughout the dormitory; instruct factory manager to demonstrate during factory tour;
- ◆ Facility has a visual and/or personal notification procedure to supplement the audible alarm;
- ◆ The fire extinguishers are charged and a record of monthly service is kept;
- ◆ The fire extinguishers are easily accessible in all sleeping quarters;
- ◆ Exits remain unlocked at all times;
- ◆ Directions for a safe and rapid evacuation are posted, in the native language, in all the sleeping quarters in case of fire or other emergencies;
- ◆ Emergency lighting is installed in the halls, stairwells and above each exit;
- ◆ There are at least two clearly marked exits on each floor;
- ◆ The halls and exits are kept clear of obstructions for safe and rapid evacuation;
- ◆ Fire escapes are available for buildings more than one-story high;
- ◆ The emergency exit signs are marked with signs that are visible up to 100 feet (30 meters); lettering of signs should be 7 inches (18 cm) high;
- ◆ There is enough room for workers to move between the mats or beds and enough room for residents to exit safely in case of emergency;
- ◆ All the main exit doors open to the outside or exterior stairwell;
- ◆ All doors are at least 48 inches (122 cm) wide and open outwards;
- ◆ The factory places at least one well-stocked first aid kit on every floor;
- ◆ The sleeping quarters have adequate lighting in place;
- ◆ Workers are provided with their own mats or beds and are not required to share mats with other workers if the factory runs a double shift;
- ◆ Workers are provided with their own storage space for their clothes and personal belongings;
- ◆ Qualities of housing accommodations are equal to independent housing;
- ◆ Security entrances and exits are staffed; and
- ◆ The sleeping quarters of non-family areas are segregated by sex.

Schedule 2

Certification Statement
Social Accountability Policy

I, _____, state that I am an Officer or the duly authorized representative of _____ (the Company) having a factory location at _____ (the Factory) and have the authority to sign this Certification Statement on behalf of the Company. On behalf of the Company, I hereby certify to The Kitchen Collection, LLC (KCLLC) that I have read the requirements of the KCLLC “Social Accountability Policy” (the Policy); that the Factory is in compliance with the Policy; and specifically affirm that:

1. No person under the age of 16 was either hired or is presently employed by the Company at the Factory;
2. No prison, forced or indentured labor is utilized by the Company at the Factory;
3. Persons employed by the Company at the Factory are not subjected to physical, sexual, psychological or verbal harassment or abuse;
4. There is no transshipment of goods to avoid any of the requirements of the Policy and
5. The factory operates in accordance with all applicable local and federal laws and regulations (including those related to employee labor, health and safety, and the environment.

NAME: _____ DATED: _____

TITLE: _____