



Collegiate Pacific
WOOL FELT PENNANTS AND BANNERS

PO Box 300 Roanoke, Va 24002 540.981.0281 www.collegiatepacific.com

Code of Business and Employee Conduct

Our Mission & Values

At Wool Felt Products, Inc (Collegiate Pacific) we are committed to acting with honesty, integrity, cooperation, equality, and freedom. Our customers have grown to expect a high level of customer service and product quality and we demand it from ourselves. Our Code of Conduct serves to remind us how to do business the right way, every day.

Policy Brief

As Collegiate Pacific employees, we are part of a long tradition of employees who have conducted themselves in an ethical manner. We are focused on doing the right thing upholding our shared commitment to complying with laws, regulations, licensing and internal policies. Employees may be held accountable for actions that could impair work performance or affect the company's reputation or business interests. We are accountable for being familiar with and following this Code and the Company's policies and guidelines. We understand that violations may result in discipline, up to and including termination of employment.

The Code of Conduct is our foundation for ethical business conduct but is not a substitute for good judgment and cannot address every situation we may encounter. If we are ever unsure about what to do in a particular situation, we must strive to conduct ourselves in the most ethical, honest way possible.

Business Conduct

Integrity first

Ethical behavior is the foundation of this company and has been for over 100 years. Our interactions with our customers, vendors and each other have always been ethical and honest. While we navigate the ever-changing world of collegiate licensed product, we continue to do business the same way we always have - without compromising our values.



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Respect in the workplace

Collegiate Pacific employees are protected from discrimination on the basis of race, color, religion, religious creed, national origin, ancestry, age, sex, sexual orientation, gender, gender identity, gender expression, physical disability, mental disability, pregnancy, medical condition, genetic information, marital status, citizenship status, military status, veteran status or any other characteristic protected by law.

When the actions of some cause others to feel intimidated, offended, or to lose dignity, we all suffer. We must treat each other courteously and professionally. We have a positive work environment and speak out if we see something that goes against our values. Even outside of work employees may be held accountable for actions that could impair work performance or affect the company's reputation or business interests.

All employees should respect their customers, vendors and colleagues. We won't allow any kind of discriminatory behavior, harassment or victimization.

Diversity

Differing opinions or viewpoints can often lead to greater creativity and allow us to think more broadly. We understand that the world is a diverse place and respect all differences.

Safety

We are committed to providing a safe working environment. We take reasonable precautions to safeguard the public, as well as our employees and customers. We stay current on laws, regulations, and practices related to the safety and health of the workplace and our products.

We comply with all legal requirements. We do not tolerate threats, violence, or other disruptive behavior in our work environments. Our concern for a safe workplace extends to protecting information about us that the Company maintains. We hold the personal information of our employees, retirees, and their beneficiaries in strict confidence.



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Compliance

We follow all laws and regulations that relate to our business. We adjust our practices as appropriate to comply with the laws and requirements of our market. We comply with all applicable international trade laws and regulations. These laws and regulations apply to the import and export of both raw and finished goods.

When acting on behalf of Collegiate Pacific, we put the Company's interests ahead of our own personal gain. We do not allow our own interest or our family or other relationships to influence the decisions we make on behalf of the Company. We do not compete with the Company.

We try to do business with suppliers and business partners that enhance our level of service and provide products and services of quality. We seek suppliers who share our commitments to ethical and sustainable business practices, human rights (including labor rights), and diversity.

Protecting Information

We earn our customers' and licensor's trust by treating them with honesty and integrity and in a professional, courteous manner. We fairly and accurately represent our products to them. We listen to our customers and licensors and try to find new ways to deliver a unique experience and product. We deliver what we promise.

Collegiate Pacific is committed to safeguarding and handling third party information in accordance with applicable laws, our policies, contractual obligations, and in a manner that protects privacy and preserves customer and team member trust. We do not tolerate the inappropriate acquisition, possession, or use of proprietary, confidential or trade secret information of Collegiate Pacific's competitors or other third parties, such as vendors, suppliers, licensors, owners and former employers. Collegiate Pacific safeguards all customer confidential information and electronic data. Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and Supplier information is to be safeguarded.

Purchasing Practices

We strive to be fair and impartial in our dealings with Suppliers and outside contractors. Purchasing decisions must be based on legitimate, defined criteria, including quality, service levels and price. We



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honor the terms and conditions of contracts and protect the confidentiality of the proprietary information of Suppliers and outside contractors. We expect our Suppliers to do the same.

Bribery & Other Corrupt Practices

Collegiate Pacific is committed to conducting their business in compliance with all laws prohibiting bribery and other corrupt practices. As a U.S. based company, Collegiate Pacific's business operations around the world must comply not only with local anti-corruption laws, but also with laws that apply to Collegiate Pacific's business activities around the world, such as the U.S. Foreign Corrupt Practices Act (the "FCPA") and the U.K. Bribery Act. The FCPA prohibits Collegiate Pacific and any of its Suppliers from offering or giving "anything of value" to a government official or their family members to influence that person in their official duties or to encourage improper or unlawful conduct. The U.K. Bribery Act's prohibitions on bribery also cover bribes offered to private business people. This prohibition applies both to activities undertaken by Collegiate Pacific, its suppliers and by third parties on behalf of Collegiate Pacific.

Anti-Money Laundering

Collegiate Pacific employees are prohibited from engaging in or facilitating transactions anywhere in the world that involve funds that were derived from illegal activities. Collegiate Pacific and its Suppliers must comply with all applicable anti-money laundering laws, rules and regulations of the U.S. and all other countries where we do business. Therefore, all payments and transactions with customers, vendors, Suppliers, agents and affiliates will be scrutinized. We will not accept any funds or make any payments that appear to be derived from illegal activities.

Community

We participate in activities and community groups to make our city a better place to live, work, and grow. We help to strengthen our community by providing good jobs with fair wages and donating our time and talents to various charity organizations that support our cities underserved populations and animals.

This is also reflected in our hiring practices as we hire and train many employees that have trouble finding other jobs. We are also committed to operating and providing products in an environmentally responsible and sustainable manner. We strive to follow best practices and minimize our environmental impact.

Competition



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We succeed in the marketplace by competing aggressively but fairly. Our products stand on their own merits. We do not misrepresent the characteristics of our products, use the intellectual property of others and we do not deceive our customers, vendors, licensors or competitors. We do not engage in any other unfair practices. We do not seek to eliminate or reduce competition through any illegal or immoral practices. We follow ethical business practices throughout every aspect of our business. We do not try to influence others through any improper means, directly or indirectly.

Core Social Principles

Human Rights

Collegiate Pacific complies with the employment and labor laws in every country and region in which it operates and expects its Suppliers to do the same.

Prohibition of child labor

Collegiate Pacific does not employ children. The minimum age of admission to employment may not be lower than the minimum school-leaving age, regardless of if conditions are more favorable to young people. Young people admitted to work must have working conditions appropriate to their age and be protected against economic exploitation and any work likely to harm their safety, health or physical, mental, moral or social development or to interfere with their education.

Clear and fair terms of employment

All workers shall be provided with clear, written information about their employment conditions with respect to wages before they enter employment and as needed throughout their term of employment. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Collegiate Pacific requires that all workers are afforded humane working conditions. Working hours must comply with national laws and industry standards. Overtime must be voluntary and in line with local laws.

Employment is freely chosen

Collegiate Pacific has a zero-tolerance approach to modern slavery, including all forms of human trafficking and forced or bonded labor. All workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per the worker's contract. We do not



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hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. We only hold documentation of our employees if such holdings are required by law. At no time should workers be denied access to their personal documents. Workers shall not be required to pay recruitment fees or other related fees for their employment. Collegiate Pacific pays particular attention to the risks of exploitation that both domestic and foreign migrant workers face.

Freedom of association and right to collectively bargain

Collegiate Pacific respects the rights of workers to join, form or not to join, an association of their choice without fear of reprisal, interference, intimidation, or harassment. Workers are free to exercise collective bargaining without fear of reprisal, interference, intimidation, or harassment. Where the right to freedom of association and collective bargaining is restricted under law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

Non-Discrimination & Harassment

Collegiate Pacific does not tolerate any form of harassment or discrimination based on any characteristic protected by applicable law. Any behavior, communication, or other conduct that creates an intimidating, offensive, abusive, or hostile work environment, or that otherwise interferes with any worker's ability to perform his or her job, is unacceptable. All workers are treated with respect and dignity and Collegiate Pacific will not allow physical or mental punishment or abuse of any team members.

Diversity, Equity, and Inclusion

Collegiate Pacific seeks out diverse Suppliers who provide quality products and services at competitive pricing. Examples of diverse suppliers include those that are owned, managed, and/or operated by: minorities, women, individuals with disabilities, veterans, lesbian, gay, and bi-sexual or transgender.

Safe & Healthy Work Environment

We are responsible for understanding and complying with all applicable safety and health laws and guidelines. We are responsible for identifying, assessing, and mitigating health and safety hazards and security concerns. We are responsible for conducting health and safety training and communicating health and safety information in local languages. These trainings are provided to all workers prior to the



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beginning of work and regularly thereafter. Workers are provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Communities

Collegiate Pacific supports a wide variety of issues and organizations that are important to our business and encourages our team members to volunteer or participate in the economic and social development of their local communities.

Core Environmental Principles

Environment

Collegiate Pacific conducts business in an environmentally responsible and sustainable manner, including resource-efficient consumption of energy, water, and other natural resources, minimizing waste and diversion from landfills, and reducing harmful chemical use. At a minimum, we comply with all local, state, and national environmental legislation. We have all required environmental permits, approvals, and registrations and follow all relevant operational and reporting requirements.

Collegiate Pacific minimizes their impact on the environment (including with respect to energy and water use, air emissions, greenhouse gas emissions, waste, pollution, hazardous materials, and recycling). In practice, this means:

- Reducing or eliminating solid waste, wastewater, environmentally damaging chemicals, endangered or non-renewable raw materials, and air emissions as required by applicable laws and regulations, including energy-related indirect air emissions, by (i) implementing appropriate conservation measures and (ii) recycling, reusing, or substituting materials
- Incorporating the use of recycled materials and reducing the use of single-use plastic where possible, practicable, and feasible
- Committing to implement renewable sources of energy where applicable
- Educating and training employees on the concept of environmental sustainability and carbon reduction



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- Participating in industry environmental collaboration and partnerships where possible and suitable.

Raw Materials

Collegiate Pacific is committed to the sustainable use of raw materials, including forestry products. Collegiate Pacific tries to mitigate negative impacts on forestry, such as deforestation.

Animal Welfare

Collegiate Pacific is committed to the humane treatment of animals. Collegiate Pacific expects its Suppliers to comply with local standards and surpass national and global standards where possible.

Business Conduct

Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse **company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.

Employees should protect the company facility and other material property from damage and vandalism, whenever possible.

Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal appearance**



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All employees must follow our dress code and personal appearance guidelines as outlined in the Employee Handbook.

- **Job duties and authority**

All employees should fulfill their job duties with integrity and respect toward customers, vendors, licensors, and the community. Supervisors and managers mustn't abuse their authority. We expect them to delegate duties to their team members considering their competences and workload. Likewise, we expect team members to follow supervisors' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.

- **Absenteeism and tardiness**

Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But generally, we expect employees to be punctual when coming to and leaving from work.

- **Conflict of interest**

We expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their job duties.

- **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be open for communication with their colleagues, supervisors, or team members.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facility, or other benefits our company offers.

- **Policies**

All employees should read and follow our Employee Handbook. If they have any questions, they should ask their supervisors or Human Resources (HR) department.



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Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our Code of Conduct or Employee Handbook. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.

We may take legal action in cases of corruption, theft, embezzlement, or other unlawful behavior.

A Note from the Owner

For over 100 years, the owners and employees of Collegiate Pacific have provided the highest quality products to schools, universities, colleges and private businesses. We have always been made in the United States of America and have acted ethically and responsibly. As we grow in the ever-changing market we hope to always maintain a strong relationship with all of our employees, customers, vendors and licensors. We hope to reduce our ecological footprint while making a larger impact on our community, its people and animals. ~ William R. Webster III