



February 4, 2005

Russell Corporation has a commitment to ensure that our facilities are the best in any community where we operate, whether it's a textile plant in Alabama or a sewing plant in Honduras. We also expect any vendor or supplier that works with us to maintain those same standards within their own operation and we make that a requirement for them to do business with us.

We have a comprehensive social compliance program to support our efforts to maintain the highest possible standards. The program covers a variety of areas, ranging from employee treatment to the environment, and does apply to all locations.

Over the past several years, our compliance program has served us very well and also helped us meet the requirements of the retailers and colleges that are our customers. As time has gone on, however, our growth through expansion of our business and through acquisitions has presented us with greater challenges. To be sure that we continue to maintain the standards we feel are necessary, we must have a code of compliance that meets our needs. To do this, we have replaced our International Operating Principles and our Business Partner Guidelines with a single Code of Conduct that covers our self-owned operations as well as those of our vendors and contractors.

Russell Corporation's new Code of Conduct more clearly addresses additional areas such as customs compliance, the freedom of association along with collective bargaining and security. As always, we are committed to having our operations and the contractors that manufacture our products meet standards that are at or above the in-country laws, regulations and practices. We have used significant benchmarking to help us make sure this Code of Conduct adheres to the highest principles in our industry now and that it will continue to do so for years to come.

We are pleased that our new Code of Conduct will allow us to continue to maintain our high standards. Yet, we will always take whatever action is necessary in the future to ensure that people who make our products are treated fairly and with respect.

A handwritten signature in black ink that reads 'Jack Ward'. The signature is written in a cursive, flowing style.



## **Code of Conduct**

Russell Corporation, its subsidiaries, and divisions are committed to the highest standards of business ethics and respect for human rights in all of its operations. While we recognize that legal and cultural differences exist and standards may vary by country, we believe that there are certain fundamental principles that should apply universally. For that reason, we have developed this Code of Conduct to outline the standards that we follow in our global operations. All of our suppliers, licensees, distributors, and other business partners (“Business Partners”) are expected to fully comply with this Code of Conduct as well.

### **Compliance with Laws**

Russell and its Business Partners will comply with all applicable laws, codes, rules and regulations in the locations where we conduct business, including the labor and employment laws of those jurisdictions. If the standards outlined in this Code of Conduct exceed a country’s legal requirements, however, we will adhere to the requirements of our Code of Conduct.

### **Prohibition of Forced, Prison and Other Involuntary Labor**

Russell and its Business Partners will not use involuntary, prison or forced labor – indentured, bonded or otherwise. All employment will be maintained on a voluntary basis.

### **Discipline, Harassment or Abuse**

Workers will not be denied their rights and dignity. Russell and its Business Partners will not tolerate harassment, psychological or physical abuse, corporal punishment, or physical coercion in any form. Sexual harassment, indecent or threatening gestures, abusive tone or language and undesired physical contact will not be allowed.

### **Discrimination**

With consideration for local and national laws, workers will be hired, paid, promoted, and terminated based on their ability to do the job rather than on the basis of personal characteristics or beliefs, such as race, color, national origin, gender, sexual orientation, religion, disability, or other similar factors (pregnancy, political opinion, social status).

### **Child Labor**

Russell and its Business Partners will not hire any employee under the age limit established by applicable law, or under the age corresponding with compulsory schooling, or under the age of 15, whichever is greater. In addition, Russell and its Business Partners will comply with all applicable legal restrictions on the nature and volume of work performed by young workers.

### **Compensation and Benefits**

For all hours worked, Russell and its Business Partners will pay wages, regular and overtime, and benefits that match or exceed the requirements of the local and national laws of the jurisdictions in which we do business.

**Hours of Work**

Except in extraordinary business circumstances, employees will (i) not be required to work more than the lesser of (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by the law of the country of manufacture or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime and (ii) be entitled to at least one day off in every seven day period.

**Health and Safety**

Russell and its Business Partners will provide a safe, clean, healthy and productive workplace for our employees. Workers will be adequately trained to perform their jobs safely. Business Partners that provide residential facilities for their workers will provide safe and healthy residential facilities. Freedom of Association and Collective Bargaining Russell and its Business Partners respect the rights of employees to exercise their rights of free association and collective bargaining, and to join or not join the organization of their choice, without penalty or interference.

**Environment**

Russell and its Business Partners will comply with all applicable environmental rules, regulations and standards and observe environmentally sound practices including the proper handling and disposal of hazardous and other waste. We will only use Business Partners that share our commitment to the environment.

**Customs Compliance**

Russell and its Business Partners will comply with all applicable customs laws and establish and maintain programs to safeguard against the illegal transshipment of products.

**Security**

Russell and its Business Partners will maintain security procedures to guard against the introduction of non-manifested cargo into shipments of our products (e.g. drugs, explosives, biohazards, and/or other contraband).

**Inspections**

Russell will ensure proper implementation of, and compliance with, the standards set forth in this Code of Conduct by our Business Partners through onsite inspection of their facilities and other compliance methods.