

BIC GROUP CODE OF CONDUCT

1. Statement of Principles

The BIC Group strives to make BIC a special place to work, with an atmosphere of mutual respect and professionalism. BIC Group and its Contract Manufacturers all have a responsibility to uphold these principles by creating an atmosphere in which each employee knows that he/she is valued as an individual and treated with respect and professionalism. The BIC Group Code of Conduct (“Code of Conduct”) enables us to conduct our business and to source production in a manner that is both profitable and socially responsible.

Implementation of this Code of Conduct enables BIC and its Contract Manufacturers to continually improve performance on worker’s rights, labor standards, and other human rights issues integral to the production process.

Compliance with this Code of Conduct is mandatory for all BIC entities and for all BIC product Contract Manufacturers. BIC reserves the right to immediately terminate its business relationship and cancel all orders with any Contract Manufacturer who does not comply with this Code of Conduct.

2. Work Environment

BIC is committed to treating all its employees with dignity and respect and providing its employees with a safe, healthy, clean and well-lit work environment including appropriate and adequate facilities and protection from hazardous materials or conditions. BIC expects its Contract Manufacturers to maintain the same standards in their factories. All BIC entities and all BIC Contract Manufacturers must comply with all applicable local laws and regulations governing working conditions. If housing is provided by BIC or its Contract Manufacturers for employees, all housing must be maintained in a clean, safe fashion. BIC strictly forbids the use of cruel and unusual disciplinary practices in the workplace.

3. Engage in Fair and Ethical Employment Practices

Fair Wages and Reasonable Working Hours: BIC and its Contract Manufacturers must fairly compensate their employees by providing wages and benefits and reasonable work hours in compliance with local standards and applicable laws of the countries in which BIC and its Contract Manufacturers are doing business. BIC and its Contract Manufacturers must compensate their employees at a rate equal to, or greater than, the prevailing local minimum wage, including piece rate workers. BIC and its Contract Manufacturers must not require employees to work more hours than the limits on regular and overtime hours prescribed by applicable law. Except in extraordinary business circumstances, BIC and its Contract Manufacturers must not require employees to work more than 60 hours per week, inclusive of overtime. If applicable law does not provide for overtime pay, BIC and its Contract Manufacturers will compensate their employees for overtime at a rate equal to or greater than the prevailing local minimum wage. In addition, except in extraordinary business circumstances, employees will be entitled to at least one rest day off in every seven-day period.

Child Labor: BIC will not accept the use of child labor in its operations under any circumstances and will not purchase product(s) from any Contract Manufacturer that uses child labor. In determining whether a laborer is a “child,” BIC will refer to the local legal minimum age for employment or the age for completing compulsory education in the country of manufacture. However, the minimum age shall never be younger than 14 years of age. Although BIC strictly prohibits the use of child labor, BIC supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

Forced or Compulsory Labor: BIC will not accept forced or compulsory labor in its operations under any circumstances and will not purchase product(s) from any Contract Manufacturer that utilizes forced or compulsory labor. Every employee must be a voluntary worker. Forced prison labor, or work against the will of an employee, including work required as a means of political coercion or punishment for expression of political views is strictly forbidden. No employee shall be subject to corporal punishment, threats of violence, or other forms of psychological or physical harassment, abuse or coercion.

Discrimination: BIC employs workers based on ability to perform a job task, not on the basis of personal characteristics, beliefs or any form of discrimination and expects its Contract Manufacturers to employ workers on the same basis. BIC and its Contract Manufacturers shall comply with all local anti-discrimination laws and regulations.

Freedom of Association: BIC respects the rights of employees to associate, organize and bargain collectively in a lawful and peaceful manner, without penalty or interference, and expects its Contract Manufacturers to respect the same rights.

Legal Compliance: BIC and its Contract Manufacturers shall comply with the legal requirements and standards of their industry and the laws of the countries in which BIC and/or its Contract Manufacturers are doing business. BIC and its Contract Manufacturers shall comply with all applicable export and import requirements. Necessary invoices and required documentation must be provided in compliance with applicable law. All merchandise shall be accurately and clearly marked with its country of origin in compliance with applicable law.

4. Animal Testing

BIC is committed to providing consumers with the highest quality products, which comply with all applicable product safety standards. Our goal is to ensure that our products are of the highest quality through the use of non-animal testing alternatives. BIC has declared a worldwide moratorium on all animal testing. If a BIC Contract Manufacturer believes that alternative testing cannot provide sufficient assurance that a new product is safe for consumer use, they should advise BIC in writing.

5. Environment, Health and Safety

BIC has maintained a long standing commitment to protect the environment and safeguard the health and welfare of its employees, neighbors and consumers. BIC recognizes that nearly every aspect of a manufacturing business has a potential to impact the environment, human health or safety. It is BIC's responsibility to minimize those impacts and develop solutions that protect people and the environment and allow BIC to maintain the product quality and value that consumers demand. BIC's approach is to collaborate with its employees, suppliers, customers and consumers to identify, assess and minimize the environmental, health and safety impacts resulting from BIC's manufacturing operations and the manufacturing operations of BIC's Contract Manufacturers.

6. Monitor Compliance

BIC conducts regular assessments of its facilities and the facilities of its Contract Manufacturers to ensure compliance with this Code of Conduct. All BIC Contract Manufacturers will authorize BIC's independent third party monitor to inspect their facilities to ensure compliance with this Code of Conduct.

7. Publication

Contract Manufacturers will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to their employees, including the prominent posting of a copy of this Code of Conduct, in the local language and in a place readily accessible to their employees, at all times.

8. Contract Manufacturer Certification

The BIC Group Code of Conduct clearly states BIC's commitment to legal, ethical and appropriate working conditions worldwide. The undersigned authorized representative of the below-named Contract Manufacturer has read the standards described in the BIC Group Code of Conduct and understands that a continuing business relationship with BIC is dependent upon the Contract Manufacturer's adherence to the standards set forth therein. Any failure to follow these standards may result in the cancellation by BIC of outstanding purchase orders, refusal by BIC to accept delivery of merchandise from the Contract Manufacturer and the termination of BIC's business relationship with the Contract Manufacturer.

Contract Manufacturer Name

BY: _____
Signature of Representative

Title

Date