



FOX FACTORY

SUPPLIER CODE OF CONDUCT



INTRODUCTION

At Fox Factory, our purpose is to challenge the impossible and lead in the never-ending pursuit of maximum performance. In fact, we believe progress happens when we challenge frontiers. Hence, we strive for excellence in everything we do and taking steps to reduce our impact on the environment is no exception. We live for the challenge, that's why we are forging a path where we keep maximum performance as our goal while discovering processes and innovation aligned with sustainability objectives. This includes leading the way in product integrity, design, and innovation, and making sure our supply chain's social and environmental impacts are well-managed.

We also aim to protect and promote our people, harnessing the power of diverse experiences to open up opportunities for all. Just as we push our customers to be their best, we are pushing our talent and influencing our communities to go further and explore more opportunities for all. We know that the best ideas come from a well-trained professional workforce with diverse backgrounds and experiences. We are also exploring ways to reduce our impact on the environment such as minimizing our GHG emissions.

Doing things the right way is foundational to continuing our robust business growth responsibly. When we race, we race to win. The same goes for the processes and policies needed for a successful business.

The purpose of this Supplier Code of Conduct is to solidify a partnership in the relentless pursuit of a future where people and the planet come first and where adventure is never done. It is rooted in our core values – Leadership, Trust, Service, Collaboration, Agility, & Ingenuity – and serves in accordance with our Fox Factory Frontiers sustainability strategy. The expectation is that all suppliers, their employees, and any third-parties act responsibly and conscientiously based on the principles and guidelines outlined in this Code of Conduct.

Compliance with the Fox Factory Code of Conduct for Suppliers

Fox Factory has the right to periodically check that suppliers are complying with the principles set out in its Code of Conduct. Suppliers therefore grant Fox Factory, or a third party commissioned by Fox Factory, access to their premises and documents relating to their compliance with the principles set out in this Code of Conduct. Access and inspection will follow only after giving prior notice and arranging a date, in the presence of representatives of the supplier, and during regular business hours in accordance with the applicable law. Adherence to the principles of our Code of Conduct is an integral part of Fox Factory maintaining good and trusting business relationships with its suppliers. Adherence is demonstrated by suppliers in an appropriate way whenever requested to do so by Fox Factory. If a supplier is not adhering to the principles set out in this Code of Conduct or if it becomes evident that third parties employed within the scope of the business relationship are not committed to these principles, the supplier must provide us with information, immediately and without having to be requested to do so, about the situation as well as about any corrective measures that have been taken. Non-adherence may entitle Fox Factory to extraordinarily terminate the business relationship with the supplier concerned. Fox Factory has the discretion to avoid such consequences and instead take alternative action if the supplier provides credible assurances and can demonstrate that appropriate immediate countermeasures have been taken to prevent future violations. This will not affect any other rights and entitlement available to Fox Factory in respect of violations.

LABOR

Freely Chosen Employment

Our suppliers must not use forced labor in any form (including bonded, debt bondage, indentured labor, involuntary or exploitive prison labor, and slavery). Additionally, our suppliers are strictly prohibited in using or supporting human trafficking. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given.

It is prohibited to use activities that restrict the worker's freedom of movement. This includes restrictions on entering or exiting company provided facilities including, if applicable, workers' dormitories or living quarters. Suppliers, agents, and sub-agents may not hold, destroy, conceal, or confiscate identity or immigration documents, such as passports or work permits. Suppliers may only hold documentation if required by law and should allow workers access to their documents.

Suppliers, agents, and sub-agents are prohibited from asking workers to pay recruitment fees or any other related costs for their employment.



Young workers

Child labor is not to be used in any stage of manufacturing. It is the responsibility of our suppliers to comply with the following:

- Workers should meet the legal minimum working age in the country in which they operate or in the absence of such a law, prohibit the employment of anyone below the age of 15. Workers under the age of 18 should not perform work that would jeopardize their health or safety, this includes night shifts, overtime, and hazardous work.
- In the case students are employed, proper management and rigorous due diligence should be performed of educational partners, maintaining student records, and protecting students' rights according to laws and regulations of the country of operation. If not stated in local laws, the wages for student workers, interns, and apprentices shall be at least the same as other entry-level workers performing similar tasks.
- If child labor is identified, assistance/remediation will be provided appropriate to the situation and in the best interest of the child.

Working Hours

Our suppliers must comply with the maximum working hours set by local laws and collective agreements whichever offer greater protection to the workers based on International Labor standards. All overtime should be voluntary and agreed upon in advance and workers shall be compensated at a pay rate greater than regular hours in line with legal requirements and applicable laws.

Wages and Benefits

Compensation paid to workers must be compliant with all applicable wage laws, this includes minimum wage, overtime and legally mandated benefits and paid or provided

on a timely and regular basis. In addition, it is prohibited to deduct wages as a disciplinary measure.

Workers shall be provided with a timely and understandable wage statement containing sufficient information to verify compensation accuracy. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

Humane Treatment

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall clearly defined and communicated to workers.

Non-Discrimination/Non-Harassment

Suppliers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers should be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way. This was drafted in consideration of ILO Discrimination (Employment and Occupation) Convention (No.111)

Freedom of Association

Suppliers must respect all workers' rights to form and join trade unions of their choice and to bargain collectively. Additionally, workers and/or their representatives should be able to communicate and share ideas and concerns openly with management regarding working conditions and practices without fear of discrimination, reprisal, intimidation, or harassment.



HEALTH AND SAFETY

Occupational Safety

Any potential exposure to worker's occupational health and safety should be identified, assessed, and mitigated, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance, and safe work procedures (including lockout/tagout). Additionally, occupational health and safety training should be provided to all employees.

Where hazards cannot be controlled, workers should be provided with well-maintained and up to date, personal protective equipment (PPE) at no cost to the worker, along with educational materials associated with these hazards.

Reasonable steps should be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments. Additionally, provide reasonable accommodation for nursing mothers.

Access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities should be provided.

Emergency Preparedness

Potential emergency situations and events under fire safety should be identified and assessed regularly. The impact of these events is to be minimized by implementing emergency plans, procedures, and reporting along with worker training including at least annual fire drills or as required by local law. The focus is to minimize harm to life, the environment, and property. Emergency plans should include appropriate fire detection and suppression equipment with clear, unobstructed, and adequate marked exits with good visibility.

Occupational Injury and Illness

Adequate systems should be in place to manage, track and report occupational injury and illness, this includes provisions that encourage worker reporting. Injury and illness cases are to be classified and recorded. In addition, necessary medical treatment should be provided and facilitate the return of the worker. Reported cases should be investigated with corrective actions to eliminate their cause.

Industrial Hygiene

Regular identification and evaluation, and control of worker exposure to chemical, biological, and physical agents should be done. Potential hazards are to be eliminated and/or reduced. Potential hazards are to be eliminated and/or reduced. If hazards cannot be controlled, workers must be provided with well- maintained and up-to-date personal protective equipment (PPE) at no cost to the worker. Additionally, workers are to be provided with educational materials about the risks associated with these hazards.

Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks to be identified, evaluated, and controlled.

Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

Prior to startup of new, modified, or fixed machinery, guarding devices should be checked thoroughly to ensure proper function.



Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. If applicable, worker dormitories provided by the supplier or labor agent should be maintained to be safe and clean, with appropriate emergency egress, appropriate fire safety measures, hot water for bathing and showering, adequate lighting and heat and ventilation, and at least one window or skylight to the outdoors, and secured accommodation for storing valuable items. Dormitories must allow for reasonable personal space along with reasonable entry and exit privileges.

Health and Safety Communication

Suppliers must provide workers with adequate workplace health and safety information and training in the primary language of the worker or a language that is understood by the worker that includes all the identified workplace hazards that the workers are exposed to. Clearly posted health and safety related information should be displayed or placed in an identifiable and accessible location to the worker. Worker training is provided prior to beginning work and regularly thereafter. All training documentation should be kept and should be accessible when required. Workers shall be encouraged to raise any health and safety concerns without retaliation.



ENVIRONMENT

Environmental Permits and Reporting

Suppliers should have and maintain all permits, approvals, and registrations in order and current. Any reporting requirements set by local laws and regulations should be followed.

Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. There should be documented training for workers overseeing the pollution control equipment and regular maintenance is to be conducted on the equipment. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

Hazardous Substances

Hazards to humans or the environment such as chemicals, waste, or other materials should be identified and labeled. These hazardous substances should be managed to ensure their safe handling, movement, storage, use/recycling/reuse, and disposal. Additionally, alarms or detectors for hazardous substances should be added in the workplace.

Solid Waste

Participants shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).

Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances,

and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone depleting substances are to be effectively managed in accordance with applicable regulations. Participants shall conduct routine monitoring of the performance of its air emission control systems. Suppliers are to implement procedures to reduce or mitigate the risk of such air emissions.

Material Restrictions

Participants are to adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

Water Management

Suppliers should implement a water management program. The program should document, characterize, and monitor water sources and usage and wastewater sources. Suppliers shall identify opportunities to conserve water and reduce wastewater and water contamination and align with the United Nations CEO Water Mandate to reduce freshwater usage and support safe and accessible drinking water in their manufacturing operations and communities. Suppliers should utilize materials with reduced toxicity in their manufacturing processes.

Wastewater is to be treated as required prior to discharge or disposal. To ensure optimal performance of wastewater treatment and contaminant system, regular maintenance and monitoring of the system should be performed.

Energy Consumption and Greenhouse Gas Emissions

Suppliers should establish a corporate-wide greenhouse gas (GHG) reduction goal. Energy usage and all applicable Scope 1 and 2 greenhouse gas emissions should be tracked, documented, and reported publicly showing progress towards set goal. Methods to improve energy efficiency and reduce usage are to be assessed by suppliers.

ETHICS

Business Integrity

The highest standards of integrity must be upheld in all business interactions. Participants must have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion and embezzlement. Supplier must not engage in corruption, extortion, money laundering, or bribery (not promised, offered, authorized, given or accepted) to obtain improper advantage. This prohibition also includes offering, promising, authorizing, giving or accepting anything of value either directly or indirectly from a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers should avoid actions with government officials that could raise concerns of bribery or other improper business ethics. Additionally, suppliers should keep accurate expenditure records and not conceal the true nature of the expense recorded.

Suppliers must properly monitor, record, and implement enforcement procedures to ensure compliance with anti-corruption laws.



Suppliers should comply with all U.S. and other applicable trade controls regarding products and services provided to Fox Factory. Suppliers should not engage in direct or indirect commercial activity with sanctioned countries, territories, entities, persons, or sectors. Due diligence should be conducted to comply with sanctions, export controls, and anti-boycott requirements.

Intellectual Property

Maintain effective privacy and cyber security practices. Our suppliers must: Act in a transparent and ethical manner regarding the use of Personally Identifiable Information (PII), FOX intellectual property (IP), and private data.

Fair Business, Advertising, and Completion

Standards of fair business, advertising, and competition are to be upheld.

Protection of Identity and Non-Retaliation

A program or mechanism should be in place to ensure confidentiality, anonymity, and protection of supplier and employee whistleblowers are maintained in accordance with applicable laws. Suppliers should have a communicated process for personnel to raise concerns without fear of retaliation.

Responsible Sourcing of Minerals

On August 22, 2012, the U.S. Securities and Exchange Commission (“SEC”) issued the final conflict minerals rule under Section 1502 the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Conflict Minerals Rule”). The Conflict Minerals Rule requires companies that file reports with the SEC to report annually on the use and origin of conflict minerals (tin, tungsten, tantalum and gold, or “3TG”) in the products they manufacture or contract with others to manufacture for them.

FOX expects its suppliers to provide it with completed conflict minerals declarations using the Conflict Free Sourcing Initiative’s (“CFI’s) Conflict Minerals Reporting Template and to use reasonable efforts to ensure that parts and products supplied to FOX and its subsidiaries are “DRC conflict-free,” meaning that the sourcing of such conflict minerals do not benefit armed groups in the Democratic Republic of the Congo (“DRC”) or adjoining countries. Our goal is to ensure that FOX’s products do not directly or indirectly finance or benefit armed groups through mining or mineral trading in the DRC and adjoining countries. If FOX becomes aware of a supplier whose supply chain includes a smelter or refiner that is not compliant with the relevant Conflict-Free Smelter Program assessment protocol, FOX will take appropriate action to remedy the situation in a timely manner, including reassessment of supplier relationships. FOX has management systems in place and files annual reports with the U.S. Securities and Exchange Commission as contemplated by the Conflict Minerals Rule.

Privacy

Suppliers are to protect the reasonable privacy expectations of personal information from everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Properly manage and safeguard your computing environment using appropriate technical and organizational data security controls

COMPLIANCE WITH THE FOX FACTORY CODE OF CONDUCT FOR SUPPLIERS

In line with our Core Values, adherence to the principles outlined in this Code of Conduct is critical in Fox Factory maintaining trusting and collaborative relationships with its suppliers.

We expect suppliers to continuously conduct due diligence to not only mitigate sustainability risks, but also proactively implement new ways of doing business that drive positive impacts. Specifically, we expect our suppliers to put active measures in place, including but not limited to:

- Consult with subject matter experts, if needed, to address and comply with the guidance outlined in this Code.
- Conduct a materiality assessment to identify hot spots and potential improvement opportunities.
- Set sustainability goals and measure results to illustrate progress, and gain alignment with Fox Factory on any impacts to its products.
- Partner with Fox Factory on its sustainability goals through joint collaborations, as warranted.
- Integrate the Environmental, Social, and Governance (ESG) lens in the decision-making process related to all relevant business operations as well as interactions within the communities where they operate.

If you have any questions or concerns related to the Supplier Code of Conduct, please contact esg@ridefox.com.



Reporting and Taking Action on Violations of the Supplier Code of Conduct

Fox Factory expects suppliers to report any issues about an actual, suspected, or potential violation of this Code of Conduct in a timely manner. Reporting can be done via email to your Fox Factory business representative or via our third-party provider helpline by telephone at 1-866-865-9478 or at whistleblower.services.com/FOXF. No action will be taken against anyone who reports a violation or raises concerns. Fox Factory also strictly prohibits acts of retaliation against individuals or suppliers for reporting unethical or unlawful acts in good faith by its employees, contractors, or third parties.

Fox Factory may ask for confirmation of compliance with this Code at any point in its relationship with a supplier, including before business is awarded. This may include periodic access to a supplier's location(s) or compliance-related documents, in accordance with applicable law.

Each supplier should put corrective action plans in place to address violations or non-compliance in a timely manner and at no cost to Fox Factory. These plans should demonstrate resolution as well as preventative countermeasures to avoid future similar issues. Failure to do so may result in Fox Factory deciding to terminate the business relationship with the supplier.



WWW.RIDEFOX.COM/PURPOSE.PHP #RIDEFOX