

# ***SKECHERS***

## **CORPORATE CODE OF CONDUCT**

Established by the Greenberg family in 1992 in a Southern California beach community, Skechers was founded on inclusivity, diversity, respect and entrepreneurial spirit. Over the years, and now as a public company, Skechers' values and culture have shaped our success. With global distribution and teams across continents, we remain dedicated to our core philosophy with a goal of treating all employees, stakeholders and customers with professionalism and dignity.

Skechers' lifestyle and performance product offering has also shaped our culture with a focus on wellness. The Company offers healthy lunch options, an in-house fitness consultant and corporate exercise programs. As a family brand, Skechers encourages active participation in the greater community, with annual charity walks for children in the United States and around the world.

### **NON-DISCRIMINATION POLICY**

Skechers is an equal opportunity employer and, as such, Skechers is committed to providing equal employment opportunities for all applicants and employees. Skechers does not unlawfully discriminate on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, military or veteran status, request for leave for a serious health condition and/or family care, pregnancy, request for pregnancy disability leave, request for an accommodation for lactation, disability, opposition to or reporting of unlawful practices, or any other category protected by state or federal law. This applies to all employment decisions, including but not limited to recruiting, firing, training, compensation, promotions and terminations. Skechers also makes reasonable accommodations for disabled employees, and for employees' religious beliefs and observances (including religious dress and grooming practices), unless to do so would pose an undue hardship. It is your responsibility to notify Human Resources if you require a reasonable accommodation to fulfill the essential functions of your job.

### **ANTI-HARASSMENT POLICY**

In conjunction with its policy against discrimination, Skechers emphasizes that every employee, applicant, contractor and customer is entitled to be treated with dignity and respect. Skechers will not tolerate any harassment on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, military or veteran status, request for leave for a serious health condition and/or family care, pregnancy, request for pregnancy disability leave, request for an accommodation for disability, opposition to or reporting of unlawful practices, or any other basis prohibited by law. It is Skechers' strict policy to provide a work environment free from harassment.

## **SEXUAL HARASSMENT**

Sexual harassment will not be tolerated by Skechers. Sexual harassment includes, but is not limited to, making unwelcome sexual advances, requests for sexual favors and other visual, verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission or rejection of the conduct is used as a basis for making employment decisions; or (3) the conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile or offensive work environment. This definition includes many forms of offensive behavior and includes, but is not limited to, harassment by employees or non-employees, gender-based harassment of a person of the same sex as the harasser, and comments or actions made outside of the workplace that could impact the work environment. Skechers prohibits managers, supervisors and employees from harassing co-workers as well as Skechers customers, vendors, suppliers, independent contractors and others doing business with Skechers. In addition, Skechers prohibits its customers, vendors, suppliers, independent contractors and others doing business with Skechers from harassing employees.

## **SAFETY**

Skechers is committed to providing a safe and healthful work environment for all employees. Accordingly, Skechers has instituted a Health and Safety Program and Violence and Harassment Program designed to protect the health and safety of all personnel. Every employee will receive a copy of Skechers' General Safety Rules and will receive health and safety training as part of the program. Employees will also receive a copy of the Violence and Harassment Program and be trained on their rights and responsibilities when it comes to Violence and Harassment in the Workplace. Complete copies of the programs are kept by the Human Resources Department, and are available for your review.

Skechers also has an Early and Safe Return to Work Program in which supervisors and employees work together to ensure a safe return to work and offer modified duties. Please see the "Workers Compensation Leave and Return to Work" section in the Employee Handbook for more information.

## **WORKPLACE SECURITY AND VIOLENCE PREVENTION**

It is Skechers' policy to prevent workplace violence and to maintain a safe working environment for all employees to the fullest extent possible. Employees should at all times be aware of their surroundings and act accordingly. Any suspicious individuals or activities should be reported to management immediately. In addition, employees should report any and all threats of violence, whether direct or indirect, as soon as possible, to any member of management, to Security or to the Human Resources Department. Please allow Skechers to respond to such situations and do not place yourself in peril. Any employee who behaves in a threatening or violent manner toward another employee, applicant, contractor or customer of Skechers will be subject to disciplinary action, up to and including termination of employment.



## **UNDERAGE LABOR**

All employees must meet the applicable legal minimum employment age requirements or are at least 15 years of age, whichever is higher, at the time of hire, and that they shall have met the age of completion of compulsory education.

## **HOURS OF WORK**

Work hours must be in compliance with local standards and applicable laws for part-time, full-time, exempt, non-exempt and highly compensated employees.

## **ENVIRONMENT**

Skechers complies with all applicable environmental laws, rules and regulations in the communities in which it operates, particularly with respect to water, energy, hazardous chemicals, air and noise quality, and waste.

## **OPEN DOOR POLICY**

Skechers' "open door policy" permits employees to discuss any complaints or problems with members of management. We believe that problems connected with your employment at Skechers can and should be settled as soon as they arise through an informal discussion with your Supervisor or Manager. We wish to be fair and honest with every employee. If you have a problem or complaint concerning your job or an interpretation of a Company policy, we would like to solve the problem by the following method. First, you should discuss the situation immediately with your immediate Supervisor or Manager and try to resolve it. If, after discussing the problem or complaint, you feel that a satisfactory solution has not been worked out, or if you are reluctant to discuss the situation with your immediate Supervisor or Manager in the first instance, you should go to the Human Resources Department. The Human Resources Department will investigate both sides of the situation and attempt to arrive at a solution.

Skechers policy expressly forbids any reprisal or retaliation against any employee because the employee has raised a problem or complaint under this procedure or because the employee has taken his or her problem or complaint to the immediate Supervisor or Manager or to the Human Resources Department.

## **WHISTLEBLOWER POLICY**

In accordance with applicable law and regulations passed by the New York Stock Exchange and the Securities and Exchange Commission, Skechers has established a Whistleblower Policy. In sum, since Skechers is a public company, it is required to have a "whistleblower policy" in order to give all employees an opportunity to complain to management and/or Skechers' Audit Committee about accounting practices, internal accounting controls or auditing practices.



You may submit complaints by name or anonymously. **(An outside mailbox has been set up for anonymous complaints: Special Reporting Division, Skechers U.S.A., Inc., P.O. Box 350, 1601 N. Sepulveda Blvd., Manhattan Beach, CA 90266-5133).** Skechers may not retaliate against an employee for submitting a complaint. This policy only applies to complaints that concern accounting practices, internal accounting controls or auditing practices. All complaints will be investigated, and records will be maintained.

**Skechers also offers a whistleblower hotline (1-800-729-1517 in the U.S.) to Skechers employees who may be adversely impacted by the Company and how it conducts its business.** This is available for Skechers corporate-related issues and any other instance that may be directly or indirectly related to Skechers' business practices.

## **PERFORMANCE EVALUATIONS**

Depending on department needs, managers and supervisors ordinarily conduct written performance evaluations for employees after approximately ninety (90) days of employment and, thereafter, on approximately the employee's anniversary date. However, Skechers reserves the right to defer the timing of an evaluation for any reason, and ordinarily will do so if an employee is absent for a significant period of time, such as a leave of absence. If an evaluation is so deferred, Skechers ordinarily will schedule future evaluations on an annual basis from the deferred evaluation.

The performance evaluation gives the Manager and the employee an opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. You are encouraged to ask specific questions and to comment about your evaluation in writing before signing the evaluation. Once you have signed your evaluation, you may, upon request, receive a copy of it.

## **COMPLAINT PROCEDURE**

Discrimination or harassment on any of the bases enumerated above will not be tolerated by Skechers. Any employee who engages in such discrimination or harassment shall be subject to disciplinary action, up to and including termination of employment.

Any allegation of discrimination or harassment that is brought to its attention will be investigated promptly by the Human Resources Department. To the extent possible, confidentiality will be maintained throughout the investigatory process. The results of the investigation will be communicated to the complainant and the alleged discriminator/harasser.

As Skechers' point of contact for human rights-related issues, SVP and Head of Global Human Resources Leslie Riggs oversees human rights issues throughout the Company, including the ILO standards of freedom from forced labor, forced child labor and discrimination at work.

Skechers will not in any way retaliate against an individual who makes a complaint of discrimination or harassment, or against any participant in the investigation. Any person found to have retaliated against another individual for reporting discrimination or harassment, or for participating in Skechers' investigation, will be subject to disciplinary action, up to and including termination of employment.



## **COMMITMENT TO REMEDY**

Skechers is committed to remedying adverse impacts that the Company may have on individuals, workers and communities affected by its practices. This includes the Company's support and participation in collaborations that support third-party remedies which may also have a positive impact.

## **MANAGEMENT SYSTEM**

Employees must fully comply with all applicable laws, rules and regulations of the country in which they are located and operating, including those relating to labor, workplace health and safety, and the environment.

Employees must comply with all relevant laws and avoid all forms of corruption, including but not limited to extortion, bribery, embezzlement, theft or other abuse of power to gain business or personal advantage.

## **STAKEHOLDER COMMITMENT**

Skechers is committed to engaging with stakeholders who are affected or have the potential to be impacted by its business practices. The Company's commitment encompasses workers and their families, the communities in which it conducts business, and any other individuals whose lives Skechers may impact. In order to ensure that its processes align with the needs of these stakeholders, the Company is also committed to collaborating with them or their representatives to create and oversee a system that helps to promote, preserve and protect their human rights.

## **SUPPLIER CODE OF CONDUCT**

Skechers ensures that its suppliers comply with local laws to ensure the safety, health and well-being of its employees. Please see the Supplier Code of Conduct for more information.

