



Effective Date: October 29, 2018

HUMAN RIGHTS POLICY

Purpose

Fox Factory Holding Corp. and its subsidiaries (collectively, the “Company” or “we”) are committed to ethical principles and supporting local, state, federal, and international human rights standards and the purpose of this policy is to formalize such commitment. We believe that protecting our employees, as well as the people in our producing communities, is part of our Company’s responsibility.

Scope

This policy applies to all employees, officers and directors of the Company worldwide.

Policy

We recognize that, in many countries, human rights and labor practices are a cause of concern. These practices are usually related to Child Labor, poor wages, health and safety, Forced Labor, physical and verbal abuse, harsh working conditions, and long hours. We are committed to prohibiting unlawful practices that in any way violate local, state, federal, and international law and standards regarding labor practices and human rights. In recognition of the foregoing commitment:

- The Company condemns Child Labor and in no event will the Company employ any person below the age of 15, unless this is pursuant to a government-authorized job training or apprenticeship program that would be clearly beneficial to the persons participating.
- The Company seeks to promote its employees' material well-being by providing compensation and benefits that are competitive and comply with applicable law.
- The Company will not use Forced Labor in any form, and will not tolerate physically abusive disciplinary practices.
- The Company seeks to comply with applicable laws regulating hours of work.
- The Company absolutely condemns Human Trafficking in the strongest terms and is committed to conducting its business in a lawful, ethical and responsible manner.

Any violations of this policy found by the Company will be dealt with immediately and thoroughly. While this is our policy, we do not believe that a more rigorous involvement with our supply chain is warranted at this time.

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Definitions

Human Trafficking: The Victims of Trafficking and Violence Protection Act of 2000, as amended, defines “severe forms of trafficking in persons” as: (a) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (b) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Forced Labor: Sometimes referred to as “labor trafficking,” forced labor encompasses the range of activities—recruiting, harboring, transporting, providing, or obtaining—involved when a person uses force or physical threats, psychological coercion, abuse of the legal process, deception, or other coercive means to compel someone to work.

Child Labor: Situations in which the child appears to be in the custody of a non-family member who requires the child to perform work that financially benefits someone outside of the child’s family and does not offer the child the option of leaving, such as forced begging.

Policy Contact

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