



Code of Conduct



The Passion to Do the Right Thing



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Introduction

Continuous innovation and strong values define us. They are the cornerstones of Johnson Outdoors, guiding our decisions and shaping our future. Passion for what we do drives our market success. And, passion to do the right thing ensures we remain the kind of company we strive to be: a company people trust.

Our Code of Conduct sets high standards for doing the right thing. It is more than words on a page; it is a living, breathing commitment to follow the law, to act ethically, honorably and honestly and to treat everyone, especially one another, with dignity and respect. All of us will be and should be measured by these standards. People put their trust in us: we will not let them down.

[Our Code of Conduct reflects a summary of many Johnson Outdoors' policies which can be found in their entirety at https://sp.johnsonoutdoors.com/policies/Pages/legal.aspx.](https://sp.johnsonoutdoors.com/policies/Pages/legal.aspx)

Our Expectations

Everyone throughout the organization is responsible for reading our Code of Conduct and taking it to heart. We each have a responsibility to put these principles of doing what's right into action every day in every way, and to encourage others to do the same. Ask questions and speak up if you think someone or the Company is not living up to our Code. Staying silent when you see the Code being disregarded can make you just as accountable, and subject to the same disciplinary action, as those actually doing wrong. Don't let that happen. Contact your manager, Human Resources representative or the Legal Department. You can remain anonymous and report suspected Code violations, financial fraud or misconduct to the Audit Committee hotline at 1-877-778-5463 or online at <https://secure.reportit.net>.

Your Protection

Johnson Outdoors prohibits retaliation against any worker who reports or cooperates with an investigation of a possible Code violation. If you think you are being retaliated against, contact Human Resources or our Legal Department right away.

Our Shared Values

Our values drive our commitment to abide by this Code of Conduct and the policies which support it. Each Johnson Outdoors' employee, officer and director, and every agent, consultant and contract worker engaged by us, shares that commitment.

Our people, our greatest strength

We will employ and retain the best people, provide an enjoyable work environment and ensure fair and consistent treatment of employees.

A superior organization

We will be highly innovative, delight the consumer, be a company of choice to our customers and socially responsible.

A winning business philosophy

We will demonstrate superior leadership, passion for winning, high ethical standards and long-term thinking.

Obeying the Law

We will obey laws when and where they apply.

This is simple: legal compliance is not optional. We will conduct our business in accordance with all applicable laws in every country and state where we do business. There are a variety of laws and regulations that govern what we do and how we do it. Knowing and understanding what, if any, laws apply to our jobs and responsibilities is essential to ensuring compliance with the law. Be sure to contact the Legal Department with any questions or concerns so that you know what the law is and can comply with it. Remember, obeying the law is always the right thing to do for the business, the Company and yourself.

Integrity

We will be fair, ethical and honest at all times.

We will conduct our business with the utmost integrity: fair in all dealings, honest in all communication and ethical in both our decision-making and in our actions.

If you have any doubt or question about what you're doing then stop, think and ask yourself:

- Would I trust someone who did this?
- Am I being fair and honest with everyone?
- Do my actions pass the smell test?
- How would this look in the newspaper?
- How will I feel about myself afterwards?
- Will I be able to sleep soundly tonight?
- What would my family and neighbors think?
- What would I tell my child to do?

People who are in a position to influence a business decision or Company action have a special responsibility to ensure they are always doing what's best for Johnson Outdoors, its stakeholders and shareholders. They must avoid circumstances where there could be the slightest hint of a conflict of interest, or even the appearance that they, their friends or family might stand to benefit or gain personally. This is why we limit the value of gifts and entertainment our people can offer or accept from business partners, and have policies and procedures to ensure we comply with important and relevant laws and regulations. If you have questions, talk to your manager or the legal department before making a decision in a situation where your or the Company's reputation and ethics could be at risk.

Ethical Work Environment

We will provide a positive and professional work environment that supports doing what is right, fostered by a culture defined by fairness, mutual respect and high performance standards.

We will provide a workplace where people feel they are valued and respected, where hard work, accountability and personal and professional achievement matter. Compensation and benefits will be fair and market-based and candid, unbiased performance appraisals will be provided. Our facilities will be safe and healthy, and we will follow environmentally sound business practices. And, we will adhere to local and national employment and workplace government requirements.

Our environment cultivates and applauds ethical conduct. “doing what’s right” starts at the top, setting a clear expectation and example for all of us to follow. Executives, managers and supervisors accept a special obligation to ensure their day-to-day decision-making, behavior and communication are appropriate and meet these expectations. No one who works at or with Johnson Outdoors should ever feel pressured to say or do anything other than what they believe and know is the right thing.

Valuing Diversity

We welcome diversity and respect the rights of all people.

Employment here is based solely upon merit and qualifications directly related to professional competence and job performance skills. Hiring and employment practices are blind to 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 and veteran status, use of family medical leave or worker’s compensation benefits, or any other protected characteristic. We strive for the diversity of our workforce to reflect that of the communities in which we operate. We have zero-tolerance for harassment of any kind in our Company. Respecting you and your rights goes beyond adherence to laws: it is one of the underlying principles which define the way we operate. Any conduct which does not reflect our workplace expectations should be reported to your human resources representative or to the legal department.

Product Excellence

We make products that meet the highest standards for quality, performance and safety.

We make products to bring outdoor fun and adventure to people of all ages. We strive to design and manufacture products that are safe, durable and fun to use. To ensure our products are well-designed and built, we will meet or exceed applicable government regulations and relevant industry standards and maintain disciplined quality control processes. Our products will undergo rigorous pre-market testing, and product labeling and information will be clear and complete in providing safe use and care information to consumers.

Truth in Advertising

We will be clear and fact-based when marketing our products.

People want to have fun using Johnson Outdoors' products. We want that too. Our packaging, advertising and other marketing materials provide relevant fact-based information outdoor recreational consumers need to choose the product that is best for them. Comparative or descriptive product claims are also relevant and must also be backed by facts and competitive testing which shows our product is indeed the "first," "strongest," "longest-lasting," "most advanced" or "easiest to use," for example. The legal department can assist marketing teams to ensure advertising claims are substantiated before they are made.

Respect and Protection of Property

We will respect the property of others and protect that of our own.

Intellectual Property

Johnson Outdoors' intellectual property rights (our trademarks, logos, copyrights, trade secrets and patents) are among our most valuable assets: they represent and protect our innovation and identity. We work hard to ensure legal protection of our intellectual property because unauthorized use can lead to its loss or a significant loss in its value. Any use of our trademarks and logos must be cleared in advance by the respective brand or marketing department. Our intellectual property may be used by others only through an appropriate written agreement which must be authorized by the respective brand management and approved by the legal department. Report any suspected abuse of the Company's intellectual property to the legal department right away.

Likewise, we respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose you and the Company to fines and penalties. Please seek advice from the legal department before you solicit, accept or use proprietary information from others, or let others use or have access to Johnson Outdoors' proprietary information. A non-disclosure agreement must first be signed by all parties, and even then you should try to accept or share only as much information as is needed to meet the business' needs. Always check with the legal department when developing a product, marketing plans or materials that utilize information that does not belong to Johnson Outdoors.

Office Property

Johnson Outdoors provides everyone the tools and equipment to do our jobs, and expects us to use them responsibly and not be wasteful. Calling home to check on a sick child or sending an occasional email to a friend is perfectly alright. Just be mindful that Company funds, equipment and other physical assets are to be used primarily for business purposes. Check with your manager or human resource representative to find out if a certain use of Company assets is permitted.

Financial Integrity and Responsibility

We will be diligent in our financial accounting, reporting and management.

The money we spend on behalf of Johnson Outdoors is not ours; it's the Company's and ultimately, our shareholders'. We all play a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to Johnson Outdoors, sign a new business contract or enter into any deals on the Company's behalf.

We maintain a system of internal controls that reinforce our compliance with legal, accounting, tax and other regulatory requirements at every location where we operate. Stay in full compliance with these internal controls and contact finance if you have any questions. If you suspect financial fraud or other serious misconduct, please consult the whistleblower policy or report your concerns anonymously if you would like to the audit committee using the following hotline 1-877-778-5463 or going online at <http://secure.reportit.net>.

Accounting accuracy and responsible fiscal management are important in every Company, particularly publicly traded companies which are required to make full, fair, accurate, understandable and timely public disclosures regarding the Company's financial performance and events which could affect the Company's results. We take our reporting and disclosure obligations very seriously, as do the appropriate oversight agencies. Responsibility for ensuring these obligations are met extend to all those who prepare, draft, review, sign and certify these documents, and requires an environment of open communication and information sharing across the organization as a whole.

Transparency in Dealings

We will be forthright and transparent in our dealings with government institutions and representatives.

From time to time, it may be necessary for us or our representatives to interact with government institutions which oversee compliance with applicable local laws, regulations and rules, or whose job it is to decide whether to do business with us. Our policy is to be fully compliant, to be open and honest whenever we interact with government bodies, and to be responsive and cooperative to their inquiries. At the same time, we must keep our relationship at arm's length to avoid any misperception that we would try to influence a government decision or action. For this reason, Johnson Outdoors and its subsidiaries do not make political contributions, nor allow gifts or special favors of any sort to be offered to government or political party representatives. Immediately contact the legal department upon receipt of and before responding to an inquiry or notice from a local government agency or representative.

Privacy

We will protect the private and confidential information of our people and others.

In the course of doing business, Johnson Outdoors may collect and use personal information from employees, customers and consumers. Our policy is to provide reasonable protections, consistent with local laws, so this personal information remains private and confidential.

Environmental Stewardship

We will be responsible stewards of the environment.

Our business relies on a healthy natural environment for consumers to enjoy. We are committed to conducting our operations with consideration for environmental quality and protection, including air, water and general land usage. Effective controls must be in place to ensure releases into water sources, the atmosphere and solid waste disposal are within permissible limits. Employees everywhere must conduct Company business in an environmentally sound manner and within applicable laws and regulations.

**If you have questions about the information in the Code of Conduct,
please contact your local Human Resources Department.**



Acknowledgment of Receipt

I received a copy of Johnson Outdoors Inc.'s Code of Conduct (the "Code") that was issued to me in June, 2016.

I acknowledge I have read, and understood the contents of the Code of Content and that I further agree to abide by the Code during my employment with Johnson Outdoors Inc., and its related entities. I understand that additional details on the Legal, Human Resources, Finance, and IT policies referenced within the Code are available on Inside Outdoors. I further understand that my failure to act in accordance with the Code of Conduct may result in disciplinary action up to and including termination of employment.

Employee Printed Name

Employee Signature

Date

After you have read and signed this page, please return it to your Human Resources Manager.