

# Lbrands

## Code of Conduct and Ethics Hotline

As our company grows, our values remain a part of everything we do:

**The customer rules!** Everything we do must begin and end with an insatiable drive to anticipate and fulfill our customers' desires.

**Passion leads to success.** We pursue excellence because we are emotionally, intellectually and spiritually engaged in our work ... and that makes our talent formidable and our results extraordinary.

**Inclusion makes us stronger.** We cherish our diversity, because embracing others' thoughts, experiences, hopes and dreams makes our own more complete and connects us to our customers.

**It matters how we play the game.** Doing what is right means following our beliefs – and the rules – even when no one is watching. Winning means very little unless how we get there is fair, collaborative, rooted in our values and contributes to the greater good.

Regardless of the circumstances, we do what is right and abide by our [Code of Conduct](#).

### **Do What's Right: Speak Up!**

You are encouraged to discuss work-related ideas, questions, problems and concerns with your manager. If there is something about your job, your brand or the company that concerns you, please communicate it openly and honestly with your manager. Your input will be given careful consideration. An important part of every manager's responsibility is to listen and help resolve any work-related problems or issues.

If, for any reason, you feel that your questions have not been answered to your satisfaction, or your concern has not been resolved, or if it seems like it's taking too long, you always have the option to speak with the person at the next level of supervision. If you are still not satisfied, you may continue on to the next level of management or your Human Resources partner.

### **In addition, you can also report concerns to the Ethics Hotline:**

- 1-888-884-7218 (United States)
- 1-866-892-4241 (Canada)
- [www.lb.ethicspoint.com](http://www.lb.ethicspoint.com)
- [ethics@lb.com](mailto:ethics@lb.com)
- For a list of contacts by country, see the Contacts section in the [Code of Conduct](#).

If you see something that you think is wrong, you are strongly encouraged to report it. The Ethics Hotline is operated and staffed by an outside source, and you can speak anonymously, where allowed by law, to report illegal or unethical activities.

- Your concerns can be made 24 hours a day, seven days a week.
- All reports to the company concerning issues under our Code of Conduct will be kept confidential to the extent reasonable possible and permissible under the law.
- In no event will you or any associate be subject to reprisals, retribution or any career disadvantage for complying with the reporting or other requirements of the Code.
- In addition, if you feel it is appropriate, you may address questions or concerns to the Office of the General Counsel.

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## Code of Conduct and Ethics Hotline

### Frequently Asked Questions: General

#### What is the Ethics Hotline?

The Ethics Hotline is a way for associates or partners to report suspected violations of our Guide, Code of Conduct or policies. It is operated and staffed by an outside source with whom you can speak, anonymously if you prefer and where permitted by applicable law, to report illegal or unethical activities.

#### Why would I use the Ethics Hotline?

We are concerned about you as an individual, and we encourage you to talk openly with us so problems and concerns can be resolved. You are encouraged to discuss all work-related ideas, questions or concerns with your manager or next level manager or Human Resources partner. If you believe a matter is too sensitive, you are uncomfortable or if you're not satisfied with the resolution of a matter, you may contact the Ethics Hotline.

#### Is my concern kept confidential?

When you report a concern through the Ethics Hotline, it is kept confidential to the extent reasonably possible. That means it's only shared with the people within the business who are appropriate to follow up on and resolve the issue(s) you raise. When you make a report, you also have the opportunity to remain anonymous, if you wish.

#### What is EthicsPoint?

EthicsPoint is the third party reporting tool we use to log and address the concerns raised by associates. This service is available to you 24 hours a day, seven days a week.

#### Why do we need a system like EthicsPoint?

There are several reasons:

- We believe that our associates are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system augments our other efforts to foster the culture of integrity and ethical decision-making that's firmly rooted in our values.

### Raising a Concern

#### May I raise a concern using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report by telephone, email or the Internet.

#### What type of situations should I raise?

The EthicsPoint system is designed for associates to raise **any** violation of our stated Code of Conduct, company policies or other concern you may have. These may include:

- Unethical behaviors
- Discrimination or harassment
- Workplace violence or threats
- Theft or fraud
- Conflicts of interest
- Associate merchandise, travel and expense reporting, or gift/entertainment abuse
- Accounting or auditing irregularities
- Bribery or corruption

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### **If I see a violation, shouldn't I just raise it to my manager, security, or human resources and let them deal with it?**

When you observe some behavior that you believe violates our Code of Conduct, we expect you to raise it. Ideally, you should bring any concerns forward to your direct supervisor, higher level of management or your Human Resources partner. We recognize, however, that there may be circumstances when you are not comfortable raising the issue in this manner. In those cases, we encourage you to contact the Ethics Hotline. We would rather you raise a concern anonymously than keep the information to yourself.

### **Why should I raise what I know? What's in it for me?**

We encourage you to raise the issue because it's the right thing to do. Violations of the Code of Conduct – no matter how trivial they may seem at the time – can be harmful to the interests of the company. Part of our individual responsibility includes letting the company know about violations of the Code.

### **Does management really want me to raise a concern?**

We certainly do. In fact, we *need* you to raise your concerns. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Raising a concern can minimize the potential negative impact on the company and our people.

### **Where do these concerns go? Who can access them?**

Concerns are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these concerns available only to specific individuals within the company who are charged with evaluating the concern, based on the type of violation and location of the incident. Each of these recipients has had training in keeping these reports in the utmost confidence. Authorized reviewers may include Human Resources partners, district and regional managers and members of the Office of the General Counsel.

### **Isn't this system just an example of someone watching over me?**

The EthicsPoint system supports the positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are always encouraged to seek guidance on ethical dilemmas, provide positive suggestions or communicate a concern – it's part of our open door policy. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

## **Security & Confidentiality**

### **It is my understanding that any concern I send from a company computer generates a server log that shows every website that my PC connects with, and won't this log identify me as a report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable raising a concern on your work PC, you have the option of using a PC outside our work environment (such as one located at an internet café, at a friend's house, etc.). Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

### **Can I raise a concern from home and still remain anonymous?**

A report from home, a neighbor's computer, a library or any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name, and the EthicsPoint system strips away internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

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**I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years working here..."

**Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an internet-based report and an interviewer will type your responses into the EthicsPoint web site. These reports have the same security and confidentiality measures applied to them during delivery.

**What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish.

## Tips & Best Practices

**I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother raising it?**

Our company chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company and all associates, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to raise it.

**I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

Raise a concern. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you raise a concern about a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

**What if my boss or other managers are involved in a violation? Won't they get the concern and start a cover-up?**

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to concerns in which they have been named.

**What if I remember something important about the incident after I raise a concern? Or what if the company has further questions for me concerning my concern?**

When you raise a concern at the EthicsPoint web site or through the Ethics Hotline, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by internet or telephone and access the original concern to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue" where situations are not only identified but can be resolved, no matter how complex.

**Are these follow-ups on concern as secure as the first one?**

All EthicsPoint correspondences are held in the same strict confidence as the initial concern, continuing under the umbrella of anonymity.

**Can I still raise a concern if I don't have access to the internet?**

Yes. You can call the EthicsPoint toll-free hotline which is available 24 hours a day, 365 days a year. For a list of phone numbers by country, see the [Code of Conduct](#).