

A background image showing three people in a meeting. A woman on the left is smiling and looking towards the center. A man in the center is wearing glasses and looking down at a laptop. A woman on the right is also looking towards the center. The image is semi-transparent and serves as a backdrop for the text.

HOW YOU CAN BE **THE BEST** **AT WORK**

CODE OF BUSINESS CONDUCT



WORKWEAR
OUTFITTERS™

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OUR COMMITMENTS

Our commitment to operate ethically and lead with integrity is embedded in the five principles of our Code. Our Code guides us on upholding this commitment as we interact with each other, our partners, our consumers and our stakeholders.

WE LEAD WITH **INTEGRITY**.

WE TREAT EVERYONE WITH **DIGNITY AND RESPECT**.

WE COMPETE **FAIRLY AND HONESTLY**.

WE **FOLLOW THE LAW** EVERYWHERE WE DO BUSINESS.

WE STRIVE TO MAKE OUR **COMMUNITIES BETTER**.

WE **CHAMPION** AND **EMPOWER** WORKERS WHO
MAKE OUR WORLD WORK BETTER.



THE ESSENTIALS WE LEAD WITH INTEGRITY.

WHY DO WE HAVE A CODE?

By setting forth the high standards we are expected to uphold, our Code serves as a pledge to our customer and each other. We commit to act with integrity-not only because it contributes to our success, but also because it is the right way to achieve success.

WHO MUST FOLLOW OUR CODE?

This Code and all relevant corporate policies apply to everyone who conducts business on behalf of WWO, including all associates.

We also expect our business partners to follow similar principles, and we aim to work only with those who meet our exacting standards. Our Business Code of Conduct is located at:
wwof.com/Business-Code-Of-Conduct

ETHICAL DECISION MAKING

Maintaining our Company's high standards for ethical business conduct requires us to act with honesty and lead with integrity. There may be times when you need to make a business decision, but the right thing to do is not immediately clear. In those instances, asking these questions can be helpful:

- Is it legal?
- Is it consistent with our Code of Conduct?
- Would you be comfortable if others knew about it?

If you answered "no" to any of these questions, don't move forward. If you are not sure, seek guidance.

OUR COMMITMENT TO PREVENTING RETALIATION

WWOF will never tolerate retaliation toward any associate for coming forward with a good-faith report or participating in an investigation. "Good faith" means making a report with honest intentions and providing all relevant information. Retaliatory acts-such as demotions, harassment or loss of employment-are prohibited by WWO. If you believe you have been subjected to or have witnessed retaliation, you should report it to Human Resources immediately.

FURTHER EXPECTATIONS FOR MANAGERS

Our managers have additional responsibilities:

- Acting as role models and leading with integrity
- Promoting a diverse and inclusive environment
- Encouraging our speak-up culture in which associates feel comfortable raising concerns
- Escalating reports from associates, as appropriate and
- Never allowing or ignoring acts of retaliation.

It falls on our managers to set the standard for all associates at WWOFF. This means creating a positive work environment, learning and understanding our Code and modeling ethical behavior every day. At WWOFF, we strive for integrity at every level of our operations, starting with our leaders.

SEEKING GUIDANCE AND RAISING CONCERNS

Raising concerns as soon as they arise and seeking guidance before acting can help WWOFF improve processes and solve problems quickly. Always ask for help whenever you have a question.

The following resources are ready to assist you:

- Your manager, or another manager you feel comfortable speaking with
- Your Human Resources representative
- Your department head, controller or Chief Financial Officer ("CFO")
- WWOFF's General Counsel
- WWOFF Ethics and Compliance hotline at 1-844-985-4091 or wwof.ethicspoint.com



OUR ASSOCIATES WE TREAT EVERYONE WITH **DIGNITY AND RESPECT.**

COMMUNICATING OPENLY

We believe open communication and the free expression of diverse and differing ideas is the best way to collaborate, solve problems and create a winning team.

EMBRACING INCLUSION AND DIVERSITY

We are committed to creating an inclusive environment that welcomes and values our differences. We know that our continued success and growth will be enhanced by a diverse workforce that encompasses a wide range of perspectives, skills and abilities. This also means WWOFF makes employment decisions based only on merit and without regard to race, color, religion, national origin, sex, age, disability, sexual orientation or any other characteristic protected by law.

PREVENTING HARASSMENT AND DISCRIMINATION

We believe in treating each other respectfully and do not tolerate harassment within our workplace. "Harassment" is any unwelcome conduct-whether physical, verbal or sexual-that has the purpose or effect of creating an intimidating, hostile or offensive workplace. Avoiding harassment means avoiding any of the following types of conduct:

- Slurs, offensive remarks or jokes based on a person's race, color, religion, national origin, sex, age, disability, sexual orientation or other similar characteristics
- Unwanted touching, assault or intimidating gestures such as blocking a person's movement
- Requests for sexual favors or unwanted sexual advances, such as leering or making sexual gestures or
- Repeated invitations for dates when the other person has declined.

If you experience or witness harassing behavior of any kind, you are encouraged to report it immediately. You will never face retaliation for making a report in good faith.

ENSURING HEALTH AND SAFETY

Workwear Outfitters goes to great lengths to foster a safe and healthy work environment.

Associates may not sell, possess, distribute, use or purchase illegal drugs-or sell, transfer or distribute prescription drugs-on Company premises or during working hours. Associates must never work while impaired by alcohol or drugs.

If you are concerned about a substance-abuse problem, please seek confidential assistance through your benefits provider.

In addition, WWOOF does not tolerate any action that threatens people, property or our Company, including verbal threats, harassment, physical attacks, damage to Company property, possession of any weapon on Company property or any other behavior that would make others feel unsafe.

If you become aware of any health or safety concern, report it to a manager immediately.

PROTECTING EMPLOYEE PRIVACY

We respect the privacy of our fellow associates and will safeguard the confidentiality of sensitive personal information that we receive in the course of our work. This includes personal health information, contact information, government-issued identification numbers and confidential employment information, including salary and evaluation details. If your job involves having access to such information, you must take care to safeguard it. Only use other associates' private information for valid business purposes.

PROTECTING CONSUMER AND THIRD-PARTY DATA

We also strive to protect the confidential information of our consumers and third parties and safeguard their confidential personal information against unauthorized access, use or disclosure.

OUR COMPANY WE COMPETE FAIRLY AND HONESTLY.

DISCLOSING CONFLICTS OF INTEREST

A “conflict of interest” arises any time your personal interests interfere with your ability to make objective decisions on behalf of WWOOF. We each have a duty to avoid situations that could create-or even appear to create-a conflict of interest.

Associates may not own any interest in or have any personal contract or agreement of any nature with suppliers, contractors, customers or others doing business with WWOOF that might tend to influence a decision with respect to the business of WWOOF.

OUTSIDE EMPLOYMENT OR FINANCIAL INTERESTS

While WWOOF recognizes that some associates will work second jobs, associates should never engage in any outside employment or other activity that violates obligations to WWOOF, such as confidentiality. In addition, if you have an ownership interest or financial stake (excluding publicly traded securities) in any company with which WWOOF does business, you must disclose this to your manager.

WORKING WITH FAMILY MEMBERS AND CLOSE FRIENDS

Working with family members or those with whom you may have a significant personal relationship can lead to the appearance of bias. If one of your family members or someone with whom you have a significant personal relationship works for WWOOF, you should not be involved in the decisions related to the hiring, compensation, evaluation or promotion of that individual.

A conflict of interest can also arise if you, your family member or close friend works for a company that has a relationship with WWOOF-such as one of our suppliers, resellers, customers or competitors. These business relationships should be based only on what is best for WWOOF. If you find yourself interacting with a company that a relative or close friend has ties to, notify your manager immediately and remove yourself from the decision-making process.

BOARD MEMBERSHIPS OR LEADERSHIP ROLES

Before accepting a position to serve on the board of directors or in a leadership role for an outside company that does business with WWOOF or that is in a similar market or industry, seek approval from your manager to ensure that no conflict of interest exists and that serving will not affect your ability to do your job at WWOOF.

CORPORATE OPPORTUNITIES

Part of our shared commitment to WWOOF is to never use company property, information or our positions at WWOOF for personal gain. You should never compete with WWOOF, whether by engaging in the same line of business or by taking away any opportunity for sales or purchases of products, services or interests.

GIFTS AND ENTERTAINMENT

You must avoid even the appearance of making business decisions based on illegal, unethical or compromising influences. Business courtesies such as the exchange of gifts or attending entertainment events may be appropriate only under certain circumstances. WWOOF associates may exchange gifts of insignificant value with suppliers, customers or others who are doing business with WWOOF, provided the following guidelines are adhered to:

- Gifts may not be extravagant
- Gifts must be infrequent and
- A gift should not give the impression that it will influence a business decision.

Gifts of money (cash or cash equivalent) are never acceptable. Promotional items, branded items or holiday gifts of nominal value are permissible.

Entertainment among WWOOF and others may be appropriate if participation will help build or maintain a business relationship for WWOOF's benefit, business topics will be discussed during the event, or members of the existing or proposed relationship teams will be in attendance. Before accepting such an invitation, however, be sure to obtain approval from your manager.

Remember that the rules for providing gifts and entertainment to government officials are much stricter than the rules laid out here. Never offer or provide a gift to a government official without prior authorization from our Legal Team.

USING AND PROTECTING COMPANY PROPERTY AND INFORMATION

Acting with integrity means that we are each responsible for safeguarding Company property and protecting it from loss, damage, theft, vandalism, or unauthorized use or disposal. This applies to property located in the office, at home or on customer premises. WWOOF's property includes:

- Physical property, including equipment, facilities and supplies, inventory and vehicles
- Intellectual property, including trademarks, patents, copyrights, work methods and practices, and trade secrets
- Proprietary information, including any nonpublic information that might be useful to a competitor or that could be harmful to WWOOF or its associates, customers or suppliers if disclosed and
- Information technology resources, including computer software, computer networks, storage devices, e-mail and voice mail.

Company property is intended to be used for appropriate Company business purposes. While incidental personal use of WWOOF's information technology resources is permitted on a limited basis, such use must not interfere with your job responsibilities or productivity levels. All Company proprietary information must be maintained in strict confidence, except when disclosure is authorized by WWOOF or required by law. Upon leaving WWOOF's employment, associates must return all Company property.

Remember the following:

- Lock your computer and other devices when you're away
- Use passwords that adhere to WWOOF's Global Information Security Policy
- Do not open e-mails and attachments unless you can identify the sender
- Keep sensitive materials close at hand when you are traveling
- Be aware of your surroundings, taking care not to discuss sensitive or confidential information in public places where others may overhear you, and
- Never share your passwords with others.

APPROPRIATE USE OF SOCIAL MEDIA

The presence of social media across our lives and daily activities requires each of us to be mindful of how we use it. Only authorized associates are permitted to use social media on behalf of WWOOF. However, all associates should follow general best practices when using social media, even for personal use, to help prevent unintended consequences that could negatively impact WWOOF's reputation.

If you mention WWOOF online, you must clearly state your association with WWOOF and adhere to the following guidelines:

- Do not discuss WWOOF's confidential or proprietary information
- Never make vulgar or intimidating remarks about colleagues or consumers
- Always communicate honestly
- Do not make disparaging or misleading remarks about our competitors

Also, keep in mind your work commitments. If social media is not a part of your job responsibilities, make sure the time you spend using social media does not interfere with your work.

KEEPING ACCURATE ACCOUNTING AND FINANCIAL RECORDS

WWOF is responsible for furnishing reliable financial information on a periodic and timely basis. We must do our part to ensure that the accounting and financial records of the Company are maintained based on valid, accurate and complete data with adequate supporting information to substantiate all entries to WWOOF's books of account. WWOOF's books and accounting records are maintained in compliance with generally accepted accounting principles, and properly established controls must be strictly followed. Never falsify any record or

document for any reason. Comply with all WWOOF systems of internal controls and do not attempt to circumvent any such process or control. You must report any suspected fraud in the company's financial reporting, disclosures or internal controls. Do not conceal information from management or from the Company's independent auditors or internal auditors.

In addition, everyone must take steps to protect the integrity of our corporate information by adhering to our policies on retaining and disposing of Company records.

INSIDER TRADING

Never use material non-public information for personal gain prior to its official public release. Such action will result in immediate dismissal. Examples of material information include:

- Possible mergers, acquisitions or divestitures
- Actual or estimated financial results
- Purchases and sales of investments in companies
- Obtaining or losing significant contracts
- Important management changes
- The threat or development of major litigation or
- Major changes in business strategies.

GOVERNMENT CONTRACTING

We commit to always acting with honesty and integrity, but interactions with government customers have additional obligations and requirements. If you are involved in transactions with the government such as bids, tenders or negotiations, be sure to understand the applicable statutory, regulatory and contractual provisions and controls. Never make unauthorized or incorrect charges or submit inaccurate information regarding costs or pricing. Be mindful of our obligation to protect classified or confidential information. In addition, be diligent in requiring that consultants, resellers and other third parties that interact with governments on our behalf meet all qualification and performance standards, undergo appropriate due diligence and understand our expectations for ethical business conduct. Always involve the legal team when engaging in government contracting.

OUR MARKETPLACE

WE FOLLOW THE LAW EVERYWHERE WE DO BUSINESS.

FAIR DEALING

WVWF engages in fair-dealing practices-meaning we conduct business ethically-at all times. To this end, we do not make disparaging or untrue statements about our competitors. Nor do we make inaccurate or unfair comparisons between our competitors' products and services and our own. Violations of these practices could lead to civil or criminal liability for the individuals involved and our Company.

FAIR COMPETITION

Our Company is committed to competing fairly by complying with the laws of the countries where we do business. Countries where we operate have fair-competition laws-sometimes known as "antitrust" laws. These laws regulate how we can compete in various markets.

Competition laws pertain to our dealings with customers, suppliers and competitors, and it is important that you know your responsibilities under applicable competition laws wherever you are located. Certain activities are strictly prohibited, including:

- Monopolistic practices
- Price fixing
- Bid rigging
- Market and customer allocation and
- Illegal boycotts.

Remember, antitrust violations frequently take the form of an "agreement between competitors," whether the agreement is in writing, verbal or merely implied. For this reason, you must take special care when interacting with competitors, such as at trade shows or trade association meetings. If a competitor attempts to engage you in conversation about any prohibited topic, stop the conversation immediately and report the incident to the Law Department.

INTERACTING WITH OUR PARTNERS

Just as we protect WVWF's intellectual property-and expect our business partners to do the same-we, in turn, respect the legal rights of others with whom we do business. Do not make unauthorized copies of copyrighted material, including computer programs for which WVWF does not have appropriate approvals.

Keeping up-to-date with others in our industry helps WVWF stay competitive, but we must take care to only collect competitive information in an ethical manner. Never use deceptive or illegal tactics to obtain information about our competitors, and do not ask or allow our associates to share confidential information about

former employers. Remember that requesting or accepting confidential information from another company without consent may have legal consequences.

When we do exchange confidential or proprietary information with our business partners, first make sure our documents are labeled appropriately and have a properly executed non-disclosure agreement in place. Seek help from the Law Department if you have questions.

CREATING QUALITY PRODUCTS

At WWOFF, we take pride in our brands and the quality of the products they represent. We adhere to the strictest standards for quality, and expect the same of our supply chain. If you become aware of any flaw in our processes or products, or those that are supplied to us, or if you suspect the use, sale or production of counterfeit products or components, report it to your manager or a member of the Supply Chain management team immediately.

ANTI-CORRUPTION

WWOF is subject to several laws prohibiting bribery and corruption, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. We comply with these laws and take pride in competing based on the quality of our products, versus an improperly obtained advantage. At WWOFF, we do not pay bribes to anyone, for any reason.

Never offer or accept a "kickback," which is a sum paid as a personal reward for making or fostering business arrangements. Because of the risk that they could be misconstrued as a bribe, WWOFF prohibits "facilitating payments," which are small, infrequent payments made to expedite the performance of routine government actions, such as the issuance of work permits and visas. Associates and third parties who refuse to pay a bribe will not suffer any penalty, demotion or other adverse consequence, even if it results in loss of business.

Money laundering is a crime and WWOFF strictly prohibits any efforts to conceal illegally gained funds or otherwise make illegal funds look legitimate. Notify our Chief Financial Officer or WWOFF Ethics and Compliance hotline if you are asked to participate in money laundering or if you notice warning signs such as overpayments accompanied by a request for a refund to a different account or payment by someone who is not a party to the contract. For additional information, review the Money Laundering section of our Anti-Corruption Policy.

Anti-corruption laws often do not differentiate between acts made by a company or someone acting on the company's behalf. For that reason, we must be certain that we only deal with third parties that apply the same high standards of ethical business conduct as we do. When working with third parties be sure to complete all required due diligence and take reasonable steps to monitor third-party conduct. Report any possible misconduct to your manager or WWOFF Ethics and Compliance.

Remember, anti-corruption laws are especially strict with regard to interactions with government officials. These include:

- State or local government employees
- Candidates running for political office
- Employees of businesses owned by a government
- Customers, suppliers or anyone working on behalf of the government and
- In some instances, royalty or tribal leaders who may hold dual roles in commercial and government settings.

Also, we may never permit a third party to make any improper payment on our behalf.

IMPORTS AND EXPORTS

It is vital to our business that we follow all applicable import and export regulations that apply to our work. Keep in mind that an “export” can mean not only the goods we distribute, but also technology and certain information we supply across national borders, or to citizens of other countries. An “import” occurs when we purchase goods from one country to bring these goods into another country. Both import and export activities generally require the filing of certain documentation and payment of taxes and fees. To retain our Company’s ability to do business around the world, we must closely follow all trade regulations that apply to us. The rules regarding imports, exports and re-exports can be complicated, so be sure to involve WWOOF’s Customs Compliance professionals or legal team while engaging in international trading activity.

INTERNATIONAL TRADE COMPLIANCE

Some countries where WWOOF conducts business impose sanctions or adhere to sanctions imposed by multi-national organizations, such as the United Nations or the European Union. These sanctions restrict or prohibit dealings with certain countries or individuals. Because WWOOF is a U.S. corporation, we must adhere to the economic sanctions administered by the U.S. Office of Foreign Assets Control (OFAC). These include, but are not limited to, restrictions on financial transactions, travel, and imports and exports. If you handle international business, it is your duty to understand and follow the most current regulations.

WWOF must comply with U.S. anti-boycott laws. These laws impose penalties for refusing to do business with a country, company or person that is “friendly” to the U.S. based on the request of another. This practice is known as “unsanctioned boycotting,” and WWOOF must promptly report any request to support or participate in a boycott to the U.S. government. Boycott activity is not always obvious and may include:

- Bid invitations that require us to provide information about our past, present or prospective relationships with other countries
- Letters of credit that contain boycott terms and conditions such as “goods of Country X not permitted” or
- Meetings during which we are questioned about who we would or would not do business with.

Contact the Law Department if you believe you are being asked to participate in an unsanctioned boycott.

OUR COMMUNITIES

WE STRIVE TO MAKE OUR COMMUNITIES BETTER.

SUSTAINABILITY AND RESPONSIBILITY

WWOF is aware of the impact our industry has on people and the environment—from the production of raw materials like cotton to the manufacturing of finished goods. While we comply with all environmental laws, we follow strict standards for the well-being of our associates and the communities in which we operate.

WWOF'S RESPONSIBLE SOURCING PROGRAM

At WWOF, we have adopted Global Compliance Principles to govern all facilities that produce goods for our Company. These principles reflect our commitment to individual rights throughout our operations, including the right to work freely, bargain collectively and be compensated fairly.

WWOF follows applicable labor laws in place wherever we operate, and does not permit the use of forced or involuntary labor in any of our operations or the operations of facilities that produce goods for WWOF. We do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union.

LOCAL COMMUNITY RELATIONS AND VOLUNTEERISM

WWOF believes that each of us has a responsibility to help improve the well-being of our communities. Our brands proactively organize events and activities through which they invest in local community interests and needs. We believe volunteering can be transformational for our associates as well as beneficial to the community. WWOF associates volunteer their time and contribute financial support to local programs we care deeply about. If you would like more information about volunteering in your community, contact your local Human Resources.

A FINAL WORD

EACH OF US HAS A STAKE

in following our Code and enforcing its principles. These principles provide guidance on how we interact with our colleagues, our company, our marketplace and our communities every day. Our Code cannot cover every situation, and you may encounter ethical questions without clear answers. If that happens, there is help available to you from several sources. See our Resources section.

You should be confident that when you report a suspected violation of the Code, your concerns will be fully investigated in a timely manner. The following point cannot be stressed too often: WWOOF will not tolerate retaliation against anyone who makes a good-faith report of a suspected Code violation.

ASSOCIATE RESOURCES

YOUR MANAGER

In most cases, your manager will be in the best position to help you with questions or concerns since he or she understands your position and responsibilities. If you prefer not to speak with your manager, you can speak with another manager you trust.

HUMAN RESOURCES

Human Resources can help resolve concerns or point you in the right direction.

CONTROLLER OR CFO

If you have a concern about accounting, internal controls, or auditing matters, you can bring the issue to our Controller or CFO.

TO CONTACT THE HELPLINE

In the U.S.: **1-844-985-4091**

In other countries, visit ethics.WWOOF.com to find a list of phone numbers by country or to make a report online.



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