

LEVI STRAUSS & CO.

SUPPLIER CODE OF CONDUCT

EFFECTIVE MAY 2022

Introduction

Levi Strauss & Co. (LS&CO.) is committed to the highest levels of responsible business practices. The LS&CO. Supplier Code of Conduct (“CoC”) outlines our requirements for fair, safe and healthy working conditions and environmental responsibility throughout the tiers of our supply chain. The Supplier Code of Conduct applies to all LS&CO. sourcing and procurement, including all suppliers of goods or services, including every factory, subcontractor, licensee, agent, or affiliate that manufactures or finishes products for LS&CO or from whom LS&Co. procures goods and services for its own use (collectively referred to as “Suppliers”). Suppliers must operate in accordance with our CoC, and in full compliance with all applicable laws and regulations, opting for whichever standard is higher should the requirements differ.

Since becoming the first multinational to establish sourcing guidelines in 1991, we have evolved our guidance documents in line with international best practice to help protect, respect and improve the lives of workers manufacturing our products, make responsible sourcing decisions and protect our commercial interests. Our CoC is based on the International Bill of Human Rights, International Labor Organization (ILO) standards, and take reference from the OECD Due Diligence Guidance for Responsible Supply Chain in the Garment and Footwear sectors.

The Supplier Code of Conduct is to be applied with our legal contractual agreements. It is a cornerstone of our sourcing strategy and of our business relationships with all our Suppliers worldwide. It assists us in making practical and principled business decisions as we balance the potential risks and opportunities, we have identified for conducting business in specific countries.

LS&CO. seeks to work with Suppliers who are actively pursuing a course of continual improvement for their environmental and social impacts in line with the CoC and internationally recognised good labor practices. Our goal is to achieve positive results and effect change by working with Suppliers to find long-term solutions that will benefit the individuals who make our products and will improve the quality of life in local communities.

We expect all Suppliers to evidence improvements when found to fall short of any of our standards. LS&CO. is committed to supporting our Suppliers’ understanding of best environmental and labor practices, at the same time, we aim to avoid contributing to any scenario, including through our purchasing practices, that could strain our Suppliers’ ability to comply with our CoC.

Our full suite of Sustainability Policies and Guidelines are available on our [website](#).

Supplier Code of Conduct



Compliance with Laws and the Code of Conduct

All Suppliers including direct and indirect suppliers, subcontractors, licensees, agents, or affiliates that we engage through responsible sourcing or procurement channels shall comply with all applicable legal and regulatory requirements and our CoC while conducting business with or on behalf of LS&CO. Suppliers shall require any business partner that manufactures or finishes product for LS&CO to acknowledge and apply the CoC in their operations and in their value chain.

In the event that the standards of local or national laws or regulations differ with the CoC, Suppliers shall adhere to whichever standard is higher.

CORRECTIVE ACTION

This document shall apply to all suppliers of direct and indirect products and services to LS&Co. In some cases, such as for finished product suppliers or suppliers that provide products that contain certain minerals or metals, additional requirements such as the LS&Co. Supplier Compliance Program, Sourcing Guidelines, or Responsible Minerals Sourcing Policy will also apply.

In the event that LS&CO. a Supplier is found to be non-compliant with our CoC, we require that the Supplier implement a corrective action plan (CAP) within a specified time period. Suppliers must evidence improvement in accordance with the CAP to maintain the business relationship. LS&CO. reserves the right to terminate contractual agreements with suppliers that do not evidence improvement or that are found to have persistent non-conformances.



Governance Guidelines

ETHICAL STANDARDS

We seek to partner with Suppliers who aspire as individuals and in the conduct of all their businesses to a set of ethical standards not incompatible with our own. We respect the internationally recognized human rights of our employees and individuals in the supply chain involved in or affected by the manufacturing and production of LS&CO. products.

BRIBERY AND CORRUPTION

Suppliers must comply with all applicable anti-corruption and anti-money laundering laws including the US Foreign Corrupt Practices Act (FCPA), the Canadian Corruption of Foreign Public Officials Act, and the UK Bribery Act, as well as laws governing lobbying and political campaign contributions in the locations where they operate. Suppliers shall prohibit all forms of bribery, corruption, extortion, and embezzlement in their own operations and in their business relationships.

FAIR COMPETITION

Suppliers must compete fairly and comply with applicable competition and anti-trust laws. Suppliers are expected not to enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position.

TRANSPARENCY AND DISCLOSURE OF INFORMATION

Suppliers shall be transparent about their business activities and keep accurate records that represent these activities including on labor, health and safety, and environment. Suppliers shall disclose this information when required by LS&CO., third parties acting on our behalf and as required by law.

DATA PROTECTION

LS&Co. requires its Suppliers to protect the personal information of individuals including LS&Co. consumers, customers and employees. Suppliers must also protect LS&Co. confidential information, and are expected to establish and maintain reasonable technical, logical and physical controls to protect all information which is processed as part of the Services.

Suppliers shall maintain compliance with data privacy, cybersecurity and similar laws applicable to Supplier's operations and shall only process confidential and personal information as instructed by LS&Co.

Suppliers should recognize that unauthorized access to, loss or disclosure of, LS&Co. confidential, proprietary or personal information could have adverse impacts on LS&Co. and individuals. Accordingly, Supplier is expected to promptly inform LS&Co. of any such event, and reasonably partner with LS&Co. to address and mitigate any resulting risks or impacts.

Suppliers must recognize their obligation to safeguard LS&Co. confidential data is ongoing and continues to apply for so long as Supplier has access to any part of the information.

RESPONSIBLE SOURCING

LS&CO. and our Suppliers shall conduct due diligence on our supply chains to identify, prevent and mitigate potential labor and human rights, health and safety, environmental, business ethics, and legal compliance risks. Suppliers shall have a sourcing policy and management systems in place to manage these risks and shall be transparent with LS&CO. regarding the source of inputs to the manufacturing and production of LS&CO. procured products. If applicable, Suppliers shall comply with LS&CO.'s

Responsible Minerals Sourcing Policy, which can be accessed [on our [website](#)].

TRACEABILITY

Suppliers shall be able to verify sourcing claims by their Suppliers from raw material sourcing point to the finished product level. Suppliers shall develop and maintain policies that align with these standards and communicate these to employees.

CAPACITY BUILDING, COMMUNICATION AND IMPLEMENTATION

The supplier shall have or shall implement a Code of Conduct that covers at a minimum, all points covered in this Code of Conduct. The Supplier's CoC shall be displayed in appropriate languages to be understood by employees, contractors and visitors of their facilities, including those from local communities and migrant workers.

Suppliers shall include the CoC in training programs for management and for existing and new employees to promote their implementation. LS&CO. seeks to work with Suppliers who develop and implement policies and management systems that align with the CoC, and we expect our Suppliers to establish processes to hold their own suppliers to account.

COMMUNITY INVOLVEMENT

Suppliers should be actively involved in improving the social and environmental conditions in the communities where they operate. We aim to build long-term partnerships with Suppliers who share our commitment to people and the environment.



Labor Guidelines

CHILD LABOR

Suppliers shall not employ workers less than 15 years of age, or younger than the age to be in compulsory education, whichever is higher. Suppliers shall not employ workers less than 18 years of age to conduct work that may negatively impact their health, safety or morals. LS&CO. supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

FORCED LABOR AND MODERN SLAVERY

Suppliers shall ensure all work conducted on behalf of LS&CO. is done so voluntarily, without human trafficking or any form of compulsory labor and particularly where vulnerable individuals such as migrant workers are employed. Forced labor including any form of slave, bonded, indentured, trafficked, prison labor or other forms of forced labor is prohibited in our own operations, in those of our Suppliers' and in contracting relationships with sub-suppliers. LS&CO. will not utilize or purchase materials from a Supplier found to be using forced labor. Suppliers must not directly or through third parties, require employees to pay recruitment fees.

DISCIPLINARY PRACTICES

Suppliers shall provide a workplace free from any form of harassment or abuse, mental or physical coercion, or sexual or gender-based violence. Suppliers shall not use any form of financial penalty as a disciplinary measure.

DISCRIMINATION

LS&CO. recognizes and respects cultural differences. We believe that workers should be employed on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs. Suppliers

shall treat all employees with respect and dignity regardless of age, caste, color, disability, gender, gender identity & expression, sexual orientation, health status (including HIV, hepatitis B), marital status, pregnancy status, parenthood, nationality, social, national or ethnic origin, migrant worker status, political opinion, race, religion, union affiliation or any other characteristic protected by national, state or local laws.

WORKING HOURS

LS&CO. permit flexibility in scheduling and identify local legal limits on work hours. Suppliers shall not exceed these legal limits except for compensated overtime at a premium or at least according to legal wage requirements. All overtime must be voluntary. Suppliers shall not impose punitive measures on employees that refuse to work overtime. LS&CO. favor partners whose combined regular and overtime work hours do not exceed sixty-hours in one week. LS&CO. shall not use contractors who, on a regular basis, require in excess of a sixty-hour week. Employees should be allowed at least one day off in seven.

WAGES AND BENEFITS

Suppliers shall provide wages and benefits that comply with any applicable law or contract and meet or exceed the prevailing local manufacturing or service provider practices, aiming to meet living wage standards in jurisdictions where they have been specified. Suppliers shall offer equal pay to all workers for work of equal value. Suppliers shall compensate employees for any overtime worked at the legal or contractual rate. Suppliers shall pay accurate wages in a timely manner.



Environmental Guidelines

ENVIRONMENTAL COMPLIANCE

Suppliers shall maintain a register and comply with all required environmental permits and regulations. Suppliers shall continuously endeavour to mitigate any adverse impacts on the local environment based on assessment of activities in the location of operation.

WASTE MANAGEMENT

Supplier shall have in place waste management policies and programs for use, storage and transportation solid waste including from materials and commodities, and hazardous waste to identify, measure, manage and reduce all forms of waste, and to ensure procedures are in place in the event of an emergency.

WATER USE AND WASTEWATER MANAGEMENT

Suppliers shall have in place water management policies and programs to measure and reduce freshwater consumption. Suppliers shall measure, manage and reduce effluents from facilities, meet all legal discharge requirements and work towards continually improving in line with industry best practice.

AIR AND GREENHOUSE GAS EMISSIONS MANAGEMENT

Suppliers shall have in place energy management policies and programs to reduce energy intensity and emissions production. Suppliers shall measure, manage and disclose greenhouse gas emissions and carbon footprint to LS&Co. and work towards continually improving in line with industry best practice. LS&CO. shall seek to work with suppliers whose carbon reduction emissions ambitions align with our own.

FREEDOM OF ASSOCIATION

LS&CO. respect workers' rights to form and join organizations of their choice and to bargain collectively. Suppliers shall respect the right to free association and the right to organize and bargain collectively without unlawful interference. Suppliers should ensure that workers who make such decisions or participate in such organizations are not the object of discrimination, harassment, or punitive disciplinary actions and that the representatives of such organizations have access to their members under conditions established either by local laws or mutual agreement between the employer and the worker organizations.

HEALTH AND SAFETY

Suppliers shall maintain a register of all required health and safety permits including business and operating permits, fire-safety and electrical certificates, permits for equipment such as boilers, generators, elevators, fuel and chemical storage tanks, etc. and building, emissions and waste-disposal. Suppliers shall provide workers with a safe and healthy work and living environment (where applicable) by proactively identifying health and safety risks and developing and maintaining policies and processes to prevent accident or injury, and to respond effectively in the event of an emergency.

EMPLOYEE WELL-BEING

LS&CO. recognizes that employee well-being enables individuals to function at or near their optimal level physically, mentally, emotionally, and socially. We seek to work with suppliers that provide workplaces that enable clear and constructive employee-manager communication, and whose workplace environments, policies and processes are conducive to helping employees feel healthy, satisfied, and engaged.

CHEMICAL MANAGEMENT

LS&CO. supports the goal of eliminating the industrial releases of hazardous chemicals into the environment. Where relevant, Suppliers shall have appropriate management systems in place for hazardous chemicals and shall be continually phasing out the use of these chemicals. Suppliers shall comply with the terms of the LS&CO. Restricted Substances List (RSL) and Manufacturing Restricted Substances List (MRSL) as a condition of business. Suppliers shall also have in place mechanisms for disclosure and transparency about the chemicals used in the manufacturing and production of LS&CO. goods.

CIRCULARITY AND CLOSED LOOP PRODUCTION

LS&CO. is focused on developing and producing products that minimise impact on the environment including from chemical, material and component waste, water and energy consumption, and air emissions. We actively pursue suppliers that have in place processes that contribute to circular design, capture value from product inputs, and divert products from becoming waste at end of life. We encourage suppliers to invest in the best available technology of closed loop production and will form long term business relationships with those that do so.



Contact us

LS&CO.'s Supplier Code of Conduct is designed to help us work with our Suppliers to improve the production methods in manufacturing facilities and the standards of living for the individuals and communities along our value chain. We would like to know if Suppliers are not complying with any aspect of them. Please raise any issues by contacting LS&CO via EthicsPoint – Levi Strauss & Co. (<https://secure.ethicspoint.com/domain/media/en/gui/48291/index.html>) or by emailing ethicscompliance@levi.com

