



LEVI STRAUSS & CO.

SUPPLIER CODE OF CONDUCT

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MANUFACTURING SUPPLIERS

This tag marks the requirements that apply only to Vendors, factories, subcontractors, licensees, agents or affiliates that manufacture or finish products for LS&Co.



SECTION 01

INTRODUCTION

What the Supplier Code of Conduct covers and how it applies

Our Commitment

Levi Strauss & Co. (“LS&Co.”) is committed to the highest levels of responsible business practices. The LS&Co. Supplier Code of Conduct (“SCoC”) outlines our requirements for fair, safe and healthy working conditions and environmental responsibility throughout our business operations and supply chain.

Who This Code Applies To

The SCoC applies to all LS&Co. suppliers of goods or services (collectively referred to as “Suppliers”), including:

- Vendors, factories, subcontractors, licensees, agents or affiliates that manufacture or finish products for LS&Co. (“Manufacturing Suppliers”);
- Suppliers from whom LS&Co. procures goods and/or services for its own use, including but not limited to professional services firms, recruitment or marketing agencies, and logistics, facilities or security providers; and
- Other third parties who act for or on behalf of LS&Co.

How the Requirements Apply

Suppliers must operate in accordance with our SCoC. In the event that the standards of local or national laws or regulations differ from the SCoC, Suppliers shall adhere to whichever standard is higher.

Requirements addressed to “Suppliers” apply to all Suppliers, as relevant to the nature of the goods or services they provide. Requirements addressed to “Manufacturing Suppliers” apply only to them.

The Basis for Our Standards

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 SCoC is based on the International Bill of Human Rights and International Labor Organization (ILO) standards, and takes reference from the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

Working Together

The SCoC guides our relationships with Suppliers worldwide. We seek partners committed to continual improvement in their environmental and social practices, consistent with the SCoC and internationally recognized labor standards. Together, we aim to develop lasting solutions that benefit people involved in providing goods and services to LS&Co. and the communities affected by those activities. We also aim to ensure that our purchasing practices do not hinder our Suppliers’ ability to adhere to the SCoC.

Relationship to Our Contracts

The SCoC supplements, and does not replace, our contractual agreements with Suppliers; where the two conflict, the contract prevails.



SECTION 02

GOVERNANCE GUIDELINES

Our expectations for ethical, transparent and lawful business conduct

Ethical Standards

We seek to partner with Suppliers who hold themselves, and their business operations, to ethical standards compatible with our own. We respect the internationally recognized human rights of our employees and of individuals involved in or affected by the goods and services provided to LS&Co.

Bribery and Corruption

Suppliers must comply with all applicable anti-corruption and anti-money laundering laws, including the US Foreign Corrupt Practices Act (“FCPA”), 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, including facilitation payments or any gift, hospitality or other benefit intended, or that could reasonably be perceived, to improperly influence a business decision or gain an unfair advantage.

Trade Sanctions and Export Controls

Suppliers shall comply with all applicable trade sanctions, export control, customs and import/export laws in the jurisdictions in which they operate. Suppliers shall not engage in transactions that are prohibited under the trade control laws applicable to them or to LS&Co., and shall take reasonable steps to ensure that their own suppliers, subcontractors and business partners do the same.

Suppliers shall promptly inform LS&Co. if they become aware that they, or any party in their value chain, are or may become subject to trade sanctions or a related restriction relevant to the goods or services provided to LS&Co.

Conflicts of Interest

Suppliers shall avoid any actual, potential or perceived conflict of interest in their dealings with LS&Co. A conflict of interest arises in any situation where a Supplier's impartiality or objectivity may be — or may appear to be — compromised, including where a personal, family or financial relationship could influence, or appear to influence, business decisions involving LS&Co. Suppliers shall promptly disclose any such conflict to LS&Co. so that it can be appropriately managed.

Fair Competition

Suppliers must compete fairly and comply with applicable competition and anti-trust laws. Suppliers shall not 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 provided to LS&Co.

Suppliers shall maintain compliance with data privacy, cybersecurity and similar laws applicable to their 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, Suppliers are 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 that their obligation to safeguard LS&Co. confidential data is ongoing and continues to apply for so long as Suppliers have access to any part of the information.

Responsible Sourcing and Traceability

MANUFACTURING SUPPLIERS

Manufacturing Suppliers and LS&Co. shall conduct due diligence on their supply chains to identify, prevent and mitigate labor and human rights, health and safety, environmental, business ethics, and legal compliance risks. Manufacturing Suppliers shall have a sourcing policy and management systems in place to manage these risks, shall be transparent with LS&Co. regarding the source of inputs to the products they manufacture or finish for LS&Co., and shall not subcontract any part of the production of LS&Co. products without LS&Co.'s prior written approval.

Manufacturing Suppliers shall also be able to verify sourcing claims made by their own suppliers, from raw material sourcing point through to finished product, and shall without delay provide documentation on the source of materials and goods upon request. They shall develop and maintain policies that align with these standards and communicate them to their employees.

Corrective Action

MANUFACTURING SUPPLIERS

Manufacturing Suppliers must comply with the LS&Co. Supplier Code of Conduct Implementation Guidebook, which sets out in detail the applicable standards and assessment methodology and is available on our website.

Where a Manufacturing Supplier is found to be non-compliant, we require the Manufacturing Supplier to implement a corrective action plan (CAP) within a specified time period and to evidence improvement in accordance with that CAP in order to maintain the business relationship. LS&Co. reserves the right to terminate contractual agreements with any Manufacturing Supplier that does not evidence improvement or that is found to have persistent non-conformances.

Engagement and
Community Involvement

Suppliers are expected to identify, assess, and address social and environmental risks and impacts associated with their operations and to maintain practices that support human rights, worker well-being, environmental stewardship, and constructive engagement with local communities. LS&Co. seeks long-term partnerships with Suppliers that demonstrate transparency, accountability, and continuous improvement through measurable actions and outcomes.

Capacity Building,
Communication and
Implementation

MANUFACTURING SUPPLIERS

Suppliers shall have, or shall implement, a Code of Conduct that imposes standards no less stringent than those set out in the LS&Co. SCoC. Suppliers are expected to establish processes to hold their own suppliers to account for applicable standards.

Manufacturing Suppliers shall also display their Code of Conduct in appropriate languages so that it can be understood by employees, contractors and visitors to their facilities, including those from local communities and migrant workers, and shall include it in training programs for management and for existing and new employees.



SECTION 03

LABOR GUIDELINES

Protecting the rights, safety and dignity of workers

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 any person under the age of 18 in hazardous work or in work that is prohibited by applicable law due to risks to health, safety, or morals. LS&Co. supports the development of legitimate workplace apprenticeship programs for the educational benefit of younger people.

Suppliers shall comply with all applicable legal requirements relating to the employment of young workers, including minimum age, age-verification, working hours and hazardous work restrictions. Where the SCoC and applicable law differ, the higher standard applies.

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, 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 treat all workers with dignity and respect, and shall take effective measures to prevent, address and remediate harassment, abuse, mental or physical coercion, and sexual or gender-based violence in the workplace.

Disciplinary measures shall be lawful, fair, proportionate and documented. Suppliers shall not use wage deductions, fines or other financial penalties as a disciplinary measure, except where such measures are expressly permitted by applicable law and applied in a fair, transparent and non-coercive manner.

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 and 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.

Non-Retaliation and Grievance Mechanisms

Suppliers shall maintain accessible and confidential grievance mechanisms enabling workers to raise concerns or report suspected misconduct without fear of retaliation. Suppliers shall prohibit any form of retaliation, threat or adverse action against any person who, in good faith, reports a concern, raises a grievance or participates in an investigation.

Suppliers shall promptly and impartially investigate reports received, maintain documentation of the investigation and any corrective action, and escalate to LS&Co. any concern relating to LS&Co., its employees or the SCoC.

Working Hours

LS&Co. permits flexibility in scheduling and adheres to 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, and Suppliers shall not impose punitive measures on employees that refuse to work overtime.

LS&Co. favors partners whose combined regular and overtime work hours do not exceed sixty hours in one week, and 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. All working conditions must at minimum comply with all applicable local labor laws.

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, meeting living wage standards in jurisdictions where they have been specified. Suppliers shall offer equal pay to all workers for work of equal value, shall compensate employees for any overtime worked at the legal or contractual rate, and shall pay accurate wages in a timely manner.

Freedom of Association

LS&Co. respects 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 applicable health and safety permits including relevant business and operating permits, fire-safety and electrical certificates, permits for equipment such as boilers, generators, elevators, fuel and chemical storage tanks, along with building, emissions and waste-disposal permits.

Suppliers shall provide workers with a safe and healthy work and — where applicable — living environment 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. This includes identifying and addressing occupational health risks arising from extreme temperatures and other changing climate conditions affecting the workplace.

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. Suppliers are encouraged to consider how initiatives may affect workers and local communities and, where appropriate, incorporate measures to support positive outcomes.

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.



SECTION 04

ENVIRONMENTAL GUIDELINES

Minimizing environmental impact and advancing responsible resource use

Environmental Compliance

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

Waste Management

MANUFACTURING SUPPLIERS

Manufacturing Suppliers shall have in place waste management policies and programs for the reduction, use, storage, transportation and responsible disposal of solid waste, including from materials and commodities, and hazardous waste. Policies and programs should identify, measure, manage and reduce all forms of waste, and ensure procedures are in place in the event of an emergency.

Water Use and Wastewater Management

MANUFACTURING SUPPLIERS

Manufacturing Suppliers shall have in place water management policies and programs to measure and reduce freshwater consumption and reuse and recycle water. Manufacturing Suppliers shall measure, manage and reduce effluents from facilities, meet all legal discharge requirements and work towards continually improving water stewardship and Water, Sanitation and Hygiene (WASH) practices in line with industry best practice.

Air and Greenhouse Gas Emissions Management

Suppliers are expected to have in place energy management policies and programs to reduce absolute energy and energy intensity from the production of goods and services. Suppliers are expected to measure, manage and, when requested, disclose greenhouse gas emissions and carbon footprints in alignment with the Greenhouse Gas Protocol. LS&Co. seeks to work with Suppliers whose carbon emissions reduction ambitions and progress align with our own.

Chemical Management

MANUFACTURING SUPPLIERS

LS&Co. supports the goal of eliminating the industrial releases of hazardous chemicals into the environment. Where relevant, Manufacturing Suppliers shall have appropriate management systems in place for hazardous chemicals and shall be continually phasing out the use of these chemicals.

Manufacturing Suppliers shall also have in place mechanisms for disclosure and transparency about the chemicals used in the manufacturing and production of LS&Co. goods and adhere to Zero Discharge of Hazardous Chemicals (ZDHC) guidelines.

Circularity and Closed Loop Production

MANUFACTURING SUPPLIERS

LS&Co. is focused on developing and producing products that minimize impact on the environment, including from chemical, material and component waste, water and energy consumption, and air emissions.

We actively pursue Manufacturing 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 Manufacturing Suppliers to invest in the best available technology of closed loop production and will form long-term business relationships with those that do so.

Additional Requirements for Manufacturing Suppliers

MANUFACTURING SUPPLIERS

Manufacturing Suppliers shall also comply with applicable LS&Co. sustainability and sourcing policies, as updated from time to time and available on our website.

CONTACT US

How to raise concerns – confidentially and without fear of retaliation

We encourage anyone who becomes aware of a potential violation of the SCoC to report it through LS&Co.'s EthicsPoint reporting channel, or by emailing ethicscomplianceteam@levi.com.

Reports may be made confidentially. LS&Co. prohibits retaliation of any kind against anyone who raises a concern in good faith.

