



GLOBAL STANDARDS FOR SUPPLIERS

**HANES** Brands Inc

# Global Standards For Suppliers Guidelines

EXCELLENCE EVERY DAY



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## Introduction

Hanesbrands Inc. (HBI) believes in doing business with those suppliers, manufacturers, contractors, joint venture partners, agents, distributors, and consultants (referred to in these guidelines as Suppliers) who embrace and demonstrate high standards of ethical business behavior.

Our Global Standards for Suppliers (GSS) require our Suppliers to conduct themselves with honesty and integrity and to comply with all laws and regulations that govern their activities. When differences arise between our standards and the law, Suppliers must apply the highest standard.

## Scope

The GSS program applies to any facility involved in the production of products, components and materials containing any intellectual property owned by HBI anywhere in the world, including licensed products.

# 01 General Requirements

All facilities **MUST** undergo a GSS assessment **BEFORE** production begins and yearly thereafter while engaged in business with HBI.

This applies to:

- All finished goods contractors and sub-contractors
- All licensee facilities
- All facilities in which HBI or licensed trademarks are applied to products
- All HBI owned facilities



## Vendor and Facilities Registration

Global Vendor Management System (GVMS)

The GVMS is a repository for HBI Supplier information, as well as an interactive database accessible via the internet for Suppliers and HBI associates.

*All HBI Suppliers are required to be registered in the GVMS Database.*

It is the Supplier's responsibility to keep its information updated and accurate. A SEMI-ANNUAL UPDATE OF THE GVMS INFORMATION IS MANDATORY.



## GSS compliance fees

An annual fee of \$2,000.00 per facility will be deducted from Suppliers' invoices (for direct Suppliers) and HBI will be responsible for scheduling all initial, annual and follow-up assessment visits.

# 02 Global Standards for Suppliers

## Code of Conduct



### Employment Practices

Hanesbrands has a strong commitment to treating employees fairly and with dignity and respect. We believe in doing business with Suppliers who share this commitment. We require Suppliers to comply with all applicable laws and regulations and to support fundamental human rights for all people.



### Child Labor

Suppliers will not employ individuals in violation of the local mandatory school age or under the legal employment age in the country where they operate. Moreover, in no case will Suppliers employ workers under age 15, except for child actors and models employed in advertising or media who are protected by applicable child labor requirements.



### Compensation

Suppliers will comply with applicable compensation laws and regulations, including those relating to minimum wages, overtime premiums, allowances and benefits. Suppliers shall pay at least the legally required compensation or the prevailing industry compensation, whichever is higher.

Hanesbrands recognizes that everyone who works has the right to fair compensation. Hanesbrands further recognizes that total compensation (wages, plus bonuses and in-kind benefits, excluding overtime) should enable workers to meet basic needs and have some discretionary income. We encourage suppliers to provide such level of fair compensation. Where this goal is not met, suppliers shall work with us to take appropriate actions that seek to progressively realize a level of compensation that does.



### Nondiscrimination

Suppliers will not discriminate in hiring, compensation, advancement, discipline, termination or retirement, based on a person's race, color, gender, national origin (or ethnicity), age, religion, disability, sexual orientation, gender identity, veteran status, marital status and any other protected characteristics or beliefs. Hanesbrands will favor those Suppliers who provide equal opportunity to all.



### Forced Labor Practices

Suppliers will not use forced or involuntary labor whether bonded, prison or indentured, including debt servitude.







## Freedom of Association and Collective Bargaining

Suppliers will recognize and respect the right of employees to exercise their right of freedom association. Similarly, Suppliers will recognize and respect the rights of their employees to choose or not choose collective bargaining.



## Safety and Health

Suppliers will operate a safe and healthy work environment for their employees. Suppliers must be committed to eliminating unsafe acts and conditions, thereby preventing harm to their workers, customers and the general public



## Workplace Harassment or Abuse

Suppliers will not subject employees to physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.



## Working Hours

Suppliers will comply with all applicable laws and regulations regarding working hours. Other than in exceptional circumstances, workers must not work over the legal limits or over 48 regular hours plus 12 overtime hours per week whichever, is lower.

Suppliers must allow workers at least 24 consecutive hours of rest following 6 consecutive working days.

Overtime shall not be requested on a regular basis and is voluntary.



## Environment

Hanesbrands believes in doing business with Suppliers who share the company's commitment to protecting the quality of the environment around the world through sound environmental management.

Suppliers will comply with all applicable environmental laws and regulations and will promptly develop and implement plans or programs to correct any non-compliant practices.

Suppliers shall seek to reduce waste and adopt responsible measures to minimize and mitigate the environmental impact of their operations.



## Accuracy of Business Records

Suppliers will record and report information accurately and honestly. Suppliers will not hide, fail to record, or make false entries. All financial books, records and accounts must accurately reflect transactions, payments and events, and conform both to generally accepted accounting principles and good internal controls. Similarly, all operational records must be accurate, filed in a timely fashion and conform to Hanesbrands' operating requirements.



## Anti-corruption

Hanesbrands strictly abides by all applicable laws regarding anti-corruption, including local country laws, the Foreign Corrupt Practices Act, and U.K. Bribery Act, and requires Suppliers to do the same.

Suppliers will not pay bribes or engage in corrupt practices in order to advance Hanesbrands' business interests. This includes, directly or indirectly, offering, promising to pay or authorizing the payment of money or anything of value to local government officials, political parties, candidates for political office or private individuals for the purpose of influencing the acts or decisions of government officials or other individuals.



## Confidential Information

Suppliers will safeguard Hanesbrands' confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas, such as on planes, in elevators and on mobile phones.

Confidential information includes facts, data and knowledge that are not generally disclosed and provide Hanesbrands a competitive advantage such as trade secrets, sales and profit figures, new product or marketing plans, research and development ideas or information, manufacturing processes, personnel information, and information about potential acquisitions, divestitures and investments. The obligation to preserve Hanesbrands' confidential information is ongoing, even after the business relationship ends.

Hanesbrands will appropriately respect and safeguard the confidential information of our Suppliers.



## Fair Competition and Antitrust

Hanesbrands believes in free and open competition and fully complies with antitrust laws in the United States, competition laws of the European Union, and similar laws in the many other countries where Hanesbrands conducts business. Suppliers will comply with all applicable laws and regulations regarding fair competition and antitrust.



## Conflicts of Interest

Hanesbrands expects business decisions to be made in the best interest of the company. Any situation that creates or appears to create a conflict between personal interests and the interests of Hanesbrands must be avoided.

A conflict of interest may arise when doing business with an organization that employs or is partially or fully owned by a Hanesbrands associate or an associate's family members or close personal friends.

Suppliers must disclose actual or potential conflicts of interest to Hanesbrands' management.





## Gifts, Favors and Entertainment

Gifts, favors and entertainment are not needed in order to conduct business with Hanesbrands and may lead or appear to lead to a conflict of interest. Suppliers should be aware of and respect these guidelines.

In many industries and countries, gifts and entertainment are used to strengthen business relationships. Throughout the world, one principle is common and clear: no gift, favor or entertainment should be provided or accepted if it will obligate or appear to obligate the recipient. Gifts or entertainment may be provided if they are reasonable complements to business relationships, or of modest value, and, in any event, not against the law or the policies of Hanesbrands.

**The following situations are always inappropriate and are expressly prohibited:**

Hanesbrands associates requesting or soliciting personal gifts, favors, entertainment, or services.

Hanesbrands associatess exploiting their position to solicit vendors, including financial institutions, to provide individual preferential treatment in pricing, terms or loans. Bribes or Kickbacks.

The giving or receiving of cash or cash equivalents (i.e., gift cards).

Lavish or excessive gifts and entertainment.

Entertainment at clubs or organizations that discriminate on the basis of race, color, gender, national origin, religion, or sexual orientation.

Entertainment that places the Hanesbrands associate or the business associate at a risk of physical harm.



## Other Legal Requirements

Suppliers will comply with all applicable laws and regulations. In these Standards, “applicable laws and regulations” include, but are not limited to, local and national laws, rules and regulations, as well as applicable treaties.



## Monitoring and Compliance

Suppliers will notify Hanesbrands immediately if they become aware of any non-compliance of their company or of any of their Suppliers with these Standards. Suppliers will take immediate actions, as necessary, to remedy any non-compliance.

Suppliers understand that Hanesbrands engages in various monitoring activities to confirm compliance with these Standards, including, but not limited to, conducting its own or independent third-party site inspections and assessments of Suppliers on an unannounced basis.

**Please get a copy of the GSS in your local language:**  
<https://hbisustains.com/global-standards-for-suppliers/>



# 03 GSS Assessment Process

All HBI Suppliers shall permit HBI to periodically conduct assessments, on an unannounced basis, to verify compliance with applicable laws and the HBI Global Standards for Suppliers and to promote continuous improvement.

Suppliers must fully cooperate with HBI's designated representatives to successfully complete all activities related to the assessment process.

Included in these guidelines is an overview of what to expect during the assessment and remediation process, as well as other requirements and expectations.



## Goal

The implementation of a sustainable system to assess, monitor and measure the overall effectiveness of our Global Standards for Suppliers (GSS).

### We want to:

- Measure workplace adherence to the GSS:
  - All workers are treated with respect from hire to separation,
  - Suppliers provide a safe and healthy workplace, and
  - Suppliers are committed to environmental sustainability.

- Certify transparency and ethical conduct.
- Evaluate effectiveness of controls.
- Effectively and efficiently gather the data needed to drive continuous improvement.
- Support the development of sustainable programs to attain world class manufacturing.



## Expectations

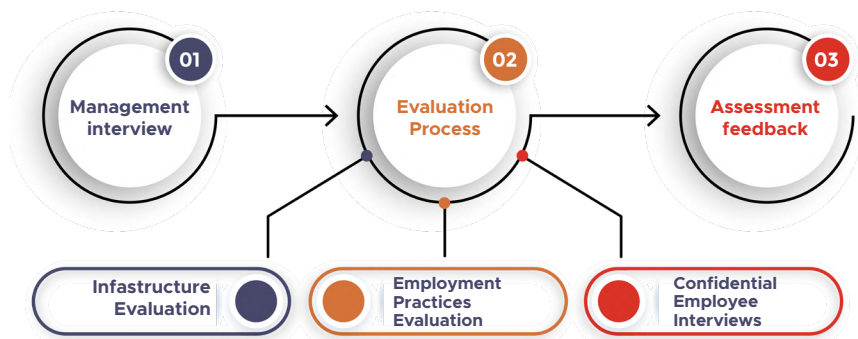
- **Allow HBI representatives or its designated monitoring firm** to interview factory management, confidentially interview workers, and review policies, procedures, payroll, employment documents, manufacturing reports, training records and other pertinent documents.
- **Allow HBI or its designated monitoring firm**, access to all buildings, including but not limited to manufacturing areas, warehouses, dormitories, offices, canteens, and social areas.
- **Ensure there is always a Supplier representative available** at the factory to provide the auditor access to all areas and documents requested for review.
- **Keep all wage records** as long as relevant law requires or 12 months, whichever is longer.
- **Maintain and make available** authentic and accurate payroll, attendance, and personnel records for every worker.
- **DO NOT** intimidate or coach workers on how to respond to a monitor's questions.
- **DO NOT** offer HBI personnel or any monitoring firm representing HBI any money or gifts of any kind. This is considered a Zero Tolerance Violation. Likewise, if approached by HBI personnel or a monitoring firm representing HBI requesting an inappropriate payment, please report immediately to HBI's global compliance department. Please see the contact information section in these guidelines in section 15.





## Assessment Workflow

The following is a summary of what to expect during the GSS assessment process.



## Management Interview

**Objective:** To obtain the basic information of the facility and employee profiles before the detailed on-site assessment is performed.

- Invite key managers, employee representatives, and other relevant personnel to the assessment opening meeting and management interview.
- The following will be explained:
  - The objective of the assessment.
  - The role of the monitor(s).
  - The assessment workflow agenda for each day.
  - HBI GSS requirements.
  - HBI's anti-bribery policy.
  - The scoring system to be used.
- Provide subcontractor information, if any.



## Evaluation Process

### ● Infrastructure assessment

#### Objective

To verify that the manufacturing site is in full compliance with health & safety, environmental, and security laws and regulations and GSS requirements.

#### Areas covered

- All factory buildings (manufacturing, warehouses, offices, shipping/receiving areas, etc.).
- Eating and social areas.
- Dormitories (where applicable).
- Complex perimeter and green areas.

#### Procedure

- Facility management shall provide facility layouts and lead the tour with auditors.
- Pictures will be taken as necessary.
- The factory must share requested information about dormitory and any remote buildings.
- During the tour, management must allow auditors to randomly select workers for the confidential interview process.

### ● Employment Practices Evaluation

#### Objective

To assess the Supplier's employment practices including a payroll analysis to verify data for compensation and working hours.

#### Procedure

- Review the production records and compare to payroll records.
- Review hiring process.
- Review employee records.
- Review employee age verification process and records.
- Review payroll records.
- Review working hours and overtime policies and procedures.
- Review employees' understanding of labor policies and procedures.
- Review forced labor policies and procedures.
- Review child labor policies and procedures.
- Review employees' understanding of compensation / deductions.
- Review employees' understanding of harassment / discrimination policies and procedures.
- Review capacity building and employee development program.
- Review retrenchment policy and process.

## ● Confidential Employee Interviews

### Objective

Employees are the front line of the Supplier's day-to-day activities. The objective of confidential employee interviews is to obtain first-hand, relevant information that will allow the auditor to evaluate the accuracy of the documentary information obtained, evaluate the assimilation of policies and procedures, and identify any potential gaps.

### Procedure

- Auditor(s) will interview all selected individuals confidentially in a private room.
- The auditor(s) is to randomly select those to be interviewed.
- Management must provide a private room for the interviews and must help coordinate the interviews.
- Management must not interfere and/or coach interviewees. Doing so is a Zero Tolerance Violation.
- Management must not retaliate against interviewed employees. Doing so is a Zero Tolerance Violation.



## Assessment Feedback

**Objective:** To provide the facility representatives a summary of the results of the assessment.

### Procedure

- Invite management, employee representatives, and other key personnel to the closing assessment feedback meeting.
- Auditors will summarize all best practices observed and non-compliance concerns.
- All matters obtained via employees will be discussed, but the auditor will not disclose the specific source.
- The Corrective/Preventive Actions Report (CPAR) will then be available online through the GVMS system.
- Auditors will differentiate non-compliance issues vs. those that represent continuous improvement opportunities.

# 04 Scoring

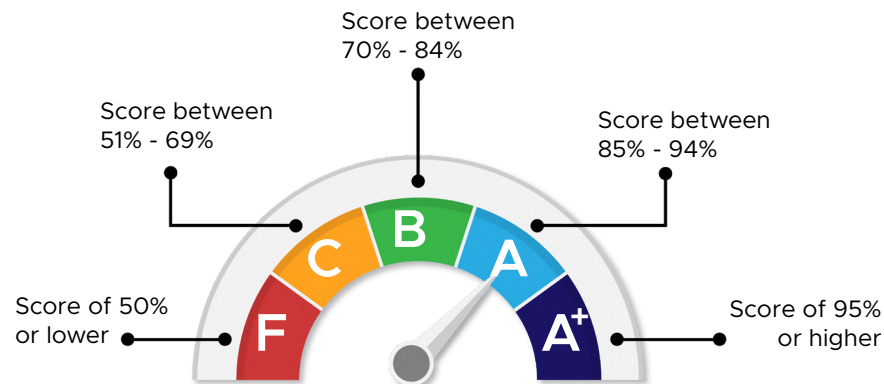
Each applicable question is scored based on the auditor's observations. If the factory does not meet HBI's requirements, points are deducted and HBI will request the factory to take appropriate corrective and preventive actions to remediate such non-compliances.



## Scores

Each of the questions in the assessment is individually scored. Scores are then rolled-up by section, and a final, overall score is calculated.

**There are 5 possible GSS compliance levels:**



**A+**

## Far Exceeds Expectations

A+ is defined as any Supplier with a final score equal to or above 95%.



Compliance Risk

A+ indicates that risks are being properly managed. The Supplier controls are at industry best practice level and in compliance with the GSS program requirements.



Deficiencies

None, A+ indicates there is a successful assimilation of the GSS program at all levels of the organization.



Remediation

HBI reserves the right to schedule a remediation assessment but will do so on a limited basis. Immediate attention to the CPAR is required.

**A**

## Exceeds Expectations

A is defined as any Supplier with a final score between 85% and 94%.



Compliance Risk

A indicates that risks are very well managed. The Supplier controls are clearly effective and aligned with the GSS program requirements.



Deficiencies

A indicates there is a comprehensive assimilation of the GSS program. Very few significant deficiencies are present, but there is still room for improvement in specific areas.



Remediation

A semi-announced (two week window) virtual remediation assessment will be scheduled based on the severity of the violation in the CPAR. Immediate attention to the CPAR is required.

**B**

## Meets Expectations

B is defined as any Supplier with a final score between 70% and 84%.



Compliance Risk

B indicates that key risks are adequately and properly managed. No significant breaches in the implementation of the GSS programs are present.



Deficiencies

B indicates that no GSS High Risk violations are present, there is an adequate assimilation of the GSS program but there is still room for improvement.



Remediation

An unannounced remediation assessment will be scheduled within 180 days. Immediate attention to the CPAR is required.

**C**

## Below Expectations

C is defined as any Supplier with final score between 51% and 69%.



Compliance Risk

C indicates that risks are not being effectively managed. Some breaches in the implementation of the GSS programs are present.



Deficiencies

C indicates that no GSS high risk violations are present but a significant number of GSS violations were found.



Remediation

An unannounced remediation assessment will be scheduled within 30 -120 days. Immediate corrective actions are required

**F**

## Unsatisfactory

F is defined as any Supplier with a final score equal to or below 50%.



Compliance Risk

F indicates that risks are not being managed. Significant breaches in the implementation of the GSS programs are present.



Deficiencies

F indicates one or more of the findings were classified as GSS High Risk and immediate corrective actions are required. Disapproval of the facility very likely.



Remediation

Any facility with a score equal to or below 50% will be placed on the GSS Facility Alarm report (FAR). For the applicable remediation process, please refer to the FAR section in these guidelines. Immediate corrective actions are required.



# 05 GSS High Risk Violations

Following is the list, by category, of high risk violations that could result in being removed from our approved Suppliers list.



## Zero Tolerance Violations (Immediate Disapproval)



Bribery / attempted bribery



Child labor (workers under the age of 15)



Unauthorized sub-contracting



Retaliation against workers that participate in the GSS assessment process



Prison Labor



Sourcing from prohibited countries/regions



## Critical Violations (30 day Remediation Process)



GSS assessment rejection



Evacuation routes not posted



Verbal harassment



No fire drills performed within the last 12 months



Sexual harassment



Combustibles stored in dormitory buildings



Physical abuse



Work performed at home



Child labor (workers 15 or above but below legal age)



Freedom of association violation



Forced labor



Retention of travel or identity documents



Payroll delayed on 2 or more consecutive payment periods



Locked emergency exit



Insufficient number of fire extinguishers



## Serious Violations (60-90 day Remediation Process)



Paying below the legal minimum wage



Insufficient number of emergency exits



Migrant workers paying recruitment fees



Dormitory buildings not separated from manufacturing and/or warehouse buildings



Recordkeeping transparency. Misleading or inconsistent recordkeeping (wages, benefits, production, time records, etc.)



# 06 Remediation Process

Once the report is finalized and approved by HBI, all non-compliances and their respective recommended remediation actions will be available on the GVMS system for the supplier to review and to take appropriate action.



## Addressing the non-compliances:

Once the remediation report is ready, Suppliers will receive a notification from the GVMS system via e-mail.

Suppliers must develop a realistic timeline for completion of corrective/preventive recommendations within 15 days of receiving the report.

*For those issues that may require extended periods of time to resolve, Suppliers must work with the HBI global compliance team to develop a plan for incremental improvement.*

Suppliers must include a root cause analysis as part of the remediation process.

Suppliers must implement all corrective/preventive measures by the designated due date.

It is recommended to include employee representatives, as appropriate, in the implementation of the remediation measures.

When remedial measures are completed, Suppliers must mark it as “completed” in the GVMS system and upload the relevant evidence.

*If Suppliers have any questions, inquiries or would like to challenge any open finding, contact the HBI CSR department directly. Please see the contact information section in these guidelines in section 15.*

### Notes:

- Failure to comply with HBI's recommendations may result in cancellation of current orders, prohibiting subsequent use of the factory, or total cessation of business.
- If zero tolerance issues are identified, HBI reserves the right to immediately cease all business with the factory
- If the same serious issue is repeatedly identified without evidence of appropriate corrective action, HBI reserves the right to cease business with the factory or take other appropriate remedial measures.





# 07 GSS Facility Alarm Report (FAR)



## Initial Assessment resulting in FAR

If a facility gets a score equal to or below 50% in its initial assessment, **it will be immediately disapproved.**



## Annual or Remediation Assessments resulting in FAR

If a facility gets a score equal to or below 50% on its annual or remediation assessment, **it will be automatically placed in the Facility Alarm report (FAR):**

**The system will generate a letter to:**

- The HBI sourcing responsible party
- The facility management
- The vendor/licensee, when applicable.

**The facility must address all violations:**

- For Zero Tolerance violations, the facility will be immediately disapproved and will be exited promptly.
- For Critical violations, the facility must remediate within 30 days of the assessment date.
- For Serious violations, the facility must remediate within 60-90 days of the assessment date. These violations typically need a remediation process that requires a longer implementation period.

*When violations have been properly remediated and marked as completed in the GVMS system, the Supplier will be subject to an unannounced remediation assessment.*

*If a factory that is on the FAR receives a remediation assessment that results in a score that is equal to or below 50%, the facility will be disapproved.*



# 08 Sourcing Restrictions



## PROHIBITED SOURCING COUNTRIES/REGIONS

Suppliers shall NOT apply for the GSS approval of facilities located in countries/regions included on the following list. This list is subject to change at any time.

## PROHIBITED SOURCING COUNTRIES/REGIONS



Cuba



Sudan



Iran



Syria



Jilin Province,  
China



North Korea

Any country/region prohibited by trade restriction programs enacted by the U.S. government, or by other relevant international laws.

*A violation to this provision constitutes a zero-tolerance violation and will result in immediate cessation of all business with HBI.*



## RESTRICTED SOURCING COUNTRIES/REGIONS

Before applying for GSS approval of facilities located in the following countries, Suppliers must get written authorization from the Director of Corporate Social Responsibility.

## RESTRICTED SOURCING COUNTRIES/REGIONS



Haiti



Myanmar



Pakistan



# 09 Supplier Disapproval

Failure to comply with HBI's recommendations may result in cancellation of current orders and prohibiting subsequent use of the facility for a minimum of one year from the disapproval date.

## On disapproval:

- HBI sourcing will immediately stop issuing new purchase orders.
- HBI sourcing will communicate the exit plan to the Supplier.
- The facility GSS status will be moved to disapproved in the Global Vendor Management System (GVMS), and the facility will remain disapproved for at least one year.



## Disapproved Supplier Reinstatement

### After one year, the facility may start a reinstatement process:

- Requires the re-activation approval from the Chief Procurement Officer
- Requires the approval of the Corporate CSR Director
- Requires a satisfactory unannounced GSS assessment

# 10 GSS Penalties



## Facility Alarm Report Remediation

The Supplier is responsible for the costs associated with all remediation assessments to verify compliance while the facility is on Facility Alarm Report (FAR).



Up to \$1,500.00



## GSS Assessment Rejection

As established in these guidelines, all GSS assessments are unannounced. When a Supplier rejects an assessment without an approved justification, the Supplier is responsible for the cost of the rejected assessment plus the cost of the re-assessment.



Up to \$4,000.00





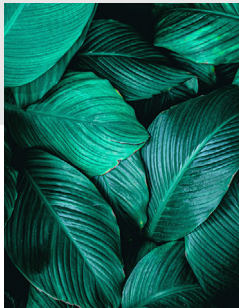
# 11 Sustainability

We're committed to doing our part to create a more comfortable world for every body and we expect our suppliers to work with us on this endeavor.

By acting responsibly, caring for our people and communities, and holding ourselves to the highest ethical standards, we're living up to our core principles and making a difference.

As a growing global enterprise with dozens of famous brands and a worldwide network of manufacturing facilities, we know we need to be taking bigger and bolder action to minimize our impact on the planet and help our people and communities thrive.

*We're building on a long track record of strong social and environmental practices across our operations and business. As we face what is sure to be a decisive decade for the world, we aim to take it to another level. We are ramping up our efforts to pursue ambitious goals that will improve the lives of **people**, protect the **planet**, and generate a world-class sustainable **product**.*



## HANES Brands S U S T A I N A B I L I T Y

Our 2025/2030 goals include the following:



### People:

Contribute to improving the lives of at least 10 million people through diversity and inclusion, workplace quality, health and wellness, education, and community-improvement philanthropy.



### Planet:

Setting science-based targets to cut greenhouse gas emissions, reducing water use, moving to 100% renewable electricity, and taking landfill waste to zero.



### Product:

Using 100% recycled/biodegradable polyester and sustainably sourced cotton, eliminating all single-use plastics, and reducing packaging weight by 25%.

To learn much more about our sustainability goals and efforts, visit [www.HBISustains.com](http://www.HBISustains.com)

# 12

## Global Anti-bribery Program



### Guidelines



**No HBI Supplier may make any payments (in cash or otherwise) to a foreign official** (which includes any employee of a foreign government, government-owned foreign entity, international agency, foreign political party, or candidate for foreign political office, or any person acting on behalf of any such person). No HBI Supplier may make a gift of any kind to any foreign official.

**WE DON'T BRIBE! PERIOD!**

*Suppliers must at all times comply with HBI's Gift & Entertainment policy. If you have any questions regarding a proposed payment or gift, contact one of the resources identified in section 15 immediately.*



No HBI Supplier may engage in any activity, domestic or foreign, which he or she knows or has reason to believe circumvents HBI's systems, procedures, and controls for (i) internal accounting, fund expenditure, and purchasing or (ii) the sale, barter, transfer, or disposition of assets. **No HBI employee or Supplier may make a payment of any kind and intentionally fail to make the correct payment entry into the company's accounting system.**



**No Supplier of HBI may place an order, enter into barter agreements, authorize or make payments** for supplies, materials, inventory items, facilities, hardware, software, professional or technical services, reimbursements, or any other item or service **without (i) utilizing a purchase requisition, contract, or other written authorization in accordance with applicable policies, or (ii) observing any other practice or procedure specifically required by HBI.**



**If an HBI Supplier is approached or asked to hide the identity of the other party to a transaction** or to participate in an illegal payment, an "off-the-books" payment, a payment in cash, or a payment to a third party or bank account outside the country, he or she **must refuse to take such action and must immediately report the incident directly to one of the resources identified in section 15.**



**HBI may not pay above-market fees, commissions, costs, or other expenses for goods or services in a foreign country without first consulting an HBI attorney**



**All HBI contracts and agreements establishing partnerships, joint ventures, or similar business arrangements** to do business in or with any foreign country, and any contracts and agreements by which HBI engages the services of any consultant, agent, or other representative to act on behalf of HBI in any foreign country **must contain language provided by an HBI attorney:**



- Requiring the other party to be aware of the prohibitions contained in the US and UK anti-bribery and anti-corruption laws and to abide by them and local anti-bribery and anti-corruption laws.
- Providing for the immediate termination of the relationship in the event of an improper payment that would violate the FCPA and for payment by the other party of any damages and expenses suffered by HBI as a result thereof
- Pursuant to which the other party represents and warrants that none of the other party's principals, staff, officers, or key employees is a governmental official, candidate of a political party, or other person who might assert illegal influence on HBI's behalf.
- Prohibiting assignment of the agreement by the other party without HBI's consent
- Prohibiting any payments for travel, entertainment, or other miscellaneous expenses under such contracts or agreements by the other party to foreign officials without the express consent of HBI
- Requiring the other party to periodically certify its compliance with the FCPA upon HBI's request.



**Any Supplier who has information leading the Supplier to believe that this Policy is being or may be violated must report that information to one of the resources identified in section 15.**

Every reasonable effort will be made to keep confidential the identity of Supplier reporting such information.

*Any reported activities that appear to be inconsistent with this Policy will be investigated appropriately. Appropriate measures (including disciplinary action) will be taken with respect to any violation. No Supplier reporting a violation of this Policy in good faith will be subject to disciplinary action based on such reporting.*

For more information please visit: <https://hbisustains.com/global-anti-bribery-program/>

# 13 Conflict Minerals

HBI is committed to sourcing materials from companies that share our values regarding human rights, ethics, and environmental responsibility.

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act") was approved by the U.S. Securities and Exchange Commission ("SEC").

## Conflict minerals include:

- Columbite-tantalite (coltan, i.e., tantalum)
- Cassiterite (i.e., tin)
- Wolframite (i.e., tungsten)
- Gold or their derivatives

The rule imposes reporting requirements on publicly traded companies like HBI to annually report on the presence of conflict minerals originating in the Democratic Republic of the Congo ("DRC") and adjoining countries ("Covered Countries") in the products they manufacture or contract to manufacture.

*HBI is committed to complying with the legislation and has implemented a comprehensive Conflict Minerals Compliance Program to meet our obligations.*



HBI is committed to avoiding the use of conflict minerals which directly or indirectly finance, or benefit armed groups in the DRC or adjoining countries.

**HBI Suppliers will be required to declare that all products supplied either:**

- Do not contain tantalum, tin, tungsten, or gold that are necessary to their production or functionality; or
- If they do contain these materials, they originate from non-conflict areas or from smelters that have been validated by an independent party to be conflict-free.

HBI will routinely evaluate its Supplier relationships to ensure continued compliance with this policy. We expect our Suppliers to pass these expectations on to their Suppliers. HBI values its Suppliers and appreciates their commitment to the goal of using conflict-free minerals.

For more information visit: <https://hbisustains.com/conflict-minerals/>

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## Product quality and safety

HBI has a fundamental responsibility to ensure that consumers can trust the safety and quality of our products. **Suppliers will provide services and/or products that meet or exceed all government and HBI quality and safety standards.** Any threats to product safety must be immediately reported to HBI.



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