



Carhartt's commitment to integrity, fairness, and respect for human rights is embedded in everything we do, from design and sourcing to manufacturing, marketing, and operations. The principles outlined in this Supplier Code of Conduct ("Code") guide our entire organization and reflect standards that go beyond the Global Social Responsibility program.

Carhartt's mission is **"We Serve and Protect All Hardworking People by Building Durable Products."** In alignment with this mission, Carhartt has developed this Code to define the minimum standards expected of all Suppliers.

Scope

This Code is grounded in internationally recognized labor and human rights standards, including the International Labour Organization's (ILO) Core Conventions and the Universal Declaration of Human Rights. While the Code sets baseline expectations, Carhartt seeks to work with suppliers who share our values and are committed to continuous improvement in both social and environmental practices. Additionally, within this Code incorporated by reference is the Global Social Responsibility Manual ("Manual").

All Suppliers are required to comply with Carhartt's Global Social Responsibility program including its mandatory policies outlined within the Manual and will be held accountable for failing to meet its requirements. Non-compliance with this Code may result in consequences including, but not limited to, the cancellation of current orders or termination of future business relationships with Carhartt.

Supplier Definition

The term "Supplier" is broadly defined to include all partners involved in producing, finishing, decorating, storing, or otherwise handling Carhartt products or materials. This includes finished-goods factories; sub-factories; laundries; printing and embroidery facilities; raw-material suppliers to Carhartt-owned and cut-make-trim (CMT) factories; co-branded production partners; off-site warehouses operated by suppliers; and any facilities performing rework or secondary processing.

A more detailed definition of Supplier, along with the process for approval and compliance enforcement, is provided in the Manual.

1. Compliance with Laws and Regulations – Suppliers must comply with all applicable laws ("Applicable Laws") and regulations in the countries where they operate, including those related to labor, social insurance/security, health and safety, and environmental protection. "Applicable Laws" means all laws, statutes, ordinances, regulations, rules, codes, orders, and requirements of any governmental authority having jurisdiction over Supplier, the subject matter of this Code, or the performance of the obligations hereunder, including but not limited to federal, state, and local laws, as well as any binding judicial or administrative interpretations thereof. Suppliers are also expected to fully cooperate with Carhartt in meeting legal obligations in the countries where Carhartt conducts business. In cases where local laws or standards differ from Carhartt's requirements, the stricter standard shall apply.

2. Employment Relationship – Suppliers must establish and maintain employment relationships that respect workers and comply, at a minimum, with all Applicable Laws including but not limited to national labor laws, international labor standards, and social security regulations. All terms and conditions of employment should promote fair treatment and protect workers' rights.

3. Prohibition of Forced Labor – Carhartt strictly prohibits the use of any form of involuntary or coerced labor. This includes bonded labor, debt servitude, forced prison labor, or any work performed under threat or penalty. All workers must enter employment voluntarily and have the freedom to leave their job with reasonable notice. Suppliers must not withhold personal documents, restrict freedom of movement, or charge workers fees related to recruitment or employment. These practices are incompatible with Carhartt's Code and are grounds for immediate corrective action. **(ILO Conventions 29, 105, 182)**

4. Prohibition of Child Labor – Carhartt is committed to protecting the rights and well-being of children and does not permit the use of child labor in any part of its supply chain. Suppliers must ensure that no one under the age of 15—or the legal minimum working age in the country of operation, whichever is higher—is employed. Additionally, anyone under the age of 18 must not be assigned tasks that are hazardous or that could interfere with their education, health, or personal development. Suppliers are expected to have systems in place to verify workers' ages and prevent underage employment. **(ILO Convention 138 and 182)**

5. Prohibition of Harassment or Abuse – Suppliers must ensure that all workers are treated with dignity and respect. No worker shall be subjected to physical, sexual, psychological, or verbal harassment, abuse, corporal punishment, or monetary fines.

6. Prohibition of Discrimination – Suppliers will employ, pay, promote, and terminate based on their ability to do the job, rather than based on personal characteristics or beliefs. Discrimination based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group, or ethnic origin is strictly prohibited. **(ILO Conventions 100 and 111)**

7. Freedom of Association & Collective Bargaining – Suppliers must recognize and respect the rights of workers to freely associate, join or form trade unions, and to engage in collective bargaining, in accordance with applicable laws. Workers must be able to exercise these rights without interference, intimidation, or retaliation. In the event of a labor strike, work stoppage, or other labor-related unrest at any factory producing Carhartt goods, the supplier is required to notify Carhartt within **48 hours**, in accordance with Carhartt's **Reporting Policy**. **(ILO Conventions 87, 98 and 135)**

8. Grievance Mechanism – Suppliers must establish and maintain accessible, confidential, effective grievance mechanisms that allow all workers to raise concerns, report violations, or file complaints without fear of retaliation. These mechanisms must be clearly communicated to workers and support fair and timely resolution of issues. Carhartt expects Suppliers to regularly monitor and improve these systems and to ensure that workers' voices are heard and respected, in accordance with Carhartt's **Grievance Mechanism Policy**. **(ILO Conventions 87 and 98)**

9. Compensation and Benefits – Suppliers must pay workers at least the minimum total compensation required by applicable law, including base wages, overtime, allowances, and legally mandated benefits. Where overtime premiums are not clearly defined by law, Suppliers must provide premium pay for all overtime hours worked. Workers must receive clear, written pay statements each pay period, and accurate payroll records must be maintained. Final wages for workers who resign or otherwise separate from employment must be paid promptly and without unreasonable barriers. Carhartt strictly enforces a zero-recruitment fee policy, as outlined in its **Migrant Labor Policy**, and workers must not bear any costs associated with their recruitment or hiring. **(ILO Conventions 26 and 131)**

10. Hours of Work – Suppliers must comply with all Applicable Laws regarding working hours in the countries where they operate. At a minimum, workers must receive at least one day off (defined as 24 consecutive hours) in every seven-day period, except in urgent business circumstances. Suppliers are encouraged to limit total weekly working hours to 60 or fewer, and all overtime must be voluntary. **(ILO Convention 1 and 30)**

11. Health and Safety – Supplier practices must comply with Applicable Laws for Health and Safety and always prioritize worker safety. Suppliers must provide a safe, clean, and healthy work environment that prevents accidents and protects workers' physical and mental well-being. Facilities must be maintained to avoid hazardous or unsanitary conditions, including in housing and cafeteria areas where provided. Special attention must be given to workers performing repetitive tasks, to reduce physical strain and support overall health. **(ILO Convention 155)**

12. Environmental – Suppliers must comply with environmental Applicable Laws and take proactive steps to reduce the environmental impact of their operations. This includes responsible management of hazardous waste, general waste, air emissions, water treatment, and other significant environmental risks. Carhartt expects Suppliers to adopt sustainable practices that protect the environment and promote long-term resource stewardship.

13. Bribery and Corruption – Suppliers shall not, in connection with any aspect of their business with Carhartt, directly or indirectly offer, give, or promise any bribe, kickback, or improper payment or benefit to influence any individual, company, organization, government official or body, political party, or candidate, regardless of whether such conduct is tolerated or condoned locally, as outlined in Carhartt's **Anti-Bribery Policy**. Additionally, no payments, gifts, rewards, or gratuities of any kind shall be made directly or indirectly to Carhartt employees, buying agents, or staff members in consideration of business being placed with the Supplier.

14. Falsified Information – Honesty and transparency is critical for a relationship with Carhartt. Suppliers must always provide accurate and truthful information to Carhartt, in accordance with Carhartt's **Falsified Information Policy**.

15. Animal Welfare – Carhartt expects all Suppliers to support the humane and ethical treatment of animals. Animal-derived materials must be sourced in a responsible manner, and suppliers should ensure compliance with applicable laws and broadly accepted animal welfare principles. Carhartt reserves the right to request information or take further action if concerns arise.

16. Source of Cotton Fiber – Carhartt is committed to preventing forced labor and child labor in the sourcing of cotton. Accordingly, Carhartt and its suppliers pledge not to knowingly use cotton or cotton-based materials sourced from regions with known labor abuses. Suppliers must comply with Carhartt's **Cotton Source Policy** to ensure responsible sourcing.

Reporting Code of Conduct Violations

To report questions, concerns, or potential violations of this Code of Conduct, contact factorycompliance@carhartt.com

Reporting Other Serious Concerns

For concerns involving Carhartt personnel misconduct, bribery, corruption, or other unethical behavior, contact www.carharttlistens.com



*Carhartt reviews all reports promptly, maintains confidentiality where appropriate, and prohibits retaliation against anyone reporting in good faith.