

AMERICAN EAGLE OUTFITTERS®

Code of Conduct

American Eagle Outfitters, Inc. (AEO) is dedicated to the highest level of social responsibility. As part of that commitment, we direct our business relationships to those suppliers, including our sourcing agents, vendors, factories and their own suppliers, who share our vision of ethical and fair working conditions. Our Code of Conduct, which is based upon internationally accepted standards, including the International Labor Organization (ILO)'s core conventions and the Universal Declaration of Human Rights, outlines the minimum standards that we require of our suppliers. In addition to these baseline expectations, suppliers must comply with all legal regulations and are encouraged to incorporate best practices into their workplaces. Our Code must be communicated to all workers and supervisors and posted prominently in each represented language. Where issues of non-compliance are identified, we expect suppliers to take immediate steps to remediate and to demonstrate continuous improvement.

LAWS AND REGULATIONS

Suppliers must comply with the laws of the countries in which they operate and all other applicable local, national and international laws and regulations. Where there are discrepancies between this Code and any applicable laws, the provision that provides the most protection to workers must be followed.

HARASSMENT AND ABUSE

Suppliers must treat all workers with dignity and respect. Workers must not be subject to corporal punishment or physical, psychological, verbal or sexual harassment, threats, or abuse. Workers must be free to raise complaints about workplace conditions without risk of retaliation.

DISCRIMINATION

Suppliers must not discriminate against workers in hiring or other employment practices on the basis of age, race, color, nationality, social or ethnic origin, religion or creed, gender, gender identity or expression, sexual orientation, maternity status, marital or partnership status, disability, political beliefs, trade union affiliation or any belief or characteristic protected by law.

WAGES & BENEFITS

Suppliers must comply with all applicable laws related to wages and benefits. Workers must be paid at least minimum wage or the prevailing local industry standard, whichever is higher, in a timely manner. Overtime work must be paid at the legally-required premium rates. Suppliers must not use monetary fines as a disciplinary action.

HOURS OF WORK

Workers must not be required to work more than 60 hours in a week, including overtime. Overtime work must be on a voluntary basis. Workers must be given at least one day off in every seven-day period.

HEALTH & SAFETY

Suppliers must provide a clean, healthy and safe workplace free of chemical, electrical, fire, structural and other risks. Supplier-provided housing must also meet these standards.

FORCED LABOR

Suppliers must not use any form of forced, involuntary or trafficked labor, including prison, bonded, and indentured. Suppliers must not retain workers' IDs or collect deposits at time of hire. Workers must have freedom of movement within their workplace and living quarters.

CHILD LABOR

Suppliers must not employ any workers younger than the local minimum age or the age for completion of compulsory education. Regardless of local law, suppliers must not employ any workers younger than the age of 15. Suppliers must comply with local requirements for workers under the age of 18 to ensure that they are provided with safe conditions.

FREEDOM OF ASSOCIATION

Workers have the right to join or not join any organization of their choice and to bargain collectively. Suppliers must not interfere with the workers' attempts to exercise this right. Workers must not be discriminated against based on their affiliations. Where the right to freedom of association and collective bargaining is restricted by law, effective communication methods must be established between workers and management.

ENVIRONMENT

Suppliers must adopt measures to mitigate negative impacts of their operations on the environment. They must comply with all applicable laws and regulations related to the protection of the environment.

MONITORING AND TRANSPARENCY

Suppliers must allow AEO and our designated third-party representatives full access to all facilities (including supplier-provided housing), workers and records at all times. Suppliers must be able to document compliance with this Code. They must not falsify records, coach workers in how to answer questions, engage in bribery, or intentionally mislead AEO or our representatives in any way.

INTEGRITY

Suppliers must carry out their business operations in an honest and transparent way. They must comply with all local and international anti-bribery and anti-corruption laws and regulations. They must not pay or give anything of value, either directly or indirectly, to any person for the purpose of influencing an act or decision or otherwise securing an improper advantage for themselves or AEO.

SUBCONTRACTING

Suppliers must not subcontract any part of the manufacturing process without AEO's prior written approval. Subcontractors must agree to comply with this Code.