

American Eagle Outfitters, Inc. Human Rights Commitment

American Eagle Outfitters, Inc. (AEO) is anchored by purpose and our core values: People, Integrity, Passion, Innovation, and Teamwork. We collaborate. We engage. And in the face of difficulties and challenges, we innovate. Our success is based on celebrating the uniqueness of each person, because that is what will make our teams and AEO stronger.

We believe that respect for global human rights is an integral piece of living our values everywhere that we do business. Our commitment to these fundamental, universal, and inalienable human rights applies to our own operations, our associates, and our partners. This commitment is informed not only by our own values but also by the [International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#), the [UN Declaration of Human Rights](#), and the [United Nations Guide for Developing a Human Rights Policy](#). We are committed to fostering a culture which recognizes human rights everywhere and seeks to empower our associates, our supply chain, and our communities.

Respecting the Human Rights of our Store, Corporate, and Distribution Center Associates

Our approach to human rights starts with our own associates and operations across the globe. AEO believes that our associates should be supported in their livelihoods and has committed to paying a living wage to all full-time associates. We review associate salaries on an on-going basis to make sure they have the means to meet their needs and plan for the future.

AEO also strives to create a professional work environment that allows each person to feel safe, respected, and accepted. Everyone is entitled to be treated with dignity while having their unique talents, background, and perspectives valued. To be sure that everyone in the AEO community is aware of these expectations, AEO publishes and refreshes its Workplace Culture Policy every year. In this policy, AEO makes clear that it welcomes all individuals regardless of their race, ethnicity, color, age, gender, gender identity, gender expression, sexual orientation, religion, creed, marital status, pregnancy, genetic information, medical condition, national origin/ancestry, citizenship, physical/mental disability, military or veteran status, or any other status protected by law.

AEO has committed to a workplace where discrimination and harassment against any marginalized group, or because of any protected characteristic, is not tolerated and can promptly be reported, investigated, and addressed if it occurs. Our Workplace Culture Policy was recently amended to ensure that trans- and non-binary associates' interests and concerns, as well as antisemitism, anti-Asian violence, and all forms of targeted hate, were specifically addressed. Our Workplace Culture Policy will continue to be a living document, reflecting the needs and interests of our associates.

In 2019, AEO established an [Inclusion & Diversity Alliance](#) to ensure that associates, at all levels, share responsibility in achieving our Inclusion & Diversity (I&D) goals. AEO recognizes that I&D is not simply a moment in time – rather, it is a commitment of passion and requires integration across all functional areas. The Inclusion & Diversity Alliance enables associates to make I&D more than a corporate aspiration by incorporating these initiatives into our operations. More about our I&D goals can be found [here](#).

In addition, to learn more about AEO's core values and to learn how we innovate to remain leaders in an ever-changing environment, we encourage you to view our [Code of Ethics](#).

AEO proudly supports associates coming together for common causes. Associate Networks and Connections, AEO's resource groups, promote educational opportunities and foster our associate community. They use AEO's values, I&D position, and guiding principles as anchors to how they operate and interact. More information on the Associate Networks and Connections is available [here](#).

As a company whose customer base and associates predominately identify as women, it is important to us that our workforce is reflective of the people whom we serve. At AEO, women serve in leadership positions at all levels of the company, which includes our Board of Directors.

AEO recognizes that empowering women from diverse backgrounds and experiences is essential to helping advance global human rights. We are dedicated to removing barriers and creating opportunities for the advancement of women, particularly those from underrepresented groups. Women@AEO is a Connection that fosters an inclusive environment at the company and in the community, where women are empowered and inspired to achieve their full potential. Our Aerie brand specifically promotes body positivity and self-love by celebrating the beauty of real women by not airbrushing its models.

Brand Partnerships

AEO's commitment to ensuring dignity and value of others extends into the communities we serve. AEO has proudly developed brand partnerships with Feeding America, Food Banks Canada, It Gets Better Project, Bright Pink, Special Olympics Canada & U.S., National Eating Disorders Association, HeadCount, Bring Change to Mind and more. These brand partnerships provide a variety of support – from addressing food insecurity, to empowering LGBTQ+ individuals, educating about breast and ovarian cancers, mental health awareness and supporting non-partisan initiatives to encourage young people to vote. Our support of non-profits, such as the It Gets Better Project, has led them to expand to more countries. More information about these meaningful brand partnerships can be found [here](#).

Human Rights in Our Global Supply Chain

AEO firmly believes everyone has the right to fair treatment and to a safe and healthy work environment, and we know we cannot do it alone. To guide AEO through complex human rights challenges, and to help set the standards for our suppliers, we partner with many collaborative initiatives. These include [ILO's Better Work Program](#), the [Sustainable Apparel Coalition](#), the [Better Cotton Initiative](#), the [International Accord for Health and Safety in the Textile and Garment Industry](#), and [American Apparel & Footwear Association \(AAFA\) and Fair Labor Association \(FLA\) Apparel & Footwear Industry Commitment to Responsible Recruitment](#).

Our human rights policy is reflected in our [Code of Conduct](#). It clearly outlines our expectations for the treatment of factory workers for the suppliers that make our products. Our code prohibits corporal punishment or physical, psychological, verbal or sexual harassment, threats, or abuse. It also forbids the use of any form of forced or compulsory labor, involuntary or trafficked labor, including prison, bonded, and indentured and any form of human trafficking. AEO and its suppliers will not employ workers under the age of 15 or the minimum age required by law, if higher. The Code also outlines our expectations regarding working hours, health & safety, promotion of living wage and many other topics that affect the lives of factory workers.

AEO and their 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 policy and any applicable laws, AEO will require that the provision which provides the most protection to workers is followed.

AEO actively seeks to establish business associations and partnerships with those who share our vision of ethical and fair working conditions. The AEO Responsible Sourcing team reviews each new factory for compliance with the Code of Conduct before any manufacturing of our products may begin. Additionally the team reviews the working conditions annually with factories through on-site audits, remediation visits, or special engagement projects. More information about our factory audit process can be found [here](#).

Building on our basic compliance programs, we have built program goals around four important issues that affect factory workers to ensure ethical and fair working conditions:

Health and Safety

All of our strategic factories are required by AEO to comply with national building requirements and fire codes and have training for their workers on safe workplace practices. In this spirit, AEO signed the 2013 Bangladesh Accord on Fire and Building Safety—an unprecedented independent, legally binding agreement to build a safer and healthier ready-made garment industry. AEO subsequently signed the 2021

International Accord for Health and Safety in the Textile and Garment Industry to continue this vital work.

Women's Empowerment

All of our strategic factories are required by AEO to invest in women workers through health, life skills, and employment skills training, as well as increase women's access to management positions. To this end, AEO partners with global initiatives, such as Empower@Work and HERproject, to drive systemic change for women workers in global supply chains. These programs focus on educating workers on topics that include health needs, financial inclusion, and gender equality. The individuals who attend these programs are also trained to share their learned skills with others in their communities.

Worker Voice

All of our strategic factories are required by AEO to implement effective grievance systems and establish elected worker / management committees. AEO recognizes the need for suppliers to own their own compliance systems. A key part of this process is to implement effective ways for workers to raise concerns and communicate openly with factory management. This is accomplished by forming committees within factories that include both worker and management representatives, that regularly meet to discuss issues raised by workers, auditors, and other stakeholders. We work together with our suppliers to establish systems that best work for their companies and verify the effectiveness through regular review and worker surveys.

Responsible Recruitment

All factories are required by AEO to ensure migrant workers do not pay recruitment fees and all international migrant workers must be trained on contract terms before leaving their home countries. Migrant workers, both domestic and international, make up a vital part of factory workforces in certain AEO sourcing countries, including China, India, and Jordan. We published a Forced Labor and Migrant Worker Policy in 2019, which outlines the protections that factories must have in place for migrant workers, including ensuring that fees are not paid by workers at any stage of the recruitment process.

Implementation and Oversight

Our Nominating, Governance and Corporate Social Responsibility Committee reviews AEO's policies and practices relating to human rights and social corporate responsibility, including evaluating the impact of company practices on communities and individuals, and reports its findings to the Board of Directors.

AEO encourages its associates to speak with confidence and is committed to creating an environment where associates feel empowered to speak up. Under our Open Door Policy, we strongly encourage associates to go to their supervisor, manager, or the Human Resources department with any questions or concerns. AEO does not engage

in reprisals against any associate who may raise a concern about health and safety or any other violation of AEO’s Global Human Rights Policy. If there is an issue that impacts the values AEO strives to uphold, associates also have the option of contacting the [Compliance Department](#) directly (Compliance@ae.com) or through the [AEO Hotline](https://aeohotline.com/speakup) (https://aeohotline.com/speakup or 1.800.490.1089), which is available to take a report 24 hours a day, seven days a week.

AEO’s Ongoing Commitment

In 2020, AEO conducted a Materiality Assessment to prioritize important themes. We gathered input from our stakeholders – including associates, customers, non-profit organizations, and peers – to evaluate their alignment in connection with our own. The consensus priorities that emerged included Climate and Energy, Forced Labor, Human Rights, Chemical Management, Health & Safety, Water, Sustainable Materials, Anti-corruption, Living Wages, Gender Equality, Employee Engagement & Recognition, Traceability, Inclusion and Diversity, and many more topics. This analysis is a living document, and AEO will periodically reassess this ranking to ensure that we are operating consistent with our priorities. AEO’s Materiality Assessment can be found [here](#).

Our approach to these themes can be found in the following documents:

Our People	Our Workers in the Supply Chain	Our Communities and Customers
Code of Ethics	Code of Conduct	Climate Policy
Open Door Reporting Policy	Forced Labor and Migrant Worker Policy	AEO training for Brand Ambassadors
AEO Work Place Culture Policy	Subcontracting Policy	Customer Service
Anti-Bribery & Anti-Corruption Policy	Prohibited Sourcing Regions Policy	
Anti-Boycott Policy		
No Harassment or Discrimination Policy		

Continuing Forward

In 1977, AEO started as a single store and has now grown to become an industry leader through a multi-channel, global organization. We are building a REAL community with our customers and with each other.

While we continue to innovate in an ever-changing world, we remain rooted by our core values. As we move forward, AEO is committed to acting with integrity, honesty, and upholding the highest ethical standards. We seek to treat everyone with dignity and to celebrate uniqueness. AEO proudly embraces global human rights because we strive to foster a culture based on empowerment so each person can be their REAL selves.