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Message from Calvin

At lululemon, we take ethics and integrity seriously. We're responsible to show up as our best selves with one another and to act in a way that's respectful and in line with our values.

As we grow to be a truly global brand, we will continue to operate in countries that have a broad range of cultural business practices. While cultural business practices will feel different in each country and context, our behaviour should remain aligned to a clear and consistent Code of Conduct that outlines our unwavering commitment to conducting our business ethically.

Living the principles in our Code will enable us to deliver on our purpose. The Code, in tandem with our IDEA commitments (Inclusion, Diversity, Equity and Action) and Impact Agenda, helps set the conditions for us to create positive change in building a healthier, thriving future together with our guests, partners, and communities.

Our responsibility, as individuals, as leaders and as a company, is to create a truly diverse and inclusive culture. Grounded in our IDEA commitments, the Code reflects the diversity of the global communities in which we operate and helps ensure we are always practicing inclusive behavior.

The Code contains information, resources, and tools that empower us to act ethically and in compliance with the law. While our Code is thorough, we know that it may not address every ethical choice we face in business. Each of us must use common sense and judgment in our personal conduct as we act in accordance with the Code.

If you have questions about the Code, or if you have concerns about possible ethical violations in the workplace, I urge you to speak immediately with your leader and/or your P&C Business Partner, or utilize the other resources listed in the Code.

Upholding our values and living into our Code of Conduct is the ultimate display of personal responsibility. The example that we all set each day shapes who we are for the world, and I look forward to continuing to build the future of lululemon, together.

With gratitude,

Calvin McDonald
Chief Executive Officer

Our code is grounded in our values.

We are guided by our core values in everything we do.

The Code applies to all lululemon and MIRROR employees, ambassadors, contractors, officers and directors.

To reach our business and personal goals, we must all exemplify the highest integrity. This means that we respect each other, our guests and all laws, customs, and cultures. In this spirit, we support a workplace environment that neither pressures nor encourages anyone to compromise their ethical values or standards of conduct.



01. We comply with all laws, and in doing so we contribute to healthy communities.

We are all expected to comply with all laws. This includes not only following the laws of your home country, but also complying with local laws when visiting a different country or transacting business with individuals, organizations or guests located in a different country. In particular, be aware of the following key laws that impact our business:

Anti-corruption

It is never appropriate to offer or accept bribes, kickbacks, or any other type of improper preferential benefit. Likewise, we do not allow vendors or other individuals or organizations to offer bribes or kickbacks on our behalf. A bribe can include giving or receiving any item of value (e.g., money/cash, cash equivalents such as gift cards, gratuities, gifts, kickbacks, unauthorized rebates, meals, entertainment, products, trips, favors, loans, contributions or donations) to/from a person or entity to improperly influence any act or decision to obtain or retain business or to secure any advantage for lululemon, or otherwise improperly promote our business interests in any respect. We have zero tolerance for corruption, and we must always operate with integrity regardless of local custom or industry practice. Doing business the right way not only helps us obey the law, but it also strengthens our relationships with local communities and our partners. Please refer to our anti-bribery policy on our company intranet site for more information.

Import-Export and Trade Laws

We transfer products, supplies, and raw materials to and from countries all over the world every day. In so doing, we must comply with all laws, rules, and regulations that govern these activities. These laws may include export controls, customs laws, and trade sanctions.

FAQ: What is a bribe?

Bribery is giving money or anything else of value to another person so that they will do something for you. A “kickback” is a form of bribery where money or something of value is given in exchange for services rendered. For instance, making a payment directly to a customs official to “assist” with getting products into a country would be a bribe.

FAQ: Could it still be a violation of the Code to give gifts when they are local custom and expected a part of doing business?

Yes. Our policies regarding gifts and entertainment set out in the Code apply equally in all countries regardless of any perceived local customs/practice.

Insider Trading Laws

We may not buy or sell shares of lululemon stock (or securities of other companies) if we know of material information that has not been made public. Material information is any information

that would influence a reasonable investor's decision to buy or sell stock. Examples of "material information" include consolidated sales figures, the departure of an executive, or a significant issue with a key supplier. Trading in shares while in possession of non-public material information is a serious violation of securities law as is providing non-public material information to someone who may trade in our shares. You should never provide material non-public information to other people, including your family members or friends as it may enable them to improperly buy or sell securities using confidential information. Please refer to our Insider Trading Policy for more information. Members of our board of directors, executive officers, and certain other employees have additional restrictions on trading in lululemon securities, which are outlined in our Insider Trading Policy.

Competition Laws

We compete hard but play fairly. Fair dealing laws and antitrust laws protect industry competition by generally prohibiting agreements between competitors that seek to manipulate prices or unfairly impact competition. We must not attempt to make any anticompetitive agreements, such as agreements to fix prices or production. In addition, we must not disclose competitive and non-public information to competitors, suppliers, or distributors

02. We preserve our integrity by avoiding conflicts of interest.

Personal Relationships

You should not participate in any business decision that could benefit an individual with whom you have a close personal relationship. For example, employees may not influence or have any involvement with employment-related decisions that involve a relative.

In addition, we may not have any involvement with vendors who are a relative, including being a party to the selection of the vendor.

Gifts and Business Entertainment

Providing and receiving modest gifts or entertainment may foster long term business collaboration provided that they are reasonable and appropriate for the situation, not offered to improperly influence a business decision, and are permissible under the law. Gifts and entertainment should always be in good taste and considered a courtesy. Receipt of gifts from any one individual or entity may not exceed \$250 USD in aggregate value in a given year. Gifts and entertainment for government officials are prohibited without prior written approval from the legal department. Please contact People Practices or the legal department for more information.

Political Activities

Political activities should be kept separate from work activities. It is inappropriate to use

company resources (including time, property, or equipment) in furtherance of personal political activities or to display personal political messages (on buttons, clothing, and other paraphernalia) at work. Any political activities being conducted on lululemon's behalf must be approved and conducted in accordance with internal policies and procedures.

Business Opportunities

You may not take advantage of business opportunities that you learn about through your work with lululemon or direct any such opportunities to another individual or organization, unless lululemon has already been offered and declined the opportunity. We may not use company property or information to compete with lululemon.

Outside Employment and Other Potential Conflicts of Interest

We must ensure that we do not provide services to another for-profit business that may appear to conflict with their duties to the company, unless otherwise allowed under the terms of employment or local law. Never provide services to a competitor while you are employed by lululemon. If you're not sure whether something might be considered a conflict of interest or perceived as a conflict of interest, ask your manager, your People & Culture partner or contact People Practices.

Director Conflicts

Board members have a duty to avoid actual or potential conflicts of interest in the performance of their duties as directors of lululemon. A director should not have any interests that would materially impair their ability to (1) exercise independent judgment or (2) otherwise discharge the fiduciary duties owed as a director to lululemon and its stockholders. Each director must independently evaluate their own current and planned actions, positions, and interests to determine whether or not an actual conflict of interest, or the appearance of a conflict of interest, is or may be present.

If they determine that a conflict of interest or the appearance of a conflict of interest does or will exist, the director must avoid such action, position, or interest.

Prohibition of Loans

lululemon may not directly or indirectly, make a loan to an executive officer or director of lululemon or guarantee any loan or obligation on behalf of an executive officer or director.

FAQ: What is a conflict of interest?

A situation in which a person has a private or personal interest that appears to influence their official duties at lululemon. An example of a conflict of interest would be considering hiring a relative's company to perform services for lululemon.

FAQ: What if I am unsure as to whether a conflict of interest exists?

It is important to understand that it is the appearance of influence that triggers a conflict of interest, not whether a person has actually been influenced. If you are at all uncertain about a potential conflict of interest, seek guidance from your manager/supervisor or contact your People & Culture partner or People Practices.

03. We are all responsible for fostering a respectful and inclusive workplace.

We stand for humanity, diversity, and empathy.

We strive to provide an environment that allows all employees to excel, be creative, take initiatives, find new ways to solve problems, and generate opportunities. Teamwork helps us to leverage our diverse backgrounds, talents, and ideas. Our high standards for professional and ethical conduct govern how we interact with guests, vendors, colleagues, and members of the public at all times.

Extend courtesy and respect to all individuals, respect the property of others, act fairly and honestly, and take steps to understand local laws and customs wherever we operate.

We do not tolerate racism, discrimination, harassment or hate.

The diversity of our workforce is a tremendous asset that helps us fulfill our mission. We are committed to providing equal opportunity in all aspects of employment and will not tolerate discrimination on the basis of age, race, color, national origin, religion, sex, gender identity or expression, sexual orientation, family status, marital status, or any other protected status. We will not tolerate harassment or unlawful behaviors of any kind, including derogatory comments or conduct based sexual orientation, race, or ethnicity.

We believe everyone has the right to be well, to live free from all forms of bullying and harassment, and to be treated with respect and appreciation.

We have zero tolerance for violence, bullying and harassment in our workplace. Bullying and harassment includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated.

Examples of bullying and harassment include deliberately impeding or undermining a person's work, excluding, or isolating a person socially, cyber-bullying, and spreading malicious rumours or gossip that are not true.

Bullying and harassment does not include any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment. Reasonable direction or management includes performance management, corrective action, or instruction provided to assist an employee in their development or advancement.

Sexual harassment will not be tolerated.

Sexual harassment is a form of discrimination. We strictly prohibit sexual harassment in the workplace. Sexual harassment can occur between any two people, regardless of their gender or sexual orientation. Sexual harassment includes sexually suggestive gestures, unwelcome leering or staring, and the making of sexual advances or repeated invitations after a previous advance or invitation have been refused.

04. Our culture promotes a happy, healthy, and fun life.

Environmental Stewardship

Because environmental health is the foundation for personal health, we are passionate about reducing our environmental impact. At a minimum, we are expected to follow all environmental rules and regulations established by local, regional, or national authorities.

Workplace Safety

lululemon promotes and maintains a safe and healthy work environment that complies with all relevant laws, rules, regulations, and policies, as well as our own standards and guidelines. Through our [Vendor Code of Ethics](#), we require our supply chain partners to agree to maintain safe and healthy workplace facilities.

Labour Practices

lululemon, and any other individual or organization working with us, must comply with all labor and employment standards laws, rules, regulations, and policies in the jurisdictions where we or they operate.

If an employee is unsure or not clear on local labor and employment standards, they should contact People & Culture or their manager. We will not use forced or involuntary labor, child labor, or engage in human trafficking—nor will we tolerate any other individual or organization who engages in such practices. We are committed to a responsible supply chain, and all vendors must

agree to uphold our ethical standards of production and adhere to our Vendor Code of Ethics.

Workplace Culture

Managers and supervisors should help foster a supportive, inclusive, and compliant workplace environment. They must always demonstrate their personal commitment to the Code and ensure the same from their employees. Thus, managers should exercise care when appointing an individual to a position of authority and responsibility.

Respect for Our Guests and Others

Guest relationships, as well as relationships with other third parties, are critical to our success. In meeting guests' needs, we are committed to conducting business with integrity and according to all applicable laws, rules, and regulations. Guests will be served without regard to gender, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin, or any other legally protected status.

05. Personal responsibility is the path to success.

Protecting lululemon's Assets

We all have a responsibility to protect lululemon's assets from improper use or disclosure. This includes, among other things, protecting all non-public information from disclosure, including our trade secrets, design information, information about our suppliers, contracts, and manufacturing processes, guest information, financial information and employee and pricing data, as well as not reproducing licensed or internally developed software for personal use. We also don't permit unauthorized photography or video recording of any nature in our stores, the SSC, the DCs or any other lululemon property.

Intellectual Property

Intellectual property (IP) is one of our most valuable assets. IP includes our trademarks, copyrights, patents, and trade secrets. You must always protect our IP. Never disclose our IP to any third party outside of lululemon unless they are contractually required to maintain confidentiality. Disclosure of our IP could result in severe damage to lululemon so it must be safeguarded. We respect the IP rights of others and do not tolerate the unauthorized use of anyone else's IP or confidential information. If you want to use someone else's IP (including their names, images, or likenesses), you must have appropriate consent to use it. If you're not sure, reach out to the legal department.

Personal Use of Technology and Other Assets

Personal use of lululemon's assets, including our technology, during work time, should be minimal and should not interfere with job performance or otherwise violate the Code. It is never appropriate to use our technology, including email or intranet, to send or access potentially offensive or inappropriate content.

FAQ: Can I use the Company's computers, phones, printers, and copy machines at the office for my consulting business so long as it is after hours?

No. Using lululemon's resources for a consulting practice in this fashion is more than incidental use of company assets and is not permitted.

Privacy

Employee and guest privacy is important. We should always respect the privacy of personal information whenever we collect, maintain, or transfer information and ensure that we comply with all applicable guest and employee privacy policies.

FAQ: Can I use product strategy information that a friend of mine at a competitor accidentally sent me to develop lululemon's strategy?

No. If you receive confidential information under unusual circumstances, send the information back to the owner and delete all copies of it on

your system. Do not share the information with any other employees.

Data Security and Data Protection

Keeping data safe preserves the trust that exists between lululemon and our employees, guests, and business partners. Data security involves following all relevant company policies and being mindful to protect passwords, user IDs, access cards, and encryption or authentication keys. Any actual or suspected disclosure of data must be immediately reported to Information Security and Legal. Examples of a data breach include the loss or theft of a USB stick containing company data, leaving work devices unlocked or in an unsecure place (e.g. your laptop computer or mobile phone), leaving work product in a public place or even in lululemon property accessible to the public (e.g. on the bus, or visible through the window of a parked car, in unsecure garbage or recycling bins, on whiteboards in unsecure conference rooms.) It is important that we treat employee, guest, and business partner data with respect. We handle data consistent with local data protection and privacy laws and Regulations.

Accurate Records

You must follow our system of internal controls and disclosure controls and ensure that corporate records and all securities filings are timely, legitimate, and accurate. Creating false or misleading records is prohibited, and all financial accounts, reports, and records are expected to be fair, accurate, and appropriately authorized.

Document Retention

You are expected to comply with all records management policies and legal hold notices. These policies apply to retention and destruction of all records created by lululemon, including, but not limited to, hard copies, electronic files, emails, instant messages, video, and backup tapes.

Speaking on lululemon's Behalf

Unless specifically authorized to do so, you cannot speak publicly on lululemon's behalf or publicly disclose proprietary or confidential information about lululemon, including on social media. Those permitted to speak on our behalf must be truthful, accurate, and respectful in their communications and maintain any duty of confidentiality.

06. Questions, concerns and assisting with investigations.

Questions

You can speak to your manager, or People and Culture if you have questions about the Code. If you're not sure what to do in a certain situation, speak up and ask for help.

Waivers

Waivers or exceptions to the Code for any employee will be granted only in advance and under exceptional circumstances by the legal department. A waiver of the Code for any executive officer or member of our board of directors may be made only by the board of directors or a designated committee of the board.

Consequences for Violating the Code

Violation of any law or the Code is a serious matter. Any employee, contractor, director, or officer who compromises or violates any applicable law or the Code may be subject to disciplinary action, up to and including, termination of employment, loss of employment-related benefits, and, if applicable, criminal or civil proceedings.

Cooperating in Investigations

lululemon will conduct a prompt, thorough and objective investigation into any potential violations of the Code. You may be asked to cooperate or provide information as part of an investigation. Your full cooperation and assistance are required and any failure to do so will be considered a violation of the Code.

07. Reporting a violation of the Code and non-retaliation.

Reporting Violations

If you suspect that there has been a violation of the Code, you should report it through the following channels:

- your manager
- another manager
- your People and Culture partner
- any member of the legal department.
- anyone on our Senior Leadership team.
- the integrity line; or
- Our Audit Committee Chair:
Chair, Audit Committee
1818 Cornwall Avenue
Vancouver, British Columbia V6J 1C7
auditcommittee@lululemon.com

Investigation Process

lululemon has an internal investigation process and will conduct a prompt, thorough and objective investigation of complaints. Any complaint received, will be considered, and if necessary, investigated by our internal independent investigation team (People Practices) or an impartial third-party on the basis of the information provided and in accordance with applicable law.

Government Investigations

Nothing in the Code precludes an employee from reporting a violation of law to a government agency or cooperating in a government investigation.

Non-retaliation

We will not tolerate retaliation against, or unfair treatment of, any employee who makes a report in good faith about a violation or possible violation of applicable law or the Code, or who participates in any investigation conducted internally or by a government enforcement agency. Any employee who believes he or she has been retaliated against should promptly report it to one of the resources listed in the Code.

FAQ: What does non-retaliation mean?

Anyone who in good faith reports a possible violation of the Code or assists in the investigation of a reported violation will be protected by the Company. Similarly, any person who reasonably reports any possible violation of local, regional, state, or federal laws or regulations will be protected by the Company. The protection continues even if the report is ultimately unsubstantiated.

08. Reporting a violation of the Code through the Integrity Line.

If you are not comfortable discussing your concern with any of the above resources, you can contact our Integrity Line to report your concern in a confidential manner. All Integrity Line reports are provided to the legal department and the chair of the Audit Committee.

Our Integrity Line is operated by a third party with trained staff who gather information related to your concern. If you wish to remain anonymous, you are able to do so.

You can contact our Integrity Line by phone (available 24 hours, 7 days a week) using the phone numbers listed in the tables on pages 16 below. For those countries with access numbers, you must first dial the appropriate access number based on your country and if applicable, your provider, and then when prompted, you must enter the 844-toll free number. Instructions for calling the Integrity Line are also available online at www.lululemon.ethicspoints.com. You may also complete an Integrity Line report online at www.lululemon.ethicspoints.com.

All reports of violations will be addressed consistent with our policies and procedures.

Any manager or other individual who receives a report of a violation or a possible violation should refrain from conducting any independent investigation, and promptly forward the report to the legal department, who will advise on next steps.

Integrity Line Numbers

Country/Region	Access Numbers (Dial this number first)	Toll Free Number
North America	N/A	1-877-217-4665 OR 844-676-8048
Australia	1-800-551-155	844-676-8048
China	N/A	400-601-3075
France	France Telecom: 0-800-99-0011 0-800-99-1011 0-800-99-1111 0-800-99-1211 Telecom Development: 0805-701-288 Paris: 0-800-99-0111	400-601-3075
Germany	0-800-225-5288	844-676-8048
Hong Kong	800-93-2266	844-676-8048
India	N/A	844-676-8048
Japan	KDDI: 00-539-111 NTT: 0034-811-001 Softbank Telecom: 00-663-5111	844-676-8048
Macao (Macau)	00-800-111	844-676-8048
Malaysia	1-800-80-0011	844-676-8048
Netherlands	0800-022-9111	844-676-8048
New Zealand	000-911	844-676-8048
Norway	N/A	844-676-8048
Singapore	SignTel: 800-011-1111 StarHub: 800-011-0001	844-676-8048
South Korea	Dacom: 00-309-11 ONSE: 00-369-11 Korea Telecom: 00-729-11 US Military Bases – Dacom: 550-2872 US Military Bases – Korea Telecom: 550-4663	844-676-8048
Sweden	020-799-111	844-676-8048
Switzerland	0-800-890011	844-676-8048
Taiwan	00-801-102-880	844-676-8048
UK	0-800-89-0011	844-676-8048
Vietnam	N/A	844-676-8048

09. Training and Certification

Training

You may be required to complete annual compliance training. If asked to do so, completion of the training is required and any failure to complete such mandatory training in a timely manner could result in disciplinary action.

Certification

On an annual basis, you will be asked to acknowledge your commitment to the Code. In addition, you will be asked to confirm that you are not aware of any unreported violations of the Code. This acknowledgement must be completed.

