Human Rights Policy

Commitment

Abercrombie & Fitch Co. (“A&F”) through its subsidiaries (collectively, A&F and its subsidiaries are referred to as the “Company” and “we”), is proud of our commitment to global human and labor rights, and to ensure that our products are only made in safe and responsible facilities. We partner with suppliers who respect local laws and share our dedication to utilizing the best practices in human rights, labor rights and workplace safety. A&F believes that business should only be conducted with honesty and respect for the dignity and rights of all people, including women, children and minority groups.

Our Human Rights Policy reflects A&F’s commitment to the International Labor Organization (“ILO”)’s Core Conventions, including the ILO Declaration on Fundamental Principles and Rights at Work, the United Nation’s (“UN”) Universal Declaration of Human Rights, UN Guiding Principles for Business and Human Rights, and UK Modern Slavery Act 2015. Supporting these initiatives emphasizes our adherence to best practices and provides guidance as a universal standard for enforcing strong human rights initiative throughout our business. Our Human Rights Policy applies to all activity affiliated with A&F Co., including but not limited to third-party vendors, partners, and suppliers around the world.

Governance & Implementation

Our Code of Business Conduct & Ethics and Vendor Code of Conduct clearly outline our ethics expectations for our associates at all levels in our offices and stores, as well as our business partners throughout the supply chain. We maintain several channels for our associates to report any unethical behavior or suspected misconduct.

Code of Business Conduct & Ethics

We are dedicated to acting with integrity and honesty. Our Code exists to support those commitments by giving us the guidance and resources to ensure we are acting ethically at all times. Our Code has been adopted by our Board of Directors and Management and reflects the importance that we place on ethical conduct. Acting with integrity and honesty will ensure that we meet our high standards and enhance our ethical culture.

Everyone at A&F—all associates, managers, officers, and directors worldwide, or any person given access to confidential and proprietary information—is responsible for following the Code, regardless of seniority or title. Associates are given training in our Code when hired and are required to annually affirm that they will comply with the Code and have no knowledge of any violation or suspected violation of the Code. We also expect our suppliers and other business partners to acknowledge and align with the principles of our Code when doing business with A&F.

Ethics Reporting Mechanisms

Adhering to the Code and reporting observed misconduct are both critical to protecting our culture and our brands. Associates are encouraged to raise issues, concerns, and questions as soon as possible so that they may be investigated and resolved quickly. A&F offers a confidential reporting system as part of its Speak Up culture so anyone may file an anonymous report with questions or suspected violations of the Code in one of three ways:

- Online at www.abercrombie-ethics.com
Vendor Code of Conduct

Our Vendor Code of Conduct ensures that our Supply Chain Partners operate in a manner which is aligned with A&F’s principles and values, as reflected in A&F’s Code of Business Conduct. We require all vendors, suppliers, manufacturers, contractors, subcontractors and their agents (collectively, “Vendors”) to operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations, including those enumerated by contract as well as the standards below.

While Abercrombie & Fitch does not own the factories producing our products, we do require all factories with whom we work with to follow the standards set forth in our Vendor Code of Conduct. If production is found in unauthorized factories and/or subcontracted factories, this will result in financial and other penalties.

A full version of our Vendor Code of Conduct can be found here.

Supply Chain Capacity Building

As a global company with operations around the world, A&F Co. continuously takes steps to combat human trafficking and forced labor in our supply chains. Our commitment includes providing training internally to all employees who are directly involved in our supply chains and externally to our vendors so they are able to identify the signs of human trafficking and forced labor. We implemented e-learning courses through our Mekong Club membership for all internal A&F employees who directly impact our supply chain. The Company continues to examine how we can best utilize other Mekong Club membership tools.

Every factory we work with is required to follow the standards set forth in our Vendor Code of Conduct. We conduct third party audits prior to any new production and on an annual basis, as appropriate, to ensure Vendor Code compliance. Vendors must submit a Corrective Action Plan (“CAP”) within 30 days that identifies specific actions to address any non-compliance audit findings. A&F works with the Vendor to monitor progress, facilitate improvements, and provide support, as needed. If factories earn an A on their audit, we reevaluate them every other year. Scores B-D are audited annually, and factories with an F are tasked with more specific action items.

Our Supply Chain Capacity Building includes distinct programs aimed at providing a positive impact throughout our supply chain, which aim to improve the lives of those working in our supply chain, specifically women and girls. To learn more about our initiatives, please visit https://corporate.abercrombie.com/af-cares/sustainability.

Diversity and Inclusion

At A&F Co., inclusion & diversity is woven into every aspect of our business. We believe that embracing diversity in all its forms make us all stronger. We work to ensure that each associate and customer feels included, respected, supported, and empowered. Every day we strive to reach beyond A&F Co. to make a positive impact in the global community.

Our Strategy

As part of our diversity and inclusion strategy, the company values individual differences— whether grounded in gender, race, ethnicity, disability, nationality, religion, age, LGBTQ status, or other factors. Accordingly, the company is committed to ongoing steps toward ensuring appropriate representation across all these dimensions of diversity at the Board level, in senior management, and for our workforce overall.
Associate Resource Groups (ARGs)

Our associates motivate and drive our progress. Through initiatives and partnerships, our associates are encouraged to interact both internally and out in our communities in ways that enhance their understanding of diversity and inclusion. Our Associate Resource Groups (ARG) are open to all associates from all backgrounds and provide members with an opportunity to share common experiences, build new skills, and create new connections. Our ARGs focus on minority groups, such as women and the LGBTQIA+ community.

Giving Back

A&F Co. invests in a strategic portfolio of community partners that support and empower each generation on their journey to being and becoming who they are. Led by purpose, we are focused on building long lasting, multi-faceted partnerships that allow us to positively impact our global community and connect with our associates and customers.

We aim to build long-lasting, deep partnerships that are embedded into our organizations. We want to create meaningful change through our philanthropic efforts, and we do that by cultivating multi-faceted relationships with all of our strategic impact partners.

Our customers are agents of change. We aim to constantly engage and connect with our customers across our family of brands through continued listening, always evolving to support causes and partners that are most important to them.

Always Forward

At A&F Co., we believe that honesty, integrity, and respect are integral to meeting and exceeding the expectations of our many different stakeholders, including our associates, our customers, and our stockholders. The concept of doing the right thing, no matter what, is embedded into the values that we all strive to fulfill throughout all our work: Commitment to Quality, Authentic Goodness and Always Forward.

We will review our Human Rights Policy to accurately reflect our operations regarding our practices throughout the supply chain and within our organization. Factory compliance with the Vendor Code of Conduct is enforced through our audit program. Our Policy consists of information reviewed and enforced by our Board level ESG Committee, Sustainability VP, and Legal department. We share this Policy with our associates in our offices and stores, as well as any relevant third parties. By regularly updating and sharing this Policy, we remain aligned to our core value of acting ethically in our own operations and throughout our value chain.