

Levi Strauss & Co.
Conflict Minerals Policy Statement
Dodd-Frank Act
May 31, 2014

In 2010, Congress enacted the Conflict Minerals provisions of the Dodd-Frank Street Reform and Consumer Protection Act with the goals of eliminating the illegal trade in gold, tin, tantalum and tungsten (Conflict Minerals) and cutting the funding of armed groups in the Democratic Republic of the Congo (DRC) and its neighboring countries (Angola, Burundi, Central African Republic, The Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia) that are engaged in human rights abuses. Section 1502 of the Dodd-Frank Act requires publicly traded companies to report to the U.S. Securities and Exchange Commission (SEC) whether any of the Conflict Minerals in the products they manufacture or contract to manufacture originate in the DRC Region and the due diligence conducted to determine if the original sale of the mineral funded armed conflict.

LS&Co.'s Commitment to Responsible Sourcing

For decades, LS&Co. has been committed to operating and sourcing in an ethically and socially responsible manner. Today, LS&Co. continues to be committed to ensuring our principles are honored in all of our business decisions, including those with our customers, manufacturers, suppliers and licensees. As set forth in our Supplier Code of Conduct, Social and Environmental Sustainability Guidebook, and our Terms of Engagement for vendors, LS&Co. is dedicated to preventing the sale of products produced at the expense of communities, workers or the environment. We are committed to taking steps to ensure that the products we manufacture, those that we purchase from our manufacturers and suppliers, and those that are manufactured by our licensees are responsibly sourced, including sourcing from companies that share our values around human rights, ethics, and social and environmental responsibility. At the same time, LS&Co. does not ban the use of Conflict Minerals that originate in conflict-affected and high-risk areas when they are sourced in accordance with existing international standards. Avoiding the sourcing of all Conflict Minerals from these areas would cause a *de facto* embargo with serious adverse impact on the living conditions of local populations.

LS&Co. supports the efforts undertaken by the Dodd-Frank Act to eliminate illegal mineral trading and the funding of armed conflict, while supporting legitimate commercial ventures in the DRC and its neighboring countries. LS&Co. sources nearly all of its Levi's® and Dockers® products from independent contract manufacturers and the remainder are sourced from LS&Co.'s company-operated manufacturing and finishing plants. While LS&Co. does not source any Conflict Minerals directly, they may exist in the products that we source. Due to the size of our supply chain as well as the complexity of the routes by which these Conflict Minerals are traded, smelted, recycled and sold (including the common practice of mixing ores and recycled scrap from many different sources), we are committed to working with our suppliers to increase transparency regarding the origin and traceability of minerals contained in our products to ensure that our products are "DRC Conflict Free."

LS&Co.'s Expectations of Suppliers

To comply with the SEC reporting regulations related to Conflict Minerals, LS&Co. requires, from relevant suppliers within our supply chain, chain of custody declarations to verify the origin of the Conflict Minerals contained in their products. In addition, we require the following from our suppliers:

- to source materials from socially responsible sub-tier suppliers and manufacturers
- to assist LS&Co. to comply with the SEC regulations related to Conflict Minerals and to provide all necessary declarations
- to undertake reasonable due diligence within their supply chain to determine the origin of the Conflict Minerals, if applicable, including developing policies and management systems designed to transition suppliers away from the use of Conflict Minerals or derivative minerals sourced from mines that directly or indirectly finance armed groups through mining or mineral trading in the DRC or any neighboring country, and to pass these requirements along to their sub-tier suppliers and require them to do the same with lower tiers of suppliers.

Additional Information

Questions regarding LS&Co.'s Conflict Minerals Policy and Compliance program can be addressed to MBXSustainability@levi.com. Potential ethical or legal violations involving LS&Co. business can be reported by accessing our hotline at 1-800-405-8953.