



**WORLDWIDE CODE OF  
BUSINESS CONDUCT**

**LEVI STRAUSS & CO.**





# AT LEVI STRAUSS & CO., WE PRIDE OURSELVES ON DOING WHAT'S RIGHT.

That means we obey the law in every country where we do business. But beyond that, it means we stay true to our own values by acting with integrity, being socially responsible and following a consistent set of ethical standards across the globe.

This Worldwide Code of Business Conduct outlines the basic principles that we expect all employees and LS&Co. affiliates to follow.

Being a good corporate citizen is essential to our success as a company, and it's the bedrock of our profits-through-principles approach to business. But really what it comes down to is you — not only the decisions you make every day but also your willingness to raise your hand if you see anything questionable.

If you ever have questions or concerns, please talk with your manager or contact our [Ethics & Compliance Reportline](#).



**THANK YOU FOR UPHOLDING OUR  
COMMITMENT TO DOING THE RIGHT THING.**



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# HOW WE WORK WITH INTEGRITY

## COMPLYING WITH LAWS, RULES & REGULATIONS

Obeying the law is the starting point in how we do business. Laws touch all aspects of our business, from how we make, market, promote and sell our products, to how we treat each other.

Each one of us is individually accountable for respecting and following the laws where we operate. That doesn't mean you have to know the details of every law in every country. In general:

- If a law conflicts with our Worldwide Code of Business Conduct, you must comply with the law.
- If a local custom conflicts with our Code, you must comply with the Code.

When in doubt about what to do, ask your manager or get in touch with the Human Resources or Legal department.

## ANTI-BRIBERY & ANTI-CORRUPTION

Our approach to doing business is open and honest. We do not offer or accept bribes or condone corruption anywhere that we operate or wherever our products are sold or sourced.

LS&Co. and our employees do not:

- Authorize, pay, promise or offer to give anything to a government official or a private individual to improperly influence that individual to act in our favor.
- Request or authorize any third party to make such payments, promises or offers on our behalf.
- Accept bribes from government officials or private individuals.

We take this seriously. Failure to comply with this policy may result in disciplinary action, up to and including termination. You also run the risk of being fined or going to jail.

For more guidance, please see the full [Global Anti-Bribery & Anti-Corruption Policy](#) on Threads or contact the Legal department.

# CONFLICTS OF INTEREST

A conflict of interest happens when a person's private interest interferes in any way with the company's interests. The most obvious conflict of interest would be doing work for a competitor while still working at LS&Co.

Being a member of the LS&Co. team means you have a duty to advance the company's legitimate interests, not your own. That means you may not take personal advantage of opportunities that you find out about through the use of corporate property, information or your position, without the consent of the general counsel.

You need to avoid any direct or indirect business connection with our customers, suppliers, lenders, advisers or competitors, except when working on LS&Co.'s behalf or for our benefit. You also may not compete with LS&Co. directly or indirectly or help any third party compete with us while you work here.

Conflicts of interest are not always clear-cut. If you have a question or become aware of a potential conflict, talk to your manager, Human Resources or the Legal department.

## Gifts

To avoid any perception of impropriety, employees must not accept or make payments, gifts, loans or any other favors from or to anyone who does or wants to do business with LS&Co.

The exceptions to this general rule are outlined in the [Global Gifts & Entertainment Policy](#) on Threads. The Legal department can provide additional guidance.

## Family Members

LS&Co. started out as a family business and we are proud of those ties. Members of the same family can work at LS&Co. and in the same general location. When that happens, however, it is important to avoid conflicts of interest and favoritism or even their appearance. You should avoid hiring, managing, promoting, transferring or giving work assignments to any relative, domestic partner or someone with whom you have a significant personal relationship.

➔ In these situations, get prior written approval from your local Human Resources department.

It's just as important not to do business with, or buy goods or services for LS&Co. from, a member of your family. The same goes for any business in which you or a family member plays a management, ownership or other important role.

➔ If you want to engage in this kind of transaction, you need prior written approval from LS&Co.'s general counsel.

If you do have company dealings with a relative, you need to treat that transaction the same as any other business relationship. It is important to avoid even the appearance of preferential treatment.

| SITUATION  | CONFLICT  |
|--|---|
| A member of the Finance department is married to an outside auditor assigned to LS&Co. | It may make it difficult for the employee to perform his or her work objectively and effectively.                     |
| An employee gives sample clothing to a relative, who sells the samples on eBay.        | The employee and the family member are receiving improper benefits as a result of the employee's position with LS&Co. |
| A supervisor starts a relationship with a subordinate.                                 | This creates opportunities for favoritism and unfair advantages being given to the subordinate.                       |
| An employee goes to work part-time for a customer while still employed at LS&Co.       | The employee could share proprietary LS&Co. information and compromise our competitive advantage in the marketplace.  |

**Q:** I want to start my own accessories business, working on the weekends. Is this OK?

**A:** Any outside employment, even your own business, needs the approval of your manager. In addition, this proposed business could be considered a competitor, posing another conflict of interest. You should talk with your manager or a member of the HR or Legal team before starting your own business.

**Q:** We're accepting bids for a new vendor. One candidate offered to donate \$1,000 to one of the company's favorite charities as a thank you for all of the meetings during the RFP process. Is this OK?

**A:** No. Even if the vendor is donating in good faith, the timing could be seen as an effort to influence our decision. You should thank the candidate for the gesture but decline the donation.

**Q:** A consultant handling the permits for a new store outside the U.S. asked for a \$40,000 retainer. He says the money is needed to "make sure the permitting goes smoothly." Should I be concerned?

**A:** Absolutely. You need to know where, how and why the \$40,000 is being spent. LS&Co. needs to be sure the money won't be used as a bribe. Raise this issue with your manager or the Legal department.

## Outside Employment

Before taking a second job or going to work for yourself, you need to have the written approval of your manager. Once you have that approval, your outside employment should not interfere with your performance and responsibilities to LS&Co. You also may not rely on your LS&Co. co-workers or use company property for your own business purposes.

Under no circumstances can you work for or receive any compensation from an LS&Co. supplier, customer, competitor or lender while you work for us.

## Speaking Fees

Giving back to the community sometimes involves speaking to a professional organization or community group. We encourage employees to contribute their time, as long as no conflict of interest exists and the amount of company time, resources or assets needed to prepare are reasonable.

An honorarium is a relatively small sum given in recognition of your contribution to the organization. It should not be offered as compensation. All speaking fees must be turned over to the company so we can donate them to a nonprofit.

## FREE & FAIR COMPETITION

Most of the countries where LS&Co. operates have laws designed to encourage and protect free and fair competition. They are often called “antitrust,” “competition” or “consumer protection” laws. They regulate our relationships with retailers, including:

- Pricing practices
- Discounting
- Credit terms
- Promotional allowances
- Exclusive distributorships
- Franchisee relationships
- Licensee relationships
- Restrictions on carrying competing products
- Termination of relationships

They also govern, usually quite strictly, relationships between LS&Co. and our competitors. Generally speaking, you should limit contact with competitors. When you do meet with a competitor, you should avoid discussing prices, terms and conditions of sale, customers and suppliers.

LS&Co. is committed to protecting the best interests of our customers and our company by obeying these laws. The consequences of violating antitrust laws are severe, especially in terms of our reputation.

Because these laws can be quite complex, be sure to involve the Legal department as soon as questions arise.



## IT'S ALL RIGHT TO BE ACTIVE IN A TRADE ASSOCIATION ALONGSIDE COMPETITORS.

That includes groups like the American Apparel and Footwear Association (AAFA), U.S. Fashion Industry Association (USFIA) and the European Branded Clothing Alliance (EBCA), for example.

If you have questions about whether an organization is acceptable, contact the Legal department. Also note that the provisions of the Code regarding Free & Fair Competition still apply to your participation.

## ENVIRONMENT & SUSTAINABILITY

Part of delivering profits through principles means minimizing our impact on the environment and fostering the well-being of the people who make our products. Our sustainability initiatives support growth and brand equity while reducing costs and risks. They are a competitive advantage for us. It is every employee's responsibility to support, encourage and advance these initiatives.

## BOARD SERVICE

**Nonprofit boards:** We encourage you to do good in your communities. Serving on an advisory or nonprofit board is fine with LS&Co. as long as it doesn't interfere with your commitment and responsibilities on the job. As a member of a board, you may not act on behalf of or appear to represent LS&Co.

**For-profit boards:** Only members of the Worldwide Leadership Team (WLT) are allowed to serve on the boards of for-profit organizations. WLT members can serve on one board at a time and must obtain approval from the general counsel and chief executive officer before agreeing to serve on any board. No LS&Co. employee may serve on the board of directors or the advisory board of any LS&Co. competitor, customer, supplier, vendor, contractor, licensee or agent.



# LS&CO. HAS A LONG HISTORY OF WELCOMING AND CELEBRATING DIVERSITY.



HOW WE WORK WITH EACH OTHER



## DISCRIMINATION

We do not tolerate discrimination of any kind by any employee. Every employee has the right to work in a fair work environment free of discrimination based on their:

- Race, color, creed, religion
- National origin, citizenship
- Age, sex, sexual orientation, gender identity
- Marital status
- Mental or physical disability
- Other individual attribute or status protected under local law

You should report any discrimination immediately to your manager or your Human Resources representative.

## HARASSMENT

Three of our core values—integrity, courage and empathy—align with our prohibition of harassment. We do not tolerate harassment of any kind. This includes any conduct related to a person's race, color, national origin, ancestry, religion, creed, physical or mental disability, marital status, medical condition, sexual orientation, gender identity, age or any other basis protected by federal, state or local law.

Committing any kind of harassment will lead to disciplinary action, up to and including termination of employment.

Here are some examples of what harassment can look like:

- Unwanted and unwelcome sexual advances or offering employment benefits in exchange for sexual favors.
- Unwelcome visual conduct such as leering, staring or making sexual gestures or displaying sexually suggestive objects or pictures.
- Unwelcome verbal or written comments such as threats, epithets, insults, slurs, jokes or emails.
- Unwelcome physical conduct such as assault, unwanted touching or blocking normal movement.
- Retaliating for reporting or threatening to report harassment.

## OUR CORE VALUES

ORIGINALITY ★ INTEGRITY ★ COURAGE ★ EMPATHY

## SAFETY

LS&Co. has rules in place to protect the safety and well-being of all employees. It is your responsibility to:

- Obey these safety and health rules and policies.
- Report accidents, injuries and unsafe equipment, practices or conditions.
- Exercise caution in all of your work activities.
- Report any unsafe condition to your supervisor immediately.

We do not allow violence or threatening behavior. If you engage in this kind of behavior, you will be subject to disciplinary action, up to and including termination of employment.

## ILLEGAL SUBSTANCES & ALCOHOL

When you're at work, you may not possess, transfer, buy, sell or use (unless professionally prescribed) any illegal controlled substance. The unauthorized use or excessive consumption of alcohol during work or at company-sponsored events is also prohibited.

## PERSONNEL INFORMATION

Your personal employee information—compensation, performance, home address and phone number, for example—is sensitive and highly confidential. You may not handle, retain or share any employee's personal information without authorization. Doing any of these things violates company policy and may also violate local or international regulations.

Please consult the Legal department if you have any questions or concerns about personal employee information.

**Q:** A local events company asked me for the names and addresses of my team members in order to invite them to a party. Is it OK to give that information out?

**Q:** A colleague told me that his supervisor asked him to submit an inflated expense account. I wasn't involved. Do I have an obligation to report this?

**A:** No. Sharing personal information about LS&Co. employees violates company policy.

**A:** Yes. It's your responsibility to report an incident that may be a violation of the Code of Conduct. You don't have to have been an eyewitness or be absolutely certain of the situation. When you report something like this, it allows us to investigate. You're doing your part to make sure LS&Co. and our employees act with integrity.

## REPORTING ILLEGAL BEHAVIOR & CODE VIOLATIONS

You play an essential role in bringing our Code of Conduct to life and incorporating it into how we do business. Please talk to your manager or reach out to the Human Resources or Legal department if you see or experience any illegal or unethical behavior, violations of this Code, questionable accounting, internal controls or auditing matters, or when you have doubts about the best course of action in a particular situation.

If you are uncomfortable raising an issue or a question internally, you can contact [LS&Co.'s Ethics & Compliance Reportline](#). This service lets you anonymously report any observed unethical or illegal behavior, Code violations or questionable accounting, internal controls or auditing matters.

LS&Co. does not allow retaliation for reports of misconduct based on your belief of illegal behavior or Code violations. You are expected to cooperate in internal investigations of misconduct.



**Q: Can I get fired if I report that I think our financial statements are incorrect?**



## **NON-RETALIATION**

We encourage employees at all levels of the company to raise concerns regarding perceived violations of this Code of Conduct, harassment or ethical issues.

LS&Co. prohibits retaliation against any employee who, in good faith, reports perceived illegal, unethical or inappropriate behavior or Code violations.

When a violation or other improper behavior is being investigated, we expect you to cooperate in the investigation.

## **DISCIPLINARY ACTIONS**

This Code of Conduct helps us do business in accordance with our values. We expect all of our employees to live up to and follow these standards while working for the company. LS&Co. will take appropriate action against any employee whose conduct violates these policies or any other company policy. Disciplinary actions may include termination of employment.

**A: No. This would be considered retaliation for doing what this Code asks you to do. We never discharge, demote, threaten or discriminate against anyone who has made a good faith report about accounting or auditing matters. What's more, federal and state laws protect employees who raise concerns about this kind of misconduct.**



# HOW WE PROTECT OUR ASSETS

LS&Co.'s assets are both tangible (equipment, supplies and samples) and intangible (data, electronic communications and financial information). All of those assets need to be treated with care and respect. This section of our Code of Conduct describes what we expect from you regarding company assets in all forms.

## DATA PROTECTION & PRIVACY

LS&Co. is committed to protecting personally identifiable information (PII) and other confidential information we collect from or maintain about consumers, customers, suppliers and other third parties.

We expect you to keep business records containing PII, including any electronically accessed or stored information, secure at all times and to use the data only for authorized business purposes.

Every employee is responsible for being familiar with the laws that apply to collecting, storing, transferring and using PII. This includes understanding and following all applicable local privacy and data protection laws and regulations in the country where you work and complying with the rules that apply to the transfer of PII internationally. You can find out more about PII on our [Information Security portal](#).



## WHAT IS PII?

**PII (personally identifiable information) is any information that can identify an individual (customer, consumer, employee or supplier), including:**

- Name
- Date of birth
- Business or personal address
- Business or personal telephone number
- Credit card number
- National identification number





## ELECTRONIC COMMUNICATIONS

Digital communications—phones, email, instant messaging, the internet and social media—are woven through our daily lives. We couldn't do business without them. That makes it all the more important to use these tools ethically and responsibly for legitimate business activities.

Business communications can become public whether you intend them to or not, so avoid making inaccurate or exaggerated statements, derogatory remarks or inappropriate characterizations of people or companies that could be misunderstood. This applies to email, internal memos and formal reports, whether in digital or paper form.

Remember that anything you view on your computer screen or print out can be seen by others. You should never display any images that others might consider offensive or a form of harassment.

Digital communications may never be used to make disparaging comments or send content that violates our policies against discrimination and harassment.

### Personal Use

We understand that some personal use of our information systems is to be expected. However, it should be kept to a reasonable minimum. You may not use company equipment or digital communications for activities that are unlawful, unethical or otherwise contrary to this Code or company policy.

Keep in mind that even personal data on LS&Co. information systems is subject to all corporate policies. This means, for example, that you may not use LS&Co. information systems to send or forward content that:

- Violates any company policy, including those against discrimination and harassment.
- Is misleading, dishonest or otherwise improper.

The company does not typically monitor internet usage or messages on our voicemail or email systems. However, we reserve the right to do so in appropriate circumstances, consistent with applicable local laws and regulations.

### Email & Instant Messaging

Email and instant messaging are convenient, fast and effective ways to communicate with team members, our business partners and customers worldwide, as long as you use them appropriately. Irresponsible, careless, disparaging or insensitive statements can be taken out of context and used against you and the company. They also could be considered libel or harassment.

**LSA/LSAMA employees:** Your LS&Co. digital communications accounts (email and instant messaging) are there for you to conduct company business and enhance your productivity. Subject to local laws, digital communications sent or received on the company's email system are the property of LS&Co. You have no right to privacy for documents, addresses or correspondence contained on the company's digital communication systems, and no information on the system is your "confidential information."

**LSE employees:** Your LS&Co. digital communications accounts (email and instant messaging) are there for you to conduct company business and enhance your productivity. Subject to local laws, communications sent or received on the company's systems are the property of LS&Co. Your right to privacy of documents, addresses and correspondence contained on the company's communications systems is protected in accordance with local law.

### Social Media

What anyone says in a blog, tweet or post can reach a global audience in minutes. This power to connect with millions of people around the world carries an obligation for us as a company and as individuals to act responsibly when we communicate with our friends, family, co-workers, customers and consumers. Social media is a powerful tool, and we need to treat it with care to avoid unintended consequences.

As an LS&Co. employee, what you say on social media can positively or negatively affect our company. Your responsibility to LS&Co. does not end when you leave the office. Many of us use social media outside of work; even in these personal pursuits, we all need to protect our corporate confidential and proprietary information and LS&Co.'s reputation. We expect you to use good judgment and exercise personal responsibility whenever you use social media.

For more information, refer to our [Social Media Policy](#).

# EVERY EMPLOYEE IS RESPONSIBLE FOR PROTECTING OUR ASSETS.

## PHYSICAL ASSETS

Every employee is responsible for protecting our assets—including digital, financial and physical assets, intellectual property and confidential information. This includes making sure that assets are not loaned, sold or donated without proper authorization and documentation. Theft, carelessness and waste have a direct impact on our business success.

You should report any suspected incident of fraud, theft, loss, damage or misuse to your manager, the Security department or the [Ethics & Compliance Reportline](#).

### Computers & Other Equipment

We expect you to use company equipment for company business, but we realize that there are occasions when you will need to take care of personal business. This personal use should be limited and comply with LS&Co. policies, including those related to discrimination and harassment.

You are expected to take care of company equipment entrusted to you and use it responsibly. If you use LS&Co. equipment at your home or offsite, you must take precautions to protect it from theft or damage, just as if it were your own. When you leave LS&Co. employment, you must return all company-owned equipment immediately.

### Product Samples

Product samples are valuable company property and should be used only for legitimate business purposes. Samples—whether stored in LS&Co. offices, supplier warehouses, retail locations or customer premises or earmarked for donation—need to be protected from loss, damage, theft, sabotage or unauthorized use or disposal.

Taking or using product samples of any value for personal use without authorization is theft of company property and may result in disciplinary action, up to and including termination. You also may be subject to civil or criminal charges, according to local law.

## INFORMATION SYSTEMS

LS&Co.'s information systems, including computers, voicemail, email and internet access, are to be used for business purposes consistent with this Code and all applicable corporate policies.

If you have access to LS&Co. information systems, you are responsible for taking the precautions needed to prevent unauthorized access to those systems. This includes protecting passwords and other means of entry.

### Software

All software used by employees to conduct company business must first be authorized by our Information Technology department. Never make or use unauthorized copies of any software for company business, whether in the office, at home or on business travel. Doing so may expose you and LS&Co. to civil and criminal liability.

## RECORDS MANAGEMENT

Each LS&Co. business affiliate has its own records retention policies, governed by local law. Business records should always be retained or destroyed according to those local policies.

Altering, destroying, mutilating or concealing documents or other records when the company is, or has reason to believe that it may be, involved in litigation or a governmental proceeding may have serious legal consequences. If you are involved in company-related litigation or an internal or external investigation, please consult the Legal department with any questions about document retention.





# HOW WE WORK WITH MONEY

## CORPORATE CREDIT CARDS

In general, corporate credit cards are to be used only for business-related expenses, such as:

- Travel and entertainment, including catering.
- Operating expenses, such as supplies, subscriptions, postage, courier services and printing.
- Recognition expenses, such as flowers and awards (refer to our [Employee Prizes and Awards Policy](#)).
- Company car expenses, including repairs, parts, maintenance and fuel.

If you are issued a corporate card, you are responsible for the services and purchases paid for with the card. This includes payments, late fees and penalties. You may not use a corporate card for personal expenses.

Unauthorized use of a corporate card will result in disciplinary action, up to and including termination.

For more information, refer to our [Corporate Card Policies](#).

## TRAVEL & ENTERTAINMENT

The company reimburses employees for necessary business travel and reasonable entertainment expenses.

If you are not sure whether an expense is legitimate, ask your manager or send a message to [MbxCorpCard@levi.com](mailto:MbxCorpCard@levi.com).

You need to document all T&E expenses. The documentation must accurately describe or include the:

- Nature of the expense and the business reason.
- Date, location and who was there.
- Itemized receipt for business meals.
- Entire hotel folio for hotel stays, not just the first and last pages.

Keep in mind that all travel and entertainment transactions must comply with our [Anti-Bribery & Anti-Corruption Policy](#).

For more information, refer to our [Global Travel Policy](#).



### THREE TIPS FOR SUBMITTING EXPENSE REPORTS

1.

SUBMIT THEM PROMPTLY. IF YOU WAIT TOO LONG, YOU MAY NOT BE FULLY REIMBURSED.

3.

MAKE SURE ANY SUPPORTING DOCUMENTATION IS LEGIBLE.

2.

BE SURE TO ATTACH A RECEIPT.



If you're a supervisor, it's your responsibility to actually read and review expense submissions before you approve them.

| LEGITIMATE T&E EXPENSES  | PROHIBITED EXPENSES   |
|--|---|
| Lunch with a supplier.   | Dinner with your partner when you forgot your personal credit card at home.             |
| Airfare and hotel to attend a conference.  | Booking non-business, premium seating for the flight and booking a non-preferred hotel. |
| Parking in the long-term lot at the airport for a three-day trip.  | Leaving your car in the short-term parking lot during a three-day trip.                 |
| Buying three pairs of Lee jeans and noting on your expense report that they were needed for fabric analysis. | Buying a new laptop computer and printer.   |





## ACCOUNTING PRACTICES

One of our most important responsibilities to our shareholders, lenders and regulators is to make sure that all financial transactions are fully and accurately recorded in the company's books and records. This obligation is one we take seriously as a legal and ethical matter.

No one is allowed to make false or misleading entries, or to receive unrecorded funds, assets or payments, without appropriate supporting documentation and approval. Any effort to improperly coerce or manipulate, mislead or conceal relevant information from the Finance team, Corporate Controller or our independent auditor is also prohibited.

We maintain all LS&Co. books, records, accounts and financial statements in appropriate detail so they accurately reflect the company's transactions. These documents must strictly conform to local tax and accounting requirements and practices, applicable legal requirements and our own systems of internal and disclosure controls.

## INSIDER TRADING

You may have access to information about LS&Co.'s business performance that has not been released publicly. This can include financial or other information that an investor would, or would likely, consider important in evaluating our bonds or other securities. This is called "inside information."

Trading bonds on the basis of inside information and providing inside information to any party who may use the information to trade may be a serious violation of U.S. securities laws and the laws of other countries. This is true regardless of where in the world you reside or the size of the transaction.

It also can raise legal issues if you have access to material, nonpublic information on our suppliers and you buy or sell their securities.

Contact the Legal department with any questions about inside information and insider trading.

## INVESTING IN BUSINESSES THAT COMPETE OR WORK WITH LS&CO.

If you want to buy stock or invest in a customer, supplier or competitor, you must be very sure that the investment does not compromise your responsibilities to LS&Co. or create a conflict of interest. You need to consider:

- The size and nature of the investment.
- The relationship between LS&Co. and the other business, including whether LS&Co. buys goods and services from the company you want to invest in.
- Your access to LS&Co. confidential information related to the other company.
- Your ability to influence LS&Co. decisions related to the company you want to invest in.

You should check with the Legal department if you have any questions about whether a proposed investment may violate the Code.

## LOANS

Any loan made by LS&Co. to a director, officer or employee is subject to legal and contractual limitations. In some cases, loans are simply illegal. Any loan by LS&Co. to a director, officer or employee must be approved in writing by the chief human resources officer and the chief financial officer.

## SIGNATURE AUTHORIZATION

Certain employees have the authority to sign contracts, checks and other commitments on behalf of the company. For more information, please contact your regional controller refer to our [Global Finance Policies](#).





# OUR RELATIONSHIPS WITH OTHERS ARE BASED ON TRUST AND TRANSPARENCY.



HOW WE WORK WITH OTHERS





## SUPPLIERS

LS&Co.'s suppliers are critical to our success. You may not discuss a supplier's performance with anyone outside LS&Co. without the supplier's permission.

A supplier is free to sell its products or services to LS&Co.'s competitors, except in two situations:

- When they have been designed, fabricated or developed to LS&Co.'s specifications.
- When LS&Co. and the supplier have a specific agreement regarding exclusivity and confidentiality.

## CONSULTANTS, INDEPENDENT CONTRACTORS & OTHER SERVICE PROVIDERS

LS&Co. engages consultants, independent contractors and other third parties to provide services and act on the company's behalf. These relationships must be proper, lawful and documented.

Commissions, fees and discounts must always be documented in a written agreement and reflect the value of the service being provided to LS&Co. These sums should never exceed what is reasonable and customary in our industry.

Because the actions of consultants, independent contractors and other third parties reflect on LS&Co., they must be aware of this Code of Conduct and agree to follow company policy prohibiting bribery as described in the [LS&Co. Global Anti-Bribery & Anti-Corruption Policy](#).

## FINANCIAL DISCLOSURES & COMMUNICATIONS

LS&Co. discloses its financial results in filings with the U.S. Securities and Exchange Commission (SEC) and other authorities, as well as public investor conference calls and media releases. You should not disclose any financial information, other than data already made public, without prior approval of the chief financial officer or the corporate controller. This is important for maintaining confidentiality and compliance with applicable securities laws in the U.S. and elsewhere.

We have specific policies about who may communicate information to the media and the financial analyst community. Please refer all financial analyst calls to Investor Relations in the Corporate Treasury department in San Francisco.

## MEDIA RELATIONS

As an industry leader with iconic brands, LS&Co. receives extensive media coverage worldwide. Therefore, it's important to protect the company's reputation. You should always consult with the communications professionals in your region before responding to media calls or participating in media interviews. For more information, refer to our [Global Media Guidelines](#).

## POLITICAL CONTRIBUTIONS, ACTIVITIES & LOBBYING

While LS&Co. is proud of the stands the company has taken on social issues, you may never use LS&Co.'s name in a way that suggests that the company sponsors or endorses your personal political activities. You also may not use your position at LS&Co. to pressure team members to make political contributions or to support or oppose specific candidates.

As a corporate citizen, LS&Co. complies with strict reporting requirements related to lobbying. The Global Policy and Advocacy team in the Corporate Affairs department must approve any lobbying activities on behalf of the company, including retaining an external lobbyist or lobbying firm. More generally, you may not use any LS&Co. resources for political purposes without the prior approval of Global Policy and Advocacy.



## WAIVERS OF THE WORLDWIDE CODE OF BUSINESS CONDUCT

Any waiver of this Code for executive officers, other than the chief executive officer (CEO), must be approved by the CEO. Any waiver of this Code for any director or the CEO must be approved by the board of directors.



### LS&CO.'S ETHICS & COMPLIANCE REPORTLINE

# 1-800-405-8953

Toll-free, 24/7 Outside the U.S.? Find your local, toll-free country access code on [Threads](#).

The Ethics & Compliance Reportline is a confidential, anonymous way to report or inquire about illegal or unethical behavior. You don't have to identify yourself unless you want to.

**LEVI STRAUSS & CO.**