

LEVI STRAUSS & CO.

Global Anti-Bribery and Anti-Corruption Policy Statement for Third Parties

I. Summary

Levi Strauss & Co. (“LS&Co.” or the “Company”) is committed to doing business in an ethical, honest, and transparent manner. As a result, LS&Co. prohibits bribery and corruption in all forms and expects the same from its Third Parties.

The term “Third Parties” is defined as those agents, distributors, licensees, suppliers, consultants, joint venture partners, vendors, and all other third parties acting for, on behalf of, or who have otherwise contracted with LS&Co.

All LS&Co. Third Parties must meet the requirements set forth below and comply with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010 (“UKBA”), and other anti-corruption and anti-bribery laws of the countries where LS&Co. conducts business (collectively known as “Anti-Corruption Laws”). Third Parties who do not comply with these requirements may be terminated and/or precluded from consideration of future business.

In selecting Third Parties, LS&Co. intentionally chooses reputable business partners who are committed to the highest ethical standards and business practices. LS&Co. acts with integrity and competes fairly on the quality of its products, using a “profits through principles” approach. In particular, the Company does not use the exchange of improper payments, business courtesies, or other things of value to gain an unfair competitive advantage. LS&Co. holds its Third Parties to these same standards and expects its Third Parties to act ethically and in compliance with all applicable legal requirements. This Global Anti-Bribery and Anti-Corruption Policy Statement for Third Parties (“ABAC Policy Statement”) summarizes LS&Co.’s global expectations. Any questions about this ABAC Policy Statement or compliance concerns should be directed to LS&Co.’s Global Compliance Department via email at ethicscompliance@levi.com.

II. Prohibition of Bribery and Corruption

As a LS&Co. Third Party, you shall not tolerate, permit, or engage in any form of corruption or bribery. This means that you shall not offer, pay, promise, solicit, or authorize “anything of value” (as defined below), directly or indirectly, to any person, whether from the public or private sector, with knowledge, expectation or suspicion that such person will use their position to obtain or retain business or otherwise secure a business advantage for LS&Co. “Anything of value” is broadly defined, and includes items such as: (1) bribes, whether tangible (e.g., money, gifts) or intangible (e.g., preferential treatment, whether objectively or subjectively); (2) meals, travel, and entertainment; (3) stock, shares or ownership; (4) discounts on products and services not readily available to the public; (5) offers of employment or internships; (6) placement at educational institutions; (7) political contributions; (8) charitable donations; (9) assumption or forgiveness of debt; and (10) prospective business.

III. Prohibition of Facilitating Payments

A “facilitating” or “grease” payment is a nominal payment made to a government official to expedite or secure the performance of a routine, nondiscretionary government action that the government official is required to routinely perform. Examples of facilitating payments include payments to obtain permits, licenses, or other official documents to qualify a person or entity to do business in a particular country; process governmental papers on an expedited basis; or schedule physical inspections associated with business or contract performance. LS&Co. strictly prohibits facilitating payments, and Third Parties acting for or on behalf of LS&Co. must consistently refrain from offering, paying, promising, or authorizing any such payments.

IV. Restrictions on Political Contributions and Charitable Donations

Third Parties are prohibited from offering, making, promising, or authorizing any political contributions or charitable donations for or on behalf of LS&Co., or in any way intended to influence or otherwise affect LS&Co. business. The prohibition related to political contributions extends to any and all payments related to city, local, county, regional or national governments and non-governmental organizations (NGOs).

V. Internal Controls and Recordkeeping Requirements

LS&Co. relies on its books and records for financial reporting, legal filings, and business decision-making. As a result, LS&Co. has established both internal controls and recordkeeping requirements designed to ensure the fairness and accuracy of its financial statements, provide a means for accounting for the Company’s assets, and safeguard those assets against loss.

LS&Co. requires its Third Parties to establish similar internal accounting controls and to keep, maintain, and — upon request — promptly provide to LS&Co. accurate records of all matters related to the business conducted for or on LS&Co.’s behalf. Moreover, Third Parties are expected to promptly implement corrective actions in the event that any concerns are identified.

VI. Due Diligence and Monitoring Requirements

Under many Anti-Corruption Laws, companies and their employees can be held liable for Third Party misconduct. As a result, LS&Co. is vigilant in the screening, selection, and monitoring of its Third Parties and conducts reasonable investigations of their backgrounds, reputations, and business capabilities prior to any new engagement. In addition, LS&Co. requires its Third Parties to represent and warrant in their contracts that they will comply with all applicable Anti-Corruption Laws.

Third Parties must exercise similar caution when hiring any agents or representatives to perform work for or on LS&Co.’s behalf, and Third Parties must monitor those agents throughout the term of their engagements. If Third Parties identify any red flags — factors suggesting misconduct or the potential for misconduct — such issues must be documented, investigated, and addressed.

VII. Training, Communication & Reporting

LS&Co. requires its Third Parties to establish policies and procedures to ensure compliance with this ABAC Policy Statement and applicable Anti-Corruption Laws. Third Parties must:

- Communicate the requirements outlined in this ABAC Policy Statement to Third Party employees and agents through relevant training, distribution of policies, and/or other forms of formal messaging.
- Ensure compliance with this ABAC Policy Statement by both employees and agents, and remediate any issues that may arise during the course of the LS&Co. engagement.
- Promptly report any suspected violations, allegations and/or concerns related to this ABAC Policy Statement and/or applicable Anti-Corruption Laws.

VIII. Raising Questions and Concerns

LS&Co. expects its Third Parties to uphold the Company's values and high ethical standards, including an unwavering commitment to integrity in all business relationships. As a result, LS&Co. is committed to creating an environment where its Third Parties feel comfortable raising concerns and requesting help. If you know or suspect any violations of this ABAC Policy Statement, the Anti-Corruption Laws, or any other applicable laws, regulations, or requirements, immediately report your concerns to LS&Co.'s Global Compliance Department. Raising a concern helps all of us perform business in a responsible and ethical manner.

For general guidance on complying with this ABAC Policy Statement, the *LS&Co. Global Anti-Bribery and Anti-Corruption Policy*, or any other LS&Co. requirements, consult the LS&Co. Global Compliance Department or your local LS&Co. legal representative.

Levi Strauss & Co. Reportline

Third Parties may report a concern by email at ethicscomplianceteam@levi.com or by using the global [LS&Co. Reportline](#) available on our website www.levistrauss.com, or via phone at 1-800-405-8953.