



GLOBAL EMPLOYEE CODE OF CONDUCT

LEVI STRAUSS & CO.

AT LEVI STRAUSS & CO., WE PRIDE OURSELVES ON DOING THE RIGHT THING.

LIVING THE CODE

We strive to create an environment that is committed to diversity, equity and inclusion, respect, accountability, and doing what is right. Everything we do to drive growth must be done with the highest standards of ethics, honesty and integrity.

Each action we take as we conduct business globally must adhere to these high standards and must comply with this Code of Conduct ("Code"), LS&Co. policies and procedures, and all applicable laws and regulations. All LS&Co. employees (including officers), directors, service providers, temporary employees and contractors across the globe are responsible for reviewing, understanding and complying with this Code and LS&Co.'s policies and procedures.

In addition to this responsibility, LS&Co. managers and supervisors are also responsible for:

- Acting as role models and creating an environment where employees feel comfortable asking questions and raising concerns without fear of retaliation.
- Regularly training team members about the Code and applicable LS&Co. policies.
- Making themselves available to provide guidance to employees.
- Reporting any issues or concerns raised by an employee in a timely manner to Ethics & Compliance, Legal or Human Resources.

The expectations within this Code apply globally, regardless of whether you are working remotely or in the office, attending a business meeting or customer event, or conducting any other activity on behalf of LS&Co. If there is a difference between this Code, LS&Co. policies, and local laws and regulations, you must apply the rule that sets the higher standard of ethical behavior and is the more stringent legal requirement.



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USING THE CODE & SEEKING ADVICE

If you are questioning whether your actions or those of others comply with the Code, consider the following:

- Would you be comfortable having your actions publicized?
- Is the action legal?
- Is it expressly permitted by our Code or our policies?
- Does it make sense? Consider the following:
 - Is it consistent with the company's strategies and goals?
 - Does it align with our values?
 - Does it "feel" right? This includes any hesitation you may have regarding a request made of you by a superior or another colleague.

If you answer "No" to any of these questions or if you are unsure of the answer, reach out to your manager, Ethics & Compliance, Legal or Human Resources for help navigating your questions or concerns.

HAVING COURAGE & SPEAKING UP

We all have an obligation to ensure that business is conducted with honesty, integrity and in full compliance with this Code, LS&Co. policies, and applicable laws and regulations. If you become aware of a suspected violation or an allegation of misconduct, you must promptly report your concern.

How Do I Report a Concern?

You have several options:



Speak directly to your manager or reach out to Ethics & Compliance (ethicscompliance@levi.com), Legal or Human Resources.



Report the issue on our [Reportline site](#).



Call the Reportline at 1-800-405-8953. (If you are calling from outside the U.S. or Canada, refer to the toll-free country access codes on [Threads](#).)

Note: The Reportline allows for anonymous reporting if allowed under local law.

Non-Retaliation

Speaking up takes courage. LS&Co. strictly forbids retaliation against any person who in good faith raises a concern or reports possible misconduct. Retaliation can occur in many ways, including unfavorable or reduced assignments, adverse performance evaluations, harassment, demotion, termination and more.

If you believe you have been subject to retaliation of any kind, you should report this immediately to Ethics & Compliance, Legal or Human Resources.

Violations & Investigations

LS&Co. takes all reports of potential violations seriously and is committed to reviewing and investigating all credible allegations. If requested to do so, you must cooperate fully and truthfully during an internal investigation. In addition, nothing in this Code or any of our policies or agreements is meant to prohibit or restrict you from reporting any violation of law to any appropriate governmental or regulatory entity, or from cooperating with or providing information to any such entity in connection with a legal violation, investigation, government inspection or inquiry.

Q: Do I have to identify myself if I want to report any suspicions, concerns or wrongdoing?

A: No, you can report any concern anonymously via the Ethics Reportline. The Reportline is managed by an independent third party and enables anyone to report concerns without identifying themselves.

Q: A colleague told me that his supervisor asked him to submit an expense report containing illegitimate expenses. I was not involved, and I did not see proof. Do I have an obligation to report this issue?

A: Yes. It is your responsibility to report any incident that may be a violation of the Code – even if you were not a witness or are not certain of the details. When you report it, we can then properly investigate. You are doing your part to ensure LS&Co. and our employees act with integrity.

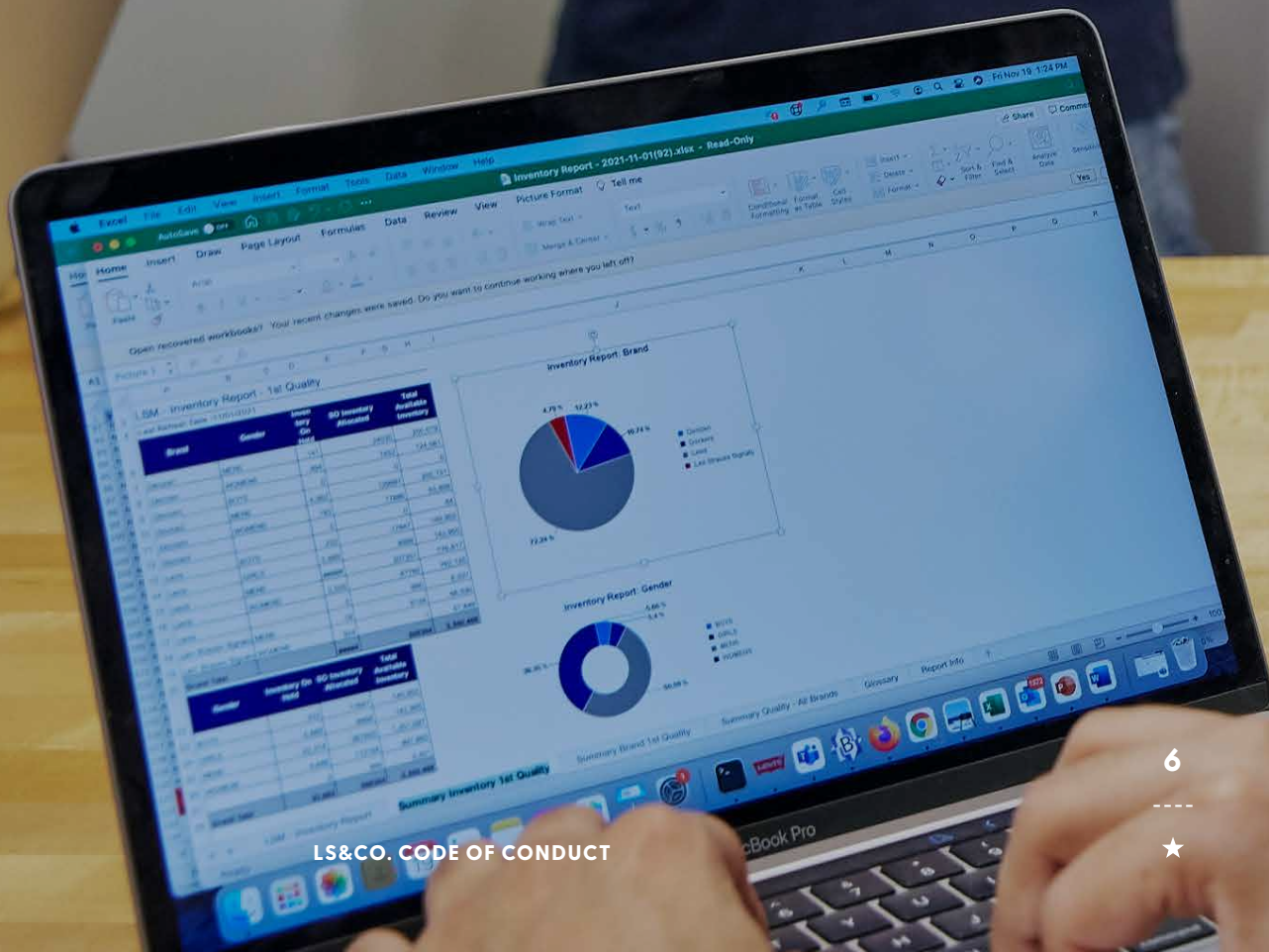
Disciplinary Action

Violations of this Code, LS&Co. policies, and all applicable laws and regulations – and attempts to conceal violations – may result in disciplinary action up to and including termination of your employment. In some circumstances, your actions may also result in legal authorities imposing fines or criminal penalties against you and/or LS&Co. Therefore, it is important to follow the rules and restrictions set out in this Code at all times.

Q: I have previously spoken up about an issue involving my manager. Although I did so anonymously, I think they know it was me and have been treating me differently since then. They stopped inviting me to team lunches and involving me in strategic projects. Can they do this?

A: No, they cannot. If your manager is behaving like this and you believe it is because you have spoken up, this may be retaliation. LS&Co. does not tolerate retaliation against anyone who has spoken up in good faith. You should report this behavior.

DOING BUSINESS LEGALLY & ETHICALLY WITH EXTERNAL PARTIES



We must consider the legal, financial and reputational consequences of our interactions with business partners. As part of this commitment, LS&Co. will only work with reputable business partners who act in compliance with all laws and regulations and who value the same ethical principles that LS&Co. operates under. These principles are set out in our [Supplier Code of Conduct](#). When working with our business partners, you must:

- Avoid any illegal, unfair or deceptive practices.
- Treat all business partners honestly, fairly and objectively.

- Be honest and forthright regarding our products and services.
- Follow proper procurement and sourcing
Select business partners based on merit and never because of a conflict of interest.

In addition to the above, you must ensure that our business partners undergo appropriate background checks to protect LS&Co. from corruption and other risks that arise from engaging with disreputable business partners. For more information, please review the third-party due diligence process located in the appendix of the [Anti-Bribery / Anti-Corruption Policy](#).

Q: My team has been working with the same distributor for the past 10 years. We are now going through the process of renewing the distribution agreement. Is third-party due diligence approval still required?

A: Yes, third-party due diligence is required for all new third parties and all existing third parties that are going through a new contracting process to renew or extend their contracts, regardless of whether they had been previously reviewed by Ethics & Compliance.

Q: We are looking to engage a new vendor to carry out some minor work for us, and the total value of the contract is less than \$50,000 USD. Does this vendor still need to be reviewed by Ethics & Compliance?

A: Yes. All third parties, regardless of the monetary value of the contract, need to be reviewed by Ethics & Compliance. Anti-bribery, anti-corruption and sanctions regulations do not set minimum materiality thresholds.

Q: If I receive Ethics & Compliance approval for a new third party, does that mean I can engage that third party with no further actions?

A: No. You need to double-check whether there are any mitigating actions Ethics & Compliance has asked you to put in place first. You should also ensure that you have complied with other pre-engagement processes that may be required for that type of third party (e.g., legal contract review/approval, [Privacy Impact Assessment](#), [Vendor Security Assessment](#), etc.).

ANTI-BRIBERY & ANTI-CORRUPTION LAWS

LS&Co. prohibits all forms of bribery and corruption. Anti-bribery and anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, generally apply to all LS&Co. employees and operations around the globe. While bribery and corruption laws vary in each country, the rules at LS&Co. are simple:

- You must never pay, authorize, offer or promise to pay or facilitate a bribe or payment to anyone, including to a government official or a business partner.
- You must never request or receive a bribe.
- You must never use a third party or agent on your behalf or on behalf of LS&Co. to pay or receive a bribe.

If you believe that a colleague or third party may be improperly influencing, bribing or engaging in any corrupt behavior, or if something does not feel right, contact Ethics & Compliance or the Legal team immediately.

What Is a Bribe?

Bribes can take many forms and can include giving or receiving money, kickbacks, donations, business or employment opportunities, gifts, meals, entertainment, travel, special favors, benefits or anything else of value for the improper purpose of:

- Influencing a decision.
- Obtaining or retaining business.
- Obtaining a business permit or other license.
- Influencing the outcome of a government audit, inspection or decision.

LS&Co. also prohibits the making of facilitation payments, which typically are cash payments provided to government officials to speed up routine government actions such as expediting an import through customs.

Interactions With Government Officials

As a global company, we are often required to interact with government officials where we

operate, but we must be extra cautious during these interactions because even employees with the best intentions can run afoul of anti-bribery laws when government officials are involved.

Following are examples of people who may be considered government officials:

- Any officer or employee of a foreign government, regardless of rank.
- Employees of government-owned or government-controlled businesses, such as a hospital or university.
- Foreign politicians, political parties or candidates for office.
- A family member or agent of the above.

If you expect to interact with individuals who match any of the above criteria, you must abide by the prohibitions set out above and familiarize yourself with our [Anti-Bribery / Anti-Corruption Policy](#).

Meals, Entertainment & Gifts

At LS&Co., we value successful working relationships and goodwill with our customers, suppliers and other business partners because they are vital to our success. We recognize that business meals and/or entertainment can play an important role in strengthening these relationships. While we respect these practices, we must be careful not to let them override our commitment to comply with the law and our policies.

Meals, entertainment and/or other hospitality must never be given or received with the intent to obtain or retain business, or to influence a decision. We should also avoid circumstances that would create even the appearance of improper intent.

In general, gifts are not allowed. Please consult the [Global Travel, Meals, Entertainment & Gifts Policy](#) for any exceptions. Any requests outside of the policy must be approved by Ethics & Compliance.

Meals and entertainment with government officials are not allowed per our [Anti-Bribery / Anti-Corruption Policy](#). Any requests for exceptions must be approved by Ethics & Compliance.

Q: One of our vendors has invited my team to an event that will include dinner, drinks and a sporting event. Could this be considered a bribe?

A: Yes, it could, but we would need to consider other factors. For example, is the vendor in the bidding process with LS&Co.? Will business be discussed at the event? What is the value of the event per guest? Please contact Ethics & Compliance to discuss the matter in more detail.

Q: I have a business-critical meeting overseas and will need a visa to travel. I do not have enough time to go through the standard visa process. The travel agency mentions paying a separate, on-the-side fee for an expedited process. Can I proceed given the time sensitivity?

A: No. If the fee is not an official consular fee, it is most likely a facilitation payment and is considered a bribe. It cannot be paid under any circumstance, even if you risk missing a business trip.

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

A: Yes. You need to understand more. What specifically is the \$40,000 USD being used for? Is the business rationale logical and legal? To whom will the money be sent? LS&Co. must be sure the money will not be used as a bribe. Raise this issue with the Ethics & Compliance or Legal team.

TRADE CONTROL & SANCTIONS

As a global company, LS&Co. delivers its products throughout the world and across many borders. Operating globally means that we are subject to the trade control laws of the countries where we operate. LS&Co. is committed to full compliance with these laws, including:

- Export controls, trade restrictions, trade embargoes and economic sanctions (including, but not limited to, any sanctions in place with the Office of Foreign Assets Control, the European Union and the United Nations) that limit or prohibit LS&Co. from engaging in business activities with certain countries, individuals or entities.
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved

or sanctioned by the U.S. government.

- Other import or export laws that require LS&Co. and its business partners to pay duties and/or to obtain specific licenses, permits or other documentation before transferring products and technical data across borders.

If you are responsible for making decisions about where we buy or sell products and/or whom we work with, or if you are otherwise involved in cross-border business transactions, you must familiarize yourself with our Economic and Trade Sanctions Compliance Policy. Be aware that all third parties require continuous screening and that there can be restrictions or limitations related to doing business with certain countries, entities or individuals. Trade control laws and anti-boycott laws are extremely complicated. If you have any questions or concerns that you may be engaging in prohibited business, or if you receive a boycott-related request, you should contact the Ethics & Compliance or Legal team.

Q: We want to engage a vendor in the U.S. that will only carry out services in the U.S. Is there a concern regarding sanctions?

A: Yes, there may be. Sanctions may apply to any entity anywhere in the world if they are majority owned (directly or indirectly) by one or more restricted entities; this may include U.S. entities active mostly or exclusively in the U.S. Further, if the vendor transacts with sanctioned entities, this may also expose us to violations.

Q: I am based in a country that does not have the same sanctions as the U.S. government (e.g., my country does not prohibit business with countries such as Russia and Iran). Does that mean we do not need to comply with U.S. sanctions?

A: No, as a U.S.-headquartered company, we must comply with U.S. sanctions everywhere we conduct business. All our offices, subsidiaries and affiliates must follow these requirements.

MONEY LAUNDERING & RELATED ACTIVITIES

LS&Co. prohibits any form of money laundering, terrorist financing or any other financing for illegal or illegitimate purposes.

“Money laundering” is when an individual or organization attempts to hide the proceeds of crimes by making those proceeds look legitimate. Typically, these proceeds are funneled through one or more shell companies and offshore bank accounts to hide the true origin and destination of the proceeds. If you suspect a business partner is engaged in illegal or suspicious activity, contact the Ethics & Compliance or Legal team.

MONETARY CONCESSIONS TO OR FROM EXTERNAL PARTIES

Discounts, commissions, fees or any other monetary concession should be market-driven, based on arms-length transactions, have the appropriate authorization, be transparent as part of a written agreement and must not result in any undue personal benefit to any party.

COMPETITION LAWS & DEALING WITH COMPETITORS

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

- Allocations of territories or contracts
- Monopolies or attempted monopolies through anti-competitive conduct

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

LS&Co. is committed to protecting the best interests of our consumers and our company by obeying these laws. The consequences of violating antitrust laws are severe, especially in terms of our corporate reputation. Please be aware that consequences for certain types of violations include criminal penalties, potential fines and damages (which may be tripled under certain circumstances). Because these laws can be quite complex, be sure to involve the Legal department as soon as questions arise.

If you have questions about whether your participation in a particular trade organization is acceptable, contact the Legal department.

CONFLICTS OF INTEREST

Avoiding conflicts of interest is essential to operating as an ethical, honest and transparent company. While working at LS&Co., you must ensure that your personal interests and relationships do not conflict, or even appear to conflict, with your professional obligations to LS&Co. Being a member of the team means you have a duty to advance the company’s legitimate interests, not your own.

A conflict of interest can take many forms, but it arises when your personal activities and relationships interfere with, or appear to interfere with, your ability to act in the best interest of LS&Co. Examples include:

- Serving as an employee, officer or director of another company while employed by LS&Co. (unless approved by Human Resources, Legal or Ethics & Compliance).
- Having a personal or financial relationship with a competitor, supplier, vendor or customer. If an employee holds a financial interest in one of the aforementioned parties, that interest must be de minimis (no more than 5%).

- Working as a consultant for a competitor, supplier, vendor or customer of LS&Co.
- Taking personal advantage of opportunities or information that you become aware of due to your position at LS&Co.
- Working or conducting business with a family member or with any business in which a family member has a personal financial interest.
- Conducting non-LS&Co. work activities during company time or with LS&Co. resources.
- Being in a romantic relationship with a supervisor or subordinate.

Please note that corporate employees may not work for or receive any compensation from a

LS&Co. supplier, customer, service provider, vendor, distributor, competitor or lender. However, retail or distribution center employees may be given latitude regarding outside employment provided there is no conflict of interest. Retail or distribution center employees should consult with Human Resources prior to taking other outside employment.

Potential conflicts must be disclosed immediately to your supervisor and to the Ethics & Compliance or the Legal team for resolution. The good news is many conflicts can be mitigated simply by disclosing them.

For additional guidance on conflicts of interest and the disclosure process, please refer to our [Conflicts of Interest](#) page and [Conflict of Interest Disclosure Form](#) on Threads.

Q: My partner works at a company that is bidding on a large contract for LS&Co. Could this be a conflict of interest?

A: It depends. Conflicts of interest should be evaluated based on various factors, including the respective roles held by you and your partner. You should contact Ethics & Compliance if in doubt.

Q: My colleague wants to start his own online hat business. Can he do this?

A: Any outside employment, including your own business, needs the approval of your manager and the Human Resources, Ethics & Compliance or Legal teams. In addition, if the proposed business could be considered a competitor, that poses another conflict of interest. Your colleague should seek guidance before starting his own business.

BOARD SERVICE

Nonprofit boards: We encourage you to do good in your communities. Serving on an advisory or nonprofit board is permitted, provided there is no conflict of interest and it does not interfere with your job responsibilities or your commitment to LS&Co. As a member of a nonprofit board, you may not act on behalf of or appear to represent LS&Co. If you are unsure whether you can serve on a nonprofit board, contact Ethics & Compliance.

For-profit boards: Members of the executive leadership team (ELT) are allowed to serve on one board of a for-profit organization at a time and must obtain advance approval from the general counsel and chief executive officer before agreeing to serve on any for-profit board (with or without compensation). No LS&Co. employee may serve on the board of directors or the advisory board of any LS&Co. competitor, customer, supplier, vendor, distributor, contractor, licensee or agent without the advance review and approval of the general counsel or the chief compliance officer. The chief executive officer must obtain advance approval from the LS&Co. board of directors for service on any external for-profit board. Non-ELT employees who wish to serve on a for-profit board must consult with and receive approval from Ethics & Compliance and their manager. As a member of a for-profit board, you may not act on behalf of or appear to represent LS&Co.

For more guidance about board service, refer to the [Advisory Board Guidelines](#) on the [Conflicts of Interest](#) page on Threads, or contact the Ethics & Compliance or Legal team.

COMMUNICATIONS

As a publicly traded company, it is critical that we speak with one voice so that all external messages are truthful, accurate and consistent. To ensure this is the case, only designated spokespeople can speak on behalf of LS&Co.

Unless expressly authorized to do so, you may not make public statements or respond to inquiries regarding LS&Co., our business or operations, or any LS&Co. employee. This restriction applies to:

- Traditional media across all channels.
- Speaking engagements.
- Personal and professional social media accounts.
- Books, articles or other published data.
- Blogs and other online content platforms.
- Any “on the record” or “off the record” requests for information, including from investors and analysts.

If you are contacted for information, direct the inquiry to our media hotline (newsmediarequests@levi.com). Please refer to our [Global Media Policy](#) for further guidance.



A woman with long hair, wearing a grey long-sleeved shirt, is focused on working on a piece of plaid fabric. She is in a factory or workshop setting, with other plaid shirts hanging on a rack in the background. The lighting is warm and focused on her hands.

ACTING LEGALLY & ETHICALLY IN THE WORKPLACE

We strive to foster a workplace that is inclusive, diverse and respectful of all people. We have zero tolerance for any type of discrimination, harassment, retaliation, or unfair or unsafe behavior.

DISCRIMINATION

We do not tolerate discrimination of any kind by any employee. Every employee has the right to 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 suspected discrimination immediately to your manager or your Human Resources representative.

HARASSMENT

We do not tolerate harassment of any kind, including any unwelcome comments, behaviors,

actions or conduct that intimidates, offends or demonstrates hostility based on a person's protected personal characteristics. 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, 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.
- Retaliation for reporting or threatening to report harassment.



Q: My store manager refers to people from other backgrounds as “those” people and treats them differently than those she perceives to be of her same background. What should I do?

A: LS&Co. does not tolerate discriminatory behavior of any kind. This is a clear violation of our values and our code. You should reach out to Human Resources or Ethics & Compliance. We need you to be our eyes and ears. If you are not comfortable disclosing your identity, you can report issues anonymously via the Reportline.

Q: I understand that physical contact with colleagues could be considered harassment, so how does a person know where the line is regarding acceptable and unacceptable physical contact?

considered acceptable may vary from person to person and from culture to culture. Consider the context of the interaction. Is the physical contact typically accepted as part of normal day-to-day interactions in a business environment? If you are the recipient of unwelcome physical contact and are comfortable expressing that you do not view the contact as appropriate behavior, speak up and set boundaries. For those that are not comfortable speaking up, please reach out to the Human Resources or Ethics & Compliance teams as we are here to partner with you and help navigate the situation.

Q: How can I make sure that I do not offend any colleagues with inappropriate language?

A: People will interpret what is and is not inappropriate language differently based on their own personal experiences, cultures and backgrounds. The best thing to do is to use language that is neutral and does not put people into categories. Be mindful of the words you use and how they make people feel, and avoid sexual comments and innuendo, as well as other foul or discriminatory language.

A: You should be mindful that physical contact may be perceived as inappropriate in a business setting. If you perceive that the physical contact you might initiate or the physical contact you engaged in was unwelcome, it is best to stop such behavior and, if needed, establish protocols for that environment. Additionally, please be aware that what is

FAVORITISM

Favoritism occurs when an employee receives preferential treatment as a result of their personal connection and not their work performance. Favoritism in the workplace is not acceptable; all employees must be treated fairly.

DIVERSITY, EQUITY & INCLUSION

At LS&Co., we are committed to creating a workplace where people from all walks of life feel confident that their voices will be heard and their contributions will be welcomed and celebrated. Our goal is to build an organization that reflects the full diversity of our consumers and the communities where we live and work because we know a more diverse company is a stronger company.

We are focused on advancing diversity, equity and inclusion (DE&I) through meaningful programs, strong policies and guiding principles. We believe that embedding DE&I into our culture and processes creates a sense of belonging and a real competitive advantage for our company. We strive to nurture a culture where there is a deep sense of belonging that transcends any role, business function, language or country and shares a commitment to representation, psychological safety and social responsibility.

Our efforts extend from our executive leaders to our frontlines. Our journey is continuous and demands strategy, tenacity and long-term commitment. Guided by our company values of originality, empathy, integrity, courage, and performance, we continuously work to make LS&Co. an employer of choice and a collection of inclusive and innovative brands for people from all walks of life.

SAFETY

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

- Obey these health and safety rules and policies;
- Report accidents, injuries and unsafe equipment, practices or conditions;
- Exercise caution in all of your work activities; and

- Report any unsafe working conditions to your supervisor immediately.

WORKPLACE VIOLENCE

At LS&Co., your safety and security while at work and when traveling on behalf of the company is always our top priority. Every effort is made to ensure that every employee and contractor is safe from both external and internal threats, including workplace violence. Workplace violence is defined as any action that threatens the safety of our employees or contractors or causes damage to LS&Co. property. Workplace violence may include:

- Physical assault
- Threats (both direct and indirect)
- Harassment
- Intimidation
- Bullying
- Stalking
- Domestic violence that spills over into the workplace

You are the first and best line of defense when it comes to preventing workplace violence. Early notification is essential. If you witness any of these behaviors or become aware of possible threats of violence in the workplace, immediately alert your manager, Human Resources or Global Security (mbxworkplaceviolenceprevention@levi.com). We do not allow workplace 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. If you are in the U.S., please also refer to our policy on [Weapons in the Workplace](#).

ILLEGAL DRUGS, MARIJUANA & ALCOHOL

When you are at work, you may not possess, transfer, buy, sell or use (unless professionally prescribed by a healthcare provider) any prohibited substance per LS&Co. [Policy](#). Employees should report to work fit for duty and free of any adverse effects of illegal drugs, marijuana or alcohol. The unauthorized use or excessive consumption of alcohol during work or at company-sponsored events is also prohibited.



PROTECTING ASSETS & PROPERTY

We are all responsible for protecting LS&Co.'s assets, which include digital, financial and physical assets, as well as intellectual and physical property. LS&Co. assets and property are intended to be used strictly for business purposes. Improper use of our assets and property for unethical or illegal purposes, or for personal gain, is strictly prohibited.

As part of this responsibility, you must protect against fraud, misuse, waste and theft:

- Fraud is a wrongful or criminal deception intended to result in financial or personal gain. Do not engage in fraudulent behavior and report any suspected fraudulent behavior to Ethics & Compliance;
- Avoid the misuse or waste of company funds, and use corporate credit cards in accordance with LS&Co.'s Corporate Card Policies: [Corporate Card Expense Reimbursement Policy \(U.S. & Canada\)](#), [Corporate Card Policy \(LSA\)](#), [Corporate Card Policy \(LSE\)](#);
- Ensure that all transactions are properly authorized and within the authorization limits set out in our [Signature Authorization Policy](#);
- Do not misuse the employee discount for your country, as outlined in [Employee Discount - U.S. & Canada](#) or [EU Employee Discount](#). Please refer to local Human Resources or your manager for your local discount policy;
- Ensure product samples are used only for legitimate business purposes and are protected from loss, damage, theft, unauthorized use or disposal;
- Return all LS&Co. property and assets, physical and intangible, at the end of your employment with LS&Co; and
- Maintain accurate records and follow our [Record and Information Management Policy](#).

TRAVEL, MEALS & ENTERTAINMENT EXPENSES

LS&Co. provides reimbursement to employees for necessary business travel and reasonable meals and/or entertainment expenses.

If you are not sure whether an expense is legitimate, refer to the [Global Travel, Meals, Entertainment & Gifts Policy](#), ask your manager, or contact MbxCorpCard@levi.com. Contractors should follow our [Travel Policy for Contractors](#).

You must document all business-related expenses;

this may include airfare, ground transportation, meals, hotel/lodging, etc. The documentation must accurately describe or include the following:

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

NOTE: All managers are responsible for reviewing and approving the expenses of their direct reports.

Q: My manager asked me to pay for a team dinner on my company card. I was unsure about the request, but I did what my manager asked. Is this OK?

A: No. It is understandable that you felt compelled to comply with your manager's request. However, both you and your manager have a duty to follow our policies, and our policy states that the most senior employee should pay for the meal. Additionally, this scenario provides a window of opportunity for misconduct on behalf of your manager because they will be approving their own expenses without any oversight.

Q: My colleague delegates expense approvals to their administrative assistant. Is this OK?

A: No, each manager is responsible for reviewing and validating the expenses submitted on behalf of their team.

EMPLOYEE DISCOUNT

In many countries, employees are given access to a discount on LS&Co. products as a privilege of employment. This discount is not to be abused. Any attempt to resell your discounted purchases and therefore profit from the employee discount can result in the loss of this privilege and/or discipline up to and including termination. It is your responsibility to understand what is considered acceptable use of the employee discount. If you have any questions or concerns, please refer to the [Employee Discount – U.S. & Canada](#) or [EU Employee Discount](#), or refer to local Human Resources or your manager for more information on your local discount policy.

Q: I heard that the assistant store manager at my location has started a side business and is using his employee discount to buy Levi's® product that he marks up and resells online. Is this OK?

A: No. Not only is that an abuse of the employee discount, but it is against company policy to own a competitive business. The assistant store manager is receiving an undue benefit by using his employment with Levi's® to source highly discounted product for resale in his side business.

PRODUCT SAMPLES

Product samples should be used only for legitimate business purposes. Taking or using product samples of any value for any non-LS&Co. use without advance authorization will be considered theft of company property and may result in disciplinary action, up to and including termination. Additionally, employees may be subject to civil or criminal fines or penalties.

inventions, formulas, processes, products, customer lists, programs, patents, trademarks, copyrights, trade secrets, expertise, domain names, ideas, discoveries and improvements. You must not use or share LS&Co.'s intellectual property without appropriate legal protections and documentation in place.

Additionally, some confidential and proprietary information may be held as an LS&Co. trade secret if:

- It concerns subject matter that is eligible for trade secret protection, including a formula, pattern, compilation, program, device, method, technique or process;
- It is commercially valuable because it is a secret and not generally known or ascertainable to the public; and
- LS&Co. takes reasonable steps to protect the information from disclosure.

INTELLECTUAL PROPERTY

All intellectual property invented, created or developed by LS&Co. or by you during your employment with LS&Co. that relates to or is useful to our business, or was developed using any amount of our time or resources, is company property and is often confidential. Similar to other LS&Co. assets, our intellectual property may only be used in connection with our business and for the benefit of LS&Co.

Examples of such intellectual property include

Please contact a member of the Legal team if you have any questions related to intellectual property.

ACCURATE RECORDS

Complete and accurate books and records are legally required and essential to managing LS&Co.'s business and maintaining the accuracy and integrity of our financial reporting and disclosures.

“Books and records” refers not only to financial accounts but also to all records prepared, generated or maintained by LS&Co., such as invoices, purchase orders, agreements, payroll documents, safety and environmental reports, and regulatory filings.

When you contribute to the creation of business records – such as when you submit an expense report or a time sheet – you are responsible for the honesty and accuracy of the information you submit.

Any attempt to conceal or misstate information in LS&Co.'s books or records is a serious violation. This includes:

- Delaying recording the date of an order or payment.
- Reporting inaccurate or misleading information about a transaction.
- Falsifying quality reports, data or other company documents.

The rule is clear: All records and reporting must be complete, fair, accurate, timely and not misleading. No exceptions.

RECORD RETENTION

All business records must also be held and disposed of in accordance with our [Record and Information Management Policy](#).

LS&Co.'s retention periods for business records do not apply if you have been directed to retain certain documents or records that are relevant to an actual, threatened or reasonably foreseeable lawsuit, investigation, audit or administrative proceeding. Your compliance with this obligation is critical as the destruction, alteration or concealment, even inadvertently, of a document that is relevant or subject to a legal hold could expose LS&Co. and you to civil and criminal liability.

If you are unsure about a particular document or retention period, retain the document and consult the Record and Information Management Policy and Legal team for more guidance.





**SAFEGUARDING
CONFIDENTIAL
& PERSONAL
INFORMATION**

As an employee of LS&Co., you may use or have access to information about LS&Co. that is confidential and proprietary, or you may be privy to personal information. It is your responsibility to treat all LS&Co. information with care and caution. This includes information we collect, develop or maintain regarding our business, employees, consumers, customers, suppliers and other third parties.

information, identity or source of raw materials, network IP addresses, etc. Improper use of confidential information includes using or entering it into public large language models like ChatGPT or similar generative AI platforms.

For guidance on the use of data and AI, refer to our [Data and AI Guidelines](#) and our [Data and AI Operating Principles](#).

CONFIDENTIAL & PROPRIETARY INFORMATION

You must not disclose LS&Co. confidential information to anyone outside the company without advance approval. Any information about LS&Co. that has not been released to the general public may be considered confidential, including acquisition or merger plans, product information such as launches or designs, sales and pricing

Q: My colleague invited me to meet at a busy coffee shop to discuss this year's business plan, key customer insights and financial performance. Is this OK?

A: It sounds like this topic of conversation would include confidential information, so it would not be wise to discuss this information in a public place. We suggest you move this meeting to a private location.

SOCIAL MEDIA

What a person writes 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 global corporate reputation. We expect you to use good judgment and exercise personal responsibility whenever you use social media or other Web-based messaging applications.

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

INSIDER TRADING

Buying or selling LS&Co. securities (including stock, restricted stock units, stock options or stock-settled appreciation rights) when you know material non-public information about LS&Co. is not only unethical but also against the law and can result in severe civil and criminal penalties for you and LS&Co. This rule applies to all employees and relates to all material non-public information about LS&Co.'s business. Trading in LS&Co. securities or in those of any other company (including customers and suppliers) while in possession of material non-public information about either entity is strictly prohibited; as is informing other people, including family members and friends, about material non-public information regarding LS&Co. or any other company, even if you do not trade yourself. Individuals, including family members, who trade in securities while acting on a tip or possessing material non-public information may be violating the law and subjecting themselves to civil and criminal penalties. You may not use your position with us or any material non-public information for improper personal financial gain.

Material Non-Public Information

Material non-public information is any information that has not been made available to the public and that a reasonable person would consider important when deciding whether to buy, sell or hold securities of a company. This includes information about LS&Co., as well as information about other companies such as our business partners and competitors. Examples of material non-public information include:

- Unpublished earnings forecasts, estimates, or results.
- Acquisitions, divestitures or restructurings.
- Management changes.
- Upcoming product launches or product innovations.
- Gain or loss of important customers or contracts.
- Pending or threatened litigation or regulatory action.

For more information, please review our [Insider Trading Policy](#).

Q: My team has spent the last year negotiating a highly confidential acquisition of a thriving new retailer. A few days before the acquisition was disclosed to the public, my colleague shared the news with her brother, and he purchased shares in the retailer. Was her disclosure OK?

A: No. Your colleague should not have disclosed news of the acquisition to her brother because it is considered confidential and material non-public information. Additionally, because her brother traded based on this tip, your colleague and her brother have committed insider trading and are subject to civil and criminal penalties. It does not matter whether your colleague knew her brother would purchase shares in the business. She is still accountable.

Trading Windows

Depending on your role at LS&Co. or your access to confidential LS&Co. information, you may be subject to pre-clearance requirements or periods of time when you are restricted from trading in LS&Co. securities. If you are in doubt about whether a transaction is allowed, please refer to our [Insider Trading Policy](#) and [Blackout Periods calendar](#), or contact a member of the Legal team.

PROTECTION OF PERSONAL INFORMATION

Personal information is any information that can identify an individual. This includes data like name, date of birth, address, telephone number and government-issued identification such as Social Security Number or national ID number. It may also include less obvious data like IP address, order history or purchase preferences.

Projects involving personal information must be managed in line with our [Privacy Policies and Procedures](#). We expect you to understand how to recognize and properly handle personal information and to promptly report any concerns. More sensitive personal information like race, ethnicity, religious beliefs, medical conditions, gender preference, compensation, performance reviews, etc. should be treated with even more care.

Please consult the Privacy team if you have any questions.

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 this information to the events company?

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

APPROPRIATE USE OF INFORMATION SYSTEMS

Electronic communication systems – such as computers, mobile devices, servers, telephones, email and general internet access – and all information and communications sent, received or stored through those systems are made available to employees for business purposes. Occasional personal use of LS&Co. systems is permitted, but such use must not disrupt LS&Co.'s business, be detrimental to LS&Co. or affect an employee's performance.

You are expected to protect LS&Co. systems from accidental or unauthorized access, to maintain the confidentiality of passwords for all systems, and to

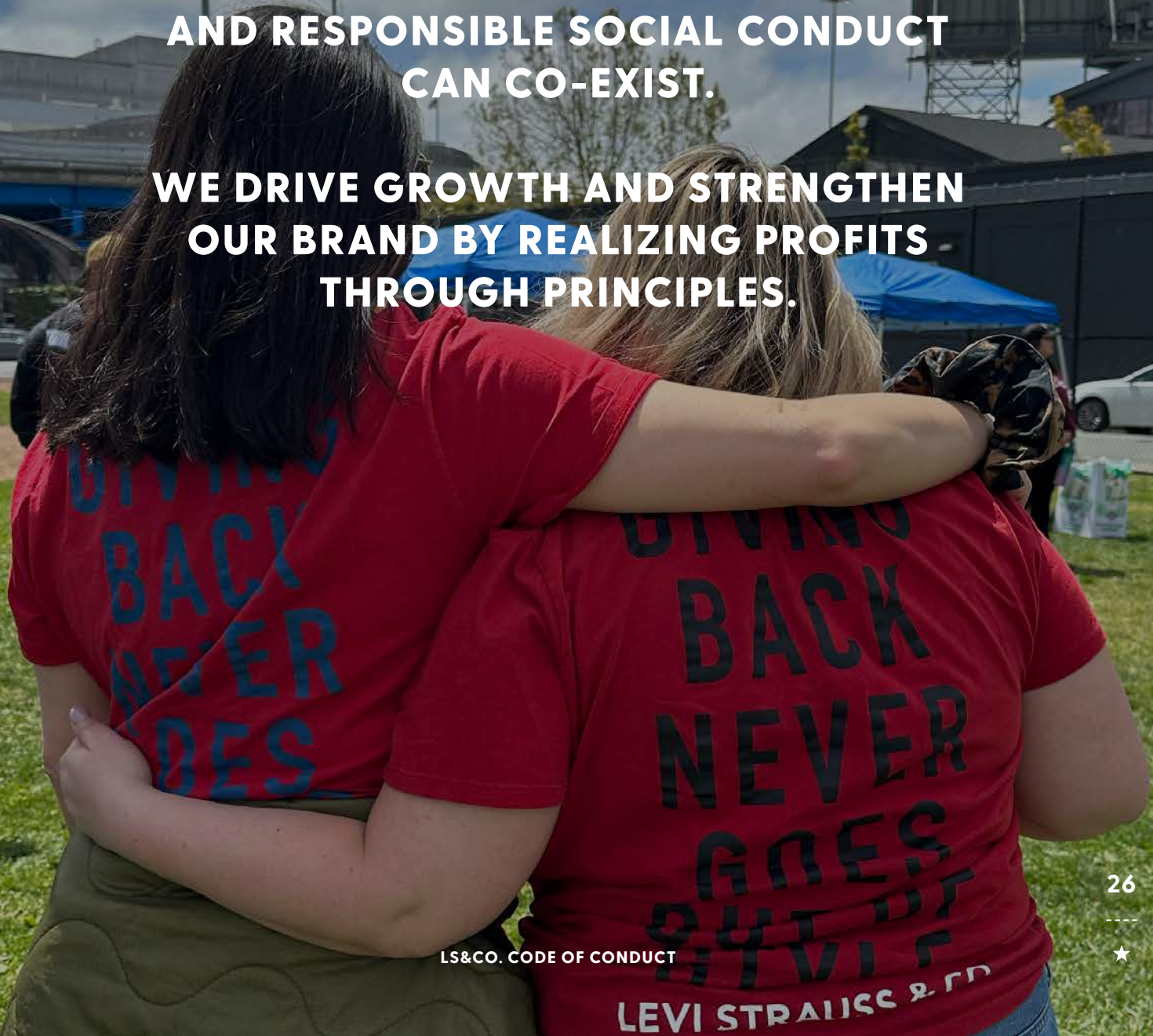
comply with all policies relating to our systems and information security.

To protect LS&Co.'s assets and reputation as well as users, we reserve the right to, in compliance with applicable law, monitor, access, review, delete and record information and communications, including personal emails received, viewed or saved on LS&Co. systems, as well as your use of and activity (including internet browsing) on or through LS&Co. systems. Consequently, you should have no expectation of privacy with respect to any such information, communication or activity. Your right to privacy regarding data contained on the company's communication systems is protected in accordance with local law; please consult with your local privacy lead for more information.

REALIZING PROFITS THROUGH PRINCIPLES

BUSINESS PERFORMANCE AND RESPONSIBLE SOCIAL CONDUCT CAN CO-EXIST.

WE DRIVE GROWTH AND STRENGTHEN OUR BRAND BY REALIZING PROFITS THROUGH PRINCIPLES.



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.

HUMAN RIGHTS & FAIR LABOR

LS&Co. respects the fundamental human rights of all and is committed to providing fair and equitable wages to employees around the globe. As part of this commitment, LS&Co. recognizes employees' rights to freedom of association and collective bargaining. LS&Co. forbids the use of child labor, forced labor and human trafficking, and this prohibition extends to all LS&Co. business partners. If you see something, you must say something – it is our duty.

CHARITABLE DONATIONS

Charitable donations made on behalf of the company must be reviewed and approved by Community Affairs and Ethics & Compliance. Please refer to the [Anti-Bribery / Anti-Corruption Policy](#) for

guidance. Charitable donations, whether in the form of a cash donation, corporate sponsorship or any other in-kind benefit, must never be made to any political organization, politician or organization that is affiliated with or linked to a politician without the explicit, written approval from Ethics & Compliance, so as to avoid the risk or appearance of bribery and corruption. Additionally, LS&Co. will not donate to any organization that discriminates on the basis of a protected class.

POLITICAL ACTIVITIES

We encourage all employees to be politically and socially active citizens. The decision to commit your free time, contribute your money or other personal resources to political activities is entirely up to you. However, please remember that while we encourage your involvement, you may not use your position at LS&Co. to pressure team members to make political contributions, participate in events or support/oppose specific candidates. Additionally, your personal support of political activities must be done on your personal time and with your personal resources, not during work hours or using company resources or assets. Additionally, employees are prohibited from posting or distributing political materials on LS&Co. property. When engaging in the political process, you must comply with the laws and regulations governing political activity and contributions. You also may not use LS&Co.'s name in a way that suggests that the company sponsors or endorses your personal political activities.

Q: My manager is hosting a fundraiser for a local candidate and has invited our team to attend. Is this OK?

A: No. It could be argued your manager is using her position to influence your team's participation. Additionally, she is using her work email to solicit an employee for a non-LS&Co. activity. Your manager should keep up the passionate work but do so in line with LS&Co. policy.



DELIVERING ON EXPECTATIONS

The values, expectations and practical guidance found within this Code form the basis of how LS&Co. expects its employees to conduct themselves. However, it is up to each of you to bring the Code to life.

In addition to the Code, there are many more practical resources that can be found on Threads, including additional policies and procedures that you must review, understand and follow. We recognize it is not always easy to know what to do in every situation that you encounter. Our Ethics & Compliance team is ready to help if you

have questions. You should also feel comfortable reaching out to your local Human Resources and Legal team members for assistance and guidance. Finally, you may always ask questions or report suspected violations of the Code via the LS&Co. Reportline.

LS&Co.'s success is dependent on employees acting ethically, asking questions in unclear situations and speaking up when things go wrong. Together we can maintain a positive work environment that celebrates everything that is special about LS&Co. and its employees.

APPENDIX

Amendments to the Global Employee Code of Conduct

Amendments to the Global Employee Code of Conduct may be done at any time, for any reason.

Policy Hub

Please note there is a [Policy Hub](#) on Threads, refer to Threads for more information. Retail employees should also check the Apps Dashboard page on Yoobic for additional policies related to Retail. If you have a question or concern, please contact the appropriate subject matter owner for further information.





LEVI STRAUSS & CO.