

# **HUMAN RIGHTS POLICY**

## 1. Summary

This Human Rights Policy establishes the global human rights standards for YETI. YETI conducts its global business in a manner that respects the human rights and dignity of all, as articulated in the UN Declaration of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. YETI supports international efforts to promote and protect human rights, including efforts to eradicate slavery, forced labor, child labor, and human trafficking. Violations of human rights laws may result in fines or imprisonment, and violations of this Policy may result in disciplinary action, up to and including termination of employment or contractual relationship with YETI.

## 2. Applicability

This Policy applies to YETI Holdings, Inc., and its subsidiaries ("YETI"), and all YETI employees, contractors, officers, and directors worldwide (collectively "Covered Employees"). This Policy also sets forth compliance requirements applicable to all individuals and entities doing business on YETI's behalf, including third-party agents, consultants, business partners, and suppliers, and their employees (collectively "Third Parties"), in addition to the compliance requirements set forth in YETI's <u>Code of Business Conduct</u>, <u>Supplier Code of Conduct</u> and other applicable YETI policies.

To the extent that YETI policies impose a higher standard than what is required by applicable laws and regulations on its Suppliers, such higher standard will prevail.

Any questions concerning the application of this Policy or a specific law should be directed to the Sustainability team (sustainability@yeti.com) and the Ethics & Compliance Department (compliance@yeti.com).

## 3. Policy Details

A responsible supply chain and the fair treatment of everyone who contributes to YETI and our products are at the core of our business. As we navigate the complexities of an expanding global supply chain, enter new consumer markets, and grow our team, we are committed to respecting the fundamental human rights of anyone who engages in work or other activities connected to our business operations and supply chain. YETI strives to respect and promote human rights of Covered Employees and those employed by Third Parties in accordance with the UN Guiding Principles on Business and Human Rights, the UN Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and standards set forth by the Fair Labor Association. This Policy sets forth the minimum human rights standards at YETI.

## 3.1. Respecting Fundamental Human Rights

YETI prohibits Covered Employees and Third Parties from violating human rights, including rights related to bonded, compulsory, forced, or slave labor; child



labor; discrimination and harassment; excessive working hours; fair hiring and recruitment practices; fair wages, benefits, and compensation; freedom of association, collective bargaining, and the right to strike; healthy, safe, and accessible working conditions; protection of cultural resources; and responsible chemical management.

#### 3.2. Due Diligence

- 3.2.1. Consistent with the UN Guiding Principles on Business and Human Rights, YETI conducts due diligence to identify and prevent negative human rights risks from affecting people in our business and our supply chain. This may consist of regular review of human rights risks in our operations and our global supply chain, engaging with third party experts on specific human rights risks, and formal auditing and engagement with Third Parties.
- 3.2.2. Identifying and engaging specific stakeholder communities is crucial to effective human rights due diligence. At YETI, we focus on the following stakeholder communities to understand potential human rights risks and impacts:
  - 3.2.2.1 *Communities* that host YETI operations and from which YETI and Third Parties recruit Covered Employees and workers;
  - 3.2.2.2 Consumers that use YETI products and services;
  - 3.2.2.3 *Covered Employees* that are directly employed by YETI across the United States and internationally; and
  - 3.2.2.4 *Vulnerable workers* employed by Third Parties that are at high risk of having their human rights violated due to geographic or market-based risk factors.
- 3.2.3. We have developed procedures that enhance our due diligence of manufacturing and distribution partners that are at higher risk of human rights violations due to several factors. We regularly leverage supplier self-assessments, audits, and risk assessments to update our understanding of the likelihood and severity of potential human rights risks in our supply chain. We regularly integrate the findings of assessments and audits into our business planning and partner selection. We are committed to regularly reviewing and enhancing our due diligence systems to ensure we have the most accurate understanding of human rights risks in our operations and supply chain as possible.

## 3.3. Training and Engagement

3.3.1. YETI will provide annual training on this Human Rights Policy and other relevant company policies addressing human rights risks and obligations for all YETI employees (including the YETI Code of Business Conduct). YETI will periodically provide training opportunities on this policy for Third Parties.



- 3.3.2. In addition to our Supplier Code of Conduct, YETI will include this Human Rights Policy in its service or supply agreements with Third Parties. Acknowledgement of this policy and its requirements by Third Parties will be necessary to effectuate all service agreements with Third Parties.
- 3.3.3. YETI will also engage internal teams responsible for implementing and ensuring compliance with this policy. That includes communicating any material updates and changes to the policy to our senior leadership team and Board of Directors.

#### 3.4. Grievance Mechanisms

- 3.4.1. YETI believes in providing grievance mechanisms that allow anyone affected by our operations or the operations of Third Parties to report a potential violation of this Human Rights Policy. We strive for the grievance mechanisms that YETI makes available to be accessible, predictable, equitable, transparent, and a source of continuous learning. We expect Third Parties to have grievance mechanisms that meet these same criteria.
- 3.4.2. Any Covered Employee or an employee of a Third Party may and should report potential violations of this Human Rights Policy or other YETI company policies through <u>our ethics hotline (available via phone and web)</u>.
- 3.4.3. YETI prohibits retaliation against anyone who, in good faith, reports a possible violation of our policies, the law, or who participates in a related investigation, even if evidence to substantiate the concern is insufficient. Anyone found to have engaged in retaliation will face appropriate disciplinary action.

## 3.5. Providing Remedy

3.5.1. When YETI determines that it or a Third Party has caused or contributed to a violation of this policy, we will take necessary and appropriate steps to remedy the negative impact. YETI or its partners will work with directly impacted individuals or groups or their representatives to understand the root cause of the violation and build systems to avoid future negative impacts.

#### 3.6. Commitment to Transparency

- 3.6.1. YETI will regularly monitor and evaluate compliance with this policy by all Covered Employees. YETI also will regularly monitor the compliance of Third Parties with this policy.
- 3.6.2. YETI will annually report on its implementation of this policy and Third Parties' compliance with this policy through its annual ESG Report.
- 3.6.3. Where human rights risks materialize into severe negative impacts, YETI will also promptly and effectively communicate its strategy for remedying the negative



impact to all necessary internal and external stakeholders.

#### 4. Penalties and Enforcement

Failure to comply with global human rights laws and regulations can result in severe consequences for YETI and any individual(s) involved, including, but not limited to, government investigations, disruption to business operations, reputational harm, criminal penalties including imprisonment, significant monetary fines, and loss of business. A violation of this Human Rights Policy may also constitute a violation of other YETI policies or procedures, including by not limited to, YETI's Code of Business Conduct or Supplier Code of Conduct, which may result in disciplinary action, up to and including termination of employment or contractual relationship with YETI.

#### 5. Related Information

- 5.1. <u>YETI Code of Business Conduct</u>
- 5.2. <u>YETI Supplier Code of Conduct</u>
- 5.3. YETI Modern Slavery Statement