



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 [Code of Business Conduct](#), [Supplier Code of Conduct](#) 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 Environmental, Social and Governance ("ESG") team (esg@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. 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 [our ethics hotline \(available via phone and web\)](#). In addition, any Covered Employee who knows of a potential violation of this Human Rights Policy must immediately provide notice to YETI's Vice President of ESG, Chief Compliance Officer, and the General Counsel.
- 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. [YETI Code of Business Conduct](#)
- 5.2. [YETI Supplier Code of Conduct](#)



6. Appendix

YETI prohibits Covered Employees and Third Parties from violating human rights standards, including those listed below. YETI consulted the UN Guiding Principles on Business and Human Rights, UN Declaration of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and standards set forth by the Fair Labor Association when developing its expectations on human rights risk and governance.

| | |
|--|---|
| <p>Bonded, compulsory, forced, or slave labor</p> | <p>YETI prohibits any bonded, compulsory, forced or slave labor, including work that is indentured, trafficked, or prison labor. This includes employing workers who: are not free to leave work or terminate their employment with reasonable notice; workers who are forced to surrender any government-issued identification, passports or work permits as a condition of employment; or workers who are employed under employment terms that fall below any national labor laws or freely negotiated and valid collective bargaining rules.</p> |
| <p>Child labor</p> | <p>YETI prohibits the employment of workers under 16 years of age, the minimum age for employment in that country, or the minimum age for completing compulsory education in the country of operations. YETI requires Covered Employees and Third Parties to comply with all relevant laws that apply to young workers (e.g. those between the minimum working age and the age of 18), including regulations related to hiring, safe working conditions, types of work, hours of work, proof of age documentation, and overtime.</p> |
| <p>Discrimination and harassment</p> | <p>YETI prohibits any employment decisions, including hiring, promotions and compensation, or termination, from being made on the basis of gender, race, religion, age, sexual orientation or gender identity, disability, nationality, ethnic origin, marital status, medical status, union affiliation or any other protected class status in the country of employment. Harassment may include any sexual, physical, or mental abuse or corporal punishment.</p> |
| <p>Excessive working hours</p> | <p>YETI prohibits Covered Employees and Third Parties from allowing the total weekly work hours (regular work hours plus overtime) shall not exceed 60 hours per week, other than in exceptional circumstances. All overtime work shall be voluntary.</p> <p>Workers shall be entitled to at least 24 consecutive hours of rest in every seven-day period. If workers must work on a rest day, an alternative consecutive 24 hours must be provided within that same seven-day period or immediately following. Employers shall provide workers with all official public holidays, reasonable</p> |



| | |
|---|---|
| | meal and rest breaks, and paid annual leave as required under national laws, regulations, and procedures. |
| Fair hiring and recruitment practices, including the withholding deposits as a condition of employment | YETI prohibits Covered Employees and Third Parties from using recruitment agencies that: require workers to pay recruitment and/or employment fees; and mislead workers regarding the nature of work, payment terms, and duration of the employment contracts. |
| Fair wages, benefits and compensation | YETI prohibits compensating workers with anything less than the minimum wage and benefits required by applicable laws and regulations. YETI requires pay for overtime hours at the premium rate required by applicable laws and regulations. Workers shall be informed, orally and in writing, in the language(s) spoken by workers about overtime wage rates prior to undertaking overtime. |
| Freedom of association, collective bargaining, and the right to strike | YETI prohibits any covered employee or third party from infringing upon anyone's rights to lawfully associate or not with groups of their choosing, if such groups are permitted by law. Covered Employees and Third Parties shall bargain in good faith with any worker representatives, not impose any sanctions on workers organizing or participating in a legal strike. |
| Gender-specific protections | YETI requires all Covered Employees and Third Parties to abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their newborn children, temporary adjustment of working hours during and after pregnancy, and the provision of breastfeeding breaks and facilities. Such measures shall be taken in a manner that shall not unreasonably affect the employment status, including compensation of pregnant women. Employers shall not use pregnancy tests or the use of contraception as a condition of hiring or of continued employment. |
| Healthy environment | YETI prohibits Covered Employees or Third Parties from knowingly violating national and local environmental laws applicable to air emissions, waste handling and disposal, water use, wastewater discharge, and hazardous and toxic substances. Third Parties are also required to validate and |



| | |
|---|---|
| | <p>maintain records demonstrating that source materials were harvested in accordance with all international treaties in addition to national and local laws.</p> |
| Healthy, safe, and accessible working conditions | <p>YETI requires that all Covered Employees and employees of Third Parties are provided with a healthy, safe and accessible work environment with appropriate personal protective equipment and workplace health and safety training provided at no cost to workers. All applicable, legally required or recommended elements of safe evacuation shall be complied with. YETI prohibits the unlawful and unnecessary restriction of movement of employees by Third Parties.</p> <p>All necessary ventilation, plumbing, electrical, noise, and lighting services shall be installed and maintained to conform to applicable laws and to prevent or minimize hazardous conditions to workers in the facility. All facilities including workplace buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and comply with all applicable laws, including relevant sanitation, medical, and safety and health regulations. Medical facilities shall be established and maintained in factories as required by applicable laws.</p> <p>Employers shall establish the number of toilets required under applicable laws within a reasonable distance of the workplace. Employers shall not place any undue restrictions on toilet use in terms of time and frequency. Employers shall not place any undue restrictions on drinking water in terms of time and frequency. Safe and clean drinking water shall always be freely available, within a reasonable distance of the workplace.</p> |
| Responsible Chemical Management | <p>All chemicals and hazardous substances shall be properly labeled and stored in secure and ventilated areas and disposed safely and legally, in accordance with applicable laws. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.</p> |