



## 1. Introduction

This Modern Slavery Statement (“Statement”) is made by YETI Holdings, Inc. (“YETI”) and its subsidiaries, YETI Canada Limited, YETI UK Limited, and YETI Australia Pty. Limited. The Statement is made in accordance with The Canadian Forced Labour and Child Labour in Supply Chains Act, the UK Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act (the “Acts”). This Statement covers YETI’s 2023 fiscal year.

At YETI, we are committed to conducting our business with integrity and respect for human rights throughout all aspects of our operations and our value chain. We support international efforts to promote and protect human rights, including efforts to eradicate slavery, forced labor, child labor, and human trafficking, as outlined in our [Human Rights Policy](#). We recognize the profound adverse impact that modern slavery can have on individuals and communities globally and are dedicated to the prevention and elimination of these egregious violations of human rights.

YETI conducts business globally, and while we respect the norms of our customers, business partners, and co-workers, we are fully committed to complying with international human rights standards and national laws. To the extent to which there is a conflict between YETI’s policies, , and applicable laws and regulations, the higher standard will prevail.

## 2. Business Structure, Operations, and Supply Chain

YETI is a leading outdoor lifestyle brand and a global designer, retailer, and distributor of innovative, durable outdoor products. YETI is headquartered in Austin, Texas, and operates across eight countries with over 900 employees. We offer products around the world through both wholesale and direct-to-consumer channels. Our primary office locations are in the United States, Canada, China, Australia, and the Netherlands, while our primary distribution centers – managed by third-party logistics providers – are located in the United States, Australia, Canada, the United Kingdom, New Zealand, and the Netherlands.

Although our supply chain sources may change from time to time, our suppliers are located in China, Malaysia, Mexico, the Philippines, Poland, Taiwan, Thailand, the United States, and Vietnam. We do not own or operate any manufacturing facilities. For additional details, please refer to our [Factory Disclosure List](#).

The policies set by YETI Holdings, Inc. apply unequivocally throughout our subsidiaries, including those covered by this Statement.

## 3. Policies and Due Diligence Processes

Our ESG strategy is based on three key pillars – People, Product and Places. These pillars are integrated into our business, our partnerships, and the YETI culture and underpin everything we do.

### 3.1 Governance

The YETI Board of Directors (“Board”) is responsible for the oversight of our ESG strategy, while the Chief Executive Officer reviews and approves the ESG strategy. The Board is updated on ESG developments at least annually, with specific material ESG topics being addressed by various committees of the Board.



Human rights and modern slavery risks are included as part of YETI’s enterprise risk management to identify and evaluate risks across the enterprise. The enterprise risk framework is integrated into our internal processes, led by the Internal Audit team in collaboration with senior leadership and the Board. Our ESG team is composed of subject matter experts reporting directly to the Executive Leadership team. Additional details can be found on our [Governance page](#) and our [Investor Relations page](#).

### **3.2 Human Rights Policy**

Our [Human Rights Policy](#) is core to the People Pillar and establishes YETI’s commitment to uphold international human rights standards and to work toward the prevention and eradication of modern slavery. The policy applies across YETI, its subsidiaries, employees, and third parties working on YETI’s behalf.

Our Human Rights Policy establishes the minimum human rights standards applicable throughout our value chain. We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights and expect our suppliers and others with whom we work to do the same. The policy specifically calls out bonded, compulsory, forced, and slave labor, as well as child labor, as particular human rights issues that must be addressed.

The Human Rights Policy also outlines our approaches to due diligence, training, internal and external engagement on human rights, grievance mechanisms and access to remedy, and our commitment to transparency.

### **3.3 Code of Business Conduct**

As part of our Code of Business Conduct, we support efforts to eliminate abuses such as slavery, forced labor, child labor, and human trafficking. Our [Code of Business Conduct](#) outlines our expectations and is applicable to all YETI employees, including members of our Board of Directors. We also expect third-parties working with YETI to follow the spirit of the Code of Business Conduct, in addition to their other obligations in working with YETI. Where a YETI employee becomes aware of a violation of our standards, they can raise their concerns through our grievance mechanism, outlined below. We encourage third parties to require the same of their employees.

### **3.4 Supplier Code of Conduct**

All suppliers and vendors are required to adhere to the expectations outlined in our [Supplier Code of Conduct](#) (“SCoC”), which includes reference to our Human Rights Policy and Responsible Sourcing expectations. .

In addition to provisions addressing human rights more generally, the SCoC explicitly details the prohibition on suppliers from using any type of forced or child labor and includes provisions prohibiting recruitment fees and the surrender of any government issued identification. Adherence to the SCoC is assessed, in part, through select annual on-site semi-announced audits, performed by Fair Labor Association (“FLA”) approved third-party firms.

## **4. Risks of Forced Labor and Child Labor**

As a consumer goods company, we recognize that the primary risks of modern slavery reside in our tier 1, tier 2, and extended supply chain, particularly within manufacturing operations around the world. Although we are still in the early stages of our efforts to identify and prevent modern slavery, we are



aware that the sector we operate in has inherent risks of modern slavery. A responsible supply chain starts with the decisions we make in selecting suppliers and partners, as well as our ongoing procurement practices. We expect those at YETI, and those who do business with YETI, to exemplify responsible business practices.

In order to assess YETI's risks of modern slavery, we conduct audits of our suppliers and use a variety of industry tools to assist in the process of mapping and monitoring geographical and geopolitical risks. Our social compliance team works in tandem with our global procurement to apply a risk-based approach to scheduling and conducting third-party audits. These audits evaluate factors like fair wages, responsible work hours, and safe working conditions—allowing us to reward ongoing improvement and identify corrective actions where necessary.

## **5. Due Diligence, Monitoring, and Compliance**

Our Human Rights Policy outlines our due diligence process, which includes reviews of the human rights risks in our operations and supply chain, engagement with external experts on particular risks, as well as audits and engagement with our suppliers and other third parties. Our due diligence efforts span throughout our supply chain, with responsible business conduct embedded into our policies and management systems. We track human rights issues and emerging risks by monitoring industry, thought leaders, and civil society reports and trends. Annually, we evaluate our risk criteria and update our approach based on due diligence and on-the-ground findings from our teams.

We deploy supplier self-assessments, audits, and risk assessments to ensure we have an up-to-date understanding of the likelihood and severity of potential human rights risks in our supply chain. Social and environmental criteria are included in our pre-qualification assessment of potential new suppliers, and we assess each supplier to ensure their compliance with YETI's policies and international human rights standards prior to officially beginning the partnership. Monthly supplier scorecards track audit findings and progress alongside traditional procurement performance metrics to inform overall fitness and to monitor ongoing compliance with YETI's policies.

Our supplier agreements also require all YETI suppliers to certify their compliance with our SCoC. This includes the requirement to cascade our modern slavery standards, human rights standards, and international human rights standards to all sub-suppliers throughout the YETI supply chain.

Once YETI engages with a supplier, we conduct periodic audits to ensure ongoing compliance and also require suppliers to conduct annual self-assessments to monitor continuous improvement. When conducting audits on our suppliers, we define the annual audit schedule based on overall supplier risk and the amount of time since the last audit. Should any potential issue or opportunity for improved practice be identified through these processes, our internal team works with the auditors and the supplier to develop and complete a Corrective Action Plan. Additional information and 2023 data relating to the audit program can be found in our annual [ESG report](#).

## **6. Training and Capacity Building**

YETI conducts mandatory annual training on our Code of Business Conduct, required for all YETI employees and our Board. We also engage with industry organizations, expert consultants, and other brands to stay abreast of the latest developments, issues and regulations, and collaborate where possible.



## **7. Grievance Mechanisms and Remediation**

We are committed to providing [grievance mechanisms](#) that allow anyone affected by either our own operations or the operations of our partners to report a potential violation of their human rights or our Human Rights Policy.

We provide anonymous, third-party hotline (via phone and web) access in all countries where YETI operates that can be used by YETI Employees, vendors, or the public to anonymously report any concerns or violations of YETI policies or laws and regulations. We have a no retaliation policy with respect to anyone who comes forward with concerns or participates in an investigation.

## **8. Performance Evaluation**

We have several systems in place to ensure that our efforts to address and prevent modern slavery are effective. We commit to regularly reviewing our policies and procedures, including those related to modern slavery. We also track relevant performance indicators, such as the cases reported and addressed through our grievance mechanisms and findings surfaced during regular on-site audits. Our due diligence efforts, including our supplier risk assessments and general evaluation of risks throughout our supply chain all serve to inform our approach to modern slavery and to help ensure that our programs are effective at addressing these risks.

## **9. Collaboration and Engagement**

YETI works with the Fair Labor Association and several FLA-approved audit firms to assist in its human rights practices. YETI seeks to stay engaged with external stakeholders, including nongovernmental organizations and community partners, investors, wholesale partners, and consumers to help inform our human rights approach and our ESG strategy more generally.

We also engage directly with suppliers and are currently in the process of further standardizing our engagement approach with suppliers, in part through the SEDEX SMETA audits.

## **10. Conclusion**

YETI is committed to continuous improvements in our efforts to address modern slavery risks in our operations and our supply chain. We understand that modern slavery is a complex issue and there is no simple solution, and we will continue to refine our approach to help ensure that our actions to address modern slavery are effective. We continue to remain committed in supporting international efforts to promote and protect human rights.



**11. Attestation**

In accordance with the requirements of the Acts, I attest that I have the authority to bind YETI and that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Acts, for the reporting year listed above.

Signature	 <small>78D17188774401...</small>
Full name	Matthew J. Reintjes
Title	President, CEO, Director
Date	6/7/2024