

OXFORD

SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct (Code) sets forth the minimum standards with which our suppliers and their business partners are required to comply. Suppliers shall adopt and adhere to rules and conditions of employment that, at a minimum, respect workers and safeguard their rights under national and international labor and social security laws and regulations.

In this Code of Conduct, “suppliers” refers to all vendors and their factories, subcontractors, sub-suppliers, and contracted service providers engaged in business with Oxford Industries, Inc. and our operating groups Tommy Bahama, Lilly Pulitzer, Johnny Was, Southern Tide, The Beaufort Bonnet Company, Duck Head, and Jack Rogers (“Oxford and our operating groups”). Suppliers must communicate these standards to all workers in all countries where they operate. We also expect our suppliers to communicate these standards to their business partners and conduct due diligence to ensure they are compliant. Where there are discrepancies between this Code, other supplier Codes, and applicable local, national, and international laws, regulations, and conventions, suppliers are obligated to abide by the highest standard. This document must be translated into the language(s) of employees, posted in a conspicuous location, and supported by training to ensure that all employees are aware of their rights as defined by this Code and all applicable laws, regulations, and conventions. In the event that the business relationship between the supplier and our operating groups ends, suppliers shall promptly remove this Code from display. Failure to comply with this Code may result in termination of suppliers’ business relationships with Oxford and our operating groups.

For any questions regarding this Code, suppliers are encouraged to contact sustainability@oxfordinc.com.

LAWS AND REGULATIONS Suppliers must comply with the laws of the countries in which they operate and all other applicable local, national, and international laws, regulations, and conventions. Suppliers should seek to align their policies and practices with customary international standards, including the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Rights and Principles at Work.

FORCED LABOR Suppliers throughout our supply chain are prohibited from using any form of forced labor, including prison, indentured, bonded, trafficked, and any other form of coerced or involuntary labor. Workers must be provided with a contract that accurately represents their employment including hours, wages, tasks, etc. and sign it of their own free will prior to starting work. Suppliers must maintain all relevant employment records including contracts, copies of identification documents, employment eligibility, etc. Under no condition can employers retain workers’ original identification or travel documents. Suppliers must ensure that workers have the right to freely move around and leave the facility and all supplier-controlled or -provided housing. Workers must be informed of their right to terminate their employment at any time without penalty. All workers, both foreign and national, must be treated equally. Suppliers are responsible to pay any fees for recruitment or employment eligibility, including transportation to and from workers’ home countries. When applicable, workers must be informed of the basic terms of their employment in their native language before leaving their home countries.

YOUNG WORKERS Suppliers may not employ any person under the age of 15, under the age for completion of compulsory education, or under the minimum age as defined by local law, whichever is highest. Suppliers must comply with local requirements for any workers under 18 and protect them from working conditions that may pose a danger to their health, safety, or development. Suppliers are expected to maintain a list of all workers under 18 and to maintain a copy of young workers’ identification documents and a record of their titles, managers, and responsibilities to ensure they are of legal working age and in positions appropriate for their age.

WORKING HOURS The work week cannot exceed 48 regular hours plus 12 overtime hours or the regular and overtime hours legally allowed in the country of employment, whichever is lower. Other than in exceptional circumstances, the sum of regular and overtime hours should not exceed 60 hours per week. All workers must consent to overtime hours and be able to reject overtime requests without fear of retaliation. Suppliers should not request overtime on a regular basis and must compensate for all overtime work at a premium rate. Suppliers must have a system to accurately track and monitor all regular and overtime work hours. Workers must record their own hours and be allowed at least 24 consecutive hours of rest in every seven-day period.

WAGES AND BENEFITS Suppliers must pay at least the minimum wage or the industry standard (whichever is higher), comply with all legal requirements on wages, and provide any benefits required by law or contract. Wages must be paid in a timely manner and be accompanied by a written accounting for every pay period that clearly indicates hours worked, overtime, wages earned, and deductions. Deductions from an employee’s pay for disciplinary infractions are prohibited. Any deductions not required by law can only be made with worker consent. Charges to employees for supplier-provided food, housing, etc. must not be greater than the cost of providing the services and must be freely agreed to by the worker prior to issuing the charge. Where compensation for a regular work week is not sufficient to meet the worker’s basic needs and provide some discretionary income, we will work with our suppliers to progressively realize a level of compensation that does.

HARASSMENT OR ABUSE Suppliers are expected to treat every employee with respect and dignity. No employee may be subject to or threatened with any form of harassment or abuse, including physical, sexual, psychological, or verbal. Suppliers are expected to take serious actions to prevent and rectify harassment and abuse in both the facility and all work-related spaces. Additional measures must be taken to prevent gender-based violence and sexual abuse. Disciplinary measures, including possible termination, should be considered when appropriate, based on the principle of impartiality. Under no circumstances can anyone use corporal punishment. All employees and potential hires must be free to raise complaints about workplace conditions without risk of retaliation.

DISCRIMINATION Suppliers must ensure that no person is discriminated against at any point in the employment process (including in hiring, compensation, training, advancement, discipline, termination, or retirement) based on sex, gender identity, race, religion or belief, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, social group or ethnic origin, trade union status or activity, or any other protected status. Under no circumstances can workers be required to undergo medical testing, including pregnancy or HIV testing.

FREEDOM OF ASSOCIATION Suppliers must recognize and respect the right of employees to freedom of association and collective bargaining. They may not interfere with, harass, or intimidate workers who lawfully and peacefully associate, organize, or bargain collectively. In countries where freedom of association is restricted, suppliers are expected to find alternatives to engaging workers, e.g., through worker committees, worker engagement programs, etc. In such cases, suppliers shall take no steps to further restrict or encourage the restriction of this right.

HEALTH AND SAFETY Suppliers must comply with relevant health and safety laws, promote the general health of employees, and provide a safe and healthy workplace setting to prevent accidents and injuries arising out of, linked with, or occurring in the course of work or resulting from the operation of their facilities. Suppliers should implement systems to prevent, detect, and respond to safety risks. Suppliers must investigate all health and safety incidents including by documenting reports, findings, resolutions, and resulting preventative or corrective actions taken. Records of all health and safety licenses, certificates, and trainings (both conducted by suppliers and required of workers to perform their tasks) must be maintained. Workers must be informed of their right to refuse work under unsafe conditions without fear of retaliation. Workers must have adequate access to private restroom facilities and drinking water at all times. The same standards must be applied to employees’ living quarters if they are provided by suppliers or their contracted parties. Homeworking and shared building arrangements are prohibited.

ENVIRONMENT Suppliers must adopt responsible measures to mitigate the negative impacts that their facilities have on the environment, including policies and procedures with respect to monitoring and minimizing energy use, air emissions, water use, waste, hazardous materials, and other significant environmental risks. Facilities are expected to make sustainable improvements in environmental performance and, where applicable, report progress through the Higg Facility Environmental Module. Suppliers should be able to provide supporting details and documentation of these steps upon request.

ANTI-CORRUPTION AND ANTI-BRIBERY Suppliers must comply with all applicable anti-corruption and anti-bribery laws, rules, and regulations. Suppliers must not tolerate, permit, or engage in bribery, corruption, fraud, or unethical business practices in dealing with business partners, public officials, or representatives of Oxford and our operating groups. Suppliers are expected to conduct themselves with the utmost integrity in all business dealings and to hold any contracted third parties to the same standards.

AUTHORIZED PRODUCTION Suppliers are required to formally request the use of new facilities and subcontractors and obtain written authorization from the applicable Oxford operating group prior to the start of production.

TRACEABILITY Oxford and our operating groups are jointly responsible with our suppliers for the social and environmental impacts of our products from raw materials to the finished goods factory. Suppliers are required to map and continuously track and monitor all locations throughout their supply chains, including but not limited to farms, gins, mills, processing facilities, factories, and any other site involved in the manufacturing of our products and to provide relevant details and supporting documentation promptly upon request.

COMMUNICATION AND TRANSPARENCY Compliance with this Code and applicable laws and regulations is subject to ongoing review by Oxford, our operating groups, and our representatives, including third-party auditors. Suppliers are expected to communicate transparently and proactively, maintain complete and accurate records, and provide Oxford, our operating groups, and our representatives with prompt and unrestricted access to facilities, records, and confidential worker interviews, regardless of whether advance notice is provided. Suppliers must not falsify or omit records, coach workers on how to answer questions, or intentionally mislead Oxford, our operating groups, or our representatives in any way.

GRIEVANCE SYSTEM All suppliers are required to have in place a grievance mechanism that allows workers to raise concerns in their preferred language without fear of intimidation, retribution, or retaliation. Suppliers must clearly communicate the existence of their grievance mechanisms to workers via signage and training. Where possible, suppliers are encouraged to participate in industry-wide grievance mechanisms. Suppliers are required to investigate and act upon all concerns reported by all stakeholders including workers, affected communities, NGOs, and others. Where serious and pervasive issues arise, suppliers are expected to document the relevant grievance(s) and inform the applicable Oxford operating group of the issue(s) within 24 hours.

Grievances can also be reported directly to Oxford at <https://oxfordsuppliers.ethicspoint.com>.