

Buckle
**RESPONSIBLE SOURCING
STANDARDS & CODE OF CONDUCT**

Buckle 

The Buckle, Inc. and Buckle Brands, Inc. (together “Buckle”) maintain a high standard of business ethics and regard for human rights. In this regard, Buckle has established certain standards in order to identify potential suppliers who share Buckle’s commitment, not only to quality products but also to sound business and human rights ethics.

Each of Buckle’s business relationships are based on the ability of vendors, agents, manufacturers, and vendor’s contractors and subcontractors (collectively, “Suppliers”) to fully comply at all times with the minimum principles and requirements of Buckle’s Responsible Sourcing Standards & Code of Conduct.

CODE OF CONDUCT

Buckle suppliers are required to abide by the contents of Buckle's Code of Conduct:

1. LEGAL REQUIREMENTS

Suppliers and their products must comply with all applicable federal, state, and local laws and regulations of the United States, of the countries in which Suppliers do business, and of national and international standards. Laws, voluntary standards and regulations are continually changing, and Buckle expects all of its Suppliers to remain current on the requirements that apply to their business and products.

2. WAGES AND WORKING HOURS

Suppliers must pay wages and provide benefits and compensation for overtime in compliance with all applicable laws and regulations, legal collective bargaining agreements, or the prevailing local industry wage, whichever is higher. Additionally, Suppliers shall compensate overtime at a premium rate. Suppliers must adopt working hours that are consistent with humane and productive working conditions and do not exceed the limits indicated in applicable laws and regulations. Workers must be provided at least one day off in seven, along with adequate meal and rest breaks during the workday consistent with local law. Suppliers must observe applicable laws regarding paid time off, leave periods, and holidays.

3. NO FORCED LABOR

Any form of indentured, bonded, forced, prison, involuntary, coerced or slave labor, or practices similar to slavery or labor engaged through human trafficking¹ or other forms of exploitation, used within Buckle's supply chain is strictly prohibited. All labor must be voluntary and provide workers with full freedom of movement. Suppliers are not permitted to retain any personal identification, travel documents or wages as a condition of employment, and must not restrict freedom of movement of Workers. Suppliers shall provide workers with complete and transparent details about their employment, including all rights, responsibilities and information regarding their wages, hours, and available leave. Indicators of forced labor identified by the International Labour Organization ("ILO") shall be used to identify forced labor within the supply chain. Any confirmed violation of Buckle's forced or child labor policies shall result in termination of its business relationship, along with cancellation of any then-pending orders, with the Supplier.

4. NO CHILD LABOR

The use of child labor by any Supplier within Buckle's supply chain is also strictly prohibited. Suppliers must not employ workers under the age of 15, under the age consistent with local law and applicable ILO Conventions, or under the local minimum legal age for employment, whichever is higher.

5. NO CORPORAL PUNISHMENT OR MONETARY PENALTIES

Suppliers must not use corporal punishment or other mental, physical or verbal abuse or coercion, threatened or otherwise, against workers. Additionally, Suppliers must not permit monetary fines for disciplinary action.

6. NO DISCRIMINATION OR HARASSMENT

Suppliers must be committed to equal opportunity employment and make employment decisions based upon the worker's competency, ability, skill, experience, and performance. Suppliers shall not discriminate based upon veteran status, uniformed service member status, race, color, creed, religion, sex, sexual orientation, gender identity or expression, age (40 and over), pregnancy (including childbirth, lactation, and related medical conditions), national origin or ancestry, citizenship status, physical or mental disability, genetic information (including characteristics and testing), or any other protected characteristic as established by applicable local, state, or federal law. Suppliers shall not engage in any form of harassment, including sexual, physical, psychological, or verbal harassment, or other forms of mental/physical coercion, abuse, or intimidation.

7. FREEDOM OF ASSOCIATION

Suppliers must respect the right to legally associate, organize and bargain collectively without restriction, interference, penalty, discrimination, retaliation, harassment or intimidation. If local laws restrict such activity, Suppliers shall introduce parallel means for free association and/or collective bargaining.

8. MONITORING

Suppliers must maintain adequate and up-to-date documentation to prove compliance with Buckle's Responsible Sourcing Standards & Code of Conduct and applicable laws, and engage in adequate monitoring activity to verify contractor and subcontractor compliance. Buckle and its designated parties reserve the right to monitor Supplier compliance with Buckle's Responsible Sourcing Standards & Code of Conduct through whatever reasonable means possible, including unannounced on-site inspection of

Supplier facilities, access to facility grounds, including workers' accommodations, access to employees for private interviews and access to relevant documentation. Suppliers shall implement grievance mechanisms to allow workers to confidentially communicate concerns to Supplier management and/or a freely chosen worker representative without the risk of retaliation, and such grievances shall be investigated in a timely manner with corrective action taken as necessary.

9. HEALTH AND SAFETY

Suppliers must provide safe and healthy work environments for their workers, including adequate facilities and worker accommodations (if applicable) in compliance with all applicable laws and regulations or other legally mandated standards for workplace health and safety. At a minimum, Suppliers shall provide proper health and safety management, including proper training on all equipment and policies and procedures (including emergency procedures) and access to adequate personal protective equipment. Suppliers must also provide access to potable drinking water, adequate lighting, ventilation, suitable sanitary facilities. Workers shall retain the right, without Supplier reprisal, to refuse to work under hazardous conditions that would compromise their health and safety.

10. ETHICS, CORRUPTION & BRIBERY

All supplier business records shall be clear, truthful and accurate. Suppliers shall not engage in unethical behavior, including bribery, kickbacks or any unfair trade practices to obtain or retain business. Suppliers must comply with the US Foreign Corrupt Practices Act, which prohibits giving money or anything of value to foreign government officials, foreign political parties, or foreign political candidates for the purpose of influencing a foreign government. This includes giving payments or anything of value to intermediaries, such as sales representatives. Suppliers must also cooperate with local, national, and foreign customs and other agencies to guard against terrorism and illegal activity.

11. ENVIRONMENT

Suppliers must demonstrate a high regard for the environment, as well as compliance with all applicable environmental laws and regulations, including but not limited to those related to waste disposal, emissions, wastewater and toxic substances. Suppliers must maintain any required environmental permits and/or licenses and follow all operational, registration and reporting requirements.

12. SUBCONTRACTING

Suppliers must share Buckle's Responsible Sourcing Standards & Code of Conduct with contractors and subcontractors and require adherence to it. Suppliers must display in a prominent place which is accessible to all employees within each facility where Buckle products are being manufactured, a copy of Buckle's Code of Conduct, translated into all the native languages of Supplier's employees.

If you believe that Buckle's Code of Conduct is not being upheld or if you have any questions regarding these requirements, please contact BuckleBelieves@Buckle.com, or file a confidential report by logging into www.lighthouse-services.com/buckle or calling 1-844-630-0003.

XINGJIANG UYGHUR AUTONOMOUS REGION

Suppliers are prohibited from utilizing facilities, operations, or materials, originating from the Xinjiang Uyghur Autonomous Region in China in the production (at any level) of any merchandise supplied to Buckle. Suppliers must maintain sufficient documentation to verify the origin of materials used in their products, and timely present such documents to Buckle or U.S. Customs upon request.

TURKMEN COTTON

Suppliers may not use cotton originating from Turkmenistan in the production of products supplied to Buckle. Suppliers must maintain adequate documentation to verify the origin of any raw or finished cotton products.

CONFLICT MINERALS

Buckle suppliers must not knowingly source any tin, tungsten, tantalum and gold (“Conflict Minerals”) that directly or indirectly finance or benefit armed groups engaging in human rights abuses in the eastern Democratic Republic of the Congo. Suppliers must develop policies and management systems regarding Conflict Minerals, ensure any Conflict Minerals are sourced from industry-verified Conflict-Free smelters and refiners, and cooperate with Buckle’s due diligence inquiries regarding the origin of any Conflict Minerals used in Buckle products.

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