Cotopaxi's Human Rights Policy and Commitments

As a Benefit Corporation, Cotopaxi strives to extend its commitment to responsible and compassionate business practices across its value chain. We affirm that we have a commitment as a company to respect and protect the well being and natural equality of all people who add value to our products, this includes the workers making our products within our global supply chain. As a foundational underpinning of our human rights due diligence process, we adhere to the following set of guidelines as outlined by the UN Guiding Principles on on business and human rights:

- 1. Cotopaxi has a responsibility to respect human rights.
- 2. If Cotopaxi contributes to human rights abuses without preventing or redressing these wrongs, we cannot fulfill our mission to alleviate poverty.

3. Given the pervasive nature of human rights abuses in the apparel industry, Cotopaxi assumes violations are occurring. Cotopaxi strives to work with suppliers that comply with our Code of Conduct and respect the commitments contained in this human rights policy. We will work with our supply chain partners to be as sustainable and ethical as possible – including when and if violations occur.

4. To solve for these known realities and maintain our commitment to alleviate poverty, we are adopting this human rights policy.

Cotopaxi's commitment has been developed to align with the <u>United Nations Guiding Principles on</u> <u>Business and Human Rights</u>:

- 1. We will respect human rights. We will avoid infringing upon the human rights of others and will address adverse human rights impacts for which we are responsible.
- 2. We will respect human rights as defined in the <u>International Bill of Human Rights</u> and the <u>International Labour Organization's Declaration on Fundamental Principles and Rights at Work</u>.
- 3. To respect human rights, we will do everything within our ability to avoid causing or contributing to adverse human rights impacts and will address them when and if they occur; we will seek to prevent or mitigate human rights impacts that are directly linked to our operations and supply chain. In all contexts, we will comply with all applicable laws and respect internationally recognized human rights, wherever we operate. We will seek ways to honor the principles of

international recognized human rights. We will treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever we operate.

- 4. Cotopaxi has identified the following human rights risks as salient to our business and will prioritize preventing, mitigating and managing these risks:
 - Overtime
 - Right to collective bargaining
 - Forced labor and Human trafficking
 - Child labor
 - Wages and economic inequality
 - Harassment and discrimination
- 5. To formalize our commitment to uphold human rights, we will undertake active human rights due diligence to identify, prevent, mitigate, and account for human rights risks. If abuses are discovered, we will work immediately to remediate any adverse human rights impacts we may have caused or contributed to.
- 6. To cement our commitment to human rights, every employee will be trained on our human rights policy in 2021, and leadership will champion this policy at the highest levels of management. (See our CEO's signed commitment to the UN Global Compact.)
- 7. To ensure that our purchasing practices are not negatively impacting our suppliers' ability to comply with our Code of Conduct, our procurement and value chain stakeholders have set the goal of adopting the <u>Ethical Trading Initiative's Better Buying</u> principles in 2021.
- 8. We will reinforce our human rights policy through the implementation of our <u>code of conduct</u>, <u>restricted substance list</u>, commitments to supply chain <u>transparency</u>, upholding the B Corporation standards, adopting GRI reporting disclosures (when possible), and meeting Fair Trade Certified[™] requirements. Our commitments will be listed and reported on publicly.
- 9. To identify, prevent, mitigate and account for how we address human rights impacts, we will carry out auditing (Higg Index, supplier audits), external verification programs (B Corp), trust building mechanisms (supplier surveys, proactive communication), capacity building and accountability measures (360 degree employee reviews, anonymous reporting mechanisms and onsite factory visits).
- 10. To help gauge our human rights risks, we will identify and assess any actual or potential adverse human rights impacts and will draw upon internal and independent human rights expertise in the form of external experts, NGOs, workers groups, and suppliers. We will also work to consult directly with at-risk workers whenever possible.

- 11. Through reporting, we will attempt as best as we can to verify whether or not we are effectively addressing our human rights risks and response. We will provide qualitative and quantitative findings taken from both internal and external sources and will share our social impact reporting publicly.
- 12. In the event that it is necessary to prioritize actions to address actual and potential adverse human rights impacts, we will first seek to prevent and mitigate those that are most severe or where delayed response would make them irremediable.

-Cotopaxi