

Global Code of Conduct

Version Number	Effective Date
2024.1	January 1, 2024
2025.1	January 1, 2025

Contents

Introduction.....	2	Human Rights and Labor Practices	10
Introduction to the Global Code of Conduct.....	2	Prohibition of Child Labor	10
Who Must Follow the Global Code of Conduct.....	2	Prohibition of Forced Labor	10
Addressing Integrity Concerns and Complaint Mechanisms	2	Commitment to Responsible Recruitment	10
Investigation and Discipline Process	3	Private or Public Security Forces.....	11
Training and Education.....	3	Working Hours	11
Posting Requirements	4	Wages.....	11
Integrity In Elevate Textiles Business.....	5	Workplace Threats and Violence	11
Conflicts of Interest	5	Right to Collective Bargaining	11
Personal Business Relationships.....	5	Fraudulent Conduct.....	11
Doing Business with Family Members	5	Environmental Health and Safety Principles.....	11
Gratuities, Gifts, and Entertainment.....	5	Health and Safety.....	11
Gathering Competitive Information.....	5	Environmental Principles	12
International Trade Laws.....	6	Land, Forest, and Water Rights and Eviction	12
Foreign Corrupt Practices Act	6	Animal Welfare	12
Antitrust and Fair Competition	6	Elevate Textiles Continuing Commitment to Global Sustainability	12
Trade Sanctions.....	7	Elevate Textiles’ Restricted Substances List (RSL) Policy.....	13
Anti-Boycott	7	Integrity of Elevate Textiles Information and Property	14
Security.....	8	Confidential Information	14
Political Activity and Contributions	8	Accuracy of Financial Reporting and Record Keeping ...	14
Complying with the Law	8	Company Resources and Intellectual Property	15
Quality and Testing.....	8	Communications with the Government.....	15
Integrity In The Elevate Textiles Workplace	9	Communications with the Public	15
Fair Treatment of People.....	9	An Enduring Commitment	16
Equal Opportunity Employer.....	9	Associate Confirmation	17
Commitment to Diversity.....	9		
Non-Discrimination / Non-Harassment	9		
Drug-Free Workplace.....	10		



Introduction

Appropriate business ethics and conduct make a difference.

Introduction to the Global Code of Conduct

Each day you will face and make decisions that are critical to Elevate Textiles' ("Elevate Textiles" or the "Company") success. However, there will never be a business requirement that will ever justify an unethical, immoral, or unprofessional act. How we do business and how we treat others are critical to protecting our global business and reputation in the industry.

The primary purpose of the Global Code of Conduct (the "Global Code" or "Global Code of Conduct") is to ensure that all Elevate Textiles associates and personnel around the world understand and adhere to the highest standards of conduct and that we provide our customers with consistent quality, service, and value throughout all markets. We also hope that this Global Code of Conduct will provide you with a readily accessible reference for you to use to make good decisions in your job. This Global Code of Conduct does not attempt to address every situation you may encounter or requirement for your position but sets forth Elevate Textiles' basic expectations concerning your professional and personal behavior as well as basic rules and procedures that Elevate Textiles expects every associate to follow. The Global Code of Conduct also does not and should not serve as a substitute for your individual responsibility for exercising good judgment and common sense, so that your actions never damage Elevate Textiles' reputation for integrity. You should use this Global Code of Conduct in conjunction with the policies, procedures, and work rules of your department, subsidiary, or business unit. Ultimately, your personal integrity and that of Elevate Textiles rely upon your individual judgment in choosing the correct course of action.

Though not every issue discussed in this Global Code of Conduct will be relevant to every associate, Elevate Textiles expects all associates around the world to familiarize themselves with the Global Code of Conduct so that they understand and comply with these policies. Elevate Textiles ensures that this Global Code of Conduct is followed by all of our controlled subsidiaries. In addition, we work with our joint venture partners and our licensees to also conduct their business in the spirit of this Global Code of Conduct. This Global Code applies to all our affiliates around the world, and each one has adopted and ratified it and imposes it on its employees as its own Code of Conduct.

Who Must Follow the Global Code of Conduct

All associates must adhere to the principles and requirements contained in this Global Code of Conduct and should consult the Global Code of Conduct for guidance when acting on behalf of Elevate Textiles. Associates must not knowingly use a contractor, agent, consultant, supplier, or other third party to perform any act that conflicts with this Global Code of Conduct. Associates who engage third parties such as contractors, agents, or consultants to work on behalf of Elevate Textiles must seek to ensure that these parties are made aware of the Global Code of Conduct and should seek cooperation in adhering to the Code, where applicable.

Addressing Integrity Concerns and Complaint Mechanisms

We are all responsible for speaking up when we notice an issue or have a question. Only then can Elevate Textiles address the issue. If you have questions about any situation, or if you, as an Elevate Textiles associate, have observed misconduct or a possible violation of the Global Code of Conduct, our policies, or the law, then you are required to report it. You can seek assistance from any of the below:

- Your Manager
- Your HR Manager
- Other manager(s) in your reporting chain
- Elevate Textiles' Corporate Legal Department -- compliance@elevatetextiles.com
- Elevate Textiles' Chief Legal Officer -- kristen.hughes@elevatetextiles.com

If you are not comfortable reporting a concern or violation to one of the resources listed above, you may also use Elevate Textiles' Integrity Line, which allows anyone to make a report confidentially and anonymously via email or telephone. When you make a report on the Integrity line, no identifying information will be provided to Elevate Textiles, nor will any be required to be provided unless you choose to identify yourself. To submit a report via the Integrity Line, visit elevatetextiles.alertline.com to find country-specific Integrity Line phone numbers and/or to make an electronic submission.



In certain locations and certain circumstances (e.g., under the German Whistleblower Protection Act), in addition to the internal reporting channels provided by Elevate Textiles outlined above, there may be external, government-provided channels available for you to report your concerns. Associates are encouraged to utilize internal reporting channels before using external options.

When a concern is reported through one of the mechanisms provided, Elevate Textiles will first determine if additional details are needed and, if so, will speak with the reporting party (if identified) to gather facts about the concern alleged. We will endeavor to do this initial assessment as promptly as possible (and within any timeframes required by governing law), but its duration depends largely on the scope of the concern. Once Elevate Textiles has the relevant facts, it will comprehensively investigate the matter. In addition to speaking with the reporting party, such investigation may include speaking with other potential witnesses, speaking to the alleged violator, and/or a review of information provided to us or available through our corporate-owned systems (i.e., email, etc.). As with the initial assessment, we will endeavor to complete the investigation as promptly as possible (and within any timeframes required by governing law) but its duration depends largely on the scope of the investigation.

Elevate Textiles will attempt to keep complaints and investigations confidential and will disclose information only as needed to investigate and resolve a complaint. As noted below, associates will not be retaliated against for good faith reporting of violations of the policy or for providing information in connection with the investigation. At the conclusion of an investigation, Elevate Textiles will communicate to the reporting employee a summary of the investigative results and, if appropriate, the remedial action, if any, that will be taken. Feedback to the reporting party may be provided promptly after the conclusion of the investigation or as required by governing law.

Elevate Textiles is committed to providing all associates the opportunity to work in an atmosphere and environment free from any form of retaliation and retaliation towards someone who submits a concern (or assists in an investigation) is strictly prohibited. In fact, it is a violation of this Global Code of Conduct for Elevate Textiles associates to seek retribution or retaliation against those who raise good faith concerns or against any individual who in good faith assists in a compliance investigation. In addition, retaliation is itself a separate, serious violation of this Global Code of Conduct and should be reported in the same manner as other Global Code of Conduct violations. “Good faith” does not mean that you have to be right, but does require that you are telling the truth, as you understand it. Elevate Textiles complies with all laws regarding Whistleblower rights and protections, including but not limited to the German Whistleblower Protection Act.

Investigation and Discipline Process

We take violations of the Global Code of Conduct, our policies, and the law very seriously. Respecting the principles and complying with the policies in this Global Code of Conduct is a condition of your employment with Elevate Textiles. Any director, officer, or employee who violates these policies will be subject to disciplinary action up to and including termination.

As noted above, Elevate Textiles will thoroughly investigate any potential misconduct or violations. Results of the investigation and discipline process may be provided to those making the report, if providing those details does not violate privacy considerations and/or will not hinder further investigation or remediation.

Training and Education

A regular global training and education program will be developed and maintained on the Global Code of Conduct, all compliance policies, and applicable laws, rules, and regulations (the “Elevate Textiles Policies”). The purpose of this training program will be to ensure that all Elevate Textiles associates are familiar with the requirements of, the importance of compliance with, and their responsibilities pursuant to Elevate Textiles Policies. The compliance communication and training program will be implemented at each of Elevate Textiles’ locations.

Elevate Textiles facilities will communicate and train all workers concerning the elements, goals, and expectations of this Global Code of Conduct.

All Elevate Textiles associates at all locations will have an opportunity to read this Global Code of Conduct and to review and discuss the Elevate Textiles Policies. In addition, Elevate Textiles will monitor the scope and accessibility of the Global Code of Conduct, including without limitation a program for workers to complete a Global Code of Conduct Declaration certifying their training attendance and compliance.



Posting Requirements

Elevate Textiles facilities will post this Global Code of Conduct in a conspicuous location accessible to all associates and visitors. Additionally, the Global Code of Conduct is available on the Elevate Textiles website in multiple languages. Hard copies of the Global Code of Conduct are available upon request.



Integrity In Elevate Textiles Business

Rules that govern how we do business every day

Conflicts of Interest

A conflict of interest may exist when your personal interest interferes or appears to interfere, with the interests of Elevate Textiles. You should always base your business decisions on Elevate Textiles' needs, rather than your own interests. For example, conflicts of interest may arise (i) when you take actions or have interests that may make it difficult to perform your work objectively and effectively; (ii) when you or a member of your family receives improper personal benefits as a result of your position in Elevate Textiles; or (iii) when Elevate Textiles makes loans to, or guarantees obligations of, you or your Family Members. For purposes of this Global Code of Conduct, "Family Members" is defined to include any person related to you by marriage, blood, or adoption. This includes, without limitation, a spouse, parent, child, sibling, stepsibling, stepparent, stepchild, father-in-law, mother-in-law, son-in-law, daughter-in-law, grandparent, uncle, aunt, cousin, brother-in-law, sister-in-law, nephew, and/or niece.

As a matter of Elevate Textiles policy, conflicts of interest should be avoided. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management, and if you become aware of a conflict or potential conflict, you should report it. Conflicts of interest/potential conflicts of interest may be reported by contacting Elevate Textiles Corporate Legal Department at the number provided herein.

Personal Business Relationships

Specifically, you shall not have any position with, or substantial interest in, any other business enterprise that might affect your independence of judgment concerning transactions between Elevate Textiles and the other business enterprise. You must ensure that your personal business relationships never influence the decisions you make for Elevate Textiles. Absent other factors, mere ownership of securities representing less than one percent (1%) of the outstanding class of such securities of a publicly traded business enterprise will not constitute a conflict of interest.

Doing Business with Family Members

Prior approval of the Chief Legal Officer or Chief Human Resources Officer is required for an Elevate Textiles employee to conduct business with Elevate Textiles for personal benefit or the benefit of a Family Member.

Gifts, Entertainment, and Bribery

No Elevate Textiles employee shall solicit, receive, or agree to receive any payments, gifts, entertainment, or other favors or remuneration that go beyond our standards of reasonableness or that might be seen as a customer's or supplier's condition of doing business with Elevate Textiles. While reasonable, seasonal, or incidental items (e.g., promotional items, business meals, or tickets to events) may be allowed in the normal course of business, such items must: be modest in value; be infrequent; be consistent with customary business practices; and not create any actual or perceived obligation.

Company employees are strictly prohibited from accepting, offering, or facilitating bribes in any form. A bribe is defined as any payment, gift, or benefit offered or received with the intent to improperly influence the actions or decisions of the recipient. Additionally, Company employees shall not accept or give kickbacks, which are defined as payments or benefits given as compensation for favorable treatment or other improper advantages in any business transaction.

Employees must exercise caution and good judgment in all business dealings. Any offer, request, or receipt of items that may conflict with this policy must be promptly disclosed to and reviewed by the Chief Legal Officer, or the Chief Human Resources Officer. If any employee has a question or concern about any issue in this regard, s/he should consult the Chief Legal Officer, and the Chief Human Resources Officer for guidance and direction.

Gathering Competitive Information

Elevate Textiles values properly gathered business information. Information about our competitors should only be gathered from public sources that are freely available to others. No Elevate Textiles associates should ever spy or steal to obtain competitive information.



Your responsibilities

- Comply with laws and ethical principles above private, personal gain.
- Do not have a position with, nor financial interest in, another business that might interfere with your Elevate Textiles duties or responsibilities.
- Do not conduct business between Elevate Textiles and a Family Member.
- Report any violations or suspected violations of Elevate Textile’s conflict of interest policies.
- Avoid accepting gifts above modest value when dealing with suppliers or customers.
- Promote compliance and ethics by example –show –by your behavior– what it means to act with integrity.

International Trade Laws

Elevate Textiles conducts business all over the world. Sometimes the actions taken in one country can create legal exposure for Elevate Textiles under the laws of another country. This is particularly true under U.S. laws. Anti-competition and trade regulation laws are complex and cannot be fully explained in this guide. For this reason, Elevate Textiles has created certain global trade department policies and procedures and provides additional training for Elevate Textiles associates who are likely to encounter these laws when performing their job. However, Elevate Textiles requires that all associates have a basic understanding of the issues arising under these laws.

Foreign Corrupt Practices Act

Numerous countries in which Elevate Textiles operates have anticorruption laws prohibiting the payment of bribes or other improper inducements to secure competitive advantage or otherwise corruptly influence a recipient’s decision-making. Examples include the U.S. Foreign Corrupt Practices Act (“FCPA”) which prohibits any U.S. company or any of its worldwide subsidiaries, affiliates, employees, or agents from making payments to foreign officials, foreign political parties or officials thereof, either directly or indirectly through another person, for purposes of (i) influencing any act or decision of such foreign official or (ii) obtaining or retaining business or any business advantage. The UK Bribery Act (“UKBA”) has similar prohibitions against both official (i.e., involving government officials) and commercial bribery. In many instances, persons who would not be considered foreign officials in the United States or UK might be considered foreign officials for purposes of the FCPA or UKBA if the government directly or indirectly owns or operates their place of employment. Therefore, particular care should be directed to the status of any person receiving payment or non-cash benefit, as well as to the use of agents in foreign countries who might be involved in activities that run the risk of violating applicable anti-corruption law.

Certain limited exceptions and legal defenses apply to the FCPA and UKBA, but whether a payment may qualify under an exception or defense is usually a legal question. In some instances, “reasonable and bona fide” expenditures, such as travel or lodging expenses, can be paid for or reimbursed to a foreign official if related to the demonstration or promotion of products or services, or the execution of a contract. However, if and to what extent a particular expense is reimbursable will require a legal assessment. Elevate Textiles associates and affiliates should not try to assess the legality of a proposed payment under any anti-corruption law. Instead, they should consult the Elevate Textiles Corporate Legal Department before making any payment that may implicate anti-corruption concerns, including any payment to or for the benefit of a foreign official. Questions as to whether an individual may be considered a “foreign official” under the FCPA or UKBA should similarly be addressed to the Elevate Textiles Corporate Legal Department.

Your responsibilities

- Consult with the Elevate Textiles Corporate Legal Department to understand FCPA, UKBA, and other anticorruption rules, and to take appropriate action.
- Contact the Elevate Textiles Corporate Legal Department if a foreign official seeks something of value.
- Do not assume that a practice is acceptable because another company has supposedly done it.
- Do not give or promise anything of value to a foreign official without the approval of your manager and the Elevate Textiles Corporate Legal Department. If you’re unsure if someone is a foreign official, contact the Elevate Textiles Legal Department for assistance.

Antitrust and Fair Competition

Elevate Textiles’ policy is to ensure that all operations, activities, and business affairs of Elevate Textiles are conducted in full compliance with all applicable antitrust and competition laws in the United States and in all the other jurisdictions in which



Elevate Textiles operates. Elevate Textiles will not engage in any illegal behavior that harms competition, including, but not limited to, entering into illegal agreements with competitors or illegal arrangements with suppliers, distributors, or customers. It has always been, and always will be, Elevate Textiles' policy to make its own independent decisions about what products to offer, where and how to offer them, and how much to charge for them.

Elevate Textiles' policy states that there should be no agreements (or attempts to reach an agreement), whether formal or informal, with any representative of a competitor regarding prices, pricing policies, discounts, allowances, or any other terms of sale. In addition, competitors may not agree among themselves to allocate customers, markets, or territories, boycott any supplier or customer, or undertake any other action or non-action that harms competition.

As with any law, failure to comply poses significant risks to Elevate Textiles, its officers, and associates. Penalties for violating the antitrust laws can be particularly severe and can have long-term impacts on both the involved individuals and Elevate Textiles as a whole. Accordingly, all Elevate Textiles associates are obligated to comply with this antitrust policy.

Antitrust and fair competition laws also prohibit the use of a dominant market position to monopolize that market, control prices or exclude competitors from entering that market, independent of natural market forces.

Each office and associate is responsible for ensuring that Elevate Textiles' business is conducted in compliance with all applicable antitrust laws.

Antitrust law compliance is a complex and highly technical area of the law. If you have any questions about antitrust compliance, please contact your supervisor or the Elevate Textiles Corporate Legal Department. Elevate Textiles associates found to be violating this policy are subject to disciplinary action, up to and including termination, and may be subject to civil and criminal penalties.

Your responsibilities

- Never discuss prices or products, either formally or informally, with any employees of Elevate Textiles' competitors.
- Never make untrue or malicious statements about Elevate Textiles' competitors.

Trade Sanctions

Occasionally, governments place trade or travel restrictions on imports from or exports to foreign countries. Elevate Textiles' U.S. operations are subject to U.S. export laws, which primarily restrict the destination and end user of Elevate Textiles' products, including such products re-exported from a foreign country to a prohibited destination or end user. In some cases, no products, regardless of their origin, may be shipped to certain destinations. Elevate Textiles' policy is to comply with all laws that are enacted to restrict trade with certain countries and all Elevate Textiles associates who are involved with exports must become familiar with all the regulations and procedures that apply to his or her business activities.

Your responsibilities

- Do not assume that export control rules do not apply to non-U.S. sales.
- Consult with the Elevate Textiles Corporate Legal Department if you have any questions or concerns about compliance with any trade laws.

Anti-Boycott

U.S. anti-boycott laws prohibit Elevate Textiles (including its controlled foreign subsidiaries and affiliates) from refusing to do business with another person or taking other actions in support of a boycott not sanctioned by the U.S. government.

U.S. law requires Elevate Textiles and its controlled foreign subsidiaries to report to the U.S. government any requests that they may receive to engage in a boycott. If any Elevate Textiles employee receives a written or oral request to take any action or non-action that has the effect of furthering or supporting any boycott, he or she should promptly report the request to the Elevate Textiles Corporate Legal Department for guidance on how to respond.

Your responsibilities

- Report any requests to participate in a boycott to Elevate Textiles Corporate Legal Department.



Security

Elevate Textiles is committed to maintaining compliance with the best practices of access, personal, procedural, and physical security as it relates to our manufacturing, warehousing, and shipping processes.

Elevate Textiles facilities and personnel will maintain security procedures to guard against the introduction of non-manifested cargo (e.g., drugs and other contraband) into shipments of its products, both purchased and manufactured, including, but not limited to, compliance with Customs-Trade Partnership Against Terrorism (C-TPAT) requirements for shipments to the United States.

Elevate Textiles facilities will comply with all applicable customs laws and establish and maintain programs to safeguard against the illegal transshipment of products while working with the appropriate customs authorities worldwide.

Political Activity and Contributions

The financial and other resources of Elevate Textiles shall not be used for the purpose of supporting directly or indirectly the campaign of any candidate for political office, the reimbursement of any direct or indirect political contributions by any individual, or for the purpose of making payments, donations, or gifts to government officials or employees. Elevate Textiles does encourage all Elevate Textiles personnel to participate individually in political affairs with his or her own time and resources.

Complying with the Law

It is Elevate Textiles' policy to ensure that all its operations, activities, and business affairs are conducted in full compliance with all applicable laws in every jurisdiction in which Elevate Textiles operates.

Obeying the law, both in letter and in spirit, is the foundation of Elevate Textiles' ethical standards. Although not all of us are expected to know the details of all applicable laws, it is important to know enough to determine when to seek advice from supervisors, managers, or the Elevate Textiles Corporate Legal Department. If you have any questions or concerns regarding actions or behavior you are considering, have taken, or have witnessed, please contact your supervisor or Elevate Textile's Corporate Legal Department.

Quality and Testing

Elevate Textiles is committed to providing world-class quality products and services that meet or exceed customer requirements. World-class quality is crucial to our success and is achieved through continuous improvements of processes and is defined as being on-target with minimum variation. All test documentation must be completed accurately and promptly.



Integrity In The Elevate Textiles Workplace

Rules that govern how we live and work as Elevate Textiles associates

Fair Treatment of People

Equal Opportunity Employer

Elevate Textiles is an equal opportunity (and, in the U.S., an affirmative action) employer. Elevate Textiles' policy is to provide equal employment opportunity to all qualified associates and qualified applicants for employment without unlawful regard to race, color, religion, sex or gender, national origin, age, disability, veteran status, or any other classification protected by applicable law. This policy applies to all terms and conditions of employment including, but not limited to, hiring, benefits, transfer, compensation, promotion, leave of absence, dismissal, and lay-offs.

Commitment to Diversity

Elevate Textile seeks to recruit, develop, and retain the most talented people from a diverse candidate pool. We believe that diversity in our associates is important to our success as a global organization. We will continue to support efforts and actions that build the diversity of our workplace, ensure equal opportunity in employment, and ensure that the business environment is free of discrimination.

Non-Discrimination / Non-Harassment

All Elevate Textiles personnel are entitled to be treated with dignity and respect. Elevate Textiles is therefore committed to providing a work environment free from any form of unlawful harassment, discrimination, intimidation, and coercion based on or related to race, color, religion, sex/gender, national origin, age, disability, veteran status, or any other classification protected by applicable law. Such behavior is inconsistent with our philosophy of mutual respect for all Elevate Textiles personnel and will not be tolerated.

We ask and require that all Elevate Textiles associates add their support to achieving our objectives of equal opportunity employment and of zero tolerance for any type of illegal harassment or discrimination. Any violation will be dealt with immediately when discovered, and Elevate Textiles personnel, including any manager or supervisor, who engage in such behavior will be subject to appropriate disciplinary action up to and including termination of employment.

Improper harassment and other prohibited behavior may include but is not limited to the following:

- Making unwelcome comments about a person's appearance, body, or personal life
- Offensive or abusive physical contact
- Use of unwelcome, offensive nicknames, or terms of endearment
- Offensive jokes or unwelcome innuendoes, derogatory comments or threats regarding race, color, religion, sex/gender, national origin, age, disability, veteran status, or any other classification protected by applicable law.
- Any suggestion that sexual activities, race, color, religion, sex/gender, national origin, age, disability, veteran status, or any other protected classification would affect one's job, promotion, performance evaluation, or working conditions
- Displaying, distributing, or circulating offensive objects or pictures; or
- Other conduct that, even if not objectionable to some Elevate Textiles personnel, creates a working environment that may be reasonably considered by others to be offensive or hostile. Sexual harassment may consist of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when one of more of the following occurs:
 - o Submission to or rejection or tolerance of such conduct is made an explicit or implicit term or condition of an individual's employment.
 - o Submission to or rejection or tolerance of such conduct is used for the basis of an employment decision, such as promotion, demotion, dismissal, or pay; or
 - o Such a condition unreasonably interferes with an associate's work performance or creates a hostile, intimidating, or offensive work environment.



The above items are just examples of inappropriate behavior. Whatever the form of unwelcome abuse, discrimination, or harassment, Elevate Textiles takes it very seriously. It simply has no place at Elevate Textiles.

If you witness or experience behavior that you believe may be unlawfully harassing, discriminatory, intimidating, or coercive, you are required to report it. Reports may be made using one of the Complaint Mechanisms outlined on pages 3-4 of this Global Code.

Drug-Free Workplace

Elevate Textiles is committed to ensuring that all associates refrain from engaging in unlawful drug activity in the workplace and/or reporting to work or working while under the influence (regardless of when the illegal substance was consumed). To attain this goal, Elevate Textiles has established a Substance Abuse Policy.

Elevate Textiles will take appropriate disciplinary action, up to and including termination of employment, against any employee who violates this policy. Where permitted by local laws, Elevate Textiles reserves the right to test any Elevate Textiles employee if he or she appears unfit for work due to suspected illegal drug use or abuse of a controlled substance.

All Elevate Textiles personnel have an affirmative duty to disclose any known or suspected violations of this policy to the appropriate Human Resources Department Personnel.

Human Rights and Labor Practices

Elevate Textiles strives to act in accordance with all internationally recognized human rights and labor practices. Elevate Textiles expects its associates, contractors, suppliers, and business partners to comply with all applicable legal requirements regarding human rights and labor practices.

Prohibition of Child Labor

Elevate Textiles will not engage in or condone the unlawful employment of children in the workplace or engage in or condone the use of child labor. The Company has a minimum age for employment that is the highest of the following: 16 years, the local minimum age, or the mandatory school age in the region of employment. We also support the Universal Declaration of Human Rights of the United Nations.

In cases where child labor is identified within our supply chain or operations, Elevate Textiles is committed to implementing remedial actions in line with international best practices. These may include:

- Collaborating with local organizations and stakeholders to ensure the child is safely withdrawn from work.
- Providing access to educational opportunities, vocational training, or other forms of support, including financial support, to the affected child and their family.
- Conducting a thorough review of relevant policies and practices to prevent recurrence.

Prohibition of Forced Labor

Elevate Textiles is committed to preventing slavery and human trafficking throughout its business footprint and all forms of forced labor and human trafficking are prohibited. Elevate Textiles will not utilize prison, indentured, bonded, or any other type of involuntary, forced, or trafficked labor. Elevate Textiles shall employ its personnel strictly on a voluntary basis and such personnel shall be informed of their basic terms of employment. Contracts or agreements, if any, between Elevate Textiles and its associates shall be in the native language of the worker (or in a language which such worker can understand) and shall fully comply with all legal requirements and not impose any form of coercion (i.e., substantial fines, loss of residency by leaving employment or unlawful deprivation of land, forest, and waters). In addition, in the event Elevate Textiles hires any workers through an employment broker or agency, it shall not withhold any such worker's passport(s) and no worker shall bear the cost of any recruitment or similar fees.

Commitment to Responsible Recruitment

We are committed to the fair treatment of workers in our supply chain. As part of this ongoing effort, we will continue working together with our contractors, suppliers, and business partners to eliminate conditions that can lead to forced labor in the countries from which we source products.

We are committed to ensuring that our associates and our supply chain partners create working conditions in which:



- No workers' pay for their job;
- Workers retain control of their travel documents and have full freedom of movement; and
- All workers are informed of the basic terms of their employment before leaving home.

Private or Public Security Forces

Elevate Textiles will not hire or deploy private or public security guards to protect the business if the deployment of security forces may result in human rights violations due to a lack of training or control by the company. This includes but is not limited to, where the use of security forces poses a risk of torture or cruel, inhuman, or degrading treatment, injury to life or limb, or impairment of the rights of others.

Working Hours

An Elevate Textiles associate should not work more than the regular and overtime hours allowed by applicable law. All associates should be allowed 24 consecutive hours of rest in every seven-day period in all but exceptional circumstances and then, only in compliance with local law. All overtime work will be consensual. Elevate Textiles will carefully monitor overtime hours and will compensate for all overtime work at a premium rate or as required by local law. Other than in exceptional circumstances (and, in that case, only in compliance with local law, the sum of the regular and overtime hours in a week will not exceed 60 hours.

Wages

Elevate Textiles is committed to providing competitive wages in each of its locations and will ensure that wages will never be below local minimum wage laws applicable to each of its operations. All wage and hour non-exempt associates will receive appropriate overtime pay based on local laws applicable to the operation.

Workplace Threats and Violence

Threats, threatening behavior, acts of aggression, or acts of violence against Elevate Textiles personnel, customers, vendors, or other individuals while on duty or while on Elevate Textiles property are prohibited. In addition, threats, threatening behavior, acts of aggression, or acts of violence against associates while off-duty are prohibited. Violation of this policy will subject such a person to disciplinary action, up to and including termination of employment.

Right to Collective Bargaining

Elevate Textiles recognizes and respects the rights of workers to be heard and to collectively bargain. Elevate Textiles will seek to work in good faith with trade unions, trade associations, and other bodies if our associates collectively choose such entities to represent them, or as otherwise required by applicable law, within the appropriate legal framework.

Fraudulent Conduct

Elevate Textiles personnel who intentionally deceive or defraud another person or business in a transaction are likely to be in violation of both criminal and civil laws in most, if not all, of the jurisdictions in which Elevate Textiles does business. In addition, the discussions around such deceptive transactions through the telephone, facsimile, email, or postal mail might give rise to claims of fraud. United States laws on fraud are far-reaching and violation would subject such Elevate Textiles associates to severe fines and imprisonment. To avoid any such liability, Elevate Textiles associates should take great care to ensure that there are no intentional misrepresentations regarding Elevate Textiles' products in offers to customers, in any filings or reports to any governments or banks, or in any similar documents. Elevate Textiles will not condone fraudulent conduct, and all Elevate Textiles associates must act in accordance with all applicable laws.

Environmental Health and Safety Principles

Elevate Textiles recognizes that our business activities and global supply and value chains may potentially cause adverse impacts on employee health and safety and the environment. We are committed to conducting operations in a way that minimizes these risks to the maximum extent possible.

Health and Safety

Elevate Textiles' policy is to follow all federal, provincial, state, and local laws regarding workplace health and safety. Elevate Textiles associates are responsible for compliance with all health and safety rules, and regulations, and for continually practicing



safety while performing his or her duties. Elevate Textiles is committed to providing reasonable safeguards to ensure safe working conditions, maintaining all equipment, tools, and machines in good repair, and studying, developing, and training associates in safe work methods. In addition, Elevate Textiles prohibits the possession of firearms or weapons on Elevate Textiles property.

Elevate Textiles associates who violate these laws may not only cause harm to themselves but to others. Any suspected violations of the safety procedures or any safety concerns should be immediately reported to your supervisor so that they can be appropriately addressed.

Environmental Principles

It is Elevate Textiles' policy to conduct our operations in such a manner as to protect the environment. At a minimum, this means that Elevate Textiles will comply with all applicable laws and regulations in each country in which we operate. If local environmental laws and regulations are not in existence or are less stringent, Elevate Textiles' International Environmental, Health, and Safety policies and standards will be followed.

Companies often establish worldwide environmental, health, and safety standards that they require their suppliers to meet. Our Environmental, Health, and Safety policies and procedures are designed to meet or exceed such standards implemented by Elevate Textiles' customers.

Elevate Textiles believes that a safe and healthy environment is the obligation of every citizen and every responsible enterprise and that means Elevate Textiles should play a leadership role in protecting the environment for this generation and for generations to come. Elevate Textiles' commitment to the environment is expressed by expenditures for equipment and programs to ensure that by-products of the manufacturing process do not adversely affect the air, land, or water.

Elevate Textiles is committed to working with our customers to encourage them to purchase and accept products that have recyclable packaging and with our suppliers to design products and product packaging that may be recycled.

Elevate Textiles is committed to encouraging our communities, families, and associates to conserve our natural resources and better protect the environment in their daily lives.

Land, Forest, and Water Rights and Eviction

Elevate Textiles respects the legal land rights of individuals, indigenous people, and local communities, and prohibits unlawful forced evictions. It also prohibits the purchase, development, or other use of land, forests, and waters that are essential to a human's livelihood.

Animal Welfare

Animal welfare is important to us as no animals should be harmed in the making of our products. Elevate Textiles has a long-standing commitment to improving animal welfare across its global supply chain. Elevate Textiles, its associates, vendors, and suppliers, shall observe all rules and principles of animal and species welfare and protection related to their own and purchased fibers and animal products.

Elevate Textiles' Continuing Commitment to Global Sustainability

Elevate Textiles' long-standing commitment to Environmental, Health, and Safety (EHS), and Social Responsibility continues to be a top priority at all Elevate Textiles' operations worldwide. It has been widely recognized that enhancing environmental sustainability in operations, and in the supply chain is simply the "Right Thing To Do" and is essential to meeting the expectations of customers and stakeholders.

Sustainability is defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs." Sustainability seeks to balance the economic, social responsibility, and environmental impacts, recognizing that population growth will continue. This is encompassed by Elevate Textile's commitment to EHS and Social Responsibility, including but not limited to its use of alternative and renewable energy sources and technologies, eco-conscious resources (including responsibly sourced fibers), and its goals for reduced water consumption and waste reduction and prevention, among other initiatives. For additional information regarding Elevate Textiles' commitment to Global Sustainability and updates to key actions and sustainability innovations, visit the Elevate Textiles website at elevatetextiles.com/sustainability.



Elevate Textiles' Restricted Substances List (RSL) Policy

Elevate Textiles' continued commitment to providing safe and quality products to its customers has required the creation of strict guidelines on all fibers, chemicals, and lubricants that are used globally to manufacture its products. "Restricted Substances" are chemicals and other materials whose presence has been banned or otherwise restricted either by legislation in various countries or by brands.

Following the RSL policy will reduce customer risks and enhance Elevate Textiles products as a global leader in the textile industry.

Your responsibilities

- Know the Elevate Textiles environmental policies.
- Identify any areas where Elevate Textiles may be able to better its environmental principles.
- Bring any inaccurate environmental reporting or any environmental issues to the attention of Elevate Textiles management.



Integrity of Elevate Textiles Information and Property

Rules to safeguard Elevate Textiles' resources and assets

Confidential Information

Elevate Textiles has a significant investment in valuable confidential information used in its everyday business. We will protect that investment through procedures designed to prevent the unauthorized disclosure of confidential information including, without limitation, robust cybersecurity information processes (e.g., multi-factor authentication), as provided for by local law. Elevate Textiles' policy is to ensure that the operations, activities, and business affairs of Elevate Textiles, our customers, and our suppliers are kept confidential to the greatest possible extent. If, during their employment, Elevate Textiles associates acquire confidential information about Elevate Textiles, its customers, or its suppliers, such information is to be handled in strict confidence and is not to be discussed with anyone other than those within Elevate Textiles who have a legitimate business need to have the information. Associates are also responsible for the internal security of such information. Confidential information is information that belongs to Elevate Textiles and is not publicly known, including but not limited to the following:

- Elevate Textiles business plans
- Pricing information
- Forecasts
- Market analyses
- Training materials
- Technical manuals
- Sales data
- Customer information
- Personnel/payroll information
- Production information
- Procurement information
- Service and quality performance
- Manufacturing specifications and processes
- Manufacturing cost and productivity information
- Test methods
- Vendor certification data
- Personal health information

Such information also includes any information provided to Elevate Textiles associates with the express direction that it be kept confidential. In general, confidential information may not be divulged without express permission to anyone except others authorized to have the information.

In addition to confidential information belonging to Elevate Textiles, Elevate Textiles associates are required to protect the non-public, confidential information of customers, suppliers, and Elevate Textiles' business partners that is provided to Elevate Textiles in conjunction with its business relationships. Such information may include, but is not limited to, customers' manufacturing and production data or suppliers' pricing information. In general, Elevate Textiles assures these parties that it will protect the confidentiality of such information and associates shall not disclose it to external parties without express written permission from the CEO of Elevate Textiles, Elevate Textiles' Corporate Senior Vice Presidents, or other direct reports to the CEO of Elevate Textiles.

Any associate found to be violating this policy is subject to disciplinary action, up to and including termination of employment, and may also be subject to civil or criminal penalties for violations of, among other things, applicable securities law.

Accuracy of Financial Reporting and Record-Keeping

Elevate Textiles' policy is to make full, fair, accurate, timely, and understandable disclosure in reports and documents that it releases to the public or files with regulatory agencies. Elevate Textiles' policy has been and continues to be that all transactions be accurately reflected in its books and records. Further, Elevate Textiles' policy is that all books and records and bank accounts or other repositories of assets of Elevate Textiles shall be subject to all normal accounting and auditing controls, and the



falsification of any of its books and records or the maintenance of any secret bank accounts or repositories is strictly prohibited. Elevate Textiles requires honest and accurate recording and reporting of information to make responsible business decisions. Records should be retained or destroyed only according to Elevate Textiles' record retention policies.

Company Resources and Intellectual Property

Elevate Textiles' intellectual property is a valuable corporate asset. The company name and logo represent Elevate Textiles, and improper use could result in adverse publicity or economic consequences for Elevate Textiles. In addition, Elevate Textiles must ensure that adequate standards are met for any product bearing its name. Elevate Textiles also has the exclusive right under federal law and some foreign laws to make, use, or sell patented inventions and distribute copies of copyrighted materials. Enforcement of these rights is an important step in maintaining the competitive advantage Elevate Textiles enjoys. In addition, Elevate Textiles owns all inventions, discoveries, ideas, and trade secrets created by Elevate Textiles associates on the job or produced using Elevate Textiles' resources, unless otherwise limited by local law (e.g., the German Employee Inventions Act).

To conduct its business, Elevate Textiles operates various electronic systems including but not limited to telephone, cellular phones, pagers, voicemail facilities, Elevate Textiles-supplied personal computers, other mobile devices (including personal devices used for Elevate Textiles' business under our BYOD policy), laptops, fax machines, modems, and servers and Elevate Textiles-supplied e-mail and internet access (the "Electronic Systems"). The information contained in any of its Electronic Systems, including Company-related information on your personal device(s), is the property of Elevate Textiles and Elevate Textiles always maintains a right of access to it where it is deemed necessary to protect the interests of Elevate Textiles or its clients, unless otherwise prohibited by law. Unauthorized installation of software on any of these electronic systems is strictly prohibited. The use of these systems shall be in accordance with the Global Code of Conduct and any related Elevate Textiles policies, provided this Global Code of Conduct supersedes any conflicting provisions in such policies. Furthermore, at no time are Elevate Textiles associates to use these systems in a derogatory, offensive, disruptive, or unethical manner, or in violation of any Elevate Textiles policy, or applicable law.

In some cases, an associate may be asked to enter into an agreement with Elevate Textiles regarding such topics as confidentiality, restrictive covenants (including, without limitation, non-compete and non-solicitation provisions), and/or intellectual property. These agreements may contain provisions that apply to an employee both while he or she is employed with Elevate Textiles as well as for a period of time post-employment. If an associate executes one or more of these types of documents, he or she must comply with those requirements, as well as with local laws and customs governing post-termination restrictions and responsibilities.

Communications with the Government

Elevate Textiles' policy is to cooperate with governmental agencies in the proper performance of the agencies' functions, but responses to governmental investigations must be coordinated within Elevate Textiles. Requests for information or inquiries received from federal, state, local, or municipal government authorities (other than routine requests) are to be noted by the receiving individual and referred immediately to the Elevate Textiles Corporate Legal Department, with any appropriate comments. The Elevate Textiles Corporate Legal Department is responsible for acknowledging receipt for all non-routine requests and for initiating appropriate action for timely compliance. If you are not sure whether a particular request is routine or non-routine it should be sent to the Corporate Legal Department for review.

Communications with the Public

Only individuals designated by the CEO of Elevate Textiles are authorized to speak on behalf of Elevate Textiles to news media, analysts, or the general public. Elevate Textiles makes every effort to provide clear and accurate communications to the news media and general public to ensure that it retains integrity in Elevate Textiles' relationship with the public. If contacted by the news media, analysts, or other persons asking questions, all Elevate Textiles associates should refer such persons to the Chief Human Resources Officer.



An Enduring Commitment

Quality, service, value, and integrity. There is a difference.

Everyone at Elevate Textiles is responsible for acting ethically, fulfilling their duties, and taking responsibility for their actions. Our values and policies are global in scope, and all of us must take the time to fully understand and apply these values and policies. Elevate Textiles' management understands the challenge this presents to each one of us, but the success of Elevate Textiles depends upon our integrity in the marketplace, our relationships with each other, and our relationships in the community.

Elevate Textiles will diligently and continuously monitor compliance with this Global Code of Conduct in addition to its other policies and procedures. This will include compliance training for Elevate Textiles associates around the world as deemed necessary. Furthermore, Elevate Textiles may conduct audits on the implementations of and compliance with its policies and procedures that have regulatory or United States securities law compliance implications.



Associate Confirmation

Please return* this section to your local Human Resource manager or the General Manager of your location (to be retained in your associate employment file).

I have received a copy of the Global Code of Conduct of Elevate Textiles. I understand the standards of conduct described in it that apply to my job and agree to comply with them.

Signature

Printed Name

Department

Date

Location

****While every associate is required to read, review, and acknowledge this Global Code and to sign and return the Associate Confirmation as directed above, even if an associate does not sign and return the Associate Confirmation, the Global Code and the standards of conduct described within it still apply and each associate must comply with them as a term and condition of employment.***

Any questions or concerns regarding the Global Code of Conduct should be directed to the Elevate Textiles Corporate Legal Department (compliance@elevatetextiles.com) or to the Chief Legal Officer Kristen.hughes@elevatetextiles.com