

# Doing the Right Thing

OUR CODE OF BUSINESS CONDUCT AND ETHICS



RALPH LAUREN

# Our Promise

## Dear Team,

Our Code of Business Conduct and Ethics expresses our commitment to an ethical workplace and the enduring values that have guided our progress since 1967. As we've worked together to inspire the dream of a better life through authenticity and timeless style, we've also built a world-class reputation as a company that does business honestly and with integrity.

From the very beginning, Ralph embraced the idea that trust is foundational to our success. You – our teams – as well as our customers, business partners, communities and investors rely on us to act responsibly. With every transaction, and in every relationship, this trust helps us to accelerate the Next Great Chapter of the Ralph Lauren story.

Please take the time to familiarize yourself with our Code. In doing so, you'll find information about the laws that apply to us as a company, our commitment to doing the right thing and the resources available to you as a member of our global team. I urge you to use the Code to guide your actions and navigate situations you may face in your everyday work.

In the event you are ever at an ethical crossroad and unsure about how to proceed, please ask for help from your manager or a member of P&D or our legal team. If you ever see actions that could breach the trust we've worked so hard to earn, please speak up through the channels outlined in this handbook.

Remember, there is only one Ralph Lauren Corporation, and each of us has a role to play growing our brand and living out our Purpose – and that starts with upholding our values.



**PATRICE LOUVET**

President and Chief Executive Officer

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# Our Code of Business Conduct and Ethics

OUR COMMITMENT TO DOING THE RIGHT THING STARTS HERE, WITH OUR CODE.

We have developed a reputation for going beyond the expected and the ordinary. “Going beyond” is also a good metaphor for how we work and the high standards we set for ourselves. Our Code is our guide for doing business the right way.

# We Rely on Our Code of Business Conduct and Ethics

In our industry, a good pattern bridges the gap between a fresh idea and bringing that idea to life. The pattern brings something conceptual into sharp focus.

Our Code of Business Conduct and Ethics (“Code”) serves a similar purpose – it bridges a gap between our high-level policies and our day-to-day work. Our Code is designed to provide each of us with the information and resources we need to translate legal requirements into real-world behavior.

If you’ve ever thought to yourself, “I’m not sure how that policy applies to me,” the Code will show you how. It’s your guide to conducting business with integrity and:

- Understanding the laws, regulations and policies that apply to your work
- Learning definitions of key terms and how to navigate challenging workplace situations
- Knowing what’s expected when interacting with colleagues, customers and business partners
- Finding people and policies to help you when you’re not sure of the right course of action

## REMEMBER, IF YOU:

- Are ever unclear about how a law applies to the work you do
- Are not sure about whether a particular course of action is lawful
- Ever have a conflict between a local custom or requirement and our Code

[Ask for help.](#)

## WHO DOES THE CODE APPLY TO?

Our Code applies to all employees, officers and directors of Ralph Lauren Corporation, as well as our subsidiaries (referred to throughout the Code as either “Company” or “we”). It should be read together with our policies and procedures, including those in our employee handbook, which can be accessed from RL Today. Our Code requires that we each act with honesty and integrity at all times and, when faced with hard choices, that we do the right thing.

We expect those who work for us or on our behalf, such as vendors, consultants, contractors, agents and suppliers (“business partners”), to comply with the law, meet the obligations outlined in their contracts and honor the principles outlined in our Code.

## VIOLATIONS AFFECT ALL OF US.

Trust – in each other, in our leadership, in our brand and in the Company – can be broken with one bad decision.

That’s why violations of our Code, our policies or the law are serious and can result in disciplinary action up to and including termination of employment and, in some cases, civil or criminal consequences for those involved and for the Company.

## WANT TO KNOW MORE?

Employee Handbook

# We Understand What's Expected

As a global business, we're subject to many requirements. Each of us has a responsibility to comply with the letter and spirit of all laws, rules and regulations that apply to us by following our Code and avoiding even the appearance of anything improper.

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## YOU MIGHT BE THINKING...

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### Do people managers have additional responsibilities?

Yes. Leaders set the tone for their teams. If you are a people manager, you have a responsibility to lead by example and model ethical behavior – there should be no difference between what you say you're going to do and what you do. We also look to you to help create a workplace that values mutual respect and open communication. You should be proactive in stopping any misconduct you are aware of. And you should be a resource for others, guiding your team through difficult situations and responding quickly and effectively when an employee raises a concern.





# We Make Good Decisions

The Code is a vital resource, but it simply can't cover every legal or ethical issue that may arise in the workplace. It is essential that, regardless of the circumstances and regardless of whether there is a Company policy in place, you must act with honesty and integrity at all times. If you can't find the answer to a workplace question in our Code or policies, ask yourself some key questions.

THE ACTION I'M CONSIDERING:
Is it legal?
Does it align with our Code and our policies?
Would I feel comfortable if it were made public?
Would it preserve the reputation of the Company?

If you can answer "yes" to all of these questions, then the action you're considering is probably the right thing. But if the answer to even one question is "no" or "I'm not sure," **seek guidance first.**

## YOU MIGHT BE THINKING...

**I see other people in our industry who bend the rules.**

We just don't do business that way. Trust your instincts, use good judgment and stay true to what you know is right. Preserve what we've built and honor our culture. No reason, including the bad behavior of others or a desire to meet business goals, justifies conduct that's illegal or unethical.





# Our Open Door

EACH OF US HAS A VOICE.

We are one globally connected team, working together to bring an iconic vision to life. We owe it to ourselves, each other and the Company to promote the kind of workplace where everyone feels safe in coming forward, and everyone has an opportunity to be heard.



## We Share Our Concerns

Our culture and value system is based on caring – caring about the jobs we do and the people who work beside us, about the products that bear our name and about our customers, our communities and our planet.

We expect and encourage you to come forward and share concerns about any conduct (by another employee, business partner or customer) that violates our Code, our policies or the law. By speaking up about issues and concerns, we can address them together and work on solutions that will make a stronger and better Company.

There are many resources available to help you:

**Start with your direct manager.** In most cases, your manager is in the best position to address your concern. If you are uncomfortable approaching your manager, or if you've already spoken to your manager and no action has been taken, you're encouraged to contact:

- Another **member of management**
- **Global People Practices**
- The **Legal Department**
- **Internal Audit**
- **The Ralph Lauren Hotline**, via:

Web: **[ralphlauren.ethicspoint.com](http://ralphlauren.ethicspoint.com)**

or

Phone: **1-877-4POLORL**

Available 24/7, information provided through the Hotline is documented in detail by a third-party interview specialist (if you report via phone) or through the use of a web form (if you report online) and forwarded to the Company for investigation and follow-up. Translators are available via phone, and online reports can be made in your local language. Anyone who reports may choose to remain anonymous, except where prohibited by law.





## We Cooperate With Investigations

Regardless of who you contact, your report will be appropriately reviewed or investigated and handled confidentially to the maximum extent possible.

All reports are forwarded to an assigned, knowledgeable internal investigator to determine whether an investigation is warranted. If a decision is made to move forward, only those who have a specific need to know will be involved in the investigation.

Everyone who works at the Company has a responsibility to cooperate fully with investigations into reported misconduct.

Ralph Lauren will take appropriate steps to stop any violation and prevent it from reoccurring.



## We Don't Fear Retaliation

We strictly prohibit retaliation against anyone who makes a good-faith report about a known or suspected violation, or who cooperates with an investigation into suspected misconduct.

### YOU MIGHT BE THINKING...

#### It's not easy to speak up.

You're right. Saying something isn't easy, but it's always the right thing to do. We can't correct problems we don't know about. And ignoring bad behavior – or waiting for someone else to say something – can make a bad situation worse. Talk to someone you can trust, knowing that you are protected from retaliation for sharing concerns in good faith.

### SHARING A CONCERN "IN GOOD FAITH" MEANS:

You honestly believe that there has been a violation of our Code, our policies or the law.



# Our People

OUR PEOPLE ARE AT THE  
CENTER OF EVERYTHING WE DO.

Dedicated, engaged, focused – we deliver on our Purpose every day. We represent a diversity of stories, talents and experiences, and are united in our Purpose: to inspire the dream of a better life through authenticity and timeless style.

# We Celebrate Our Diversity

## WHAT WE BELIEVE

We are dedicated to providing a comfortable and consciously inclusive work environment for every member of our team. We unite and inspire the communities within the Company and those we serve by amplifying voices and perspectives to create a culture of belonging, equity, inclusion and fairness for all.

## WHAT WE DO

- Honor each other’s personal stories.
- Embrace all voices and perspectives different from our own, and promote belonging and inclusion in all aspects of our work.
- Promote the kind of workplace that advances equal employment opportunities and prohibits discriminatory practices.
- Make recruiting, hiring and other employment-related decisions fairly, without regard to race, color, ancestry, religion, sex, gender, gender identity and expression, sexual orientation, marital status, age, ethnic or national origin, disability, medical conditions, genetic information, military and veteran status or any other category protected by applicable law.
- Encourage and support others in the development of their individual skills, talents and knowledge.
- Provide accommodations for those with disabilities, who request them.

## WANT TO KNOW MORE?

Fair Treatment Policy or contact [Global People Practices](#)



# We Promote Respect

## WHAT WE BELIEVE

Harassment (including sexual harassment), bullying and abusive conduct have no place here. We treat all individuals – customers, business partners and each other – with dignity and respect whether we interact in the workplace, at formal and informal social gatherings in or outside the workplace, on business trips or at offsite meetings and events.

## WHAT WE DO

- Promote mutual respect and positive, productive working relationships.
- Stay alert for – and speak up about – disrespectful or inappropriate conduct, whether we experience it personally or see it directed at someone else.
- Use our open door policy to report concerns, knowing that we will be protected by our anti-retaliation policy.

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## YOU MIGHT BE THINKING...

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**Some people say things they shouldn't, but they don't intend to harass anyone.**

Harassment doesn't have to be intentional to be unlawful. It may not matter what was intended; what may matter is the perception of – and impact on – the person being harassed.



## “HARASSMENT” IS:

Intimidating or offensive behavior that interferes with someone's ability to work or creates a hostile work environment. It can be:

- Physical, such as unwelcome touching or sexual advances
- Verbal, such as insults, demeaning jokes, slurs or name-calling
- Visual, such as posting or sharing inappropriate photos, objects or cartoons



# We Ensure a Safe Workplace

## WHAT WE BELIEVE

Safety matters. We know and follow all applicable health and safety regulations, policies and procedures because good safety practices protect our most valuable asset – our people. Taking shortcuts or skipping requirements is not in our DNA. Each of us, in every location, shares the responsibility for keeping everyone safe and secure.



## WHAT WE DO

- Strive for an injury-free workplace by following all of the safety requirements that apply to our jobs and work locations, and make sure our colleagues do, as well.
- Complete all required safety training, and never take on tasks for which we haven't been trained.
- Wear personal protective equipment when required.
- Never work under the influence of alcohol or illegal drugs, especially when operating a Company vehicle or heavy machinery.
- Stay alert for hazards and report any unsafe workplace condition that could pose a risk to ourselves or others.
- Observe good physical security practices and report any strangers, suspicious activity or threats of violence.

## WANT TO KNOW MORE?

[RL-Safety@ralphlauren.com](mailto:RL-Safety@ralphlauren.com)





# Our Customers

WE VALUE OUR CUSTOMERS.

They are at the heart of our story,  
in every interaction and with every  
product, brand and market.

# We Build Loyalty

## WHAT WE BELIEVE

We are one team, focused on the customer. In every interaction, we understand and work to meet their needs. We seek a competitive advantage through superior products and services, never through unethical or illegal practices.

## WHAT WE DO

- Abide by our Customer Bill of Rights.
- Deliver our best for our customers – we’re responsive to their requests and questions.
- Tell the truth in our advertising, sales and promotional materials, and substantiate any claims we make about our products.
- Deal fairly – never taking unfair advantage of anyone by manipulating, misrepresenting or concealing facts, abusing confidential information or engaging in any other unfair dealing practice.
- Never cut corners on our quality or delivery standards.
- Honor our return and exchange policies.

## YOU MIGHT BE THINKING...

**Maybe it’s OK to exaggerate or misrepresent the facts if it means making a sale.**

It’s not OK. Our reputation for being reliable and trustworthy – for being authentic – relates not only to our collections but also to our customer transactions. We never resort to exaggeration or any other dishonest tactics in order to win business.

## WANT TO KNOW MORE?

[Customer Bill of Rights](#)

[Regulation FD Policy](#)







# We Preserve Privacy

## WHAT WE BELIEVE

All of us have witnessed the consequences of a data breach. Whether we have had our own personal data compromised in some way or seen the damage inflicted on a company's reputation because of a careless act. We must do everything we can to protect personal data, protect our brand and protect the trust that others have placed in us.

## WHAT WE DO

- Safeguard the personal data of employees, customers, competitors and business partners.
- Collect, access and share personal information in accordance with all applicable privacy and data protection laws, regulations and our policies.
- Only disclose personal information to those who have a legitimate business need for the information.
- Immediately **report** any actual or suspected breach of personal data – whether intentional or accidental.
- Contact the **Legal Department** or the **Data Protection Officer** with questions related to preserving privacy.

## WANT TO KNOW MORE?

[Data Governance Policy](#)

### “PERSONAL DATA” MAY INCLUDE AN INDIVIDUAL’S:

- Email or physical address
- Phone number
- Credit card, banking or financial information
- Social security number or other government-issued identification information
- Employee medical information
- Pay or performance information

In much of the world, including in Europe, personal data includes virtually all data and information that identifies an individual, including even their name.



# Our Company

THE RALPH LAUREN NAME IS  
SYNONYMOUS WITH TIMELESS  
DESIGN AND IMPECCABLE QUALITY.

It represents a story of risk and reward,  
of dreaming and taking chances, of being an  
influencer before the word was formed. It goes  
beyond what we make. It's who we are. Together,  
we honor and protect our iconic legacy.

# We Maintain Financial Integrity

## WHAT WE BELIEVE

The way we conduct our business matters. If we're careless about our recordkeeping, our customers, our investors and our business partners will lose confidence in us. We have a duty to make sure that what we report or record is truthful, accurate and complete. Our future success depends on it.

## WHAT WE DO

- Ensure the public is provided with accurate information about the Company.
- Follow the systems, controls and procedures we have in place to make sure our records accurately reflect our business operations.
- Protect, store and dispose of information as prescribed by our policies, and never destroy documents that may be relevant in a legal proceeding.
- Watch for irregularities or inaccuracies and **report any suspicious activities.**

## YOU MIGHT BE THINKING...

**I don't work in accounting, so this doesn't apply to me.**

There are some of us whose work directly involves financial disclosures to the public, investors, government agencies and regulatory authorities, and we must have full, fair, accurate and timely information. But each one of us, even those who don't work in accounting or finance, is a recordkeeper. Timecards, benefit claims, expense reports, contracts, invoices, purchase orders, production reports, quality and safety data – all of these are examples of records. They drive everyday transactions and decision-making and must be accurate.

## WANT TO KNOW MORE?

Regulation FD Policy

## A "SUSPICIOUS ACTIVITY" COULD BE:

- An "off-the-books" account
- A cost assigned to the wrong project
- A sale tracked to the wrong quarter
- Missing approvals or supporting documentation
- A false or misleading entry
- A request to ship to a country that differs from where payment originated

If you see or suspect financial misconduct, share your concerns.

# We Protect What's Ours

## WHAT WE BELIEVE

We don't follow trends, we set them. All of our ideas, and the assets we use to develop them, need to be protected. We're good stewards of our resources, which include things like our clothing, designs, imagery and customer data, as well as confidential information and information systems, and computer hardware and software.

## WHAT WE DO

- Keep our physical assets safe:
  - Protect them from loss, damage, waste, misuse and abuse.
  - Never borrow, lend, give away or dispose of them unless we have approval.
- Keep our electronic assets free from digital attacks:
  - Protect usernames and passwords, never sharing them with anyone.
  - Use only software that's been properly licensed – no copying, no pirating.
  - Be alert to phishing attacks and don't open suspicious links in emails.
- Keep confidential information confidential:
  - Label it properly.
  - Share it only with those who are authorized and need it to carry out their job responsibilities.
  - Watch what we say in public places.
  - Consult our employee handbook about the right employees have, under some circumstances, to confidentially disclose trade secrets to an attorney or government agency performing a government function.



## WHAT'S "INTELLECTUAL PROPERTY" ?

Ideas for a product or process that are the result of an original creative thought, including our brand, logos, trademarks, trade secrets and any other copyrighted, patented or proprietary material.

Note that the Company owns any work product you conceive of while working here, to the extent permitted by law.

## We Protect What's Ours

- Keep our innovations safely guarded:
  - Before sharing, make sure third parties have a nondisclosure agreement approved by our Legal Department in place.
  - Stay alert for – and **report** – any information about counterfeit Ralph Lauren merchandise.
  - Honor the obligation to protect our intellectual property even if we leave the Company.
- Ensure our digital assets (online platforms) adhere to Company branding and security standard:
  - Follow structured protocol for initiating and creating new websites for the Company.
  - Do not register domains on behalf of the Company without following protocol.
  - Do not use any company related and/or branded websites for personal or philanthropic purposes, without prior vetting.
- Use Company assets for Company business – any personal use (of assets such as phones, computers, email and remote access capabilities) should be infrequent, never violate the law or our policies and never interfere with our work.
- Have no expectation of privacy when using our systems – anything created on our systems is Company property and, where permitted by law, may be monitored by the Company.
- Direct any questions about the protection of assets to the **Legal Department** or the **Global IT Service Desk**.



# We Protect What's Ours



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## YOU MIGHT BE THINKING...

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**I'm not sure if information I work with is confidential information.**

If you're not sure, treat it as though it is. Examples of confidential information include nonpublic information related to product designs, advertising and promotional materials, business and marketing analyses, plans, strategies and methods, financial, sales and pricing information, product and service know-how, formulas, processes, systems and technologies, client books, records and databases and techniques for finding, analyzing and distributing information. **Personal data is confidential, too.** Always remember: Protecting confidential information from unauthorized use is critical to our continued success and our relationships with business partners, licensees and customers.

## WANT TO KNOW MORE?

[Data Governance Policy](#)

# We Avoid Conflicts of Interest

## WHAT WE BELIEVE

We are passionate about living our best lives, both in and outside of work. But we understand the importance of making sure that our personal activities, interests or associations don't influence the decisions we make on the job or interfere with our job responsibilities. We act in the best interests of the Company.

## WHAT WE DO

- Know and avoid the kinds of situations that could give rise to a conflict of interest.
- Understand that even the perception of conflict is problematic if it makes others question our motives.
- Disclose any activities – including those of immediate family members – that could create a conflict of interest, to our manager and the **Legal Department**.

## COMMON CONFLICT-OF-INTEREST SITUATIONS INCLUDE:

- Accepting **favours, cash, gifts, discounts or services that exceed nominal value**
- Pursuing, or taking for yourself, opportunities (to buy or sell products, property or services, for example) that belong to the Company
- Investing in one of the Company's competitors, customers or business partners
- Directing the Company's business or compensation to a family member or other relative
- Directing the Company's business or compensation to a supplier that is owned, managed by or employs your family members, other relatives or close friends
- Receiving a personal loan or settling a debt because of your position at the Company
- Working for one of our competitors, customers or business partners
- Using your position or Company property, assets or information for personal gain

# We Avoid Conflicts of Interest



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## YOU MIGHT BE THINKING...

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### How do I know if an activity could pose a conflict?

It's not possible to list every potential conflict of interest scenario, but you can ask yourself:

- Could this situation interfere with my decisions or my responsibilities at the Company?
- Am I using Company resources or my position for my own gain?
- Is my spouse or domestic partner or an immediate family member (my or my spouse's/ domestic partner's parents, grandparents, children, siblings, nieces, nephews and cousins) engaged in activity that could result in a conflict or even the appearance of one?
- Would others (inside or outside of the Company) view this as a conflict?

If the answer to any question is "yes" or "I'm not sure," there may be a potential conflict. It's always best to be transparent and disclose to your manager any situation you're unsure about so you can work together to address it.



# We Follow Our Gifts and Entertainment Guidelines

## WHAT WE BELIEVE

Offers of gifts or entertainment are often seen as a way to promote goodwill and build business relationships. But there is a point at which they can go too far, and there are some situations where giving or accepting is always inappropriate. To avoid even the suggestion of something improper, we know and comply with our policies, including our Anti-Bribery and Corruption Policy.

## WHAT WE DO

- Make sure anything we (or members of our family) give or receive is nominal (valued at less than US\$200), not cash, offered infrequently and would be considered customary in the course of ordinary business.
- Remember that the rules for government officials are more stringent – we seek written approval from **Global People Practices** and the **Legal Department** before extending or accepting gifts or entertainment of any value.
- Never solicit a gift or provide a gift to someone who solicits one from us.
- Never offer or accept anything of *any* value if it **creates a sense of obligation or an expectation of something (for example, a favorable business decision) in return.**
- Ensure that anything of any value given or received is recorded properly in the Company books and records.

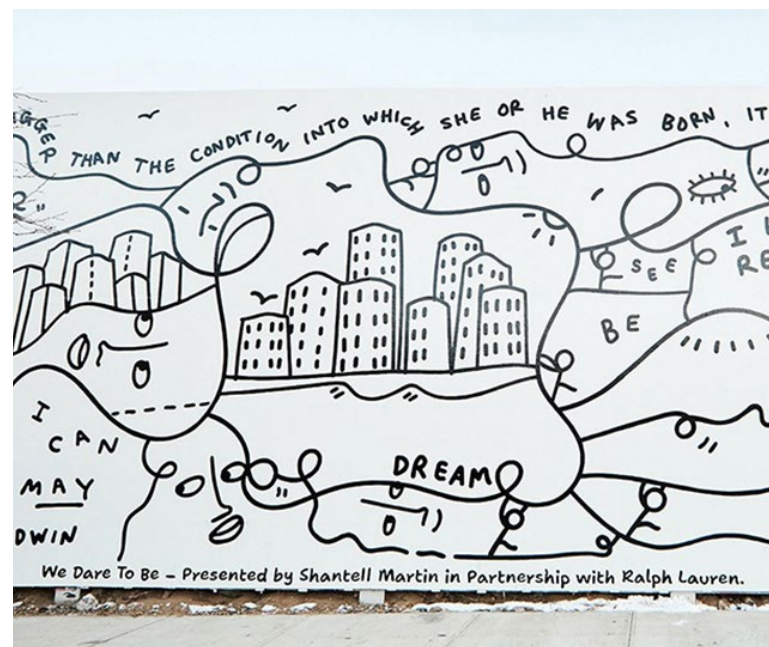
## FOR EMPLOYEES IN OUR GLOBAL MANUFACTURING & SOURCING AND SUPPLY CHAIN:

There is a zero-tolerance policy for gifts and entertainment. As a function of your job and job responsibilities, you may not give or receive anything of any value.

## WANT TO KNOW MORE?

[Gift Giving and Receiving Policy](#)

[Anti-Bribery and Corruption Policy](#)





# Our Industry

IT'S NOT JUST WHAT WE DO,  
IT'S HOW WE DO IT.

We are known for our iconic style, which sets us apart from our industry peers. But when it comes to following the law, we don't get creative. We understand and comply with the legal requirements that apply to our operations, everywhere we do business.



# We Prohibit Bribery and Corruption

## WHAT WE BELIEVE

We are caretakers of a world-class brand – we’re careful to make sure nothing dishonors it. That’s why we take a zero-tolerance approach to acts of bribery and corruption, from the highest level of the c-suite to every link in our supply chain. We know that working with integrity preserves our heritage.

## WHAT WE DO

- Never offer, give, promise or accept a bribe and never allow anyone to bribe on our behalf.
- Select business partners who share our high standards and then monitor their work to ensure compliance with the law.
- Record all transactions accurately, honestly and completely in our books and records, in compliance with our internal policies and controls.
- Follow our gifts and entertainment guidelines to make sure anything we give or receive could not be mistaken for a bribe.

## A “BRIBE” HAPPENS:

Whenever anything of value is offered to win (or keep) business or to gain an unfair or improper business advantage. “Anything of value” can be cash, but it can also be:

- An expensive gift or meal that doesn’t align with our policies
- Travel or tickets
- A loan
- A “special” discount extended only to you
- A favor
- A job or internship offer
- A charitable donation or political contribution

These are just a few examples – when something is given to influence a decision or an action, it’s a bribe.



# We Prohibit Bribery and Corruption



## YOU MIGHT BE THINKING...

**If a government official asks for a small fee to get something done (like expediting a permit application or processing papers for a visa), would that be considered a bribe?**

When a low-level government official requires a small payment to take care of everyday, routine government actions, it's referred to as a "facilitating payment." These payments can be bribes and are prohibited by the Company unless there is a threat to your health or safety. If you're asked for a facilitating payment, check with the Legal Department for guidance.

## WANT TO KNOW MORE?

[Anti-Bribery and Corruption Policy](#)

[Gift Giving and Receiving Policy](#)

# We Are Fair Competitors

## WHAT WE BELIEVE

We are a Company built on authenticity. We put superior design and quality out into the marketplace and never let unethical practices drive our success. We play by the rules and compete fairly, knowing that any conduct that restricts (or even appears to restrict) competition can not only violate the law, but our sense of what's right.

## WHAT WE DO

- Comply with antitrust and competition laws everywhere we operate.
- Never enter into an agreement with competitors, customers or business partners that could limit or interfere with full and fair competition.
- Bid fairly in competitive bidding situations.
- Use only lawful, ethical and publicly available sources in gathering information about our competitors.
- Direct any questions about how competition laws apply to a particular situation to the **Legal Department**.

## YOU MIGHT BE THINKING...

**I often run into our competitors at industry trade shows.**

Be careful. If you're at a trade show meeting or other industry gathering and the conversation turns to a competitively sensitive topic, make it clear that the discussion is inappropriate and that you won't participate, then leave and immediately contact the Legal Department to report the incident.

## AVOID COMPETITIVELY SENSITIVE TOPICS.

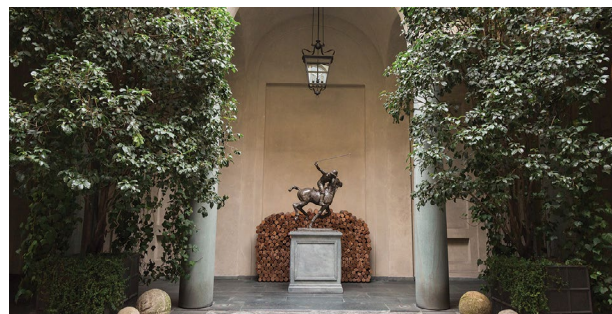
Violations of antitrust and competition laws are serious – avoid conversations with competitors about:

- Raising, setting or holding (“fixing”) prices
- Agreeing with a wholesale customer on a mandatory resale price
- Costs, terms or conditions of sale
- Who should submit the winning bid in a competitive bidding process (“bid rigging”)
- Restricting production, sales or output
- Dividing territories, markets or customers
- Preventing another company from entering the market
- Refusing to deal with certain business partners or customers (“group boycotting”)
- Agreeing with a competitor not to hire each other's employees

# We Prevent Insider Trading

## WHAT WE BELIEVE

It's not ethical – or legal – for people with access to nonpublic information about a company to buy and sell stocks based on what they know. As insiders, we may be aware of “inside information” about the Company that's not available to the public. We don't buy, sell or hold stocks or securities based on this information or tip others so they may do so.



## WHAT WE DO

- Know the kinds of information considered inside information.
- Comply with insider trading laws and our policies – we never trade on inside information or tip others so they may trade.
- Check with the **Legal Department** about questions related to our ability to buy or sell or to determine whether specific information about the Company (or companies with which we work) is inside information.
- Honor any trading windows or special blackout periods that the Company may impose, waiting to trade until the restriction is lifted.
- Contact RLTrading@alphalauren.com with any questions regarding the ability to buy or sell securities.

## “INSIDE INFORMATION” IS:

Nonpublic information about a company that might have a significant impact on the price of that company's securities, or that a reasonable investor would be likely to consider important in making an investment decision. Examples include nonpublic information about:

- The gain or loss of a large customer or supplier
- Changes in executive leadership
- New products or services
- Projected financial results or forecasts
- Potential mergers or acquisitions
- Business plans
- Litigation or pending lawsuits

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# We Prevent Insider Trading



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## YOU MIGHT BE THINKING...

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**It's probably not a big deal to share inside information with friends or family.**

It *is* a big deal. If you share inside information with friends or family and they trade based on what you share, all of you may be in violation of insider trading laws, which is a federal crime that may be punished with a prison sentence. Keep inside information inside. Don't disclose it to anyone unless they have a legitimate business reason to know it.

## WANT TO KNOW MORE?

[Securities Trading Policy](#)

[FAQ on Employee Stock Trading Process](#)

# We Choose Good Partners

## WHAT WE BELIEVE

Ethical partnerships – ones built on transparency, trust and shared values – are key to supporting our customers and growing our business. We source responsibly, choosing reliable partners and striving to act as good partners.

## WHAT WE DO

- Do our due diligence – we base sourcing decisions on objective criteria (e.g., business need, price, quality, service, experience and delivery record), never on personal bias or interests.
- Communicate expectations and hold business partners accountable.
- Monitor their work – make sure they're fulfilling their contractual obligations and complying with the law.
- Protect their confidential information and personal data and expect them to protect ours.
- Know our policies on gifts and entertainment and be ready to politely refuse any offer that doesn't comply with them.
- Stay alert for – and report – any potential conflicts of interest, human rights abuses or acts of bribery or corruption. Any conduct that reflects poorly on our partners, reflects poorly on us.

## YOU MIGHT BE THINKING...

### What about our business partners' business partners?

Our due diligence extends to every link in our supply chain. We expect our business partners to observe similar practices in the selection of *their* business partners and in the performance of *their* contracts – especially with respect to **honoring human rights, promoting environmental stewardship**, sourcing materials responsibly and speaking up about unlawful or unethical conduct.

## WANT TO KNOW MORE?

RL-Legal@alphalauren





# We Comply With International Trade Requirements

## WHAT WE BELIEVE

As a global company that reaches customers in every corner of the world, we understand the importance of knowing and following the laws that regulate cross-border trade of our products. Doing business internationally is a privilege – one we never want to lose. So, we stay informed of what's required.

## WHAT WE DO

- Follow the global import, export and trade laws that apply to our products.
- Screen our customers against applicable government lists for sanctioned and embargoed countries and entities, never dealing with people or companies specifically prohibited by law or countries subject to sanctions.
- Comply with U.S. anti-boycott laws – we don't participate in any boycotts that the United States doesn't support, and we direct any requests to do so (which are often found in documents such as shipping instructions, certificates of origin or letters of credit) to the **Legal Department** and **Customs Compliance Department**.

## YOU MIGHT BE THINKING...

### I work with Company information, not products.

An import or export is not limited to a product. They can also be services, information or technology that are sent (which includes via email or fax) from one country to another. Some information can be considered exported to a foreign national, even if it never leaves the country – for example, by showing a foreign national some software code on a computer in an office in the United States. Be careful, protect our brand and ask questions if you're unsure about whether something is OK to share or not.





# Our Communities

WE ARE PURSUING A  
MORE EQUITABLE AND  
SUSTAINABLE FUTURE.

Since the beginning, we've stood for values and things that last. Today, we take our philosophy of creating products that are meant to be passed down through generations and apply it to everything we do, from how we make our products, to how we protect the Earth and champion people and communities.



# We Work to Protect the Environment

## WHAT WE BELIEVE

We strive to operate our business in ways that respect our planet. By adopting practices that help preserve the world's natural resources, we can be stewards in protecting our environment for generations to come.

## WHAT WE DO

- Aim to make our products with more sustainable materials and methods, committing to circular and culturally sustainable design practices and implementing circular business models.
- Through ongoing innovation and strong partnerships, work across our value chain to reduce our impact on the climate and water and avoid waste.
- Through **The Ralph Lauren Corporate Foundation**, partner with organizations focused on local community needs, including safe water, adequate sanitation and proper hygiene solutions and sustainable cotton development.

## WANT TO KNOW MORE?

Visit the **Global Citizenship & Sustainability page** on [ralphlauren.com](http://ralphlauren.com).

**OUR TIMELESS BY DESIGN PHILOSOPHY:**

Reflects our core belief in timelessness. We carry this belief beyond the products we create and into the world around us, setting ambitious global goals in an effort to create a lasting, positive impact on the planet and in the communities we serve.

You can find out more about the commitments we're making and the achievements we've realized in our **Global Citizenship & Sustainability Report**.

# We Work to Inspire Better Lives

## WHAT WE BELIEVE

Creating a business that is timeless and has a positive impact on tomorrow means building relationships that stand the test of time – ensuring everyone is included, respected and empowered. That’s why we’re committed to working with and supporting each other, our partners and our communities to build a brighter future.

## WHAT WE DO

- For each other:
  - We create the kind of workplace that promotes inclusivity and allows people to bring their full selves to work.
  - We support one another’s health, well-being, work-life harmony and quality of life, and receive benefits from the Company that not only help us achieve our goals but allow us to thrive.
- For those in our supply chain:
  - We are **committed to working with business partners who conduct business ethically, responsibly and lawfully.**
  - We expressly prohibit forced, indentured, bonded or compulsory labor obtained through human trafficking, coercion, slavery or child labor.
  - We expect suppliers to share our commitment to principles and practices that prioritize diversity, equity and inclusion, such as women’s empowerment.
- For our communities:
  - **The Ralph Lauren Corporate Foundation** champions equity and empowers underserved communities around the world in its commitment to its core areas of focus: supporting cancer care and prevention, protecting the environment, fostering advocacy and access and strengthening community resilience. It hopes to deliver meaningful change in its communities through its nonprofit partnerships, investments and volunteering programs.



## WANT TO KNOW MORE?

Visit the [Global Citizenship & Sustainability page](#) on [ralphlauren.com](http://ralphlauren.com).

# We Work to Make a Difference

## WHAT WE BELIEVE

As a company, we're delivering meaningful change across global communities through Ralph Lauren nonprofit partnerships, investments and volunteering programs. And, as individuals, we're contributing our own time and talents to support the causes we're passionate about.

## WHAT WE DO

- Engage on a corporate level through **The Ralph Lauren Corporate Foundation** – established in 2001, employees are encouraged (but never required) to support The Foundation's core areas of focus in whatever way feels comfortable for them.
- Engage on a personal level in civic, charitable and political activities, using our own funds, resources and time.
- Make it clear, in any political or charitable activities, that as individuals, our views are our own (not the Company's) – we're aware that the Company does not make political contributions, does not have a political action committee and will not reimburse individuals for any personal contributions they make.





# We Work to Make a Difference

## WHAT IS THE RALPH LAUREN GIVES BACK PROGRAM?

It's a volunteering program that encourages employees and teams to support local nonprofit organizations – from food pantries, beach and park cleanups to charity walks and fun runs, all helping to make a difference and contribute toward positive change in the world.

Find out more by contacting RL Philanthropies.

## YOU MIGHT BE THINKING...

**I'm raising funds for a local nonprofit that does great work in our community. Can I ask the Company or my coworkers for a donation?**

We celebrate your personal involvement in supporting your community, but you can't use Company email to solicit your coworkers, and you can't apply pressure on them – directly or indirectly – to contribute or support your personal activities. If you have coworkers who are also friends, you will need to ask for their support using your own personal email, outside of Company time. In terms of a corporate donation, our Matching Gift Program might offer a way to double the impact of your personal donation. Contact RL Philanthropies to see if your nonprofit organization qualifies.

## WANT TO KNOW MORE?

Visit the [Global Citizenship & Sustainability page](#) on [ralphlauren.com](http://ralphlauren.com).

Matching Gift Program





# We Communicate Responsibly

## WHAT WE BELIEVE

An impulsive remark – even if well-intentioned or inadvertently shared – can have a global impact on our employees, our brand and our bottom line. We want to protect what we make and the people who make it, so we have dedicated spokespersons to speak on our behalf and send a clear, consistent and accurate message.

## WHAT WE DO

- Don't speak for or on behalf of the Company. We refer questions or requests for information to the appropriate spokesperson.
- Never give the impression that our individual views represent those of the Company.
- Use social media responsibly, complying with laws and Company policies that protect privacy and confidential information – each of us is responsible for the content we publish.

## YOU MIGHT BE THINKING...

**There are times I'd like to correct something I see about the Company on social media.**

While it's tempting to set the record straight, it's better to point the Company spokesperson to the post and let them respond where appropriate.

## WANT TO KNOW MORE?

- Corporate and Social Media Policy
- Regulation FD Policy

FOR QUESTIONS	CONTACT
From the media or reporters	<b><u>Global Corporate Communications</u></b>
About financial matters	<b><u>Legal Department</u></b> and <b><u>Investor Relations</u></b>
About legal matters	<b><u>Legal Department</u></b>
From the government	<b><u>Legal Department</u></b>
About sponsorships or charitable donations	RL Philanthropies
About making speeches or participating in events	Corporate Speaking Engagement Policy

# Helpful Resources

FOR QUESTIONS	CONTACT
The Legal Department	RL-Legal@ralphlauren.com
Global People Practices	GlobalPeoplePractices@ralphlauren.com
Internal Audit	Internal-Audit@ralphlauren.com
Global Corporate Communications	GlobalCorporateCommunications@ralphlauren.com
Global IT Service Desk	Helpdesk@ralphlauren.com
Customs Compliance Department	RL-Legal@ralphlauren.com
Investor Relations	IR@ralphlauren.com <b>1-212-813-7868</b>
The Ralph Lauren Hotline, 24/7	<b><u><a href="https://www.ralphlauren.ethicspoint.com">ralphlauren.ethicspoint.com</a></u></b> <b>1-877-4POLORL</b>

We support an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code of Business Conduct and Ethics or in any of our policies is intended to limit or interfere with that right.

Also, our Code of Business Conduct and Ethics and our policies do not limit an employee's right to communication with any government agency, such as the Equal Employment Opportunity Commission, the National Labor Relations Board, the Occupational Safety and Health Administration or the Securities and Exchange Commission (or equivalent government agencies in other countries where we operate), or otherwise to participate in any investigation or proceeding that may be conducted by any such government agency, including providing documents or other information, without notice to the Company.

Any waivers of the provisions of this Code of Business Conduct and Ethics for executive officers or directors may be granted only in exceptional circumstances by the Board and will be promptly disclosed to the Company's shareholders as required by applicable law, rule or regulation. Amendments to this Code must also be approved by the Board. It is the responsibility of each employee, officer and director to be familiar with the Code, as it may be revised from time to time.



