



# Human Rights Policy

## Urban Outfitters, Inc.

---

URBN believes that all people are born with inalienable human rights. We strive to avoid causing or contributing to infringements of human rights and seek to prevent or mitigate infringements of human rights that may be linked to our operations, products and services. URBN employs a number of policies and procedures designed to safeguard human rights, such as URBN's Code of Conduct, Vendor Code of Conduct, and Workplace Compliance Assessment process. URBN's Sustainability Committee has responsibility for creating and overseeing URBN's human rights policy, as well as its other environmental, social, data privacy & security, and governance related policies. The Sustainability Committee reports to the Board at least annually.

Among other things, URBN prohibits the following throughout all of its operations and the operations of its vendors, suppliers, and partners: child labor, forced labor, prison labor, slavery, human trafficking, invidious discrimination or harassment, corporal punishment, and unsafe working conditions. To implement these prohibitions in its supply chain, URBN mandates that all vendors meet the requirements of its Vendor Code of Conduct ("Vendor Code"). The Vendor Code is based on International Labor Organization (ILO) standards and internationally accepted good labor practices.

In order to ensure that vendors comply with the Vendor Code, URBN conducts Workplace Compliance Assessments (WCA) through third party auditors, as well as through oversight by buying offices around the world. To minimize duplication of effort, URBN also accepts the results of sufficiently recent and equivalent third-party audits conducted for other companies. URBN employs a risk-based approach for identifying suppliers subject to a Workplace Compliance Assessment. URBN maintains a repository of supplier scorecards based on compliance audits.

URBN employs a Social Compliance team to monitor the results of Workplace Compliance Assessments. The Social Compliance team receives ongoing training and continuing education on human rights and sustainability issues and shares their expertise with both internal sourcing partners and external suppliers. URBN takes Workplace Compliance Assessment scores into account in making procurement decisions. URBN has zero tolerance for priority violations of the Vendor Code. Priority violations are child labor, forced labor, slavery, human trafficking, corporal punishment, or health and safety violations that could cause immediate loss of life or serious injury. URBN will cease doing business with a supplier that has a priority violation. In the event of other violations, the Social Compliance team works with the vendor to identify an action plan to bring the vendor into compliance.