

# Human Rights Policy

Last updated: 2024

## Introduction

lululemon leads with a vision to create transformative products and experiences that build meaningful connections, unlocking greater possibility and wellbeing for all. Our purpose is to elevate human potential by helping people feel their best. We strive as a company to take responsible action by innovating in our business, scaling through our supply chain, and accelerating progress in our industry through collective action.

We believe it is important to act with integrity and respect human rights as a part of responsible business conduct. This Human Rights Policy sets out our commitment to respect human rights and implement human rights due diligence. It also outlines our expectations of third parties with which we have business relationships. This includes our own operations, direct and indirect suppliers up our supply chain, our logistics partners, and any business partners with which we have contractual relationships. We are committed to upholding these robust standards in our own operations and across the upstream and downstream business activities related to lululemon (our value chain activities).

## Our Human Rights Commitment

We seek to align our commitment with international standards on responsible business conduct, including the [United Nations Guiding Principles on](#)

[Business and Human Rights \(UNGPs\)](#), the [OECD Guidelines for Multinational Enterprises](#) and the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#). We base our commitment on internationally recognized standards, including the [International Bill of Human Rights](#), the [Universal Declaration of Human Rights](#), the [International Covenant on Civil and Political Rights](#), the [International Covenant on Economic, Social and Cultural Rights](#), and the [ILO 1998 Declaration on Fundamental Principles and Rights at Work and its Follow-up](#).

We are committed to upholding and implementing the principles of human rights due diligence across our value chain activities. Due diligence is first and foremost preventative, risk-based, dynamic, and informed by meaningful engagement with stakeholders. lululemon's Human Rights Policy was created in consultation with internal and external stakeholders and human rights experts. This Policy, and our due diligence process, are updated through an iterative process that builds on increasing knowledge about risks in our value chain. We expect our employees, suppliers, ambassadors, and other third parties with which we have business relationships to uphold these commitments.

## Implementation

In conducting due diligence, we seek to align our processes with the UNGPs and the OECD Due Diligence Guidance for Responsible Supply Chains in



the Garment and Footwear Sector. Our objective is to identify, mitigate, and address actual or potential human rights risks and impacts we may cause, contribute to, or be directly linked to through our value chain activities.

We believe that the wellbeing of people and our planet are interconnected. As we continuously evolve our human rights due diligence process, we seek to further consider and mitigate environmental impacts.

### **Identifying and assessing risks and impacts**

We are committed to conducting regular assessments of risks related to human rights and the environment across our own operations and value chain activities. This enables us to identify and prioritize actual and potential human rights and environmental harms.

We assess human rights risks across our product value chain through known sector risks and others that may be prevalent in a particular geography or production process. We also look at economic, social, and political contexts across sourcing regions, and other indicators that could signal increasing severity of risks and impacts. We prioritize the most severe human rights risks using indicators of scale, scope, and irremediable character. We also carry out site-level assessments of product suppliers, taking a risk-based approach. Suppliers that are producing for lululemon are required to be regularly assessed against our labor, human rights, and environmental standards. We are committed to expanding the scope of our assessments across our value chain over time.

### **Ceasing, preventing, or mitigating risks and impacts**

Where risks have been identified across our value chain activities, we are committed to taking steps to address those risks. We design our approach to addressing our most significant human rights risks in consultation with stakeholders and based on industry best practices to the extent feasible. When risks and adverse impacts are identified in our product value chain, we require suppliers to address them, including by implementing Corrective and Preventative Action Plans (CAPAs).

We recognize that our purchasing practices affect our suppliers and the people who make our products. We are committed to upholding high ethical standards in our relationships with our business partners, and to collaborate with them in creating long-lasting solutions.

In some cases, we may make the decision to disengage from a third-party relationship, such as after failed attempts at preventing or mitigating a significant human rights impact, in situations where preventing or mitigating a significant human rights impact is not feasible, or in the case of severe harm that warrants an immediate response. We seek to exit relationships responsibly and in a way that aligns with recommendations in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector.

### **Tracking risks and impacts**

We seek to verify, monitor, and validate that our due diligence process is effective in addressing impacts across our own operations and value chain activities.

### **Providing for or cooperating in remedy**

We are committed to hearing and addressing complaints related to human rights violations and risks in our operations and value chain that are raised through legitimate processes, are material, and can be substantiated. We have channels to receive and address such complaints.

lululemon employees are encouraged to report actual or perceived Policy violations, and we provide an anonymous third-party integrity line for reporting. Any internal or external stakeholder can raise complaints through our reporting line. We require all product suppliers to have site-level grievance mechanisms available to their workers, and lululemon also provides access to a Maker Grievance Reporting Mechanism for suppliers' workers to raise complaints directly with lululemon. We encourage all stakeholders to raise concerns related to human rights through these mechanisms.

When appropriate, we provide for, cooperate in, or require remediation within our own operations and our value chain activities. If multiple parties cause or contribute to the harm, we work to collaborate



with those parties to provide, enable, or support remediation, to the extent of our contribution to the impacts.

We will not tolerate retaliation against, or unfair treatment of, any employee or other stakeholder who makes a report in good faith about a violation or possible violation of applicable law or our codes or policies, who raises a concern through one of our grievance channels, or who participates in any investigation conducted internally or by a government agency.

### Engaging stakeholders

Engaging and collaborating with stakeholders are important aspects of our work. Throughout the course of due diligence, we are committed to conducting effective and meaningful engagement with affected stakeholders, which could include guests, investors, our employees, suppliers and their workers, trade unions and representative organizations, community members affected by our business activities, civil society organizations, and governments of the jurisdictions where we operate and source. We participate in industry associations, multi-stakeholder organizations, and non-profit initiatives to engage stakeholders and build momentum for continuous learning and improvement and systemic change throughout our industry.

### Communicating and continuously improving

This Policy is publicly communicated on our website. It will be reviewed and updated at least every two years or as required through a continuous improvement process that builds on increasing knowledge about risks and impacts across our own operations and value chain activities. We communicate annually on our due diligence process, including how we identify and address human rights risks.

## Governance

Our Board of Directors provides strategic direction for the company and determines the overall approach to respect for human rights, including oversight of the allocation of resources required for Policy implementation.

The Corporate Responsibility, Sustainability, and Governance Committee is responsible for oversight of the Human Rights Policy, with select aspects also overseen by the Audit Committee. The Human Rights Policy has been approved by our Chief Executive Officer, who is also a member of the Board of Directors.

lululemon takes a cross-functional approach to Human Rights Policy governance. Our Sustainable Business and Impact department, led by our Senior Vice President, Sustainable Business and Impact, is responsible for leading Human Rights Policy development and integration across the business. Our Legal team, led by our Chief Legal and Compliance Officer, is responsible for monitoring compliance with this Policy across the enterprise. These teams are closely supported across the business by the People and Culture; Inclusion, Diversity, Equity, and Action; Supply Chain; and Procurement departments.

## Supporting Documents

We integrate responsible business conduct expectations throughout detailed policies, public commitments, and ongoing disclosures, which are shared on [our website](#). These include:

- Global Code of Business Conduct and Ethics
- Privacy Policy
- Vendor Code of Ethics
- Vendor Code of Ethics Compliance Benchmarks
- Foreign Migrant Worker Standard
- Conflict Minerals Policy
- Forest-Based Materials Policy
- Annual Report
- Annual Impact Report
- Modern Slavery Statement

