



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 Responsibility team to monitor the results of Workplace Compliance Assessments. The Social Responsibility 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. "Critical Issues" include any type of forced or involuntary labor, child labor, corporal punishment, and attempted bribery. In the rare instance that one of these critical issues is identified, we take immediate action to stop production at the factory. Depending upon the type of issue found, we may work with the factory to help effectively resolve the issue before further production may begin. Our goal is to partner with our suppliers to ensure they have the best resources available to foster healthy, safe working environments. If we have exhausted our efforts to remediate the issues at hand, and we continue to see a lack of progress, we may responsibly end our business relationship with the factory. In the event of other violations, the Social Responsibility team works with the vendor to identify an action plan to bring the vendor into compliance.