

California Transparency in the Supply Chain Act

Crate & Barrel Holdings, Inc., and its various subsidiaries, specifically including Euromarket Designs, Inc., which does business as Crate & Barrel, CB2, and Hudson Grace will be referred to as “**the Company**” throughout this document. At the Company, we take responsibility for ensuring that our economic activities support our social and environmental standards. In today’s international marketplace, the Company and our agents and vendors must treat individuals employed or engaged by them with the highest level of respect and regard for their rights. Accordingly, we have adopted the amfori BSCI Code of Conduct for our ourselves, our suppliers and agents, and any other suppliers or producers working on their behalf, in relation to the production of goods for the Company (collectively, our “Business Partners”). As a founding member of the Business Social Compliance Initiative (BSCI), the Otto Group, our parent company, has developed industry-leading initiatives to prohibit human trafficking and slavery that we follow. The amfori BSCI Code of Conduct establishes principles that focus on labor protection and improving the working conditions of workers in the supply chain. Among many other relevant subjects, the amfori Code of Conduct specifically addresses human trafficking and slavery, stating:

No Bonded Labour: Business partners shall not engage in any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour.¹

Current Activities

The Company has taken specific actions as we strive to ensure compliance with the Code of Conduct and to ban human trafficking and slavery from our supply chain. For example:

- **Certification:** Business Partners are required to certify in writing that they have read and will abide by the terms of the Code of Conduct. Requirements apply to primary manufacturing facilities and any material suppliers used in the products we purchase. Business Partners must guarantee, and are responsible for acceptance of and compliance with the principles set forth in the Code of Conduct.
- **Verification, Monitoring and Audit: Verification, Monitoring and Audit:** The Company works with a third-party auditor to monitor and audit our supply chain program in amfori BSCI-identified risk countries, including conducting verification activities to identify, assess and manage the risks of human trafficking. As part of this monitoring process, each direct Business Partner must identify to the Company in writing all production sites used in or tangential to the production of goods or services of any kind for the Company. Then, on a periodic basis, at the Company’s request, each such Business Partner must submit itself and

¹ amfori BSCI, *amfori BSCI Code of Conduct*, https://www.amfori.org/sites/default/files/amfori%20BSCI%20COC%20UK_0.pdf (last visited December 4, 2020), 7.

each of its production sites to social audits and/or audits of books and records and/or to a review of its (and its suppliers') compliance with the Code of Conduct. Such audits and reviews may be conducted by the Company or by its third-party auditor, and may be announced or unannounced. When any non-compliance is discovered, the Company requires immediate remedial action. If a Business Partner is unable or unwilling to comply, or if non-compliance is material or repeated, the Company reserves the right to terminate its relationship with any Business Partner or to require the Business Partner to terminate any of its suppliers working for such partner on the Company's products or services.

- **Training:** The Company trains its Sourcing team members in our ethics and social responsibility standards. This routine training includes, among other things, a review of our Code of Conduct and sustainable sourcing guidelines, with a focus on mitigating violations and encouraging compliance by our Business Partners.
- **Internal Accountability:** The Company requires prompt notification from its Business Partners of any violation of the Code of Conduct. We follow up on any and all reports we receive, and we strictly prohibit retaliation or discipline of any kind, whether by an associate of the Company or a Business Partner, against any person or entity as a result of making a report or raising a concern about compliance.