

# CODE OF BUSINESS CONDUCT & ETHICS

DOING THE RIGHT THING



WE CONNECT ACTIVE PEOPLE WITH THEIR PASSIONS

# A MESSAGE FROM OUR CEO



At Columbia Sportswear Company we are committed to doing the right thing.

Our Code of Business Conduct and Ethics captures our core principles and serves as a guide for our day-to-day decisions and actions. The Code does not address every possible business situation we may encounter. Instead, the Code provides an outline of our values and expectations to help us continue to live up to one of our core strategies - creating a culture of honesty, respect and trust. Defining our culture ensures that no matter what challenges we may face, our decisions and actions will reflect our shared values.

The Board of Directors and our entire senior management team are committed to the values reflected in the Code, and we are excited to share them with you. It is important that you read the Code and renew your commitment to it. We encourage you to discuss any concerns you may have with your manager or to reach out to our Ethics & Compliance team at [ethicsandcompliance@columbia.com](mailto:ethicsandcompliance@columbia.com).

I truly appreciate your commitment to the Company and our focus on acting ethically and legally in everything we do.

A handwritten signature in black ink, appearing to be 'T. Boyle'.

Tim Boyle  
President and CEO



# DOING THE RIGHT THING

We succeed by empowering our teams to **"Do the Right Thing."** **"Doing the Right Thing"** means that, in addition to complying with the law, we:

ARE GUIDED BY OUR COMMITMENT TO  
**ETHICAL CONDUCT**

ENCOURAGE AND SUPPORT A  
**SPEAK-UP CULTURE**

TREAT ONE ANOTHER WITH  
**DIGNITY & RESPECT**

**CONDUCT BUSINESS  
HONESTLY AND  
COMPETE FAIRLY**  
IN THE MARKETPLACE

**PROTECT AND  
PROPERLY USE**  
COMPANY INFORMATION

ENGAGE THIRD PARTY PARTNERS WHO  
**SHARE OUR VALUES**





# TABLE OF CONTENTS

## **1 WE ARE GUIDED BY OUR COMMITMENT TO ETHICAL CONDUCT**

- 1 Why do we have a Code?
- 1 Who must follow the Code?

## **2 WE ENCOURAGE AND SUPPORT A SPEAK-UP CULTURE**

- 2 Seeking Guidance and Reporting Concerns
- 4 No Retaliation
- 4 Investigation and Enforcement

## **5 WE TREAT ONE ANOTHER WITH DIGNITY AND RESPECT**

- 5 Commitment to Human Rights
- 5 Respect in the Workplace
- 5 Workplace Health and Safety

## **6 WE CONDUCT BUSINESS HONESTLY AND COMPETE FAIRLY IN THE MARKETPLACE**

- 6 Compliance with Laws
- 6 Fair Dealing
- 6 Environmental Programs
- 6 Antitrust and Fair Competition
- 7 Gifts and Entertainment

- 9 Antibribery and Anticorruption Compliance Program
- 10 Political Activities and Contributions
- 11 Customs and Trade Compliance Program
- 12 Conflicts of Interest and Corporate Opportunities
- 14 Accurate and Complete Business and Financial Records
- 14 Insider Trading
- 15 Public Disclosures and Media
- 15 Government Contracting

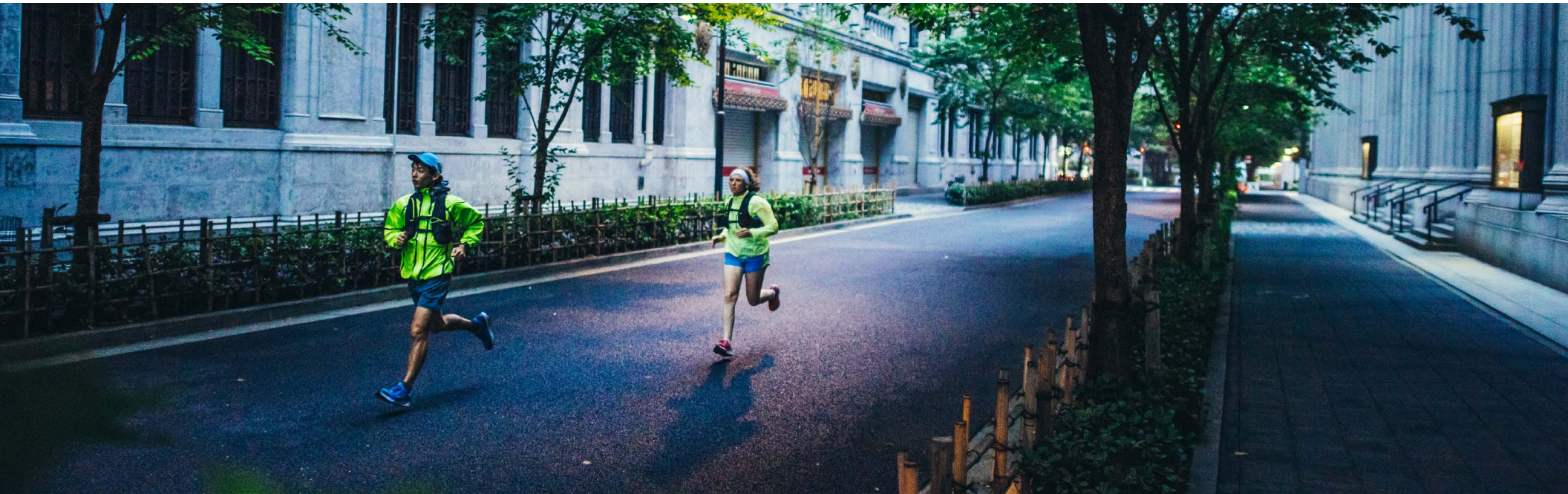
## **16 WE PROTECT COMPANY RESOURCES AND INFORMATION**

- 16 Company Assets
- 17 Company Confidential Information
- 17 Third Party Confidential Information
- 17 Privacy and Protecting Personal Information
- 18 Social Media

## **19 WE ENGAGE THIRD PARTY PARTNERS WHO SHARE OUR VALUES**

## **19 MAKING THE RIGHT CHOICE, EVERY TIME**

## **20 MANAGING THE CODE AND KEEPING IT CURRENT**





# WE ARE GUIDED BY OUR COMMITMENT TO ETHICAL CONDUCT

## USING OUR CODE AS YOUR GUIDE

Our success has been built on creating emotional connections with consumers and delivering great products, tremendous relationships with customers and suppliers and developing a winning team with a passion for active lives. Our success also depends on our character, integrity and trustworthiness. We are committed to continuing to build a company of which we can all be proud -- not only of the results that we achieve, but also how we achieve them.

This Code of Business Conduct and Ethics covers a wide range of business practices and demonstrates how our values guide us in our day-to-day dealings on the Company's behalf. The Code does not address every legal and ethical issue that may arise, but it does set out basic principles to guide us. In this Code "Company" or "CSC" refers to Columbia Sportswear Company and its subsidiaries.

## APPLYING OUR CODE ACROSS THE ORGANIZATION

All employees of CSC, our Board of Directors and anyone who conducts business on the Company's behalf are responsible for understanding and complying with the Code and our corporate policies. We expect our business partners to share our ethical standards as well.

### CONSIDER THIS!

CSC is U.S. public company with stock traded on the NASDAQ stock exchange. As a result, our Company and our brands worldwide, including our locations outside the U.S., are expected to meet the ethical standards stated in our Code and to comply with the laws, rules and regulations applicable to U.S. public companies.

### DOING THE RIGHT THING!

*If you are ever unsure about whether you are doing the right thing, ask yourself:*

- Does it feel right?
- Is it legal?
- Is it consistent with the Code and Company policy?
- Would you feel comfortable if your decision was made public?

If the answer to any of these questions is no – stop and ask for guidance using the resources identified in this Code.



# WE ENCOURAGE AND SUPPORT A SPEAK-UP CULTURE

We encourage you to speak-up any time you believe there has been a violation of our Code. When you speak up, we listen and we take action to follow-up. Compliance concerns raised in good faith are promptly investigated. If our investigation indicates there is a problem, we will address it, and we prohibit retaliation.

## SEEKING GUIDANCE AND REPORTING CONCERNS

It is important to raise questions about the Code or concerns about conduct you believe violates the Code or our other corporate policies. If you have a question or concern, raise it right away. The following resources are available to answer your questions and address your concerns:

### 1. YOUR MANAGER

You are always encouraged to bring questions or concerns to your manager or another member of management with whom you feel comfortable speaking.

#### CONSIDER THIS!

Managers have a special responsibility to champion the Code and educate their teams about our values, as well as our obligations under the law and Company policy.

If an employee, other colleague or business partner raises a potential compliance concern:

- Make time for the conversation
- Listen carefully
- Let the employee (other colleague or business partner) know you will follow up on the concern
- Contact the Ethics and Compliance Team right away for guidance on next steps

If you believe that the issue raised may be a violation of law, immediately contact CSC's General Counsel.

#### REMEMBER!

Your voice matters! If you have a question or concern, we want you to raise it.





2. YOUR HR REPRESENTATIVE

Your HR representative is available to help and to provide guidance about workplace concerns.

3. OUR ETHICS AND COMPLIANCE TEAM

You can contact our Ethics & Compliance team to report a concern about the Code or for guidance or direction about any of the topics covered in the Code; you can reach the team directly at: [ethicsandcompliance@columbia.com](mailto:ethicsandcompliance@columbia.com).

4. OUR COMPLIANCE COMMITTEE

You can contact any member of our Compliance Committee for guidance or to raise concerns; our Compliance Committee is made up of senior leaders from across the Company, including our General Counsel, Chief HR Officer, Chief Financial Officer, and Chief Operating Officer, among others.

5. LEGAL VIOLATIONS AND ACCOUNTING STANDARDS VIOLATIONS

Certain concerns should be immediately escalated to members of our senior leadership team. If you believe a violation of law has occurred, contact our General Counsel right away. If you believe a violation of our accounting policies or controls has occurred, contact our Chief Financial Officer and General Counsel right away.

6. OUR COMPLIANCE LINE

If you feel uncomfortable discussing your questions or concerns in person, or if you are concerned that your manager or other member of management may be involved, our Compliance Line offers two easy options for you to report ethics and compliance concerns via phone or online. The reporting services are available 24-hours a day, 7 days a week, and anonymous reporting is available where allowed by law.

You are able to report issues online at: [www.columbia.com/complianceline](http://www.columbia.com/complianceline). You may also call the toll-free number listed to the right for your location to report the issue with the help of a third-party call center representative.

Q: Can I make a report in my local language?

A: Yes! If you would like to make a report in your local language, we encourage you to use the toll-free phone option to ensure our Ethics & Compliance team receives as accurate a translation as possible. Our reporting solution also offers the option to display the report form in your preferred language.

COUNTRY	PHONE	COUNTRY	PHONE
United States	1-888-265-6225	Ireland	1-800-947-241
Austria	0800-802372	Italy	0033 805-089012
Bangladesh	(+91) 44-71279003	Japan	0120-692-354
Brazil	0-800-761-1621	Korea	003-0813-2840
Canada	1-800-256-1697	Netherlands	0-800-023-2271
China	400-120-9357	Norway	800-24-997
Czech Rep.	800-700-370	Poland	0-0-800-141-0117
Denmark	8082-6085	Spain	900-839778
Finland	0800-915-799	Sri Lanka	N/A
France	0805-089012	Sweden	020-889-885
Germany	0800-184-4309	Switzerland	0800-890-363
Hong Kong	800-906-579	Taiwan	00801-13-6879
India	000-800-919-0239	UK	0-808-189-1268
Indonesia	62-21-29758942	Vietnam	84-444583350

Q: Is the compliance line anonymous?

A: In most countries, yes, anonymous reporting is available. In some locations local law restricts the types of reports that may be made anonymously. If you are making a report from a location where anonymous reporting is limited, you will be asked to provide your name or you may raise your concern directly with management.



## NO RETALIATION

We do not tolerate retaliation against anyone who raises a compliance concern in good faith or participates in an internal investigation. Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline up to and including termination of employment. Employees who believe they have experienced retaliation for raising a compliance related concern should report it immediately using the resources defined in the Code.

### CONSIDER THIS!

Retaliation includes obvious actions such as a demotion or termination of employment, but retaliation can also include any other action that has a detrimental effect on an employee's career with the Company. We encourage a speak-up culture, and all forms of retaliation are prohibited.

## INVESTIGATION AND ENFORCEMENT

We take steps to promptly investigate good faith reports of potential violations of our Code, our policies or the law, and we take appropriate action in response.

Our objective is to conduct meaningful and effective investigations, which requires input and participation from employees and others who may have relevant information. We expect our employees and business partners to participate fully in this process.

Violations of our Code are taken very seriously and may result in disciplinary action up to and including termination of employment or termination of your business relationship with CSC. Violations of law could also lead to civil or criminal liability for the individuals involved and our Company.

Company officers and leaders at all levels are responsible for monitoring and enforcing the Code within each of their areas of accountability. If you observe or learn of a situation which you believe may violate or lead to a violation of this Code, report the concern using the resources described in the Code.

### Q: What does it mean to make a report in "good faith"?

A: A good faith report means that you made a report that was as accurate as possible, based on the information available to you at the time of your report. Our objective here is to guard against knowingly false reports or misrepresentations, which would not be considered to be made in good faith.





# WE TREAT ONE ANOTHER WITH DIGNITY AND RESPECT

## COMMITMENT TO HUMAN RIGHTS

We respect and protect human rights and we are committed to decent and humane working conditions. We do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses. This is true not only for our own workforce, but also for the employees of the manufacturers we contract with around the world, as further described in the Corporate Responsibility section of our Company website. If you have any concern that a manufacturing or other business partner may be engaged in actions that would violate the Code, report it using the resources described in the Code.

## RESPECT IN THE WORKPLACE

Our goal is to make CSC an exciting and dynamic place to work, where all employees are given the opportunity to achieve their potential based on their diverse experiences. We know that our continued growth is enhanced by a diverse and inclusive workforce. This means that we make employment decisions based only on merit and not on the basis of race, color, religion, national origin, age, disability, sex, sexual orientation, gender identity, or any other characteristic protected by law; it also means that we do not tolerate discrimination or harassment on the basis of any of these categories.

## WORKPLACE HEALTH AND SAFETY

We are committed to maintaining a safe work environment. This means that we expect all work to be performed in accordance with health and safety rules, regulations and Company policies. This also means that violence in the workplace is never acceptable. If you see or experience any event that raises concerns about your safety or the safety of others, immediately alert your manager and follow any policies for your location related to reporting health and safety concerns.

Our commitment to safety also means that we conduct ourselves responsibly in the work environment. With this in mind, you may not use alcohol or other intoxicants on company premises, except at sponsored company functions, with appropriate executive pre-approval, or at company restaurants that are licensed to serve alcohol during certain hours. You may not use, possess or distribute illegal drugs, or abuse legal drugs, while on company time or property. Employees should review the Employee Handbook and other employment policies for their location and business unit for additional guidance.





# WE CONDUCT BUSINESS HONESTLY AND COMPETE FAIRLY IN THE MARKETPLACE

## COMPLIANCE WITH LAWS

We are a multinational company with operations across the world. We expect our employees and business partners to comply both with the letter and the spirit of the laws, rules and regulations of all locations where we do business.

## FAIR DEALING

We win business on our merits. This means that we act in good faith and deal fairly in the marketplace. We do not make misleading or untrue statements about our competitors. We also do not make misrepresentations about our own products or capabilities. It is never permissible to knowingly make false or misleading statements about our business or about our competitors to gain competitive advantage or for any other purpose.

## ENVIRONMENTAL PROGRAMS

We are invested in sustainable solutions, and we comply with environmental rules and regulations applicable to our business.

## ANTITRUST AND FAIR COMPETITION

We compete to win, and we pride ourselves on our ability to thrive in a highly competitive industry. We also compete fairly. While growing our business, it is important that we comply with the antitrust and fair competition laws in each country in which we do business. Antitrust or fair competition laws generally apply to our relationships with our competitors, but also with our customers and suppliers. For example, competition laws are violated when competitors reach an agreement or an understanding, or simply exchange information about allocating markets or territories, pricing, customers, inventory, capacity, costs, production, or other competitively sensitive information. They are also often violated when a supplier imposes fixed or minimum resale prices to its customers, or discriminates between customers.

More generally, remember that the same market conduct can be legal in one country and illegal in another.

More information on our antitrust policy can be found in our [Antitrust Compliance Policy](#). If you have questions, please contact our Legal Department for guidance.

### CONSIDER THIS!

#### When dealing with markets and competitors:

##### DO:

- Review our [Antitrust Compliance Policy](#)
- Think about these principles anytime you are interacting with competitors
- Ask for guidance if you are unsure

##### DO NOT:

- Agree or share “competitively sensitive information” with our competitors, including information about pricing, costs, discounts, production and inventory, allocation of markets, territories, suppliers, or customers
- Think that there is such thing as an “off the record conversation” with a competitor, including “small talk” on the phone/during breaks/after dinner
- Attempt to influence the prices at which partners resell our products
- Agree with competitors to work together to leverage or influence a business deal with a shared customer or third-party partner
- Buy into standards or programs that will create certain economic losers or drive price increases
- Use or bring confidential information from a former employer to CSC

If you suspect anticompetitive activity in any proceedings or meetings, publicly object to it, immediately exit and document your objections and your efforts to exit.





## GIFTS AND ENTERTAINMENT

These requirements apply to engaging in the exchange of gifts and entertainment, including travel, with third parties, for example, vendors, sales agents, suppliers, distributors, or customers.

Gifts and entertainment, including travel, must never be used in a way that would improperly influence, or even appear to improperly influence, any business decision. Business courtesies, such as gifts, travel and entertainment, may be appropriate in certain circumstances, but must be given or received only for a legitimate business purpose, such as promoting, demonstrating or explaining a company product, position or service. If we are entertaining another party or being entertained, there must be a clear business reason and no intention or appearance of improper influence.

Gifts of cash or cash equivalents (such as gift cards) are never permitted. Otherwise, to be appropriate, gifts and entertainment must:

- Be Infrequent
- Be unsolicited
- Not be given as a bribe, payoff or kickback
- Not create an appearance or an expectation that the provider is entitled to preferential treatment
- Be in good taste and occur at a business-appropriate venue
- Comply with law and Company policy

### CONSIDER THIS!

If you are in a decision-making role related to a pending business transaction, we encourage you to avoid gifts and entertainment entirely. With the exception of small, low value branded items such as pens, notepads, and similar items which are permissible. If you are offered gifts or entertainment and are unsure how to proceed, ask for guidance.



For gifts or entertainment permitted under the above standards, you must also follow our policies for recordkeeping and approval. All gifts and entertainment, including travel, must be properly approved and documented, and you must follow all related Company policies applicable to expenditures, for example any Travel and Entertainment (T&E) policies or procedures; as well as all Finance and Accounting policies and procedures applicable to properly recording the nature and value of any expenditure.

We also require gifts and entertainment meeting certain thresholds to be reported through our Gifts and Entertainment (G&E) reporting tool, as further described below.

#### **Reporting Standards for Gifts:**

Employees in North America, Europe and Japan must report gifts at a value of USD \$100 or more using our G&E reporting tool. Employees in all other regions must report gifts at a value of USD \$50 or more using our G&E reporting tool. Requests submitted through the tool will be reviewed by the Legal Department.

#### **Reporting Standards for Entertainment:**

Entertainment comes in many forms, for example, meals, sporting or cultural events, and travel. Employees in North America, Europe and Japan must report entertainment at a value of USD \$100 or more – per person - using our G&E reporting tool. Employees in all other regions must report entertainment at a value of USD \$50 or more – per person - using our G&E reporting tool. Requests submitted through the tool will be reviewed by the Legal Department.

**It is never permissible to break gifts and entertainment into smaller pieces, or to separate checks (for example among attendees at a restaurant or event) to avoid these requirements.**

#### **Gifts to Government Officials:**

Gifts or entertainment provided to government officials are prohibited under this policy, unless approved in writing by the Company's General Counsel. Keep in mind that gifts to government officials may violate the U.S. Foreign Corrupt Practices Act (FCPA), other U.S. laws and anti bribery laws in other regions regarding business gratuities. The U.S. and other governments also have laws and regulations that restrict business gratuities that may be accepted by government personnel. We must not promise, offer or deliver to any government official or employee a gift, favor or other gratuity in violation of these rules.

For more information, please review our [Gifts and Entertainment Policy](#).

### **CONSIDER THIS!**

Did you know we have a gifts and entertainment reporting tool?  
Check it out - [here](#).

**Q: A current Company vendor is sponsoring an IT conference and has invited me to attend. The vendor is offering to cover the cost of my hotel and meals. How should I handle the invitation?**

**A:** You should consider the following questions:

- Could the invitation be perceived as influencing the Company's decision to do business with this vendor now or in the future?
- Would you be concerned if the acceptance of the invitation became public?
- Does the value of the gift exceed our policy thresholds?

If the answer to any of these questions is yes, stop and seek guidance. In this case, the offer to cover the cost of hotel and meals likely exceeds our policy thresholds, so the gift must be reported to the Legal Department using our gift reporting tool.





## ANTIBRIBERY AND ANTICORRUPTION COMPLIANCE PROGRAM

Our commitment to doing the right thing means we take a stand against corruption and are committed to doing business ethically. As a result, we:

- Do not offer or promise to pay anything of value, including bribes, kickbacks, payoffs, gifts or entertainment, or other favors to any government official
- Do not accept or offer bribes, kickbacks, payoffs or inappropriate gifts or entertainment, or other favors to commercial parties
- Comply with the FCPA, the U.K. Bribery Act (UKBA) and the laws of the other countries where we do business

*This is not just a U.S. issue. Antibribery and Anticorruption laws have recently been adopted in many countries around the world, for example, France, South Korea, China and many more. The principles stated in our Code are designed to meet these requirements and must be followed everywhere we do business.*

- Do not permit facilitation payments, which are small payments made to government officials to expedite routine government actions (such as customs clearance, local permits, and visas)
- Do not engage in money laundering

*If you suspect that someone is making an effort to conceal or legitimize illegally gained funds, report it immediately to the Company's General Counsel.*

**We do not pay or accept bribes anywhere in the world.**

### **Q: Why do we often focus on "government officials"?**

**A:** Government officials have the power to influence government access and government dealings, so there is an increased risk of improper payments to government officials just to "get the job done". To guard against this risk, the FCPA and other anticorruption laws focus on prohibiting bribery of government officials. Keep in mind that the term "government official" is broadly defined and includes:

- Elected officials and candidates for political office
- Government employees, including port authorities and customs personnel among many others
- Employees of "state owned entities" which are entities owned in whole or in part by the government
- Third parties, such as customers or vendors, working on behalf of the government
- Public international organizations, like the United Nations or Red Cross

It is never permissible to offer a payment, or anything else of value, to a government official to influence any business matter.

### **Q: What is a bribe?**

**A:** A bribe is anything of value given to influence a business decision or outcome or to gain some improper business advantage. Bribes could include:

- Cash payments
- Offers of employment, including internships
- Excessive travel or entertainment
- Favors for family or friends

We also take pride in working only with third parties that share our ethical standards and commitments to adhering to the law. This is critical, because we can in certain circumstances be accountable for the unlawful actions of our third-party partners when they are acting on CSC's behalf. We must never authorize a third party to make or accept improper payments on our behalf. When engaging third parties, follow required due diligence and monitoring processes. Contact the Legal Department for guidance.

Keep in mind that the FCPA also requires us to keep accurate books and records, which means records that are sufficient to allow us to identify and prevent improper payments. You must keep accurate records of all company business matters, and it is never permissible to misrepresent the amount, nature or purpose of any expenditure.

#### **REMEMBER!**

We will always support your actions to do the right thing. Employees or business partners who refuse to pay or accept a bribe will not experience any penalty or adverse action as a consequence, even if the refusal results in our Company losing business.

If you become aware of any event or activity that may be a potential violation of our prohibitions on corruption, report it immediately to the Company's General Counsel.

More information on our policies around gifts to government officials can be found in the [Gifts and Entertainment Policy](#) and in our [Antibribery and Anticorruption Policy](#).

## **POLITICAL ACTIVITIES AND CONTRIBUTIONS**

CSC employees may choose to support the political process by making personal contributions or by volunteering personal time to candidates or organizations. However, you may not conduct political activities on Company time, or on Company premises without the advance approval of our Chief Executive Officer. And you may not use Company resources—for example Company systems, e-mail or office supplies—to promote political candidates, parties or initiatives without the advance approval of our Chief Executive Officer. You may not make, or offer to make, any political contributions on behalf of the Company or using Company funds without the prior review and approval of the General Counsel.





## CUSTOMS AND TRADE COMPLIANCE PROGRAM

As a multinational business, we are subject to trade compliance rules and regulations impacting all countries where we do business, and we comply with import, export and other trade laws applicable to our business. This includes compliance with sanctions and embargo programs. These programs restrict or prohibit dealings with certain countries or individuals, this includes compliance with the economic sanctions administered by the U.S. Office of Foreign Assets Control (OFAC) and the laws of other countries where we do business.

We also comply with U.S. anti-boycott laws. Our employees and agents may not support or cooperate with an unsanctioned boycott of another country that is friendly to the U.S. The Company must report information about, or requests to support, such a boycott to the U.S. government. Be aware of and report these requests, which you could encounter in the form of a bid invitation, contract solicitation, letter of credit, or verbal solicitation. If you learn of a potential boycott, contact the General Counsel right away.

**Q: What are some examples of statements in bid or other documents that I should report?**

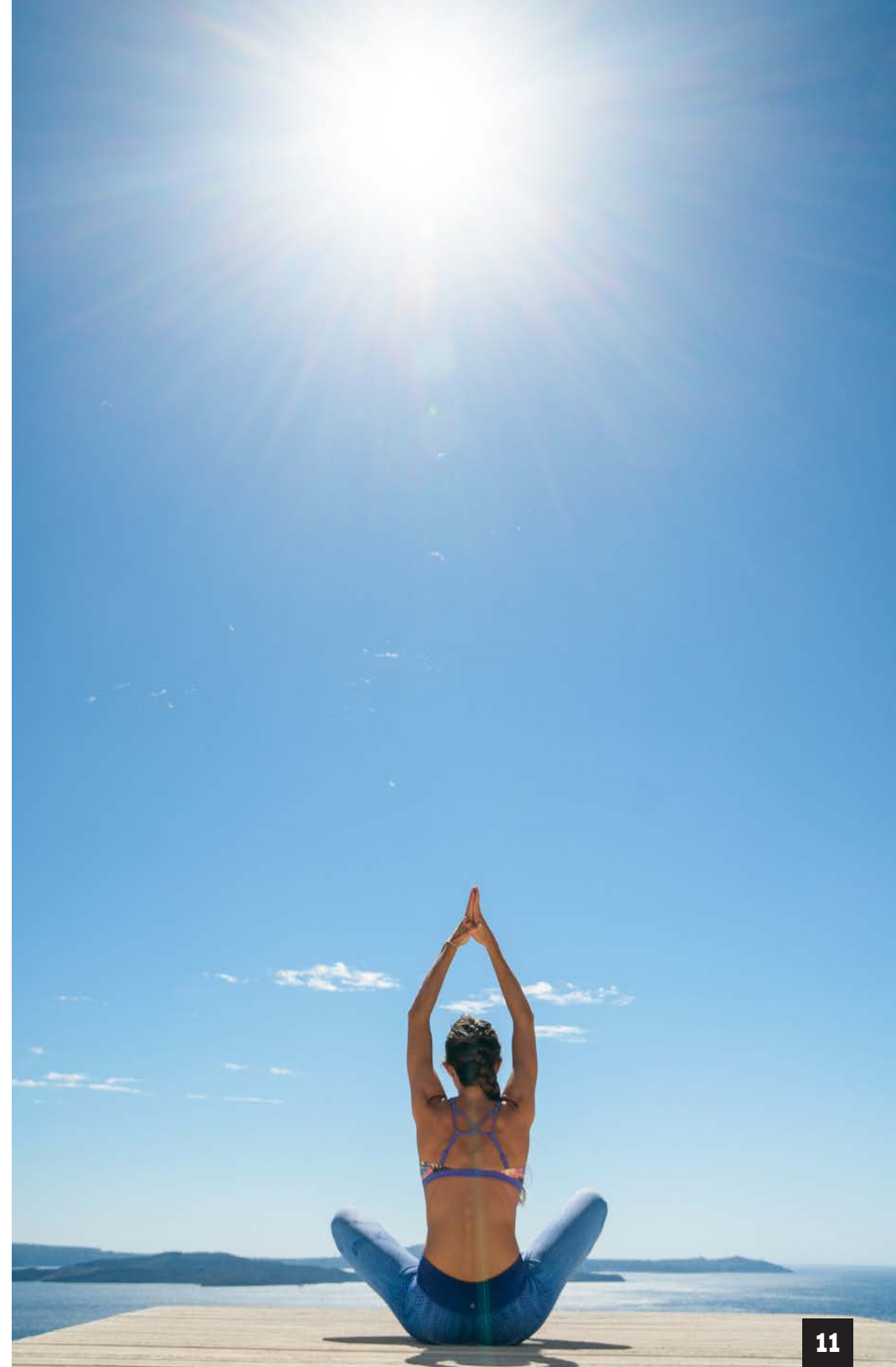
**A: Examples:**

- "The supplier must comply with the Israel boycott conditions."
- "Please provide a signed statement from the shipping company stating the name, flag and nationality of the carrying vessel and confirming it is permitted to enter Arab ports."

We must also comply with customs laws and regulations in every country in which we do business. As with everything we do, the most important thing to remember is that we must be truthful and accurate. We will not inaccurately lower customs values, describe products in misleading terms or make any intentional misrepresentations in order to avoid paying higher customs duties or to circumvent trade laws and other cross-border trade restrictions.

If you handle international business, are involved in customs activities, imports or exports, cross-border shipping or other cross-border activities on behalf of the Company, it is your duty to understand and comply with our policies and all related laws.

For further guidance on these topics, contact our VP of Global Customs and Trade or the Legal Department.



## CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Conflicts of interest arise when your personal interests (including the interests of your family members or close friends) conflict, or even appear to conflict, with the Company's interests, or interfere with your ability to make impartial business decisions on behalf of the Company. Some conflicts of interest are obvious, for example taking a Company business opportunity for your own financial benefit. Other situations may be less clear.

### REMEMBER!

We must all make business decisions based on what is best for the Company, not what is best for us personally.

Here are some examples of common potential conflicts of interest:

- Awarding or directing business to suppliers that are owned or managed by family members or close friends
- Having a side-business or second job that competes with the Company
- Having a side-business or second job that would conflict with or limit your ability to effectively perform your job duties
- Giving or accepting gifts, entertainment, other payments or other favors that would be prohibited by our Anticorruption or Gifts and Entertainment policies
- Holding a significant financial interest in a supplier, competitor or vendor of the Company without prior authorization from our General Counsel
- Any other situation in which your personal interests are at odds with the Company's interests or would impact your ability to make objective business decisions

If you are faced with a situation in which your personal interests (including the interests of your family members or close friends) would conflict with the interests of the Company, or even appear to create a conflict, you must **disclose the situation** to your manager, so the Company can assess it and determine the best course of action.





**Employees:** If you have a potential conflict to disclose:

- Notify your manager of the potential conflict, including any details necessary to allow your manager to evaluate the situation
- Be sure to take this step before engaging in any activity that may present a conflict

**Managers:** Contact the Ethics & Compliance team, your HR Representative or the Legal Department for guidance on how to evaluate and address the potential conflict.

Based on this guidance, you may:

- Approve the activity, and if appropriate provide guidance as to the steps to take to ensure there is no conflict; or
- Deny approval of the activity, because it involves a conflict that cannot be remedied.
- Keep a record of the decision and communication of the decision to the employee.

If you are a Company Executive or Officer (VP title and above) or a member of the Board of Directors and you are faced with a potential conflict of interest, you must disclose it to the Company's General Counsel for review. Additional steps, including in some instances approval by the CEO, the Board of Directors or a Committee of the Board of Directors, may be required to approve the matter.

Our Ethics & Compliance team includes members of the Legal Department and other liaisons. You can reach the team via email at: [ethicsandcompliance@columbia.com](mailto:ethicsandcompliance@columbia.com).

**Managers: Here is an example of an approved activity.**

An employee comes to you to let you know that his brother is a majority owner of a company that is part of a vendor bid; the employee is on the bid decision team and wants to know how to proceed.

Seek guidance and then advise the employee of the outcome.

In this case, an appropriate response would be to allow the bid process to proceed, but to remove the employee from the bid decision team in light of his brother's role with a participating vendor.

**Managers: Here is an example of an unapproved activity.**

An employee has an opportunity to work as a consultant for an industry best practices firm; the work would be off-hours and would not impact her work schedule, but the role would require her to advise competitors on market strategy.

Seek guidance and then advise the employee of the outcome.

In this case, the employee's opportunity creates a conflict of interest, and potentially compromises CSC's confidential and competitive business information. An appropriate response would be to advise the employee that pursuing this position would violate our policies and is something you cannot approve. Seek guidance from HR for tips on how to most effectively have this conversation with your employee.



## ACCURATE AND COMPLETE BUSINESS AND FINANCIAL RECORDS

The Company is responsible for furnishing reliable financial information on a periodic and timely basis to our shareholders, potential shareholders and others. It is essential that our financial records accurately reflect our business dealings and financial transactions.

We all share this accountability, and you must not make or direct anyone else to make any false or misleading statements, reports or entries in any of the Company's books, financial, personnel, or other records for any purpose. You must follow, and not seek to circumvent, our internal controls. Do not conceal information for any purpose. In particular, it is critical that you provide complete and accurate information to Company management and to the Company's internal and external auditors. Knowing or intentional misrepresentations are always prohibited.

Undisclosed or unrecorded funds or assets are prohibited. All cash, bank accounts, investments, and other assets must always be recorded on the official books of CSC, and bank accounts should be opened or closed only with the prior written approval of the CEO, the CFO or their designee, or as otherwise provided for in the Company's accounting and treasury policies. No payments may be made with the intention or understanding that any part of a payment is to be used for any purpose other than what is described in the document supporting the payment. If you become aware of records that may be inaccurate, or of other activity that would violate these requirements, report the situation immediately to the General Counsel or the Chief Financial Officer.

## INSIDER TRADING

We comply with all securities laws and regulations applicable to U.S. publicly traded companies. In the course of your work with CSC, you may have access to material non-public information about CSC or companies with which we do business. Using or sharing that information for personal financial benefit or to "tip" others who might use the information for their financial benefit or to make an investment decision is not only unethical but also illegal.

Examples of material information include:

- Possible mergers, acquisitions or joint ventures
- New developments with customers or suppliers, such as the acquisition or loss of a significant contract
- Changes in senior management
- Events concerning the Company's securities, such as dividends or share repurchases



**Q: Sometimes customs or other government agencies need to approve or more closely review certain types of transactions. Is it ok to label our activities as something more general, such as "Consulting Services" to make these transactions move more quickly?**

**A:** Absolutely not. You must accurately identify and document the nature of any and all Company transactions.

**Q: How do I know if I have access to inside information?**

**A:** It's best to err on the side of caution and to check with your manager or the Legal Department with any questions. The Company maintains a list of designated insiders who receive quarterly emails notifying them when the trading window opens and closes. For insiders, trading is generally not permitted during a closed window. If the window is open, remember that you still have an obligation to assess whether you are aware of any material non-public information before trading.

Remember that information is considered non-public until it is shared broadly with investors generally, such as through a press release.

We have adopted a detailed Insider Trading Policy to help you comply with these laws, and you should carefully review our [Insider Trading Policy](#) for more detailed guidance around your trading obligations.



## PUBLIC DISCLOSURES AND MEDIA

As a publicly traded company, CSC is subject to laws and regulations that govern how and when we disclose information. Only Columbia Sportswear Company's Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, General Counsel, or Director of Investor Relations, or a person authorized by one of them, is permitted to speak with investors or investment analysts about the Company, or to speak with the media about matters involving our financial condition, results of operations, future business prospects or similar topics. General media relations should be coordinated and handled according to our [Communications Policies](#).

Disclosures in securities filings and public communications must be complete, fair, accurate, timely, and understandable. If you become aware of any information that you believe may have a material or significant impact on the accuracy or truthfulness of our Company financials or other public filing, contact the General Counsel right away.

The terms "material" and "significant" have a particular meaning under the law; if you ever have a question about what these terms mean, or how to apply these requirements, contact the Company's General Counsel.

## GOVERNMENT CONTRACTING

Contracting with the government requires an understanding of additional requirements and legal obligations related to government procurement. If you are considering engaging in a contract with the government, contact the Legal Department for guidance before joining any bid process.

Once a government contract is in place, our services, billing and pricing must be conducted in rigorous compliance with the contract terms. It is especially critical that you deal honestly and fairly, that you protect confidential or classified information, and that you never make unauthorized or incorrect charges or submit inaccurate information regarding costs or pricing. Failure to meet these requirements exposes the Company and participating individuals to claims of civil and criminal wrongdoing.





# WE PROTECT COMPANY RESOURCES AND INFORMATION

## COMPANY ASSETS

We all help to create the assets that CSC relies on and the Company relies on us to protect those assets. We are responsible for safeguarding Company assets against damage, theft, loss, or misuse. There are many types of Company assets.

Here are a few examples:

- physical property, such as office furniture, computer equipment or machinery
- products, including product samples and product designs
- intellectual property, including our trademarks, patents and copyrights
- any data related to our business, such as sales data
- financial assets, such as cash or anything that can be converted into cash
- our reputation

You must take adequate steps to protect and properly use Company assets. Company policies and procedures for your role or your location may also provide additional guidance related to how Company assets must be protected.

Failing to safeguard our assets is a violation of our Code, our policies and our shared commitment to protect our business and should be reported through the resources defined in the Code.





## COMPANY CONFIDENTIAL INFORMATION

CSC's confidential information is also an asset and is critical to our growth and competitive advantage. We all have an obligation to keep information we learn as employees of CSC confidential. This obligation continues even after your relationship with the Company ends. Unless disclosure is authorized by the Company or required by law, we must keep confidential information in trust and confidence for the benefit of the Company and take reasonable security precautions and other actions needed to ensure that there is no use or disclosure of confidential information in violation of our obligations.

Confidential information includes all information relating to CSC that is not publicly available or that is treated by the Company as confidential business information or trade secrets. Our confidentiality obligations are more fully described in our [Confidentiality Policy](#).

## THIRD PARTY CONFIDENTIAL INFORMATION

We do not permit the improper collection or use of third parties' confidential or proprietary information. If you become aware of confidential or proprietary information about a competitor, customer or other third party through a prior employer or other non-public source, you are not permitted to use the information in connection with CSC's business or to disclose it to any company representative. Do not bring the information onto CSC's premises or electronic systems, or use it in any way in connection with your job role or Company business. Do not use the name, trademark or logo of another Company in connection with our business without written permission from an authorized representative of that Company. Do not reproduce, distribute or improperly use copyrighted materials owned by others.

### CONSIDER THIS!

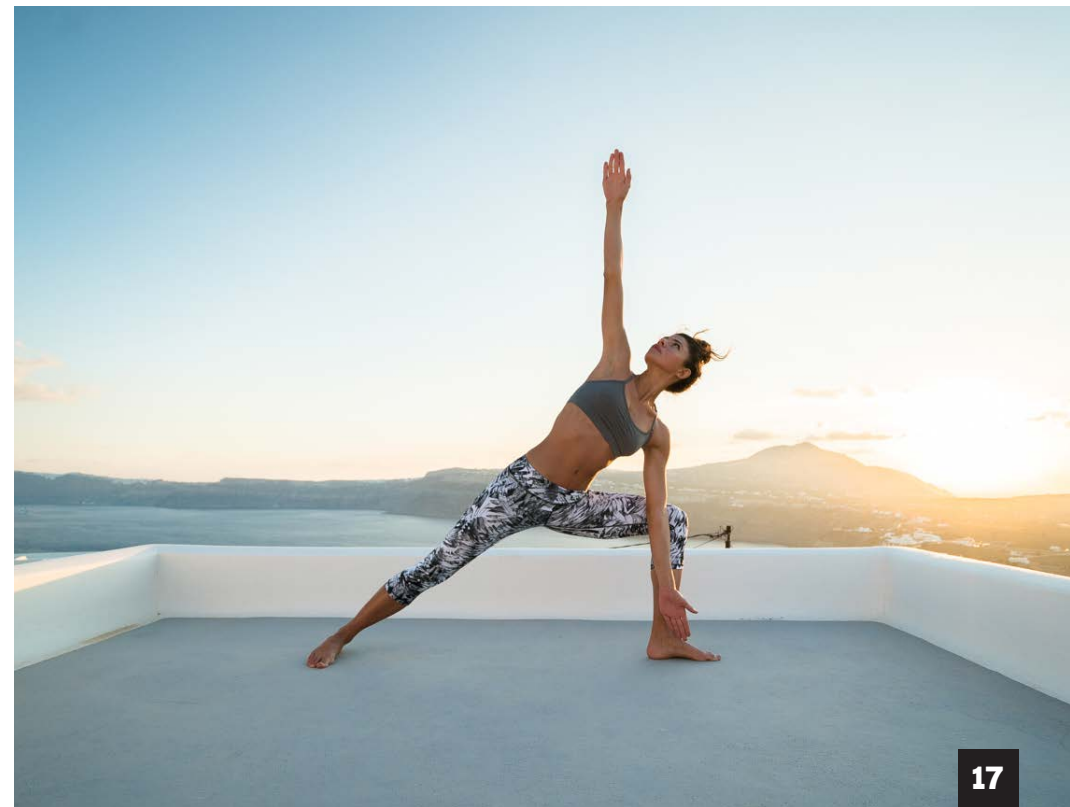
Although many materials are freely available on the Internet that does not mean they are free to copy. Unless explicitly stated otherwise, the majority of online resources are subject to copyright restrictions and the same laws which govern copyright in hard-copy works also apply to material in electronic formats. Be sure to get written permission from the copyright holder before reproducing them. If you are unsure, contact the Legal Department.

### CONSIDER THIS!

#### Confidential information could be:

- Non-public financial information
- Marketing or sales plans
- Pricing strategies
- Customer or supplier lists
- Pricing and costing data
- Research and development plans
- Trade secrets
- Any information of a third party, such as a vendor, that we have agreed to keep confidential

Personal information, which identifies a specific individual, for example social security numbers, other individual tax ID numbers, birth dates, and in some locations, even customer or employee names and addresses, is always considered confidential information and has additional protection requirements due to its sensitivity. Contact [privacy@columbia.com](mailto:privacy@columbia.com) for further information.



## PRIVACY AND PROTECTING PERSONAL INFORMATION

Consumers, employees, customers, and other third parties trust the Company with their personal data. Protecting personal data and the right to privacy has become a priority in many countries around the world, and especially in Europe, where a breach of the data protection laws exposes the Company to significant monetary fines.

We have standards in place to safeguard the personal data of our employees, consumers and other third parties that we control or process in the course of our business. Personal data generally is defined as information in any form that, on its own or in combination with other information, can be used to identify an individual.

Our employees and business partners are responsible for protecting personal data. This includes limiting the collection and subsequent access, use and retention of personal data to what is strictly necessary to carry out their business duties.

If you suspect in any case that an individual's personal data has been misused or breached, immediately report it to our data protection team at [privacy@columbia.com](mailto:privacy@columbia.com). If you have questions or need additional guidance, contact the Legal Department.

Please review our [Global Data Protection and Privacy Policy](#) for additional information.

## SOCIAL MEDIA

We encourage social media conversations about our Company and our brands. As with our actions in the workplace and the community, we expect employees to conduct themselves ethically online. When posting on social media, let our Code and our core values be your guide and keep these key principles in mind:

- Be honest and accurate; never make statements that misrepresent our products or the products of our competitors
- If you endorse a CSC product on social media, disclose that you are a CSC employee
- Avoid statements that could give rise to concerns of harassment or discrimination, or be construed as threats or intimidation
- Protect and do not post or discuss company confidential or proprietary information
- Keep privacy in mind and do not post personal identifying information of others
- Respect copyright, trademark and other laws related to that content or applicable to our business

Review our [Social Media Policy](#) for additional guidance and resources.

### CONSIDER THIS!

- "Personal data" is a broader category of information than you might expect, and includes your name, signature, address, zip code, telephone number, e-mail address, password, social security number or other individual tax identification number, any other unique identifiers, and other sensitive data such as health information.
- When you process (i.e. collect, access, use, save, send) personal data of a consumer, an employee or any other individual, you must ensure that it is accurate, relevant and not excessive in relation to the business need.
- If you are considering a new project for which high volumes of personal data or sensitive personal data will be processed you should immediately contact the Legal Team, which will complete a data privacy impact assessment.
- Be aware that privacy and data protection laws differ from country to country, and what is legal in the US might not be in the EU and other countries.





# WE ENGAGE THIRD PARTY PARTNERS WHO SHARE OUR VALUES

If you wish to do business with our Company, you must share our commitment to doing business ethically every place we do business around the world. As a result, our third party partners and providers are expected to meet and emulate the standards stated in this Code. Our third party partners and providers are never authorized to take any action on our behalf that we would be prohibited by law or policy from taking ourselves. Our third party partners and providers, like our other colleagues, are also expected to report any event that raises a potential compliance issue or concern, and to disclose potential conflicts of interest using the reporting resources defined in this Code.



## MAKING THE RIGHT CHOICE, EVERY TIME

Our employees and business partners are empowered to **do the right thing**. When faced with a business action or decision, stop and ask yourself:

- Does it feel right
- Does it meet the ethical standards defined in our Code
- Does it comply with the law and our policies
- Is it something I would stand behind, even if it becomes publicly known

When in doubt, ask! There are many resources available to guide you and we always want you to speak up with your questions and concerns.



# MANAGING THE CODE AND KEEPING IT CURRENT

The Columbia Sportswear Company Board of Directors is responsible for the administration and enforcement of the Code but may delegate its responsibility to a committee of the Board. The Board takes reasonable steps to monitor compliance with the Code and to ensure that the Code continues to comply with all applicable rules and regulations.

Waivers of this Code for an executive or financial officer or member of the Board of Directors must be approved by the Board of Directors and will be promptly disclosed as required by law or regulation.

This Code of Business Conduct and Ethics was adopted by the Board of Directors on September 1, 2003 and amended by the Board of Directors on January 23, 2009, January 31, 2014, January 29, 2016, January 27, 2017, and April 20, 2018.

Amendments or changes to this Code may only be made by the Board of Directors. A copy of the most current version of this Code shall be posted on Columbia Sportswear Company's external website and intranet.



## CODE OF BUSINESS CONDUCT & ETHICS

DOING THE RIGHT THING



WE CONNECT ACTIVE PEOPLE WITH THEIR PASSIONS