

ESG Data and Facts

Fiscal 2022

Destination XL Group, Inc.

[HTTPS://WWW.DXL.COM/ENVIRONMENTAL-SOCIAL-GOVERNANCE/CAT1080052](https://www.dxl.com/environmental-social-governance/cat1080052)

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ESG Data & Facts

Fiscal 2022

In this document, Destination XL Group, Inc. (“DXLG”) provides additional ESG (“Environmental, Social and Governance”) data and facts for fiscal 2022. As we advance on our ESG journey, we anticipate that we will refine the definitions for these metrics, the data-gathering process as well as our internal controls. Unless noted otherwise, data is presented on a fiscal-year basis. Data may be rounded.

Our Environmental Performance

Energy & Climate

Climate Change

We understand that our activities contribute to climate change and recognize our responsibility to reduce our impact on the environment.

We regularly assess risks and opportunities to our business, which may include those driven by climate change. Ultimately, oversight of DXLG’s climate-related risks and opportunities is provided by our Board of Directors. The Nominating and Corporate Governance Committee of our Board oversees our sustainability initiatives, with regular updates and presentations to the full Board. Please refer to the Corporate Governance section of our proxy statement filed with the Securities and Exchange Commission for more details.

Energy Use

Total Energy Use (in MWh)	FY 2022	FY 2021	% Change
Total energy use	41,689	41,543	0.4%
Fuels	11,376	11,003	3.4%
Natural Gas	11,326	10,986	
Diesel	49	17	
Purchased Electricity	30,314	30,540	(0.7)%
Energy Intensity (MWh per million USD sales)	76.4	82.3	(7.2)%

In fiscal 2022, we experienced a growth in sales, which led to an increase in our total energy usage by 0.4% compared to fiscal 2021. While we saw a slight increase in total energy usage, our energy intensity has improved by 7.2% in fiscal 2022 compared to fiscal 2021. In total, approximately 73% of our energy usage is from purchased electricity, with the remaining 27% from fuels.

Direct Energy Use by Facility Type (in Therms)	FY 2022	FY 2021	% Change
Total direct energy use	388,138	375,412	3.4%
Corporate office and distribution center	70,818	82,073	(13.7)%
Retail Stores	317,320	293,339	8.2%

Electricity Use by Facility Type (in MWh)	FY 2022	FY 2021	% Change
Total electricity use	30,314	30,540	(0.7)%
Corporate office and distribution center	2,546	2,477	2.7%
Retail Stores	27,768	28,063	(1.1)%
Electricity Intensity (MWh per million USD sales)	55.5	60.5	(8.9)%

Greenhouse Gas (“GHG”) Emissions

GHG Emissions (in Metric Tons CO ₂ eq ¹)	FY 2022	FY 2021	% of Change
Total Scope 1 and 2 Emissions	13,626	12,844	6.1%
Scope 1 Emissions	2,911	2,035	43.0%²
Natural Gas	2,053	1,991	
Diesel	13	4	
Refrigerants (Canton Facility)	11	40	
Refrigerants (stores)	834	n/a ³	100.0%
Scope 2 Emissions⁴	10,716	10,808	(0.9)%
GHG Intensity (Metric tons CO ₂ eq per million USD sales)	25.0	25.4	(1.7)%

Our GHG emissions for fiscal 2022 increased 6.1% as compared to fiscal 2021 due to the expanded reporting in fiscal 2022 for fugitive emissions of refrigerants in our retail stores. On a comparable basis, excluding fugitive emissions of refrigerants in our retail stores in fiscal 2022, our GHG emissions decreased 0.4%. The GHG figures in the above table cover all DXLG operations with the exception of an overseas office which was omitted due to its small size, and include 298 and 311 retail and outlet stores that were open at any time during fiscal 2022 and fiscal 2021, respectively, as well as the corporate office and distribution center (which the latter two together constitute the “Canton Facility”). The data includes diesel, natural gas and electricity use and fugitive emissions of refrigerants. Some data was estimated, most notably for

¹ Metric Tons CO₂eq = activity data (fuel consumption or refrigerant refill) * emissions factor. Data for refrigerant refill was based on invoicing in fiscal 2022 for 268 stores but excludes data for 18 stores which are contracted for service through respective landlords or for which sufficient data was not available.

² Increase is primarily due to the fact that there was no comparable data for refrigerants from retail stores for fiscal 2021.

³ Data regarding scope 1 emissions for refrigerants at retail stores was not determinable in fiscal 2021.

⁴ Location-based

stores that have since closed. The GHG emissions calculations have been conducted in line with the GHG Protocol Corporate Standard, Revised Edition, to the extent possible. Emission factors were sourced from U.S. Environmental Protection Agency (EPA) and, for two stores, the Canadian Official GHG Inventory.

Renewable Energy

DXLG sources all electricity from the grid. While we are not directly involved in the generation or procurement of renewable energy, our Canton Facility energy provider supplies us with an electricity mix that includes approximately 42% carbon-free electricity from solar, wind and other eligible sources, per Massachusetts requirements.

Energy Conservation and GHG Reduction

DXLG is constantly evaluating opportunities to reduce energy and GHG emissions at stores and our Canton Facility. In fiscal 2020 and 2021, we realized noticeable energy savings by adapting heating and lighting to lower occupancy levels driven by the COVID-19 pandemic. In fiscal 2022, the Company adopted a hybrid work policy for those associates at our Canton Facility, pursuant to which the corporate office is open to all associates on Tuesdays and Wednesdays and associates are encouraged to be in the office on those days. While this has resulted in a slight increase in electricity, water usage and waste at our corporate facility from fiscal 2021, usage is still down from fiscal 2019.

When replacing equipment under our control, such as HVAC units or conveyor motors, we take environmental performance into account. In fiscal 2019, we completed the conversion of all lighting in our Canton Facility to dimmable LED fixtures.

GHG Emissions from Transport and Logistics

DXLG does not own any vehicles, but we lease one van at the Canton Facility⁵. Transport and logistics needs are met by engaging with specialized service providers. We do not account for these outsourced emissions under our current boundaries, which is limited to scope 1+2. We intend to take a closer look at the fuel efficiency and carbon emissions resulting from transport in the future in partnership with our carriers.

Other Air Emissions

DXLG does not emit any meaningful quantities of Nitrogen Oxides (“NOx”) or Sulphur Oxides (“SOx”) in its own operations.

Product Sustainability

In fiscal 2022, we have partnered with external experts to estimate the carbon footprint of select products. Such data helps us in particular to understand upstream environmental impacts along the products life cycle, from cotton cultivation to the DXL distribution center.

⁵ We currently do not track GHG emissions from this van, which has limited usage.

Water and Waste & Recycling

Water Use

Water withdrawal at the Canton Facility totaled 543,048 gallons in fiscal 2022. All water is withdrawn from the municipal water supply. We estimate that approximately 2% or less is lost to evaporation on site by a cooling tower and other activities. The remaining 98% is discharged into the municipal sewer. The water quality of all discharge can be considered household-like. Water discharge is not treated by us. We are not aware of any incidents of non-compliance with water quality standards or regulations in our own operations.

Water Use (in gal)	FY 2022	FY 2021
Water withdrawn	543,048	477,257
Water consumed	~ 2%	~ 2%
Water discharged	~ 98%	~ 98%

Note: This data only includes the Canton Facility. Data on water use by stores is currently not available.

Waste & Recycling

We seek to minimize the impact on the environment by reducing the waste we produce in connection with the manufacture, distribution and sale of our products.

In our distribution center, we have placed special emphasis on sizing our packaging appropriately, avoiding excess packaging. We also strive to recycle as much material as possible. We engage a local service provider to send a significant portion of the remaining waste to a waste-to-energy facility. We are not producing hazardous waste in meaningful quantities in our own operations.

Waste Generation and Disposition* (in kilopounds)	FY 2022	FY 2021
Total waste generated	1,780	1,576
Cardboard	1,547	1,400
Office Paper	9	22
Other	224	154
Waste diversion rate	94%	95%
Total waste diverted	1,665	1,492
Recycled	1,579	1,422
Other	86	70
Total waste disposed	115	84
Incinerated (w/ energy recovery)	94	74
Landfilled	21	10

*The scope of this data is limited to our Canton Facility. Data about our stores is not available.

Recycled Plastics – Shipping Materials

In conjunction with the companies in our supply chain, at the beginning of fiscal 2022, we introduced an initiative to substitute conventional polybags with an alternative bag made from recycled plastics. Last year, we reported that through the first four months of fiscal 2022, approximately 36.0% of our units were shipped in polybags made from recycled plastics. By the end of fiscal 2022, 48.8% of our units were shipped in polybags made from recycled plastics.

Our Employees

DXL is committed to Diversity, Equity, and Inclusion. We provide equal employment opportunities to all employees and applicants for employment and prohibit discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state, or local laws.

Diversity, Equity and Inclusion (“DEI”)

Normalizing the Brand Initiative

We are committed to inclusivity, acceptance, and equality. In 2017, DXLG introduced ‘Normalizing the Brand’, a program to foster DEI across all our operations. The program brings awareness to unconscious bias and focuses on ensuring that the composition of our organization looks and feels like the world we live in and serve. A cross-functional committee helps steer and further develop this program.

Our 2021 associate engagement survey included DEI-related questions for the first time. Also in 2021, we joined with CEO Action for Diversity & Inclusion, a coalition of over 2,000 CEOs, pledging to advance diversity and inclusion in the workplace. By signing on to this commitment, we have pledged to take action to cultivate a workplace where diverse perspectives and experiences are welcomed and respected, and where employees feel encouraged to discuss diversity and inclusion without retribution.

In April 2016, the DXL Women’s Leadership Group was formed with a mission of “Women supporting, educating and empowering each other @ DXLG”. It started as a pilot program and quickly expanded to now include over 40 female leaders, both people and process managers, in the corporate office and field. In addition, for the past four years, we have presented Leadercast, a platform for leadership development content (held annually in May) as a host site at our corporate headquarters. We also presented Leadercast Women, which was held annually in October until 2022. For the past three years, the programs were made available via an online platform.

We are continuing to work towards gathering additional DEI metrics and benchmarks.

Fostering Inclusion

Our Culture Committee and its subcommittees are cross-functional and focus on creating a welcoming community where associates feel appreciated, are engaged and can openly share their thoughts and aspirations. The subcommittees include:

- Associate Engagement and Development – to provide opportunities for development.
- Communications/Newsletter – to build cross-functional communication.
- Core Value Recognition – to instill, promote, recognize and celebrate associates who exemplify our core values: Innovative - Trustworthy - Empowered - Team Oriented - Inclusive
- Activity – to organize fun, social and team-building events for our associates.
- Workplace Environment and Community Outreach – to improve our workplace surroundings, support a green environment and sponsor community outreach programs.
- Partners in Hope – to build awareness, coordinate fundraising activities and sustain our ongoing St. Jude Campaign.
- Including You! – to bring awareness to unconscious bias, encourage open communication and ensure that our work environment is inclusive and welcoming for all associates.

Our Normalizing the Brand Committee, which was renamed in fiscal 2022 to “Including You!” creates monthly calendars and sends emails explaining the history behind a particular holiday or day of observance to help our associates learn about cultural, regional and religious days of significance.

We have policies and training in place with respect to anti-discrimination and anti-harassment, among others, and provide our associates with access to an anonymous hotline for reporting any concerns. Throughout the year, we require our associates to participate in educational videos.

Pay Equity

In the latter half of 2021, Korn Ferry was hired to evaluate every position at our corporate office, from entry level to the CEO, and using their job leveling methodology, create a career framework of job levels based on scope, complexity, and responsibilities of each role. In addition, Korn Ferry reviewed our compensation philosophy, base salary ranges and bonus opportunities for each of the newly created job levels.

The study was completed in early 2022, and the use of job levels has helped us to ensure that all associates are properly compensated given their role within the Company and helps to strengthen our equitable pay initiatives. In addition, as a result of this new framework, in fiscal 2022, we expanded participation in our Annual Incentive Plan to include associates at the manager and senior associate level, enabling a greater number of associates to participate in our formal incentive performance program, without having to wonder if there would be a discretionary bonus.

In fiscal 2022, we hired Jackson Lewis P. C. to perform another pay equity analysis of our full workforce, including our distribution center, our guest engagement center, stores nationwide and corporate office. The study focused on statistical trends within pay analysis groupings of employees to evaluate potential risks of systemic or class-based discrimination within our compensation system, of which no material risks were noted.

Compensation and Benefits

Our compensation programs are designed to pay our associates competitively in the market, based on their skills, qualifications, role, and abilities. Our benefits are designed to help

employees and their families stay healthy and help them balance their work and personal lives. These benefits include health and wellness, paid time off, 401(k) with company match, employee assistance, competitive pay, career growth opportunities, paid volunteer time, product discounts, and a culture of recognition. The challenges created by the global pandemic brought mental health awareness to the forefront. We are continually looking for programs and opportunities to offer our associates to ensure physical and mental wellness. During the pandemic and during fiscal 2022 we provided associates access to free apps such as CALM, an app that provided our home office associates an opportunity to incorporate meditation and other mindfulness activities into their daily routines as well as BurnAlong, a free online health, wellness and fitness platform available to all associates. We also highlight mental health awareness as part of our “Lunch, Learn, Lead” series and provide other relevant content within our learning management system. In addition, we provide an Employee Assistance Program (EAP) which provides 24/7 assistance to associates and their family members for a variety of issues such as stress, family, parenting, and finances.

In October 2022, we added a new voluntary benefit *DailyPay*, which allows our associates to access their money as they earn it, instead of having to wait until their payday to access their funds.

Below are the DEI details for our Board and employees:

DEI Data – Board of Directors (as of June 1, 2023)

FY 2022	Board Members	%
Total Number	7	100%
Gender		
Male	4	57%
Female	3	43%
Other	0	0%
Race/Ethnicity		
Hispanic/Latino	1	14%
White	6	86%
Age		
30-50 years old	--	0%
Over 50 years old	7	100%

DEI Data – Employees (as of June 1, 2023)

FY 2022	All employees	%	Executives and Senior Managers	%
Total Number	1,491	100%	13	100%
Gender				
Male	701	47%	9	69%
Female	790	53%	4	31%
Other	--	0%	--	0%
Race/Ethnicity				
American Indian or Alaskan Native	13	1%	--	0%
Asian	33	2%	--	0%
Black or African American	347	23%	--	0%
Hispanic/Latino	195	13%	--	0%
Native Hawaiian or Other Pacific Islander	15	1%	--	0%
Two or More Races	43	3%	--	0%
Unknown	19	1%	--	0%
White	826	55%	13	100%
Age				
Under 30 years old	345	23%	--	0%
30-50 years old	629	42%	4	31%
Over 50 years old	517	35%	9	69%

DEI Data – Employees by Function (as of June 1, 2023)

FY 2022	Representation by Function							
	Corporate Functions	%	Distribution Center	%	Store Leadership	%	Store Associates	%
Total Number	298	100%	110	100%	298	100%	772	100%
Gender								
Male	99	33%	65	59%	137	46%	391	51%
Female	199	67%	45	41%	161	54%	381	49%
Other	--	--	--	--	--	--	--	--
Race/Ethnicity								
American Indian or Alaskan Native	--	--	--	--	--	--	13	2%
Asian	12	4%	1	1%	5	2%	15	2%
Black or African American	20	7%	67	61%	57	19%	203	26%
Hispanic/Latino	17	6%	14	13%	30	10%	134	17%
Native Hawaiian or Other Pacific Islander	3	1%	2	2%	2	1%	8	1%
Two or More Races	8	3%	1	1%	9	3%	25	3%
Unknown	5	2%	--	--	6	2%	8	1%
White	233	78%	25	23%	189	63%	366	41%
Age								
Under 30 years old	41	14%	14	13%	12	4%	278	36%
30-50 years old	126	42%	44	40%	157	53%	298	39%
Over 50 years old	131	44%	52	47%	129	43%	196	25%

Health & Safety

Occupational Health & Safety Management

DXLG strives to provide a safe work environment that prevents injuries and keeps associates healthy. This commitment is outlined in the DXLG Safety Policy which applies to all associates. For each facility type, specific health & safety guidelines and policies help employees stay safe. We conduct regular safety training and evacuation drills and distribute a safety newsletter at our Canton Facility. The Safety Committee reviews health and safety conditions and suggests improvements to management.

For store operations, the Retail Safety Training Booklet and safety checklists spell out specific procedures and expectations for this environment, for example box cutter safety, chemical inventory, first aid and the importance of our associates' safety in the event of workplace violence.

For suppliers, health & safety requirements are specified in the Vendor Manual and the Elevate Responsible Sourcing Standard. Depending on the location of the sites and risk, DXLG may also require Building, Fire, Electrical and/or Safety Assessments, which focus on risks associated with building structures.

Health & Safety Data

We routinely track and report health & safety data to OSHA. This data covers all our operations, including the Canton Facility as well as stores.

	FY 2022	FY 2021	FY 2020
Incidence Rate⁶:			
Canton Facility	0.58	--	0.82
Stores	1.99	1.75	1.96
Total recordable cases	1.66	1.29	1.76
OSHA rate for 'Clothing Stores'	1.50 ⁷		

Employee Training & Engagement

Employee Training

DXLG supports employees with bespoke training and development programs that enable them to develop skills they need to succeed. These programs include:

- Specific on-the-job training for new store managers
- Regional Sales Manager (RSM) mentorship program
- DXL Women's leadership group
- DXLG Mentor Program, which, each year, pairs approximately 10 mentees with mentors for one-year
- Leadership Coaching supported by a digital platform
- Lunch, Learn and Lead events

In addition, DXLG provides broad access to a Learning Management System as well as to Leadercast, an external learning platform.

Employee Engagement & Satisfaction

DXLG actively tracks both associate engagement and associate perception of company diversity, equity and inclusion efforts using company-wide survey tools. The response rate for the associate engagement survey in FY 2021 was 72%, while the response rate for the FY 2022 Diversity, Equity and Inclusion survey was 41%. Associate perception was positive in each of the surveys. We will be conducting both surveys again in FY 2023 and have invested in new survey software which simplifies survey distribution and collection, with a goal of increasing our overall survey response rate.

⁶ Number of injuries and illnesses * 200,000/Employee hours worked = Incidence Rate. There were no fatalities in any period.

The 200,000 figure in the formula represents the number of hours 100 employees working 40 hours per week, 50 weeks per year would work, and provides the standard base for calculating incidence rate for an entire year.

⁷ Based on NAICS code 4481, incidence rates of nonfatal occupational injuries and illnesses, 2021. As calculated on the same basis as described in footnote 5 above.

Responsible Supply Chain Management

Our Expectations

We expect our values and principles to be maintained throughout our business, including our supply chain. Our Vendor Code of Conduct and our Vendor Manual define our expectations of our suppliers, and all of our suppliers are required to agree to this code of conduct in writing to do business with us.

In fiscal 2019, we became a member of a leading ethical trade service provider to increase our social, environmental and ethical sustainability, and we participate in their Ethical Trade Audit platform. In fiscal 2020, we retained Elevate, a global leader in supply chain assessment, and instituted 4-Pillar audits of our supply chain factories. Beginning in fiscal 2023, we have retained Elevate to also perform environmental assessment audits.

Beyond the code of conduct, the private label vendor manual addresses additional issues, including our requirements on:

- Freedom of association and collective bargaining
- Compensation and benefits
- Forced labor
- Child labor
- Health & Safety
- Hours of Labor
- Discipline harassment and abuse
- Discrimination

Through collaboration with Elevate, we are pursuing what we call a “5-Pillar Audit”, which includes traceability of both raw materials and the equipment used to produce finished goods. We take seriously the US Customs Border Protection (“CBP”) Withhold Release Order on Products Made in Xinjiang region of China released on January 13, 2021 and will be responsive to any inquiries. In response to the problems in Xinjiang, we developed a Compliance Certificate of Traceability for our cotton vendors.

Social and Environmental Compliance

We work closely with our tier-1, 2 and 3 vendors to understand and improve social and environmental performance throughout our supply chain. We follow a risk-based approach that takes into account country risk as well as individual vendor risk, a measure that is based on a vendor's past environmental and social performance, as well as other factors.

All tier-1 vendors have been audited annually by a third party to our code of conduct, the ERSA standard or an equivalent, and includes a business ethics audit. In fiscal 2022, we expanded the scope of our reporting to include our tier-2 vendors. Comparable information for fiscal 2021 for our tier-2 vendors is not available. The following discussion does not include our tier-3 vendors for either period:

Supplier Information	FY 2022	FY 2021
Vendor factories (tier-1)	21	22
Mills (tier-2)	16	--
Total factories in scope	37	22

Country Risk Rating	FY 2022		FY2021	
	Number of factories	Share of Purchase Spend	Number of factories	Share of Purchase Spend
Factories in 'low risk' countries	7	26%	7	21%
Factories in 'medium risk' countries	15	58%	9	67%
Factories in 'high risk' countries	15	16%	6	12%
Total	37	100%	22	100%

Vendor Audits

In accordance with our vendor manual, our vendors must achieve an audit score of C or better. For those vendors that receive a D rating, they are provided with a remediation period to resolve all critical issues identified. At which time, the Company will make a decision to either audit the non-compliance or perform a complete full audit. The six vendors that received a D-rating in fiscal 2022 were all tier-2 vendors and this was their first year of audit. All six have subsequently completed remediation. As discussed below due to the Covid-19 pandemic and the timing of audits, comparable information for fiscal 2021 is not available.

Vendors by Audit Status	FY 2022		FY 2021	
	Number of vendors	Share of Purchase Spend	Number of vendors	Share of Purchase Spend
Audit current	35	84%	16	56%
Audit overdue	2	16%	6	44%
Total	37	100%	22	100%

Vendor Audit - Risk Rating ⁸	FY 2022	
	Number of vendors	Share of Purchase Spend
A	5	5%
B	19	58%
C	7	31%
D	6	6%
Total	37	100%

Audit Findings	FY 2022	FY 2020-21*
Number of priority non-conformances identified	13	22
Priority non-conformance rate	0.33	1.160

*The COVID-19 pandemic challenged the previously defined audit schedules. We worked closely with our suppliers to overcome adversities induced by the pandemic and in select cases accepted alternative audit schemes and virtual audits for the FY2020-21 period. As a result, the FY 2021 results included select audits conducted in fiscal 2020.

Audit Findings and Corrective Actions completed by Topic for Fiscal 2022	# of priority non-conformances identified	% corrected through corrective action
# of priority LABOR non-conformances	8	75%
# of priority HEALTH & SAFETY non-conformances	1	100%
# of priority ENVIRONMENTAL non-conformances	NA	-
# of priority BUSINESS ETHICS non-conformances	4	75%
# of priority MGMT SYSTEMS non-conformances	-	-
# of OTHER priority non-conformances	-	-
Total	13	77%

As discussed above, all priority non-conformances are discussed with vendors and addressed in a timely manner through a corrective action plan.

Environmental Management Systems ("EMS")*	FY 2022	FY 2021
Share of tier-1 factories with certified EMS	25%	24%
Share of USD volume procured from EMS certified factories	26%	14%

Note: Data is limited to our tier-1 private label factories. None of the tier-2 mills is EMS certified.

Vendors with the Higg Facility Environmental Module ("FEM")	FY 2022	FY 2021
Number of factories with Higg FEM	15	8
% of factories with Higg FEM	41%	36%
% of USD volume procured from vendors with Higg FEM	59%	46%

⁸ The grading system used by Elevate is based on a grading system: A(91-100), B(71-90), C(51-69) and D(50 or below).

Conflict Minerals

We have confirmed with our vendors and suppliers that no DXLG product in fiscal 2022 contained the conflict minerals tin, tantalum, tungsten and/or gold, per the U.S. Dodd-Frank Act.

New Vendors and Suppliers

A new vendor or supplier is first evaluated based on a number of criteria that includes, among other things, a risk assessment, product quality, speed to market, skill set, appropriate machinery, social programs for workers and sustainability efforts. A new vendor or supplier must also provide us with its most recent security, social and, beginning in fiscal 2023, environmental audits as well as a completed conflict mineral questionnaire. If a new vendor or supplier does not have a current audit that the Company can rely upon, we will request an audit be completed by Elevate prior to our accepting the new vendor or supplier.

Business Ethics and Compliance

Business Ethics & Compliance

We have a Code of Business Conduct and Ethics for our associates and a Code of Ethics for Directors, Officers and Financial Professionals (the latter of which is posted on our website). In addition, the DXLG Associate Handbook details the conduct expected from all associates on a broad range of issues, including compliance with laws, anti-discrimination, anti-harassment, equal opportunity policies, as well as policies on pay, sick leave, personal time and safety.

The General Counsel of the Company currently serves as the Company’s Compliance Officer and reports to the Chief Executive Officer. It is the responsibility of every people leader to ensure their teams adhere to the Code of Conduct and Business Ethics and the procedures outlined in the employee handbook.

Associates are required to sign a receipt of acknowledgement anytime any changes to the Associate Handbook are made, but at least annually. In addition, associates must also sign the Company’s Anti-Harassment Policy. Also, annually, we require our associates to sign off on the Company’s Code of Business Conduct and Ethics and our Board to sign off on the Code of Ethics for Directors, Officers and Financial Professionals.

DXLG provides ad hoc training to the exposed functions, such as the Global Sourcing team, including on the Foreign Corrupt Practices Act (which includes anti-corruption and anti-bribery matters).

Our Business Abuse Hotline

Any employee can report instances of non-conformance with the Code of Conduct, Associate Handbook or other concern to the Business Abuse Hotline. In fiscal year 2022, there were 9 such calls to the Business Abuse Hotline. All complaints were internally reviewed and appropriate action was taken to resolve the respective issue.

Any material fines or legal proceedings would be detailed in our annual filings with the Securities and Exchange Commission. In fiscal 2022, DXLG was not levied any fines due to violations of anti-bribery, anti-corruption, or anti-competitive standards.

Regulatory Compliance with Labeling and Marketing

During fiscal 2022, the Company did not receive any notices of violations for non-conformance with regulatory labeling and/or marketing codes.

During fiscal 2022, the Company had no legal and regulatory fines, settlements, or enforcement actions associated with false, deceptive, or unfair marketing, labelling and advertising.

Political Advocacy

While DXLG may from time to time participate in the political process to further our interests, DXLG has not made any donations for political purposes in fiscal 2022 or fiscal 2021, beyond trade association membership fees.

Key Trade Association Memberships include the National Retail Federation and the American Apparel & Footwear Association (AAFA), including active participation in the majority of AAFA's committees, subcommittees, councils and working groups, such as the Social Responsibility Committee, the Environmental Committee, and the Forced Labor Working Group.

Philanthropy

Partners in Hope

We have partnered with St. Jude Children's Research Hospital for more than 17 years, with our associates and customers raising over \$17.6 million dollars since 2005. In 2017, we made a pledge to raise \$12 million in ten years, and through May 2023 we have fulfilled \$10.3 million of this pledge. The money raised has helped to support the families of St. Jude as well as fund cancer research. In the past, DXL has funded initiatives like the Light Microscopy Center, a shared resource lab on the St. Jude campus where researchers find cures to life-threatening pediatric diseases.

Our associates support St. Jude in several ways, including spending time with patients and their families at the hospital. Every September, DXL associates nationwide participate in the St. Jude Walk/Run to End Childhood Cancer, with DXL being named top team in 2019. In all, DXL has helped to raise over \$927,000 in the last 8 years of the Walk/Run event.

In addition to the annual Walk/Run event, our associates participate throughout the year in campaigns, events, and have the ability to donate directly to St. Jude through payroll deductions. Visit our website for more information regarding our partnership with St. Jude: <https://www.dxl.com/st-jude/cat320030>.

Volunteer/Community Involvement

The Company encourages associates to take an active part in civic affairs and worthy charitable activities. One paid day of volunteer service time is granted per fiscal year for eligible associates to voluntarily participate in volunteer service activities for 501(c)-(3) community service organizations that serve the needs of the community and support the personal interests of our associates.

Vendor Code of Conduct



Code of Conduct

Destination XL Group, Inc. (hereinafter "DXL Group") is committed to fostering good corporate citizenship among its business partners. As such, DXL Group requires that its vendors, including vendors outside the United States (collectively referred to herein as "Vendor" or "Supplier"), conform to standards of business practices which are consistent with this principle. More specifically, DXL Group expects its Vendors to comply with the following standards:

Compliance with Applicable Laws

All Vendors shall comply with the legal requirements and standards of their industry under the national laws of the countries in which the Vendors are doing business, including the labor and employment laws of those countries, and any applicable international laws. Should the legal requirements and standards of the industry conflict, Vendors must, at a minimum, be in compliance with the legal requirements and standards of the countries in which the products are manufactured for DXL Group. If, however, the industry standards exceed the country's legal requirements, DXL Group will favor Vendors who meet such industry standards. Vendors shall comply with all requirements of all applicable governmental agencies.

Employment Standards

CHILD LABOR

DXL Group will not tolerate the use of child labor in the manufacture of products it sells. DXL Group will not conduct business with any Vendor that utilize in any manner child labor in their contracting, subcontracting or other relationships for the manufacture of their products. No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

- Proof of Age documentation - The Supplier shall maintain official documentation for every worker that verifies the worker's date of birth. In countries where independent documents, birth certificates, or government issued IDs are not available, the Supplier shall use some independent means for determining workers' age (i.e. medical assessment of development, other medical or religious records, or other means considered reliable in the local context)
- Government Permits and Parental Consent Documentation – Suppliers shall abide by all relevant rules and procedures where the law requires government permits or permission from parents as a condition of employment, and shall keep documentation on-site for inspection at all times.
- Childcare Facilities - Childcare facilities shall not physically overlap with production areas, and children shall not have access to production areas. Children under the local minimum age shall not be allowed in the factory area at any time, unless they are part of a guided tour or other unusual event.
- Employment for Young Workers – Facilities employing young workers (workers between the age of fifteen (15) and eighteen (18)) must follow all applicable laws and regulations concerning juvenile / young workers, including a description of juvenile / young workers, requirements for regular medical checks proof of age documentation, reduced work hours, night work and overtime.
- Hazardous Work for Young Workers - No person under the age of eighteen (18) shall

undertake hazardous work, i.e., work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, or morals of persons under the age of eighteen (18).

- Young Workers Identification System - Suppliers shall have a system for identifying work stations and operations that are inappropriate for young workers according to applicable laws and shall require workers between the age of fifteen (15) and eighteen (18) to wear a badge or uniform that identifies them as young workers.
- Apprenticeships and Vocational Training - Suppliers shall comply with all regulations and requirements of apprentice or vocational education programs, and shall be able to document to monitors that these are legally recognized programs. Informal arrangements of any kind are not acceptable.

FORCED LABOR

All forms of forced prison or bonded labor will not be tolerated by DXL Group. Vendors shall maintain employment on a voluntary basis. DXL Group will not accept products from Vendors who utilize in any manner forced labor in the manufacture or in their contracting, subcontracting or other relationships for the manufacture of their products.

Freedom in Employment - All work must be voluntary and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length. Employment terms shall be those to which the worker has voluntarily agreed to.

- Employment Terms - Written contracts of employment shall be provided to all workers, including any migrant or non-local workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. If a worker is illiterate the Supplier shall communicate, orally the terms of the contract.
- Recruiting Contracts - Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favorable) are strictly prohibited.
- Recruitment Practices – Suppliers must exercise a rigorous oversight of any documents intended as proof that a worker may be employed as an adult. The Supplier must verify the authenticity of proof of age documents supplied by the recruitment agent or training centers.
- Recruitment through Referrals - Workers shall not be engaged to work in a factory by a family member, friend or associate in order for that family member, friend or associate to receive continuing remuneration, consideration, or any other return from the Supplier. This shall not refer to normal references, referral bonuses or standard employment recruitment practices.
- Worker Identification – Workers shall not be required to lodge, or “deposit” original passports, identity papers, travel documents, any other personal legal documents, or other valuable items upon commencing employment with the Supplier. The Supplier must provide, at employees written request, secure storage for employee documents. Such storage shall be freely accessible to workers at all times.
- Debt Bonded Labor - Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.
- Wage Withholding - The Supplier shall not hold wages already earned, provide for penalties resulting in paying back wages already earned, or in any way punish workers for terminating employment for any reason. (It is acceptable to provide bonuses to workers who stay for a

term of contract and meet reasonable conditions, such as regular attendance, punctuality, good quality, etc.)

- Wage Advances - Advances shall not exceed three months' pay or legal limits, whichever is less. Advances shall only be made following clearly established factory rules which have been communicated to workers. Advances must be properly documented and their receipt and accuracy must be confirmed by the relevant worker in writing (signature, thumbprint, etc.).
- Supplier Controlled Residence - Employees shall not be required to live in Supplier-owned or controlled housing. The Supplier shall not keep non-local or migrant workers separated from general employee housing (i.e. in a recruitment area facility).
- Freedom of Movement Supplier Controlled Residence – Factory managers must not prohibit workers who reside in employer-provided housing from leaving it or the factory grounds or restrict their movements by introducing monitoring or unsolicited chaperoning by factory staff. Factory management must allow workers to leave factory grounds without fear of repercussions and must not require them to perform any compulsory or unpaid overtime.
- Suppliers shall not place any undue restrictions on toilet use in terms of time and Frequency or access to water. If workers have safety concerns in the areas around their residences, factory management should provide resources to support worker-led strategies for mutual protection and security. Employees shall be permitted to have visitors in the living quarters, subject only to reasonable rules established by the Supplier regulating access during nighttime hours.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Vendors must respect the rights of employees to exercise their lawful rights of free association and collective bargaining, and to join or not join the organization of their choice, without penalty or interference.

- The Supplier shall recognize and respect the right of workers to freedom of association and collective bargaining, as well as recognizing the union of the employees and allowing union organizers free access to employees.
- General Compliance Freedom of Association - Suppliers shall comply with all local laws, regulations and procedures concerning freedom of association and collective bargaining.
- Parallel Means - In countries such as China, where freedom of association is prohibited, decided by the State, or limited (i.e. free trade zones), Suppliers should facilitate, and not hinder, all parallel means of freely-elected representation, such as allowing workers to gather, elect representatives, and negotiate collectively without reprisal.
- Open Communication Without Reprisal - All employees, including migrant or non-local workers, should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation, or harassment, between themselves and with the management.
- Documented Policies - The Supplier should have a well-documented policy for filing, handling, and resolving grievances in the workplace, and these policies should be clearly conveyed to management or supervisor level personnel, as well as communicated to employees.
- Worker Representation - Any joint worker or management committees in the workplace should be comprised of a cross-section of the workforce, including migrant workers, workers of different gender, and workers from different departments.
- Supplier Interference and Control - Suppliers shall refrain from any acts of interference with workers' organizations, including acts which are designed to establish or promote the domination, financing or control of workers' organizations by Suppliers.
- Deduction of Union Dues and Other Fees - Suppliers cannot deduct union membership fees or

any other union fees from workers' wages without the express and written consent of individual workers, unless specified otherwise in freely negotiated and valid collective bargaining agreements.

- Supplier Interference/Constitution, Elections, Administration, Activities and Programs - Suppliers shall not interfere with the right of workers to draw up their constitutions and rules, to elect their representatives in full freedom, to organize their administration and activities and to formulate their programs.
- Supplier Interference/Registration - The Supplier shall not attempt to influence or interfere in any other way, to the detriment of worker's organizations, with government registration decisions, procedures and requirements regarding the formation of workers' organizations.
- Supplier Interference/Favoritism - Suppliers shall not interfere with the right to freedom of association by favoring one workers' organization over another.
- Supplier Interference/Formation of Alternative Organizations - In cases where a single union represents workers, the Supplier shall not attempt to influence or interfere in any way in workers' ability to form other organizations that represent workers.
- Production Shift/Factory Closure to Prevent Exercise of Freedom of Association - Suppliers shall not (threaten to) shift production or close a factory in an attempt to prevent the formation of a union, in reaction to the formation of a union, in reaction to any other legitimate exercise of the right to freedom of association and collective bargaining, including the right to strike, or in an effort to break up a union. If a factory is closing and is suspected of doing so to prevent or hamper the legitimate exercise of the right to freedom of association, the Supplier shall provide proof that can be assessed.

COMPENSATION AND BENEFITS

Vendors shall fairly compensate their employees by providing wages and benefits which are in compliance with the national laws of the countries in which the Vendors are doing business or which are consistent with the prevailing local standards in the countries in which the Vendors are doing business, if the prevailing local standards are higher. Deductions from wages as a disciplinary measure shall not be permitted. Vendors shall only use subcontractors who comply with this standard, if applicable.

- Suppliers must provide workers with clear documentation of their wages for every pay period, including an explanation of the worker's classification within the wage tiers.
- Legal Wages - The Supplier shall ensure that wages paid for a normal working week meet at least the legal minimum wage or the local industry minimum standards for compensation, whichever is higher.
- Overtime Wages - The Supplier shall ensure that wages paid for all overtime (OT) work hours meet at least the legal or the local industry minimum standards for premium rates of compensation.
- Piece Rate - Where workers are paid on a piece rate, the payment for normal & overtime work performed shall meet at least the legal or the local industry standards for compensation, whichever is higher. If no legal or industry standard exists then OT piece rate wage shall be paid at a rate that is higher than the piece rate wage paid for regular hours.
- Wage Statements - For each pay period, the Supplier shall provide workers an understandable wage statement which includes days worked, wage or piece rate earned per day, hours of overtime at each specified rate, bonuses, allowances and legal or contractual deductions.
- Training Wages - Where training wages are legally allowed, no worker shall be paid a training wage for more than three months cumulatively.

- Wage Commitments - The Supplier shall communicate, orally and in writing, to all employees in the language of the worker: the wages, incentive systems, benefits and bonuses to which all workers are entitled in that facility and under the applicable law. Deception in wage commitments, payment, advances, and loans are prohibited.
- Documentation of Hours - Time worked by all employees, regardless of compensation system, shall be documented by time cards or other accurate and reliable recording systems such as electronic swipe cards.
- Record of Hours -Workers shall record their own hours (e.g., "punch" or swipe their time cards).
- Calculation of Hours - All hourly wages, piecework, bonuses, and other incentives shall be calculated and recorded accurately, and shall be acknowledged by the employee as accurate.
- Work without Pay - Workers shall be paid for all hours worked.
- Withholding of Wages - Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the Supplier or to their jobs. Wage Deductions - Deductions for services/goods to employees (housing, meals, and supplies) shall not be taken out of the employee's wages. The only deductions from the employee's wages shall be those that are legally allowed and have the written consent of the employee.
- Debt Bondage - Workers shall not be held in debt bondage or forced to work in order to pay off a debt.
- Fraudulent Records - The Supplier shall not use hidden or multiple payroll records in order to hide overtime, to falsely demonstrate hourly wages, or for any other fraudulent reason. Payment of Wages - All compensation shall be paid in a timely manner within thirty (30) days, cannot be used withheld to prevent employees from leaving, and employees should have full control and access to their earned compensation.

DISCRIMINATION

DXL Group recognizes that cultural differences exist, and different standards apply in various countries, however, we believe that all terms and conditions of employment should be based on an individual's ability to do the job, not on the basis of personal characteristics or beliefs. DXL Group expects Vendors to have a social and political commitment not to discriminate against their employees in hiring practices or any other term or condition of work, on the basis of race, color, national origin, gender, religion, disability, or other similar factors.

- Employment Decisions - All employment decisions including but not limited to: hiring, job assignment, wages, bonuses, allowances, and other forms of compensation, promotion, discipline, assignment of work, termination of employment, and provision of retirement, shall be made solely on the basis of education, training, and demonstrated skills or abilities. The characteristics of an individual, such as race, gender, marital status, country of citizenship, and religion shall not be the basis for such employment decisions.
- Recruitment and Employment Practices - Recruitment and employment policies and practices, including job advertisements, job descriptions, and performance/job evaluation policies and practices shall be free from any type of discriminatory bias.
- Sex-Based Wage Discrimination - There shall be no differences in remuneration for men and women workers for work of equal value. Remuneration (wages, compensation) includes the basic minimum or prevailing industry wage and any additional payments to be made directly or indirectly, whether in cash or in-kind, by the Supplier to the worker and arising out of the workers' employment. Such additional payments include wage differentials or increments based on seniority or marital status, cost of living allowances, housing or residential allowances, family allowances, benefits in-kind such as the allotment and cleaning of work clothes or safety equipment, and social security benefits.

- Marital Discrimination - Suppliers shall not discriminate on the basis of marital status.
- Workers Liberties - Employees may not be prohibited from attending church and/or practicing their religions, from dating or engaging in other personal or social activities, from becoming pregnant, or from exercising any other legally-protected rights or liberties.
- Health Status - Suppliers shall not, on the basis of a person's health status, make any employment decisions that negatively affect the persons employment status, including decisions concerning recruitment, termination, promotion, or assignment of work, unless such decision is dictated by the inherent requirements of the job or a medical necessity to protect the worker and/or other workers.
- Medical Examination - Suppliers are allowed to require routine medical examination for fitness as a condition of recruitment or continued employment. Such examination shall, however, be strictly limited to assess general fitness, and not include testing for any disease or illness, such as HIV/AIDS, that does not have an immediate effect on a person's fitness and/or is not contagious.
- Confidentiality of Health Status - Suppliers shall respect the confidentiality of workers' health status and not undertake any action that could lead to breach of said confidentiality, including screening of any kind, whether by direct testing, indirect testing (for instance, by making an assessment of risk behavior) or asking questions about tests already taken or about medication.
- Reasonable Accommodation for Health Reasons - Suppliers shall take measures to reasonably accommodate workers with (chronic) illnesses, including HIV/AIDS-related illnesses, which could include rearrangement of working time, the provision of special equipment, opportunities for rest breaks, time-off for medical appointments, flexible sick leave, part-time work and return-to work arrangements.
- Discriminatory Violence/Harassment/Abuse - There shall be no type of violence, harassment or abuse, be it physical, psychological, sexual, verbal, or otherwise, undertaken on any of the grounds referred to in the Code.

DISCIPLINE, HARASSMENT OR ABUSE

Vendors will provide a work environment free of harassment, abuse or corporal punishment in any form. Vendors may not deny workers their rights and dignity. Corporal punishment and physical coercion must not be used. Vendors must not engage in or tolerate sexual harassment, indecent or threatening gestures, abusive tone or language and undesired physical contact.

- Disciplinary Policy - The Supplier shall document and communicate to all workers a progressive disciplinary policy e.g., escalating discipline action steps such as verbal warning, written warning, suspension, and termination. Any exceptions to this rule e.g., immediate termination for theft or assault, shall be in writing and clearly communicated to workers.
- Records of Disciplinary Action - The Supplier shall maintain written records of disciplinary actions taken.
- Fines - The Supplier shall not use monetary fines to discipline workers.
- Humane Treatment - Every employee shall be treated with dignity and respect. The Supplier shall not engage in or support for any reason the use of corporal punishment, mental or physical coercion and verbal abuse including, but not limited to, threats of violence and sexual harassment to any employee or family member of the employee.
- Security - Security practices shall be gender-appropriate and non-intrusive.

HOURS OF LABOR

Vendors shall maintain reasonable employee work hours in compliance with local standards and applicable national laws of the countries in which the Vendors are doing business. In any event, except in extraordinary business circumstances, employees will not work in excess of 60 hours per week, including overtime, and shall be provided with at least one day off for every 7 day period. Overtime shall be voluntary. We will not use Vendors who, on a regularly scheduled basis, require employees to work in excess of the statutory requirements without proper compensation as required by applicable law. Employees should be permitted reasonable days off, breaks, lunch periods and bathroom breaks.

- Work Week Hours - The Supplier shall ensure all local laws that pertain to hours of work are followed. Furthermore, that overtime work hours plus regular work hours in a seven (7) day period shall not exceed sixty (60) hours total per employee.
- Rest Day - Workers shall also be given at least one-day rest per seven (7)-day period.
- Combined Hours - No workday shall exceed twelve (12) hours (combined regular & overtime hours).
- Overtime Hours - Workers shall not be forced directly or indirectly to work overtime hours with or without pay.
- Overtime/Reduced Mandated Overtime - The Supplier shall demonstrate a commitment to reduce overtime and shall enact voluntary overtime system, including for overtime mandated to meet extraordinary business circumstances.
- Overtime/Positive Incentives - Suppliers shall use positive incentive schemes to induce overtime and shall
Ensure such incentive schemes are known by workers.
- Staffing Levels - The Supplier shall demonstrate an effort to maintain a level of staffing that is reasonable in view of predictable or continuing fluctuations in business demand so as to not be overly reliant on overtime hours.
- Peak Periods - Allowable "Peak Period" shall be according to the law.
- Additional Shifts - Workers who work the legally prescribed workday in one factory shall not be transferred to another section in that factory, or to another factory to work a second shift at regular pay.
- Annual Leave/Determination - Suppliers shall not impose any undue restrictions on workers' use of annual leave. The time at which annual leave is taken is determined by the Supplier in consultation with the worker, taking into account work requirements and the opportunities for rest and relaxation available to the worker.
- Annual Leave/Restrictions - Any factory restrictions or procedures applicable to taking annual leave, such as requiring a minimum period of service before being allowed to use annual leave, written requests to be submitted a certain time before the annual leave would be taken, etc., must be in line with local laws, regulations and procedures and must be communicated in full to all workers.
- Annual and Holiday Leave - Workers shall be provided annual leave and holidays as required by law or which meets the local industry standard, whichever is greater.
- Leave/Retaliation - Suppliers shall not impose any sanction on workers for requesting or taking any type of leave, such as annual, sick, maternity or other leave, in line with all applicable rules and procedures.
- Sick Leave - Suppliers shall provide workers with sick leave as required under local laws, regulations and procedures.

- Sick Leave/Restrictions -Suppliers shall not impose any undue restrictions on sick leave. Any factory restrictions or procedures regarding sick leave, such as informing the Supplier as soon as possible, the provision of medical certificates, the use of designated doctors or hospitals, etc., must be in line with local laws, regulations and procedures and must be communicated in full to all workers.
- Calculation of Absences - Absences from work for reasons beyond the control of workers, such as sick leave or periods during which factory operations are suspended, shall not be counted as annual leave nor shall they be deducted from calculations concerning length of service, unless specified differently under local laws, regulations and procedures.

HEALTH & SAFETY

DXL Group maintains a safe, clean, healthy, and productive environment for its employees and expects the same from its Vendors. Vendors shall furnish employees with safe and healthy working conditions. Factories working on DXL Group merchandise shall provide adequate medical facilities, fire exits and safety equipment, well-lighted and comfortable workstations, clean restrooms, and adequate living quarters where necessary. Workers should be adequately trained to perform their jobs safely.

- Documents - All documents required to be available to workers and management by applicable Maintenance/Worker.
- Accessibility and Awareness - Health and safety policies, MSDS, etc. shall be made available in the prescribed manner and in the local language or language(s) spoken by the workers if different from the local language.
- Written Health and Safety Policy - Suppliers are required to develop, maintain, and regularly review a written health and safety policy. The policy must, at the very least, be aimed at complying with legal minimum safety and health standards, regulations, and procedures.
- Worker Consultation - The health and safety policy shall be developed and implemented in consultation with workers or their representatives.
- Health and Safety Management System - The health and safety policy shall contain the framework for a comprehensive health and safety management system within which Suppliers' responsibilities and workers' rights and duties, various responsibilities of designated personnel, procedures that enable workers to raise health and safety concerns and procedures for reporting death, injury, illness and other health and safety issues (for instance, near-miss accidents) are clear and regularly tested and reviewed.
- Communication to Workers - The health and safety policy shall be communicated to all workers in the local language or language(s) spoken by workers if different from the local language.
- Notification and Record Maintenance - Suppliers shall notify the relevant authorities of all illnesses and accidents as required by applicable laws. All illness, safety and accident reports shall be maintained on site for at least one year, or longer if required by law.
- Permits and Certificates - The Supplier shall at all times be in possession of all legally required and valid permits and certificates related to health and safety issues, such as those related to the purchase and storage of chemicals, fire safety inspections, inspection of machinery, and (chemical) waste disposal.
- Evacuation Requirements and Procedure - All applicable legally required or recommended elements of safe evacuation (such as posting of evacuation plans, the installation and maintenance of an employee alarm and emergency lighting systems, ensuring aisles/exits are not blocked and that workers are not blocked within their workstations, employee education, evacuation procedures, etc.) shall be complied with. Workers shall be trained in evacuation procedures. Alarm systems shall be regularly tested and evacuation drills shall be undertaken at least annually.

- Safety Equipment and First Aid Training- All safety and medical equipment (such as firefighting equipment, first aid kits, etc.) shall be available in sufficient numbers throughout the factory, maintained and stocked as prescribed and easily accessible to workers. A sufficient number of workers shall be trained in first aid and firefighting techniques.
- Personal Protective Equipment - Workers shall be provided with effective and all necessary personal protective equipment (such as gloves, eye protection, hearing protection, respiratory protection, etc.) to prevent unsafe exposure (such as inhalation or contact with solvent vapors, noise, dust, etc.) to health and safety hazards, including medical waste.
- Use of Personal Protective Equipment- Workers shall not incur any costs related to the normal and regular provision and maintenance of personal protective equipment.
- Chemical Management and Training - All chemicals and hazardous substances shall be properly labeled and stored in accordance with applicable laws. Labels shall be placed in the local language and the language(s) spoken by workers, if different from the local language. Workers shall receive training, appropriate to their job responsibilities, concerning the hazards, risks and the safe use of chemicals and other hazardous substances.
- Material Safety Data Sheets/Worker Access and Awareness - Material Safety Data Sheets (MSDS) for all chemicals used in the factory must be available at the usage and storage sites of the chemicals, in the local language and the language(s) spoken by workers, if different from the local language. Workers shall have free access to MSDS.
- Chemical Management for Pregnant Women and Young Workers - To prevent unsafe exposure to hazardous chemicals, specific appropriate accommodations shall be made for pregnant women and workers under the age of 18 as required by applicable laws in a manner that does not unreasonably disadvantage workers.
- Protection Reproductive Health - Suppliers shall ensure that women are not engaged in work that constitutes a substantial risk to their reproductive health.
- Ventilation/Electrical/Facility Installation and Maintenance - All necessary ventilation, plumbing, electrical, noise and lighting services shall be installed and maintained to conform to applicable laws and in such a manner as to prevent or minimize hazardous conditions to workers in the facility.
- Machinery Maintenance and Worker Training - All production machinery, equipment and tools shall be regularly maintained and properly guarded. Workers shall receive training in the proper use and safe operation of machinery, equipment and tools they use. Suppliers shall ensure safety instructions are either displayed/posted near all machinery or are readily accessible to the workers.
- Proper Use of Machinery- Suppliers shall only use positive incentives (risk awareness training, demonstration of proper use, awards, bonuses, etc.) to ensure workers use machinery, equipment and tools properly and safely. Workers shall not suffer any negative consequences for refusing to work with machinery, equipment or tools that are not properly guarded or reasonably considered unsafe.
- Bodily Strain Workstations - Workstations, including seating and standing arrangements and reach required to obtain tools, shall be designed and set-up in such a manner as to minimize bodily strains. Suppliers shall train workers in proper lifting techniques and items such as belts shall be provided.
- Medical Facilities - Medical facilities shall be established and maintained in factories as required by applicable laws. Medical staff shall be fully licensed and recognized under applicable local rules and regulations. An appropriate number of medical staff shall be on duty during all working hours, including any type of overtime, as required under local law.
- Medical Supplies - An appropriate stock of medical supplies shall be maintained at all times. Medicines of which the expiration date has passed must be replaced immediately and

disposed of in a safe manner.

- Sanitation in Factory Facilities - All facilities including factory buildings, toilets, canteens, kitchens, and clinics, shall be kept clean and safe and be in compliance with all applicable laws, including relevant sanitation, medical and safety and health regulations.
- Toilets - Suppliers shall establish the number of toilets required under applicable laws within reasonable distance of the workplace.
- Toilets/Restrictions - Suppliers shall not place any undue restrictions on toilet use in terms of time and frequency.
- Food Preparation - All food made available to workers shall be prepared, stored, and served in a safe and sanitary manner in accordance with all applicable laws. All workers handling food shall be provided with the tools and equipment necessary to do so in a safe and sanitary manner.
- Drinking Water - Safe and clean drinking water shall be freely available at all times, within reasonable distance of the workplace. Drinking water shall be of a reasonable temperature and the means to drink water (cups, etc.) must be safe and sanitary and available in an appropriate number.
- Drinking Water/Restrictions - Suppliers shall not place any undue restrictions on drinking water in terms of time and frequency.
- Sanitation in Dormitories - All dormitories shall be kept secure, clean and have safety provisions (such as fire extinguishers, first aid kits, unobstructed emergency exits, emergency lighting etc.). Emergency evacuation drills shall also be conducted at least twice a year.

CONCERN FOR THE ENVIRONMENT

DXL GROUP believes it is our role to be a leader in protecting our environment. Vendors must comply with environmental laws, regulations and standards applicable to their industry. We encourage our customers and associates to always Reduce, Reuse, and Recycle. DXL GROUP encourages our Vendors to reduce excess packaging and to use recycled and non-toxic materials whenever possible. We will favor Vendors who share our commitment to the environment.

- Regulations - Suppliers shall adhere to all applicable environmental laws and regulations.
- Hazardous Waste - All Chemical residue and hazardous waste shall be stored and disposed of in accordance to applicable laws.
- Inhalation - Suppliers must determine if they have airborne contaminants present and, if they do, they must reduce those levels to safe levels, as outlined by regulations.
- Pollution Soil - Suppliers shall monitor their impact of operations on the surrounding soil to ensure that there is no contamination to the habitat.
- Pollution Water - Suppliers shall monitor their wastewater to ensure that it is either treated on site or off site and safe for disposal.
- Waste Management - Suppliers shall monitor and manage the wastes that are produced through operations. Facility will recycle whenever possible and properly dispose of these wastes in non-harmful manor to the environment.

WOMEN'S ISSUES

All Suppliers will ensure that workers who are women receive equal treatment in all aspects of employment. Pregnancy tests will not be a condition of employment or continuation thereof and

pregnancy testing, to the extent it is provided, will be voluntary and at the option of the worker. Workers will not be exposed to hazards that may endanger their reproductive health and Business partners will not force workers to use contraception.

- **Pregnancy Testing** - Suppliers shall not use pregnancy tests or the use of contraception as a condition of hiring or of continued employment. Suppliers shall not require pregnancy testing of female workers, except as required by national law. In such cases, Suppliers shall not use (the results of) such tests as a condition of hiring or continued employment.
- **Possible Marriage or Pregnancy** - Suppliers shall not threaten female workers with dismissal or any other employment decision that negatively affects their employment status in order to prevent them from getting married or becoming pregnant.
- **Pregnancy and Employment Status** - Suppliers shall not, on the basis of a woman's pregnancy, make any employment decisions that negatively affect a pregnant woman's employment status, including decisions concerning dismissal, loss of seniority, or deduction of wages.
- **Protection and Accommodation of Pregnant Workers and New Mothers** - Suppliers shall abide by all protective provisions in local laws and regulations benefiting pregnant workers and new mothers, including provisions concerning maternity leave and benefits, prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities. Where such legal protective provisions are lacking, Suppliers shall take reasonable measures to ensure the safety and health of pregnant women and their unborn children. Such measures shall be taken in a manner that shall not unreasonably affect the employment status, including wages and benefits, of pregnant women.

Code of Conduct

Notification to Employees: Vendors shall notify employees of the terms of these standards and post the terms in the local language, in a prominent place accessible to all workers.

Employment Records: Each Vendor commits to keep and maintain all payroll records in a complete and accurate manner as required by law, and to make such records available to their customers upon request.

Implementation Practices: DXL Group's Vendors commit to develop implementation, training, third-party monitoring, and corrective action programs to effectuate the principles set forth in this Code of Conduct.

Management System: Each Vendor shall designate one or more of its management staff to be responsible for implementation and monitoring for compliance with the standards laid out in this code of conduct within the manufacturing facilities, and the manufacturing facilities of its subcontractors.

Right of Inspection: To further assure proper implementation of and compliance with the standards set forth here within, DXL Group or a third party designated by DXL Group reserves the right to undertake affirmative measures, such as on-site inspection of manufacturing and production facilities, to implement and monitor said standards. Any Vendor who fails or refuses to comply with these standards is subject to immediate cancellation of any and all outstanding orders, refusal or return of any shipment, and termination of its business relationship with DXL Group.

Supplier:

COMPANY CHOP / SEAL:

BY: _____

Signature: _____

Title: _____

Date: _____

Address: _____

City: _____

State: _____

Phone#: _____

Email: _____