

STATEMENT OF CORPORATE POLICY AND CODE OF CONDUCT

Urban Outfitters, Inc. (UOI) takes workplace human rights very seriously and we insist that our business be conducted according to the highest ethical standards which we can point to with pride. UOI is adamant about protecting the safety and working rights of the people who produce the goods sold in our stores and through our wholesale business.

UOI insists on high standards for all of our vendors. As a requirement of doing business with UOI, our vendors and their suppliers must commit to meeting important human rights standards and conditions of employment, including, without limitation, the following:

- 1. Compliance with Law:** Vendors and suppliers must be in full compliance with all laws, rules and regulations applicable to the manufacturing of products, facilities where they are made and accommodations made available to workers.
- 2. No Child Labor:** All workers must be at least the local minimum legal working age or 15 years of age, whichever is older.
- 3. No Forced or Compulsory Labor Manufacturing:** Workers must be voluntarily employed and cannot be prisoners or any other kind of forced labor.
- 4. Nondiscrimination:** All hiring decisions must be based on the prospective worker's ability to do the job and may not be based on race, religion, gender, age, sexual orientation, disability, nationality, political opinion or union membership.
- 5. Minimum Wages, Hours and Benefits:** All national laws regarding minimum wage, overtime and hours and benefits must be complied with. In addition, hours per day and days per week shall not exceed the legal limitation of the countries in which any product is produced.
- 6. Health and Safety:** Workers must be furnished with safe and healthy working conditions in compliance with local laws.
- 7. No Corporal Punishment:** Behavior, including gestures, language and physical contact, that is sexually coercive, threatening, abusive or exploitative is not be permitted.
- 8. Environmental Protection:** Vendors shall comply with all applicable laws, rules and regulations in respect of protecting the environment and maintain procedures for notifying local authorities in the event of an environmental accident resulting from vendors' operations.

UOI has implemented a compliance program that is monitored on a regular basis by each of our buying offices around the world. An essential part of that program is the inspection of factories with whom we do business to ensure their understanding of our requirements. Areas of improvement are identified and corrective action is taken promptly upon discovery of any non-compliance. This response includes, when necessary, ceasing to do business with vendors who do not comply with our requirements.