

# CODE OF ETHICS

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JANUARY 2022



**DECKERS**  
— BRANDS —

**UGG®**

**KOOLABURRA**  
BY UGG®

**HOKA**

**Teva®**

**sanuk**





We will always  
do business in  
the right way

## CODE OF ETHICS

# MESSAGE FROM OUR CEO

At Deckers, we strive to do great while doing good. We are committed to being a regenerative business: one that prioritizes long-term value over short-term gain by restoring the health of people, communities, and the planet. This means we focus on positive change, innovate with purpose, and work to reduce our impact on the environment. At Deckers we believe our people make us great—we can't achieve our goals without each of our employees!

This Code of Ethics ("Code") sets forth the basic legal and ethical guidelines we collectively must follow to be successful. Please read the Code, take some time to think about what it says, and talk about it with others. Make a commitment to follow it, be guided by its values, and strive to do good regardless of where you sit within our organization.

We are truly better together. When we all play by the rules, we are able to hold ourselves and each other accountable. Promptly speaking up about a Code violation is not easy, but it is the right thing to do, and we urge you to utilize any of the resources outlined in this Code to voice a concern. We are committed to protecting those who raise honest concerns from any form of retaliation.

We will always do business in the right way and when we do that, we fulfill our commitment to our stakeholders including our employees, investors, communities, consumers, and customers.

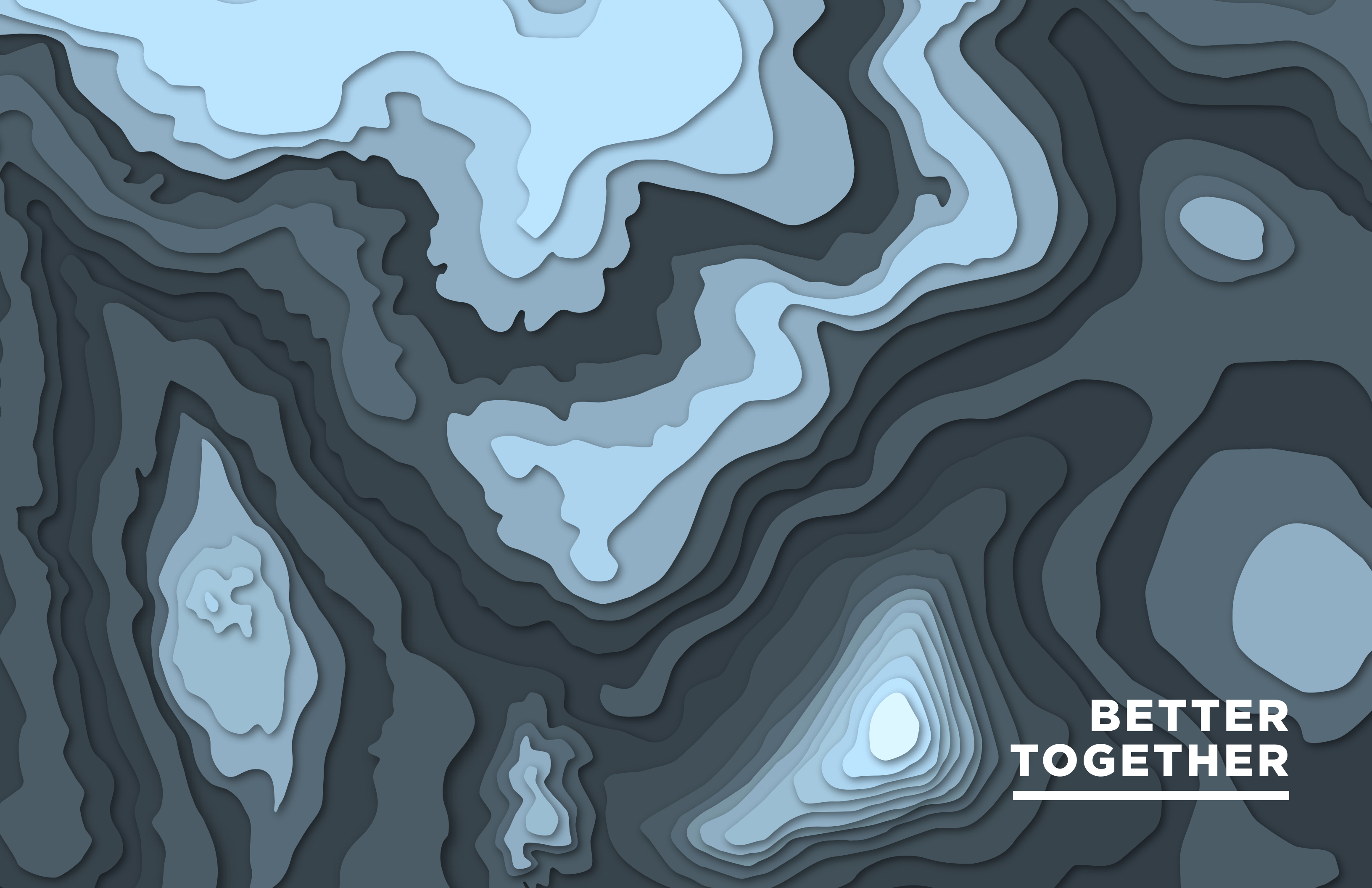
Onward,

Dave Powers  
President and Chief Executive Officer

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**BETTER  
TOGETHER**

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CODE OF ETHICS

# BETTER TOGETHER

## OUR FOUNDATION

Deckers Brands was built through a collective passion for ingenuity, creativity, and the ultimate goal of making great products. Founded in Santa Barbara, California, we've grown from a single iconic sandal into a global, multi-brand company, by seeking niche brands with a likeminded spirit and heritage.

Doing good and doing great in business is one of our core beliefs. To achieve this, we need each and every one of our employees to collectively work together. We are actively striving to create an environment where each of our employees can come as they are and be their full, authentic selves.

We believe that a diverse, equitable, and inclusive culture drives creativity and success throughout our business. We all have different backgrounds, professional skills and perspectives that have uniquely shaped us. It is precisely those differences and unique experiences that drive innovation and create space for big ideas.

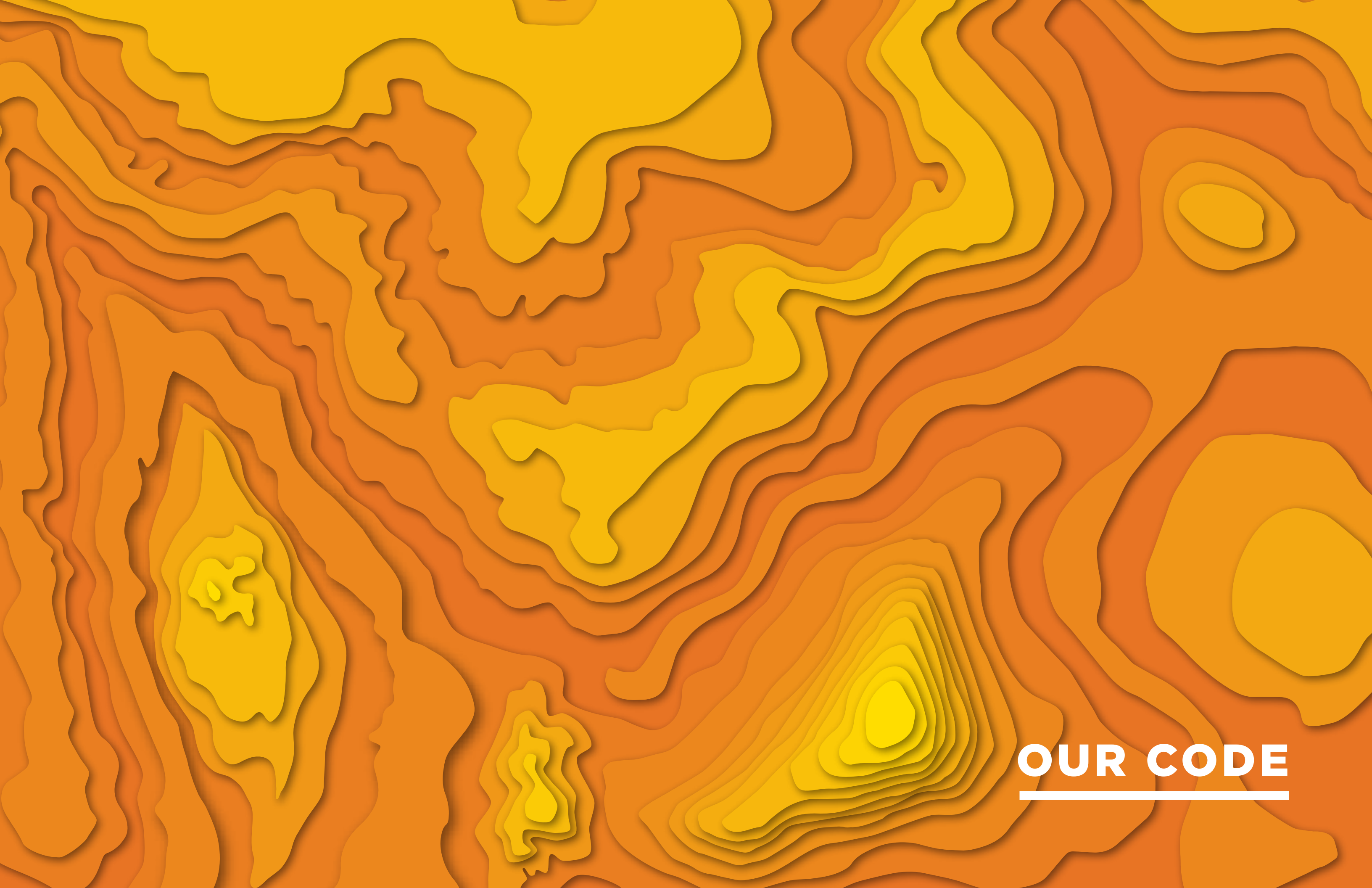
## OUR VALUES

At Deckers, we strive to positively impact the world by uniting purposeful brands with diverse people driven to succeed and create change. Our five key values (commit to create, come as you are, own it, better together and do good and do great) help drive our commitment and ensure we hold ourselves accountable to deliver on our goals. These values define who we are and serve as the driving force behind how we work together with our customers, our consumers, our partners, our suppliers, and our communities.

We also have detailed ethics and compliance policies that instill a commitment to ethical behavior and legal compliance across our entire organization. Our open-door policy and culture encourages employees to approach their managers if they believe there has been violations of our standards or policies. Employees and Factory Workers are also able to submit confidential and anonymous grievances 24-7 online or by phone using our EthicsLine Hotline that is hosted by an independent third-party provider.







**OUR CODE**



## CODE OF ETHICS

## OUR CODE

## WHAT IS IT?

Our Code sets forth our expectations of how we conduct business with each other and with our stakeholders. It builds upon the common values we share as Deckers' employees and protects our culture for the future. This Code applies to Deckers Brands, its subsidiaries worldwide and each of their respective employees, directors, and officers.

At Deckers we seek to do good work and live by our values every day. There may be times when you are faced with a challenging situation that is difficult to navigate. While no code can cover every situation, we hope that our Code serves as a reference tool to guide our employees in making good decisions.

We have included some practical examples and links throughout, as well as a helpful matrix below, to help deepen your understanding of our Code.

Our Code is more than just a document, it's a guide for how each of us should act with integrity and ethically conduct business. If you are a manager, you have a higher obligation to lead by example and conduct business the right way. You also have a responsibility to share our Code with your team, so they know what is expected of them and of you. Our Code is here to guide you through the small moments as well as the big ones and our teams are here to assist you in your decision making.

In addition to this Code, we have additional policies that provide more detail and guidance for specific situations. You can always access our most up-to-date policies at any time on our [L.A.C.E.S. Intranet](#) page.

## YOUR COMPLIANCE TEAM (L.A.C.E.S.)

The L.A.C.E.S. team, which stands for **L**eaders in **A**ccountability through **C**ompliance, **E**mpowerment and **S**upport, is a cross-functional group of employees in the Legal Team, Internal Audit, and People Experience (PX) who are always here to help. L.A.C.E.S. is supported by the Executive Leadership Team (ELT) through the Risk, Sustainability and Compliance Committee. L.A.C.E.S. is also under the oversight of the Board of Directors and its committees. The L.A.C.E.S. Team helps to implement programs, trainings and policies that support our ethical work environment. You may contact the L.A.C.E.S. team at [laces@deckers.com](mailto:laces@deckers.com).




## ASK YOUR SELF...

The matrix below has been created to help you navigate through your decision-making process. If you answer "yes" to all of the questions then you have done your due diligence, but if the answer is "no" then please seek further guidance.

- **Does it follow Deckers' policies and the law?**
- **Does it benefit Deckers business and not only me personally?**
- **Have I determined that this is the best route for the project and Deckers?**
- **Have I thoroughly vetted other options?**
- **Have I explored how this decision affects Deckers stakeholders?**
- **Have I investigated all future ramifications for Deckers and me personally if this information becomes public?**





**OUR  
COMMUNICATION  
CHANNELS**

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CODE OF ETHICS

# OUR COMMUNICATION CHANNELS

## AVENUES TO VOICE CONCERNS

We trust our employees to make good choices every day and to speak up when something is not right. Even if it is just to ask a question, all employees are empowered to speak up and have their voice heard.



### CONTACT US

We have various channels (listed below) to make it as easy as possible to voice your concerns:

- **Talk to your local leader, another leader you are comfortable with, a PX team member or a member of the Legal Team**
- **Contact the L.A.C.E.S. Team at [laces@deckers.com](mailto:laces@deckers.com)**
- **Call or email our anonymous EthicsLine Hotline:**

**Via Phone:** see numbers listed later in this section

**Via Web:** [deckers.ethicpoint.com](https://deckers.ethicpoint.com)

All EthicsLine Hotline reports will be provided to L.A.C.E.S. and Internal Audit, which will ensure that all allegations are appropriately reviewed and addressed. In collaboration with the Legal Team, the Audit Committee periodically reviews results of investigations and responses to findings. If, at any time, you feel your concern has not been adequately addressed, you may contact our General Counsel.

If you see or suspect that something is unethical, illegal, or inappropriate please say something. We understand that it may be difficult to speak up but not reporting a violation could hurt all of us. It could even result in disciplinary action up to and including termination of employment.

You do not need to be positive that something unethical, illegal, or inappropriate is happening to raise a concern, but the more details you provide the more effective an investigation will be.

Please rest assured that all allegations will be investigated and handled promptly, discreetly, and in accordance with law.

### NOTE FOR EUROPEAN TEAM

Our EthicsLine Hotline can only be used to report issues relating to internal controls in finance, accounting, or banking, or issues of competition or anti-corruption. Your privacy will be maintained in accordance with European data protection laws. If you have a concern in any other area, please report it to your local leader, another leader with whom you are comfortable, local HR, local Legal, or L.A.C.E.S.

## NO RETALIATION

We know it takes courage to come forward and share your concerns. We believe in a culture where all employees are heard. We prohibit retaliation against any person for reporting in good faith a possible violation or participating in an investigation involving possible misconduct.

We will take all appropriate actions to prevent any adverse consequences for raising a concern or participating in an investigation involving possible misconduct. Anyone who retaliates against an employee for these activities will be subject to disciplinary action up to and including termination.



### WHAT IF...

***I suspect someone in a leadership position is abusing their power, but I don't want them to find out I said anything. What should I do?***

Always voice your concerns no matter who it is. Deckers will take all actions possible to protect your identity wherever possible.

***I sent an email to L.A.C.E.S. concerning a person in a leadership position on my team. I am now applying for a promotion and am worried that my leader will hold it against me. What should I do?***

We do not tolerate harassment, discrimination, or retaliation in any form, whether overt or subtle. If you feel like anyone in the organization is retaliating against you for speaking up contact L.A.C.E.S., PX, or call the EthicsLine Hotline.

CODE OF ETHICS

# OUR COMMUNICATION CHANNELS (CONTINUED)

## HOW OUR ETHICSLINE HOTLINE WORKS?



## HOW DO I CALL OUR ETHICSLINE HOTLINE?

| COUNTRY                  | NUMBER                         |
|--------------------------|--------------------------------|
| United States and Canada | 855-503-8068                   |
| Austria                  | 0800-291870                    |
| China                    | 400-661-2102                   |
| France                   | 0800-902500                    |
| Germany                  | 0800-1016582                   |
| Hong Kong                | 800-932266 or 800-96-1111      |
| Japan                    | 00531-121520 or 0066-33-112505 |
| Netherlands              | 0800-0226174                   |
| United Kingdom           | 0800-032-8483                  |
| Macau                    | 0800-749                       |
| Vietnam                  | 120-11067                      |
| Belgium                  | 0-800-100-10                   |
| Switzerland              | 0-800-890011                   |
| Italy                    | 800721448                      |



The background of the image is a stylized topographic map. It features a complex pattern of irregular, wavy lines in various shades of blue and orange. The colors transition from a light, pale blue in some areas to a vibrant, bright blue in others, and from a muted, earthy orange to a bright, saturated orange in different sections. The lines represent contour lines, suggesting a map of terrain or a stylized geographical representation. The overall effect is a textured, layered appearance.

**OUR DECKERS  
FAMILY**

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CODE OF ETHICS

# OUR DECKERS FAMILY

## COMMITMENT TO AN ETHICAL WORKPLACE

We are proud of our inclusive, collaborative, and respectful work environment. We comply with all laws relating to equal employment opportunities. To the extent required by federal, state, or local law, all employment decisions are made without regard to race, ethnicity, color, gender, age, sexual orientation, gender identity, gender expression, national origin, religion, marital status, pregnancy, medical condition, physical or mental disability, veteran status and any other characteristics protected by law.

## NON-DISCRIMINATION OR HARASSMENT

Deckers does not tolerate any form of discrimination or harassment. Harassing conduct can be sexual or non-sexual, verbal or non-verbal, physical or non-physical. Unlawful harassment harms us all by creating an intimidating, hostile or offensive work environment. We do not tolerate any act or threat of physical violence, including intimidation or coercion. We must treat others the way we expect to be treated; that is, as professional adults, respectful of our diverse workforce. We expect everyone to uphold these standards including our employees, visitors, and business partners.

### MORE INFORMATION

[Harassment, Discrimination, and Retaliation Prevention Policy](#)

## A HEALTHY AND SAFE WORKPLACE

We promote a work-life balance that enhances the health and well-being of our employees. We also expect our suppliers, contractors, and other business partners to prioritize health and safety in their own operations.

Other than at Company-related social events when moderate alcohol consumption is permitted, we expect our employees to be completely sober while on-duty and never under the influence of illegal drugs or any substance, legal or not, that may impair their ability to work safely or perform their responsibilities. Of course, employees must never possess, sell, or transfer any illegal drugs on Deckers' premises.

At Deckers, any threats or acts of violence will not be tolerated and we prohibit weapons, in accordance with the law, on all of the Company's premises.



### WHAT IF...

***I think one of my coworkers is being harassed, but they never complain about it. What should I do?***

When you observe something, or have reason to believe that harassment is occurring, please voice your concern. We prohibit retaliation against any person for reporting in good faith. You can also share resources such as our Code of Ethics or L.A.C.E.S e-mail ([laces@deckers.com](mailto:laces@deckers.com)). If your coworker is still hesitant, you can encourage them to call our anonymous EthicsLine Hotline.

***My manager learns that I am pregnant and decides to uninvite me to a work conference to spare me the hassle of traveling while pregnant. What should I do?***

Though well-intentioned, unless you request to not attend the conference, this behavior could be considered discrimination based on pregnancy and may be harassment. To report this behavior up you can reach out to L.A.C.E.S. or raise your concerns through the EthicsLine Hotline.

***My manager makes inappropriate comments about others that I feel are inappropriate for the workplace. What should I do?***

Speak up. We want each employee to feel respected and valued in the workplace. We do not tolerate harassment of any kind. To speak up you can reach out to L.A.C.E.S. or raise your concerns through the EthicsLine Hotline.



### WHAT IF...

***My team is having a Thursday afternoon happy hour in the office. Am I allowed to drink alcohol on Deckers' premises?***

We love having fun and celebrating with each other. Even at Company-related social events, however, we expect all of our employees to consume alcohol in moderation, use good judgment and follow the law. If you are located outside of the North America region and you are unsure if your office allows the use of alcohol, ask your manager, and see if there are any relevant policies. All of our employees, especially our leaders, are expected to ensure that alcohol use doesn't result in the appearance of intoxication or inappropriate conduct. If you are planning an event, take extra time and care to make sure your plans are appropriate for the audience. If someone on your team does not or cannot consume alcohol, make sure they feel included by providing other options.

***I recently went through a separation and my ex-partner is threatening my safety. I am worried because my ex-partner is still friends with my coworkers and knows my work schedule. What should I do?***

Say something. This person is a threat to your safety and the safety of the other employees. Reporting this security issue lets us better protect everyone.



## CODE OF ETHICS

## OUR DECKERS FAMILY (CONTINUED)

## CONFLICTS OF INTEREST

When your personal interest or involvement in a situation interferes, or appears to interfere, with your ability to act objectively and in the best interest of Deckers that is a conflict of interest.

A conflict can happen when you supervise someone with whom you have a close personal relationship. It can also happen when you own, invest in, or do work for a company that competes, does business, or wants to do business with Deckers. A conflict can even happen if you accept, give or offer gifts, hospitality or favors from or to parties doing business with Deckers.



## ASK YOURSELF...

If you are not sure if a conflict of interest is present, ask yourself:

- ***Will I, my family, or close friend benefit personally from my involvement?***
- ***If this situation becomes public, will I or Deckers be embarrassed?***
- ***Will this interfere with my ability to do my job?***
- ***Would others think it might affect how I do my job?***

If the answer to any of these is 'yes' or 'maybe' please discuss the situation with a local leader or our PX team.

Here are some common situations that may present a conflict of interest:

- Doing business with family members or close personal friends
- Personal Relationships at work (working with your partner, ex-partner, family member, friend, etc., even if not on same team, must be reported to the PX Team ensure potential conflict is mitigated)
- Holding a significant financial interest in a competitor or business partner
- Working for a competitor or other business partner (exception for retail store or distribution center employees)
- Serving as a director or officer of another organization or non-profit

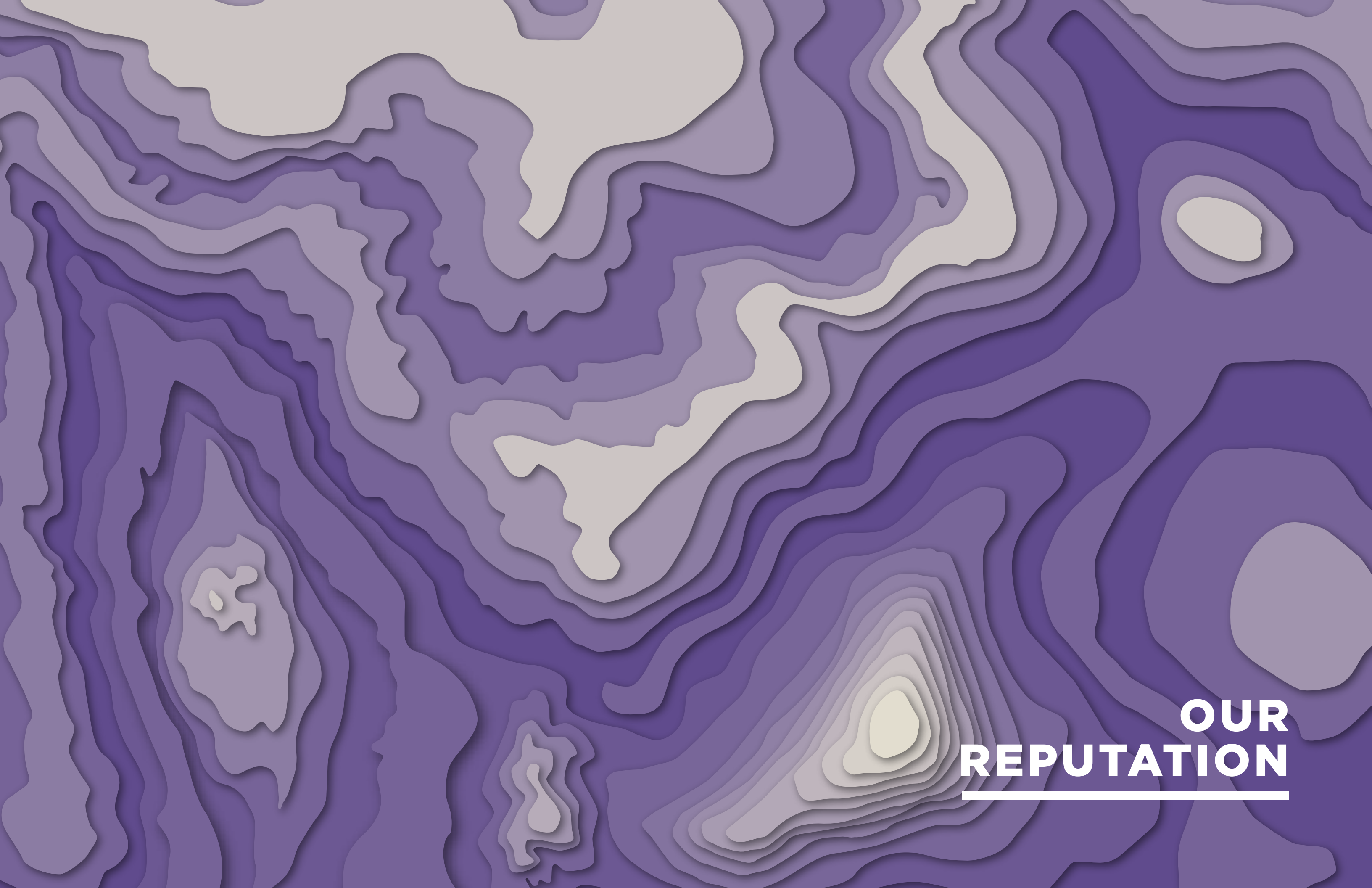
Potential conflicts can often be resolved with an open and honest discussion. Remember, having a conflict of interest is not necessarily a violation of our Code but failing to disclose it is.

For particular types of transactions with specified persons, we have adopted a review and approval process for certain "Related Person" transactions. Please refer to our Related Person Transactions Policy for more information.

Directors and ELT members should consult the Corporate Governance Guidelines.

## MORE INFORMATION

- [Gift Policy](#)
- [Related Person Transactions Policy](#)
- [Conflicts of Interest Policy](#)
- [Report a Conflict of Interest](#)



**OUR  
REPUTATION**





CODE OF ETHICS

# OUR REPUTATION

We depend on each other to always act in the best interest of Deckers. We have worked hard to establish a good reputation and earn the trust of our consumers. We recognize that everyone makes mistakes from time to time but we all must do what we can to protect and preserve our good name and reputation.

## BRIBERY AND CORRUPTION

The rule is simple, do not bribe anybody, anytime, for any reason. We want to succeed on our merits—the right way.

We do not offer, promise, give or accept money or anything of value to or from third parties to get an improper business advantage. Bribes generally include anything of value—no matter how small—such as cash, charitable donations, loans, travel expenses, gifts, and entertainment. Kickbacks generally are the return of money already paid as a reward for making business arrangements.

Anti-bribery laws apply in every country Deckers operates. Criminal penalties to you and Deckers for violating these laws are severe. We must never engage in or promote corruption or bribery regardless of local customs. We follow all anti-corruption laws including the **U.S. Foreign Corrupt Practices Act** and the **U.K. Bribery Act**.

We must take great care when working with or evaluating prospective third parties, including agents who may interact with government officials or business parties on behalf of Deckers.

All facilitation payments for an improper purpose are prohibited.

For general guidance on gifts and entertainment, see the Gifts and Entertainment section of our Anti-Corruption Policy.

### MORE INFORMATION

[Anti-Corruption Policy](#)



### ASK YOURSELF...

Some questions to ask yourself:

- **Are you doing business in a country that has a reputation for corruption?**
- **Are unreasonably high fees being requested?**
- **Are unusual payment methods being used (such as cash)?**
- **Do the deliverables sound too good to be true?**



### WHAT IF...

**We are in the middle of negotiating a big contract with a potential vendor. The vendor just gave me concert tickets. Is it OK to accept the tickets?**

Probably not. Accepting anything of value—including event tickets, gifts, excessive meals, or hospitality—from a vendor while negotiating a contract with them creates a potential conflict of interest and could also violate our policy on gifts, hospitality, and other payments. Discuss with your manager to determine the best course of action to take.

**My friend works for the United States Environmental Protection Agency (EPA) and asked if I would hire their relative as a summer intern. After receiving their resume, I quickly recognize the individual is underqualified. Is it ok to offer the relative the position or recommend them to another department at Deckers?**

No. Your friend works for a governmental agency and as such is considered a governmental official. Offering a position or ensuring they receive special consideration in the hiring process could be considered a form of bribery. Please direct all requests for employment or internships to Talent Acquisition or contact PX for assistance.

## CODE OF ETHICS

## OUR REPUTATION (CONTINUED)

## GIFTS AND ENTERTAINMENT

Gifts and Entertainment should be infrequent, of appropriate value, in compliance with applicable law, and recorded accurately in our books and records.

Business gifts and entertainment may help us build strong working relationships with our business partners. However, giving or receiving gifts or entertainment is not appropriate if it creates a sense of obligation or puts our business judgment in question. We must always use good judgement and be careful to avoid even the appearance that a gift or entertainment may influence a business decision or is illegal in the country in which it occurs.

We do not offer, give, or accept gifts of cash (or cash equivalents) in any business relationships. As a rule, never offer or give anything of value to a government official, unless you have approval in advance from the L.A.C.E.S. Team. Entertainment is another form of gift; entertainment includes events where both the person offering and the person accepting attend. Examples include meals, sporting events, shows and more.

## MORE INFORMATION

- [Anti-Corruption Policy](#)
- [Gift Policy](#)

## GUIDELINES FOR COMMON SITUATIONS

**Business Meals:** You may accept business meals as long as they are infrequent and not extravagant.

**Gifts to Others:** Gifts to your family members, close personal friends, or charities designated by you (other than through the Deckers Gives program) are considered to be given to you for the purposes of our Code.

**Non-cash holiday gifts:** You can accept non-cash holidays gifts (such as gift baskets) as long as you share them with your team.

**Third-party trainings:** If you get prior written approval from the Legal Team, you may accept certain educational trainings or conferences from third parties that are not lavish and are reasonable in value.

**Chinese New Year:** During Chinese New Year, you may accept a cash gift in the form of “Lai See,” but only for a nominal value (up to HK \$100 or its equivalent, which is approximately US \$12). We recognize that in some circumstances declining a gift or hospitality given out of genuine generosity may be culturally insensitive. In that situation, you may accept on our behalf, but you should immediately report it to the Legal Team, which will determine the appropriate disposition.

**Gifts to Employees:** Deckers has a Gift Policy (linked below) which should be consulted. If you have any questions, you can reach out to your L.A.C.E.S. Team.

**Gifts and entertainment to government employees:** This is a sensitive area that is subject to strict laws (including criminal). Before providing gifts or entertainment of any value (even nominal such as a catered lunch) to any government employees or contractors, you must get the written consent of the Legal Team and your local leader.



## WHAT IF...

***I received a gift card from a business partner as a thank you for our business arrangement. What should I do?***

Return the gift to the business partner and politely explain our policy. Unacceptable gifts can include goods or services but can also be any valuable item. Examples include cash, gift cards, samples, discounts, personal favors, tickets, and others.

***I received gift basket valued at \$100 from a business partner. Can I accept this gift?***

In order to accept the gift, the gift must meet all these requirements. (1) Not lavish and is reasonable in value (if over \$100 in value you must obtain approval from your local leader), (2) infrequent, (3) in good taste, (4) unsolicited, (5) not cash or cash equivalent, (6) in an appropriate business setting, and (7) not for an improper purpose. If there is a legitimate business interest that requires a gift or entertainment that does not meet the above criteria, it must be approved in writing in advance by the Legal Team or the L.A.C.E.S. Team.

***One of our outside vendors, who I rely on heavily, just had a baby and I would like to send a pair of UGG baby booties as a gift. Can I give this gift?***

The same rules apply whether giving or receiving a gift. In order to give or receive a gift, the gift must meet all these requirements. (1) Not lavish and is reasonable in value (if over \$100 in value you must obtain approval from your local leader), (2) infrequent, (3) in good taste, (4) unsolicited, (5) not cash or cash equivalent, (6) in an appropriate business setting, and (7) not for an improper purpose. If there is a legitimate business interest that requires a gift or entertainment that does not meet the above criteria, it must be approved in writing in advance by the Legal Team or the L.A.C.E.S. Team.

***It's the holidays and I want to reward my employees. Can I use my corporate credit card to buy a gift for my employees?***

Using your corporate credit for gifts is only permissible in certain circumstances. Recognition (projects, overachieving targets, etc.) must go through our recognition program (contact our PX team for more guidance). Personal gifts (birthday gifts, holiday gifts, etc.) should be made using personal funds—not your corporate credit card.



CODE OF ETHICS

# OUR REPUTATION (CONTINUED)

## PRODUCT SAFETY

We always uphold high standards for product safety. Our global consumers depend on our products to be innovative and comfortable and also safe. We have high standards for product safety, and we ensure that all products adhere to global safety, health, environmental protection, and labeling requirements/laws.

We only work with factories that meet our high standards for compliance, health, safety, and quality. We regularly review contracted factories to assess their ability to meet our high standards. If you become aware of any unsafe practices or products report it to your local leader and encourage others to do the same.

### MORE INFORMATION

- [Restricted Substances Policy](#)
- [Ethical Supply Chain Supplier Code of Conduct](#)



#### WHAT IF...

***I want to make a handful of hats to give away as promotional items. My turnaround timeline is already tight so should I just order? After all, it's only for promotional purposes and not for resale?***

No. Deckers has a process for the handling of promotional items. You must contact Procurement or L.A.C.E.S.

***A product failed to meet our physical performance testing requirements and I was made aware of it. Should I still allow the product to go to market, so we hit our delivery timelines?***

No. Deckers good name and reputation depend on adherence to our policies, including all testing protocols. If you are aware of any product failing to meet our standards, it should be reported immediately.

## TRADE COMPLIANCE

We are committed to operational excellence and to compliance with all applicable laws and regulations.

We source products from many different parts of the world. Each country has its own laws and regulations governing business dealings, purchases and transportation of products and goods. These laws are usually complex.

We are committed to operational excellence and to compliance with all applicable laws and regulations. This applies to every aspect of our global supply chain: global sourcing (finding the right products); quality control (making sure the products meet certain product specifications and safety requirements); logistics (delivering products to all locations); accounting (paying for the products); customs compliance (making sure the products are properly imported into the country); operations (the safe handling and delivery of the products to the customers); and exports (following proper regulations in the assistance of the delivery of the products to customers in other countries).



#### WHAT IF...

***A men's product I am working on is over budget and we need to cut costs. One of our factory partners informed me if I mark the textile uppers as leathers, I can save 15%. Seems like a win-win. Is it a problem if I change the description of the product to save on customs duties?***

Yes, it's a problem. First, not acting with integrity is a violation of this Code and could lead to disciplinary action up to and including termination. Second, false representations to customs authorities can mean fines, seizures, and the loss of import privileges. We want to succeed on our merits, not by cheating, and we always comply all applicable laws.

## BUSINESS RELATIONSHIPS AND FAIR COMPETITION

Our success is built on finding opportunity in unusual places and turning good ideas into global lifestyle brands. In building our brands, we always want to succeed on our merits and compete fairly. Our aim is to create meaningful relationships with organizations who share our values, meet their commitments, and comply with the law. We must choose carefully who we do business with.

Competition, or "anti-trust" laws, require fair competition. These laws seek to protect consumers by prohibiting business practices that interfere with competition such as price fixing or dividing markets. Both you and Deckers can face severe penalties (including prison) for violations of these laws.

We want to protect what makes us unique. As such, we should avoid discussing any of our business strategies or plans with competitors, even informally.

If you work in sales, marketing, or procurement you should familiarize yourself with these laws.

If you have any questions, please contact the Legal Team.

### MORE INFORMATION

- [Anti-Corruption Policy](#)



#### WHAT IF...

***I am representing Deckers at an industry conference where other competing brands are present. I am chatting with a Deckers colleague about our new marketing plan to 'eliminate the competition'. Is this an appropriate conversation?***

A good rule of thumb is to avoid making any statements (even jokes) that suggests an action will eliminate competition (such as 'this plan will crush our competition'). When you are representing Deckers Brands at trade events and industry conferences remember who is around you and what is appropriate conversation for that space. Avoid talking to competitors about prices, marketing practices, other competitors, vendors, market allocation or geographic region.

## CODE OF ETHICS

## OUR REPUTATION (CONTINUED)

## DATA PRIVACY

In this competitive marketplace we want to offer the best experience to our consumers and our employees. We entrust our employees with confidential information. Whether it be company confidential information or customer/consumer information, it is our responsibility to protect it. Everyone should take data privacy seriously and it is our responsibility to manage personal data in an appropriate manner. Unauthorized use of personal data can result in legal penalties and ultimately damage Deckers reputation.

We are transparent about how we use the data we collect and will only share it with outside companies (as permitted) who share in our commitment to manage it appropriately and comply with law.

For additional guidance on these policies, you can always reach out to our Security Operations Center ([SOC@deckers.com](mailto:SOC@deckers.com)).

## MORE INFORMATION

- [Insider Trading Policy](#)
- [Corporate Disclosure Policy](#)
- [Global Privacy and Data Security Policy](#)
- [Technology Usage and Security Policy](#)
- [Privacy Policy \(consumer facing\)](#)
- [Records Retention Policy](#)
- [IT Security Guidelines for Domestic and International Travel](#)



## WHAT IF...

***My coworker forgot their password and urgently needs to send an email should I give them my password to quickly log in and send their email?***

No. You should never share your passwords with anyone, including coworkers. Direct your coworker to the IT helpdesk for password assistance.

***I process payment cards for our retail customers. One of our retail customers notified me of a breach of their systems. Should I inform anyone at Deckers?***

Yes. Although it appears the breach did not occur on one of Deckers systems, our GRC Team ([GRC@deckers.com](mailto:GRC@deckers.com)) should still be notified immediately.

## INSIDER TRADING

Don't use or share material non-public information to buy or sell stock.

We are always looking for new ways to improve all aspects of our business. Because of our innovative nature and the fast-moving pace of our business, you may become aware of important information about us or another public company before it is made available to the public. This information is referred to as "material information" because it could influence a decision to buy or sell our stock or another company's stock.

Material information includes sales figures, inventory figures, financial information, management changes, acquisition, or investigation/litigation. Trading on material information before it is public is called insider trading and is both unethical and illegal. You personally could face civil and criminal penalties.

If you are aware of non-public information, you may not buy/sell Deckers stock or related company stock, share the information with others, tell others to buy/sell Deckers stock or related company stock. If your job requires you to share confidential information to a third-party, make sure a non-disclosure agreement has been signed by all parties involved. In order to allow sufficient time for the market to react to information, material information is considered public two full trading days after a widely distributed press release is published. If you are unsure whether information is material or has been released to the public, contact the Legal Team.

## MORE INFORMATION

[Insider Trading Policy](#)



## WHAT IF...

***I am on the finance team, and I have knowledge of sensitive material non-public information. Can I share that information with a coworker on the marketing team?***

Probably not. If you do not need to share that sensitive information with your colleague to accomplish your business objectives, then don't share the information. If the information absolutely needs to be shared, then be aware of your surroundings and never discuss sensitive or nonpublic information in open spaces.

***I inadvertently traded stock during a quiet period, what should I do?***

Immediately inform [securitiestransactions@deckers.com](mailto:securitiestransactions@deckers.com).



**OUR  
ASSETS**

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## CODE OF ETHICS

## OUR ASSETS

## PROTECTING OUR ASSETS

Deckers is committed to furthering your success. We give you tools and equipment to do our jobs effectively. From laptops to telephones, Deckers trusts us to be responsible with the things we are given. Make sure you learn and follow our information security rules that apply to the technology you use. Our security procedures are designed to protect our confidential information and our Information Security Team ([SOC@deckers.com](mailto:SOC@deckers.com)) is always available to answer any questions. For additional guidance on these policies, you can always reach out to our Information Security Team.

## TIPS FROM OUR INFORMATION SECURITY TEAM

- Never share your passwords with anyone
- Don't leave confidential information out for public viewing
- Never share nonpublic information
- Avoid viruses and malware – don't click on attachments that you do not trust
- Only use confidential information for company purposes and never use it for your own benefit or the benefit of others
- Only share confidential information with co-workers who truly need to know to do their jobs
- Don't share confidential information outside the company unless there is an NDA or contract in place
- Return all confidential information and assets on or before your last day with us
- Confidential information should be downloaded, printed, or retained in hard-copy form

## MORE INFORMATION

- [Technology Usage and Security Policy](#)
- [Mobile Device Policy](#)
- [Corporate Offices Physical Security Policy](#)
- [IT Security Guidelines for Domestic and International Travel](#)

## INTELLECTUAL PROPERTY AND COUNTERFEIT MERCHANDISE

We have spent years developing our brands and trademarks, and they are some of our most valuable assets. Counterfeits harm our business. Unauthorized use can lead to serious loss of value and reputational damage. Our intellectual property (IP) is confidential unless stated otherwise. If you are engaging with a third-party about our IP, you should connect with the Legal Team to make sure it is adequately protected. We can all help support our brand protection efforts by reporting any suspected counterfeit merchandise to the Legal Team.



## WHAT IF...

*I am a new hire and was so excited to start my new career at Deckers, I took a photo of my desk to share on my social media page. In viewing the photo prior to posting, I notice there are some product samples in the background of the photo. Should I still post the photo?*

No. Product samples are Deckers Intellectual Property and therefore confidential information.

## BOOKS AND RECORDS

We are all responsible for keeping accurate business records; our reputation depends on it.

The information we submit as a part of our daily job duties—such as time records, expense reports, payments, and other transactions— has a critical impact on our business. We must be careful to provide only complete, accurate, and timely information. Never make any inaccurate or misleading entries in any company records.

As a public company, our stockholders depend on us for accurate and timely reporting of company information, including financial results and financial condition. All employees must comply with company policies, procedures, and controls. Accounting and financial reporting of transactions and forecasts must follow our accounting policies as well as generally accepted accounting principles and laws.

Make sure that you cooperate fully with our internal and external auditors. Never take any action to coerce, manipulate, mislead, or fraudulently influence any public accountant engaged in an audit or review of our financial statements.

Finally, we have a Records Retention Policy (linked below) which provides guidance to so the length of time to retain documents and data and when it is okay to destroy them. Keep in mind that some records may need to be preserved in the event of litigation or a government investigation. Check with the Legal Team if you have any questions.

## MORE INFORMATION

- [Records Retention Policy](#)
- [Global Records Retention Schedules](#)
- [Email Retention Policy](#)



## WHAT IF...

*I am cleaning out my desk and have a bunch of documents from a recent deal we just finalized. What should I do with all these documents?*

Consult our Records Retention Policy and make sure you are not throwing away any information that might be needed.

The background of the entire page is a topographic map rendered in various shades of teal and dark blue. The map features numerous contour lines of varying thickness and spacing, creating a complex, layered appearance. The colors range from a light, bright teal to a very dark, almost blackish-blue, with the darker colors typically representing higher elevations or more rugged terrain. The overall effect is a textured, organic pattern that fills the entire frame.

**OUR  
STAKEHOLDERS**

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## CODE OF ETHICS

## OUR STAKEHOLDERS

POLITICAL ACTIVITY  
AND COMMUNITY

We strive to make the world a better place. We are all encouraged to get involved with issues that are important to us. Please make sure to respect the opinions of others and do not promote any personal political views at work. We welcome diversity of thought but aim to create a safe and productive work environment for all.

Political activity is carefully regulated by law and there are strict guidelines against employees participating in political activity on behalf of Deckers. For that reason, all political activity on behalf of Deckers must be initiated or approved in advance by the Legal Team. Make sure that your personal political involvement is not associated with Deckers in any way.

Except as specifically permitted by law and expressly authorized by company policy. No Deckers' funds will be used to make contributions or payments to political candidates or causes.

Lobbying includes general contact with elected officials regarding legislative or regulatory issues that impact Deckers. Because we are required to follow strict reporting requirements around lobbying, the Legal Team must approve any lobbying activities on behalf of Deckers, including retaining an external lobbyist.



## WHAT IF...

***I want to contribute to a political campaign, and I heard Deckers has an employee match program. Will Deckers match for a political campaign?***

No. Deckers can only match approved 501c3 non-profits.

ENVIRONMENTAL,  
SOCIAL, GOVERNANCE

Deckers is committed to doing great while doing good. We believe in good business, the kind that helps our communities, our people, and our environment. Sustainability is not just a check the box at Deckers, we want our employees to live more sustainably every day.

All our employees, regardless of where they sit within Deckers should ask themselves how they can do their job in a more sustainable way. If you have an idea that could help us reduce our environmental impact, or better support society, please share them with our Corporate Responsibility Team ([cr@deckers.com](mailto:cr@deckers.com)).

We have various policies and programs, from our alternative commute program to our electric car/solar reimbursement program, which support our employees live more sustainably.

## MORE INFORMATION

- [Water Policy](#)
- [Paper and Forest Procurement Policy](#)
- [Environmental Policy](#)
- [Annual Corporate Responsibility and Sustainability Report](#)
- [Ethical Supply Chain Supplier Code of Conduct](#)
- Alternative Commute Program - please contact our benefits team
- Electric Car/Solar Reimbursement - please contact our benefits team

SPEAKING ON BEHALF  
OF DECKERS

Remember we are one team and should be communicating in one unified voice when speaking on behalf of Deckers. If you have been asked to speak on behalf of Deckers (e.g., at a conference, panel, interview, or any other public-facing opportunity) you must get advanced approval from the Investor Relations and/or the Legal Team. This ensures our messaging is consistent and we are upholding our values.

Changing gears to social media—it is important to remember that anything can be recorded and uploaded online. You should consider the impact of your words when using social media to express yourself. Don't disparage individuals, competitors, our organization, and never use discriminating, threatening or abusive language. Additionally, we want our employees to share our brand stories, company accolades/accomplishments, but only after they are made publicly available—third parties should never post without the pre-approval of Deckers.

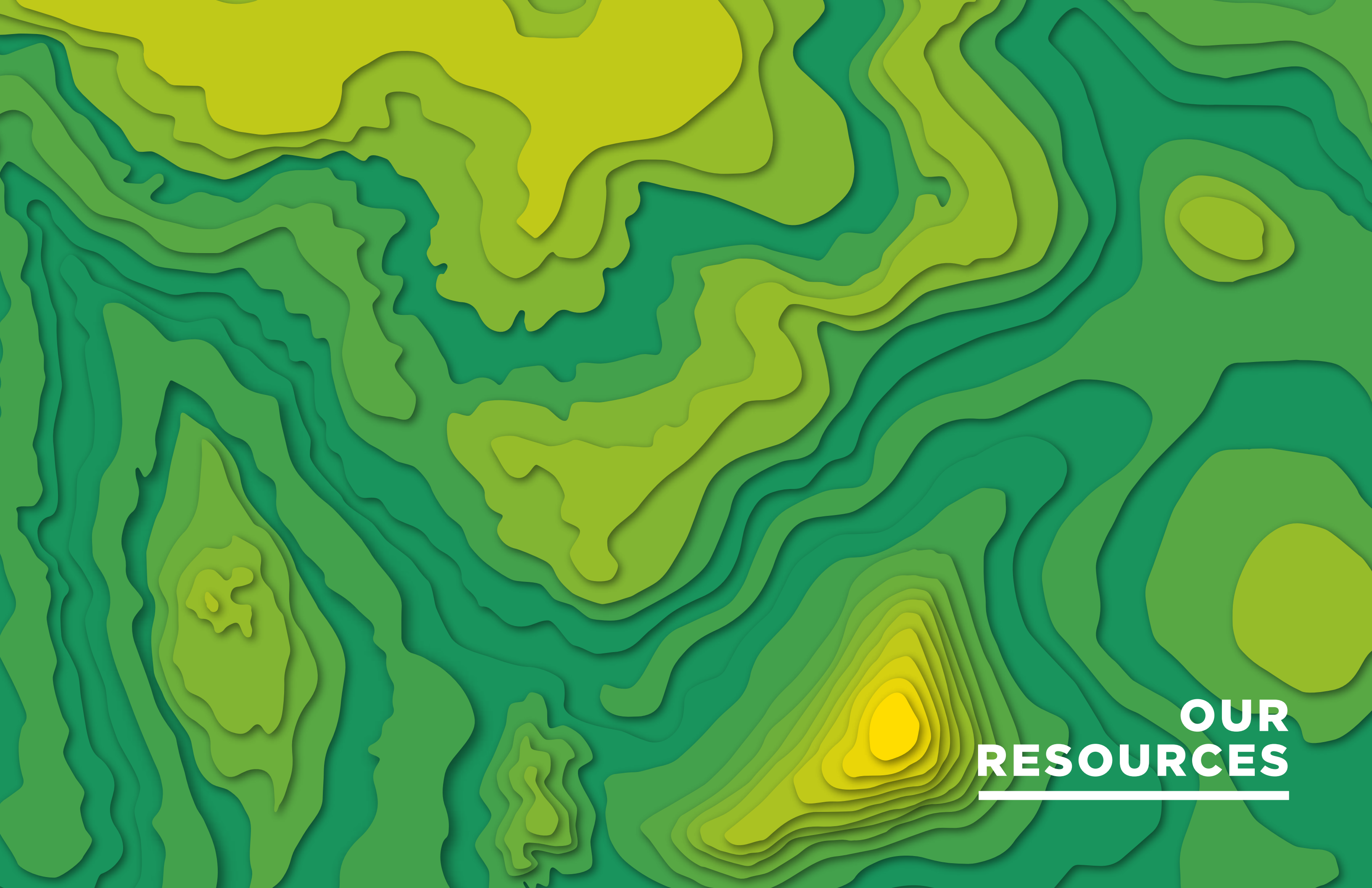
Should you come across a post that is disparaging of Deckers or our brands, do not respond to the post. While we appreciate the passion of our employees to defend our brands and our corporate reputation, we have an internal team ([communications@deckers.com](mailto:communications@deckers.com)) who is well trained to handle situations that may arise.

Remember, you are legally responsible for what you post. This means you may be held personally liable for defamation, libel, disclosure or trade secrets, obscenity, etc.

## MORE INFORMATION

- [Press Release Guidelines](#)
- [Social Media Policy](#)





**OUR  
RESOURCES**

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## CODE OF ETHICS

## OUR RESOURCES

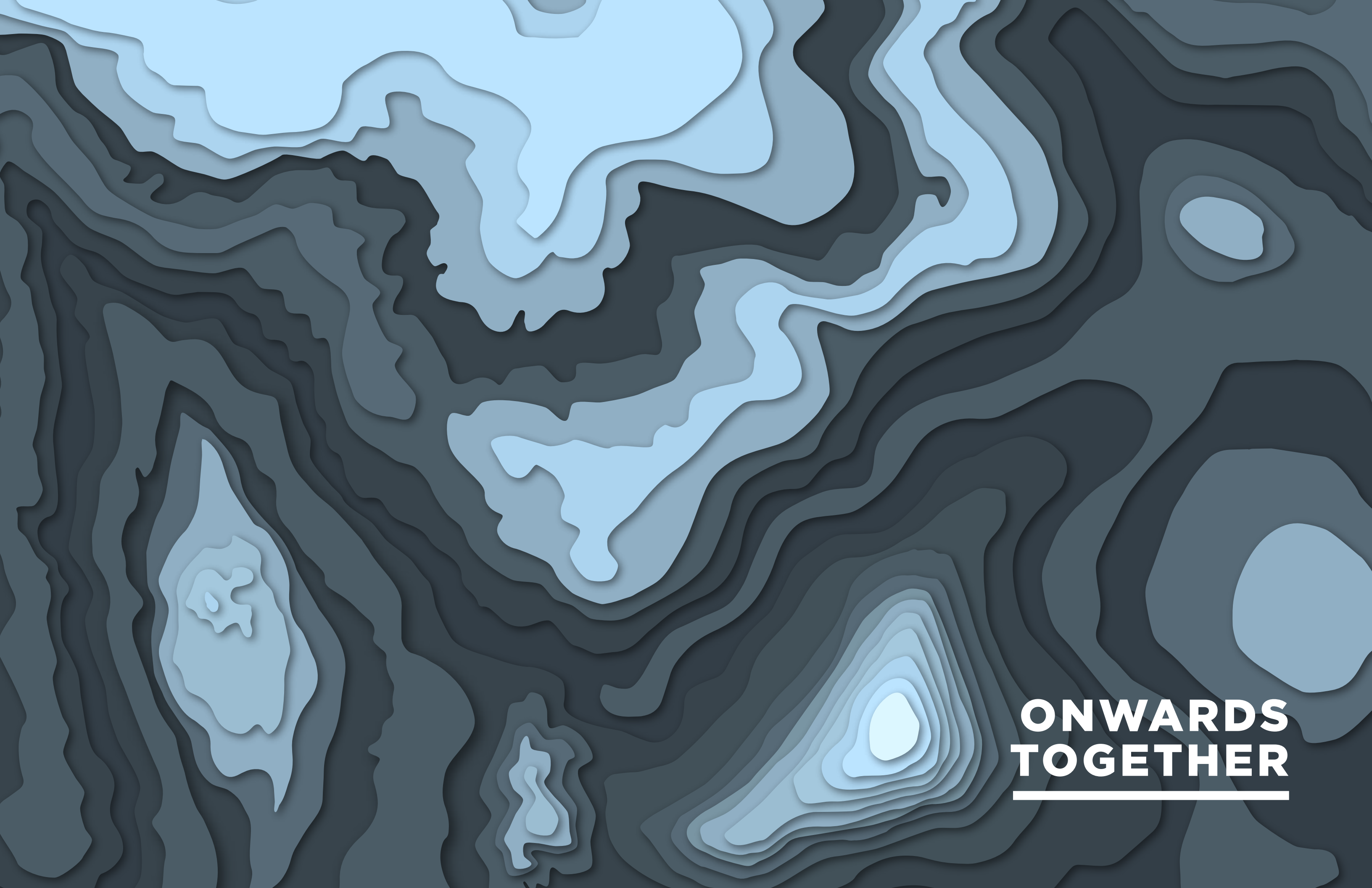
## OTHER POLICIES

In addition to this Code, we have additional policies that provide more detail and guidance for specific situations. Check out our other policies anytime on the [L.A.C.E.S. Intranet](#).

## HELPFUL RESOURCES

| QUESTIONS ABOUT                         | CONTACT   |
|---|---|
| Boycotts                                | Legal Team  |
| Bribes or Improper Payments             | L.A.C.E.S. Team   |
| Competition Laws                        | Legal Team  |
| Conflicts of Interest                   | PS Team   |
| Discrimination or Harassment            | Your local leader, another leader you are comfortable with, PX Team, L.A.C.E.S. Team, or EthicsLine Hotline |
| Gifts or Entertainment                  | L.A.C.E.S. Team   |
| Government Requests for Information     | Your local leader, PX Team, or Legal Team   |
| Insider Trading or Material Information | Legal Team  |
| International Trade Regulations         | Legal Team  |
| Media Inquiries                         | <a href="mailto:investor@deckers.com">investor@deckers.com</a>  |
| Political Activities                    | Legal Team  |
| Retaliation                             | Your local leader, another leader you are comfortable with, PX Team, L.A.C.E.S. Team, or EthicsLine Hotline |
| Trademark Violations                    | Legal Team  |
| Use of Third-Party Materials            | Legal Team  |
| Questions about Code                    | L.A.C.E.S. Team   |
| Supplier Conduct                        | <a href="mailto:cr@deckers.com">cr@deckers.com</a>  |





**ONWARDS  
TOGETHER**

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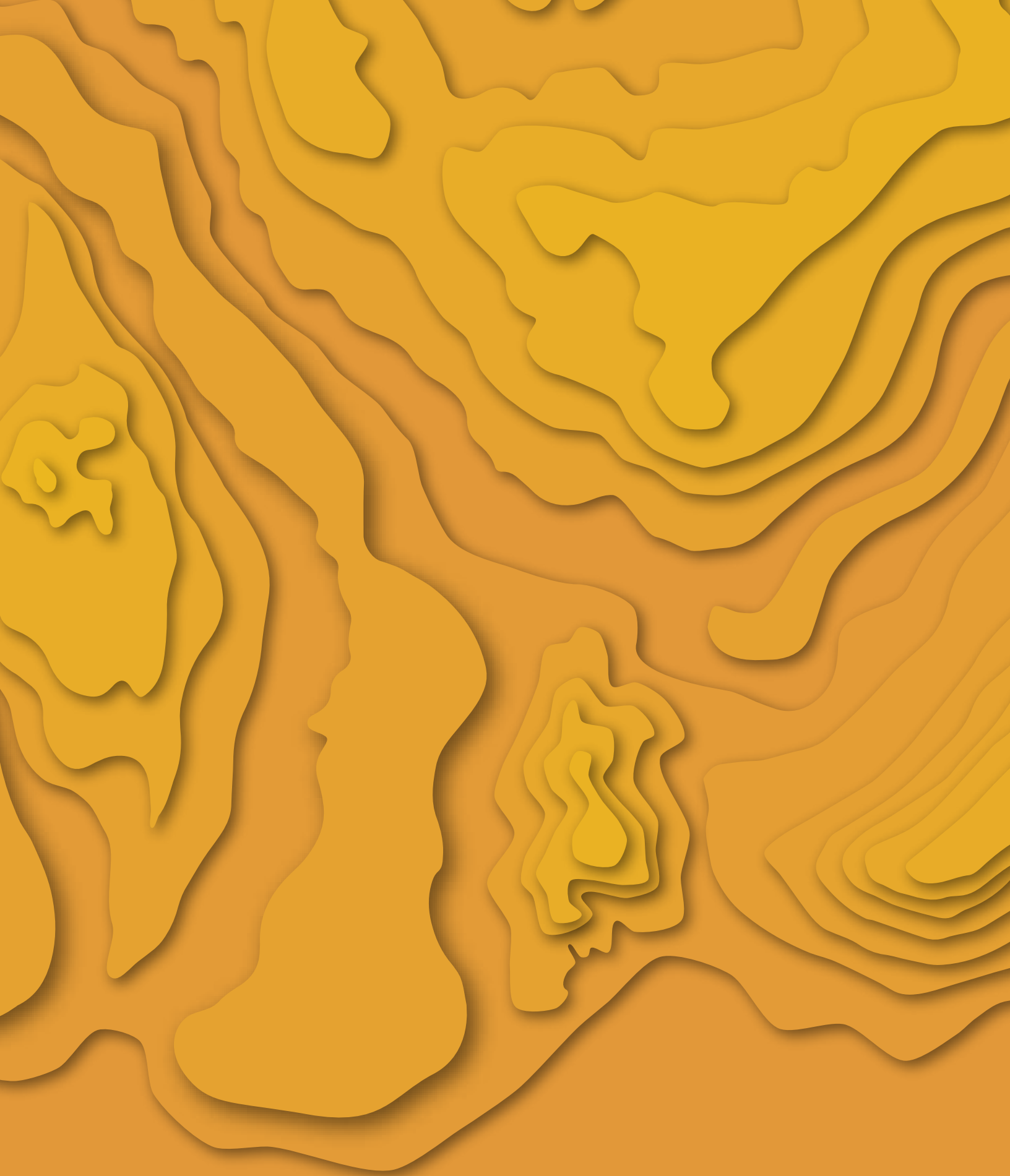
# ONWARDS TOGETHER

This Code outlines our foundation but alone is not enough. We can continue to grow our business while doing good for our employees, our communities, and our planet but we need your help! Each of our employees play a part in our future and our hope is that employees will continue to consult the Code for guidance throughout their career at Deckers.

Our Code is not a contract for employment. Failure by employees to follow our Code or applicable laws is a violation. Violation of our Code may lead to corrective action up to and including termination.

If required by applicable laws, rules, or regulations, including applicable stock exchange listing standards, any waiver of this Code for Directors or Executive Officers may only be made by Deckers' Board of Directors and must be promptly disclosed to Deckers stockholders. Our **Accounting & Finance Code of Ethics** is applicable to certain specified persons and is available for further reading.

Deckers reserves the right to make unilateral changes to our Code, or any other Deckers' policies, at any time. It is the responsibility of the Board of Directors to approve the Code of Ethics and any subsequent changes.



**DECKERS**  
— BRANDS —