



Code of
Business
Conduct

YETI®
BUILT WITH INTEGRITY



Table of Contents

- A Message from Our CEO 5**
- Our Core Values 6**
- Know the Code 7**
 - Purpose and Overview 7
 - Complying with Laws and Regulations 7
 - Who Must Follow the Code 8
 - Employees’ Responsibilities 8
 - Making Ethical Decisions 10
 - Asking Questions and Reporting Concerns 11
 - Our Non-Retaliation Policy 12
 - Cooperation with Investigations and Audits 12
 - Modification and Waiver 13
 - Accountability and Discipline 13
- Be Safe and Respectful 14**
 - Diversity, Equal Opportunity, and Non-Discrimination 14
 - Harassment-Free Workplace 15
 - Health and Safety 17
- Protect YETI 18**
 - Our Assets 18
 - Confidential Information and Intellectual Property 19
 - Accurate Recordkeeping 20
 - Communicating with the Public 22
 - Social Media 22

Be Responsible 23

Conflicts of Interest 23
Fair Dealing 24
Gifts and Entertainment 25
Environmental Stewardship 26
Human Rights 26
Corporate Citizenship 26

Be Accountable 27

Privacy 27
Insider Trading 28
Anti-Corruption and Anti-Bribery 30
Antitrust and Fair Competition 31
Anti-Money Laundering 33
Product Safety 33
Global Trade 34

Resources 36





A Message from Our CEO

YETI was built around bringing people together to enjoy the outdoors. Our products and experiences resonate with so many different communities because of the passion we have for our products and pursuits, and we do it all with integrity.

As we continue to grow, integrity will continue to be rooted in all aspects of our business. Our Code of Business Conduct is our guide to ensure we are working with integrity, within YETI's Core Values, and in compliance with laws and regulations at all times. Its contents also speak to who we are as a culture, and as employees. Every action you take as an employee has a direct impact on YETI. The Code of Business Conduct is your go-to guide to working with honesty and integrity. Read it, ask questions, and refer to it often, especially when you're unsure of the right thing to do.

We've all built an incredible brand. By continuing to do what's right together, we will continue to achieve our goals.

Thank you for the work you do and your commitment to YETI's success.

A handwritten signature in black ink that reads "Matt".

Matthew J. Reintjes

President and Chief Executive Officer, Director

A Message from
Our CEO

Our Core Values



1 BE AUTHENTIC AND INNOVATIVE WITH OUR BRAND AND PRODUCTS

2 CONTINUALLY STRIVE FOR IMPROVEMENT



3 PRIORITIZE ACTIVITIES WITH THE BIGGEST IMPACT



4 BE RESPONSIVE AND GO THE EXTRA MILE



5 ACT WITH A SENSE OF URGENCY



6 NO ONE SUCCEEDS ALONE



Know the Code

Purpose and Overview

We have created this Code of Business Conduct (“Code”) to help you:

- ▶ Comply with applicable laws, regulations, and YETI policies.
- ▶ Promote integrity and the highest standards of ethical conduct.
- ▶ Address common ethical situations you may encounter in your work.
- ▶ Avoid even the appearance of anything improper in connection with YETI’s business activities.

The Code can’t help you with every possible situation, but it’s a great starting point. It can help you use your best judgment and make ethical decisions. And when you’re stuck, the Code can also point you in the right direction, whether it’s to our policies or to resources for asking questions and speaking up.

Complying with Laws and Regulations

YETI is committed to compliance with all laws, rules, and regulations that apply to our business. In addition to the Code, YETI also has other resources that can be of help. These additional resources are listed throughout the Code. As always, we rely on you to use good judgment and to seek help when you need it.

We conduct business globally, so it’s important to be aware of different laws and customs that may apply to our operations throughout the world. While we respect the norms of our customers, business partners, and co-workers throughout the world, all employees must, at a minimum, comply with the standards and principles in this Code. If any provision of our Code conflicts with a local law or requirement, you should seek guidance from YETI’s [Ethics & Compliance Department](#).

Who Must Follow the Code

All employees of YETI and its subsidiaries and affiliates, including corporate officers and members of our Board of Directors, are required to read, understand, and meet the standards and obligations in this Code. Because our consultants, agents, suppliers, contractors, and other third-parties also serve as an extension of YETI, we expect them all to follow the spirit of this Code and Supplier Code of Business Conduct, as well as any applicable contractual provisions, when working on behalf of YETI.

If you supervise any of YETI's business partners, temporary employees, or contractors, you are responsible for communicating our standards and ensuring that they are understood. If anyone under your supervision fails to meet our ethics and compliance expectations or their related contractual obligations, it may result in the termination of their relationship with us and potentially additional legal consequences.



Employees' Responsibilities

Each of us must take responsibility for acting with integrity, even when this means making difficult choices. Acting with integrity at all times is what enables YETI to succeed and grow.

- ▶ Always act in a professional, honest, and ethical manner when acting on behalf of YETI.
- ▶ Know the information in this Code and our written policies, and pay particular attention to the topics that apply to your specific job responsibilities.
- ▶ Complete all required employee training in a timely manner and keep up to date on current standards and expectations.
- ▶ Report concerns about possible violations of our Code, our policies, or the law to your manager, your Talent Business Partner, YETI's [Ethics & Compliance Department](#), or any of the other resources listed in this Code.
- ▶ Cooperate and tell the truth when responding to an investigation or audit, and never alter or destroy records in response to an investigation or when an investigation is anticipated.

YETI **managers** are expected to meet the following additional responsibilities:

- ▶ Lead by example. As a manager, you are expected to exemplify high standards of ethical business conduct.
- ▶ Help create a work environment that values mutual respect and open communication.
- ▶ Be a resource for others. Be available to communicate with employees, contractors, suppliers, and other business partners about how the Code and policies apply to their daily work.

- ▶ Be proactive. Look for opportunities to discuss and address ethics and challenging situations with others.
- ▶ Respond quickly and effectively. When a concern is brought to your attention, ensure that it is treated seriously and with due respect for everyone involved.
- ▶ Be aware of the limits of your authority. Do not take any action that exceeds your authority. If you are ever unsure of what is appropriate (and what isn't), discuss the matter with your manager or the [Ethics & Compliance Department](#).

Remember: No reason, including the desire to meet business goals, should ever be an excuse for violating this Code, our policies, or the law.

What If? I'm a manager and not clear on what my obligations are if someone comes to me with an accusation – and what if it involves someone senior to me?

No matter who the allegation involves, you must report it. YETI provides several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in the Code or utilize the Hotline.

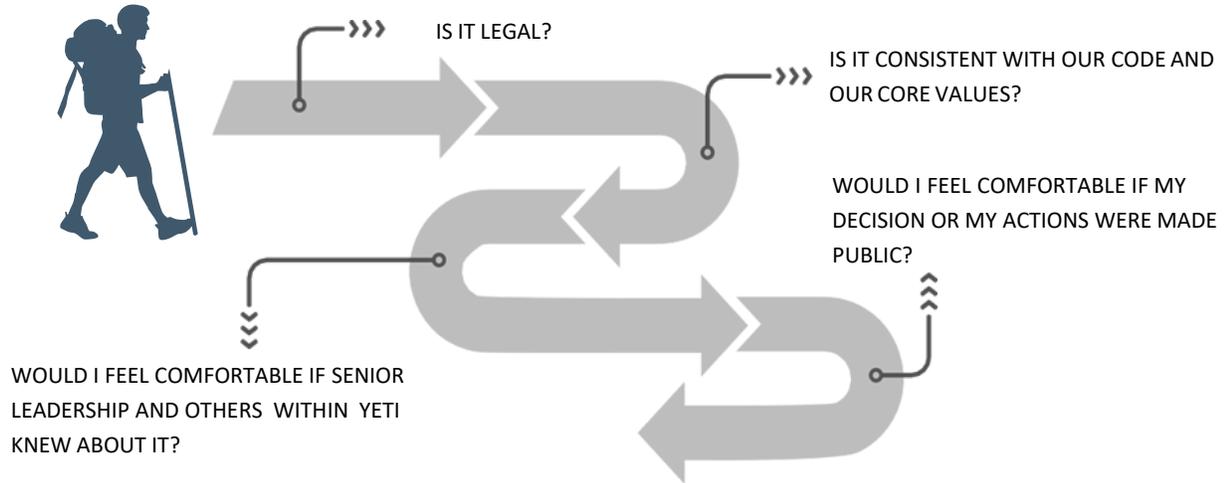


Making Ethical Decisions

Doing what's right is not always easy. There may be times when you'll be under pressure or unsure of what to do. Always remember that when you have a tough choice to make, you're not alone. There are resources available to help you.

Facing a Difficult Decision?

It may help to ask yourself:



If the answer to all of these questions is “**yes**,” the decision to move forward is probably OK, but if the answer to any question is “**no**” or “**I’m not sure**,” stop and seek guidance.

Remember, in any situation, under any circumstances, it is always appropriate to ask for help.

One More Thing...

We value your feedback. If you have suggestions for ways to enhance this Code, our policies, or available resources to better address a particular issue you have encountered, bring them to the [Ethics & Compliance Department](#). Promoting integrity at YETI is a responsibility we all share.



Asking Questions and Reporting Concerns

If you see or suspect any violation of this Code, our policies, or the law, or if you have a question about what to do, you should talk to your manager.

If you're uncomfortable speaking with your manager, there are other resources available to help you:

- ▶ Contact a member of the Senior Leadership team.
- ▶ Contact your Talent Business Partner, the [Legal Department](#), or the [Ethics & Compliance Department](#).
- ▶ Contact the **Hotline: YETI Hotline**

1-800-916-7037
Company Code: 9384

YETI will make every reasonable effort to ensure that your concerns are addressed promptly and appropriately.

Remember, a potential issue cannot be addressed unless it is brought to someone's attention.

**BUILT WITH
INTEGRITY**

YETI ETHICS & COMPLIANCE

What to Expect When You Use the Hotline

The Hotline operates 24 hours a day, 7 days a week, and is run by an independent, third-party provider. The Hotline is designed to protect your confidentiality, and your anonymity, if requested. The Hotline provides a web-based reporting capability as well as a toll-free telephone-based service.

Regardless of how a report is made, YETI prohibits retaliation against anyone who, in good faith, reports a possible violation or who participates in an investigation, even if evidence to substantiate the concern is insufficient. YETI will take appropriate action against any individual determined to be engaging in retaliatory conduct.

What If?

Someone misused the Hotline, made an anonymous call, and falsely accused someone of wrong doing.

Experience has shown that the Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on calls, and anyone who uses the Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action.

Our Non-Retaliation Policy

YETI prohibits retaliation against anyone who, in good faith, reports a possible violation of the Code, our policies, the law, or who participates in a related investigation, even if evidence to substantiate the concern is insufficient. Retaliation is a violation of both our Code and our Core Values. Anyone found to have engaged in retaliation will face appropriate disciplinary action.

What If?

I suspect there may be some unethical behavior involving my manager. I know I should report my suspicions, and I'm thinking about using the Hotline, but I'm concerned about retaliation.

You are required to report misconduct and, in your situation, using the Hotline is a good option. We will investigate your suspicions and may need to talk to you to gather additional information. After you make the report, if you believe you are experiencing any retaliation, you should report it. We take claims of retaliation seriously. Reports of retaliation will be thoroughly investigated and, if true, retaliators will be disciplined, including up to termination of employment.

Cooperation with Investigations and Audits

All employees are expected to fully cooperate with internal and external investigations and audits that are conducted by, or on behalf of, YETI. In addition, in the course of business, you may receive inquiries or requests from government officials.

You are expected to fully cooperate and ensure that any information you provide is true, accurate, and complete. If you learn of a potential government investigation or inquiry, immediately notify your manager and the Chief Legal Officer before taking or promising any action.

Against the Code

- ▶ Falsified information. Never destroy, alter, or conceal any document or data in anticipation of or in response to a request for information.
- ▶ Unlawful influence. Never provide or attempt to influence others to provide incomplete, false, or misleading statements to YETI or a government investigator.



Modification and Waiver

We recognize that the Code will not cover every possible circumstance. As such, YETI may modify the Code from time to time in its reasonable discretion. Any waivers of the Code, however, must be approved in advance. Consult with the Ethics & Compliance Department for additional information. If the waiver request relates to an executive officer or director, the YETI Board of Directors, or its designee, will review and determine the appropriate course of action. In the extremely rare situation that a waiver is approved, we will quickly and properly disclose the waiver as required by law.

Accountability and Discipline

Violating this Code, our policies, or the law, or encouraging others to do so, exposes YETI to liability and puts our reputation at risk. Violations of laws or regulations may result in legal proceedings and penalties including, in some circumstances, criminal prosecution of YETI and individuals involved. If a potential ethics or compliance problem arises, you are required to report it promptly so that YETI can investigate the matter.

YETI takes violation of the Code seriously, and any violation of the Code may result in disciplinary action, up to and including termination of employment.





Be Safe and Respectful

Diversity, Equal Opportunity, and Non-Discrimination

YETI builds diverse and dynamic teams with a wide variety of backgrounds, skills, and cultures that consistently drive results. Our colleagues, job applicants, and business partners are entitled to respect and should be judged on the basis of their qualifications, demonstrated skills, and achievements.

We support laws prohibiting discrimination based on protected characteristics such as a person's race, color, gender, national origin, age, religion, disability, veteran status, marital status, or sexual orientation.

Follow the Code

- ▶ Treat others respectfully and professionally.
- ▶ Promote diversity in hiring and other employment decisions.
- ▶ Do not discriminate against others on the basis of any characteristic protected by law or YETI policy.

Against the Code

- ▶ Offensive or inappropriate comments, jokes, or materials.
- ▶ Bias when judging others. If you supervise others, assess them on performance. Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards.

Be Safe and Respectful

What If? One of my co-workers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, but no one else has spoken up about them. What should I do?

You should notify your manager, your Talent Business Partner, the [Ethics & Compliance Department](#), or utilize the Hotline. Sending these kinds of jokes violates the Code and our commitment to diversity, anti-harassment, and non-discrimination. By doing nothing you are condoning discrimination and tolerating beliefs that can seriously erode YETI's culture of respect.

Learn [Employee Handbook](#)
More

Harassment-Free Workplace

We all have the right to work in an environment that is free from intimidation, harassment, and abuse.

Verbal or physical conduct by any employee that harasses another disrupts another's work performance, or creates an intimidating, offensive, abusive, or hostile work environment will not be tolerated.

At YETI, We Do Not Tolerate:

- Threatening remarks, obscene phone calls, stalking, or any other form of harassment.
- Intentionally damaging someone else's property or acting aggressively in a manner that causes someone else to fear injury.
- Intimidating or coercing others on or off the premises - at any time, for any purpose.

Follow the Code

- ▶ Help each other by speaking out when a co-worker's conduct makes others uncomfortable.
- ▶ Never tolerate sexual harassment, including requests for sexual favors, or other unwelcome verbal or physical conduct.
- ▶ Demonstrate professionalism. Do not visit inappropriate internet sites or display sexually explicit or offensive pictures.
- ▶ Promote a positive attitude toward policies designed to build a safe, ethical, and professional workplace.
- ▶ Report all incidents of harassment and intimidation that may compromise our ability to work together and be productive.



Against the Code

- ▶ Unwelcome remarks, gestures, or physical contact.
- ▶ The display of sexually explicit or offensive pictures or other materials.
- ▶ Sexual or offensive jokes or comments (explicit or by innuendo) and leering.
- ▶ Verbal abuse, threats, or taunting.

Sexual Harassment

A common form of harassment is sexual harassment, which in general occurs when:

- An intimidating, offensive, or hostile work environment is created by unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature.
- Actions that are unwelcome are made a condition of employment or used as the basis for employment decisions such as a request for a date, a sexual favor, or other similar conduct of a sexual nature.

What If? While on a business trip, a colleague of mine repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office, and it was after regular working hours, so I wasn't sure what I should do. Is it harassment?

Yes, it is. You made it clear that his comments and behavior were inappropriate and should be stopped. YETI does not tolerate this type of conduct, not only during working hours but in all situations involving co-workers, including on business trips. Harassment should be reported immediately to your Talent Business Partner, the [Ethics & Compliance Department](#), or via the Hotline.

Learn [Employee Handbook](#)
More



Health and Safety

Ensuring our employees' health and safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others. We expect the commitment of each director, officer, and employee to make YETI an accident-free workplace. Situations that may pose a health or safety hazard must be reported immediately to Facilities, your manager, Talent Business Partner, or the Hotline.

Follow the Code

- ▶ Follow the safety, security, and health rules and practices that apply to your job.
- ▶ Notify your manager immediately about any unsafe equipment, or any situation that could pose a threat to health or safety or damage the environment. As an employee, you have the right and the responsibility to stop any work if you feel your safety is at risk.
- ▶ Maintain a neat, safe working environment by keeping work stations, aisles, and other workspaces free from obstacles, wires, and other potential hazards.

Against the Code

- ▶ Unsafe practices or work conditions.
- ▶ Carelessness in enforcing security standards, such as facility entry procedures.

Learn [Employee Handbook](#)
More

Workplace Violence

Violence of any kind has no place at YETI. We won't tolerate:

- Intimidating, threatening, or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage, or other criminal activities.
- Inflicting or threatening injury or damage to another person's life, health, well-being, family, or property.

What If? I've noticed an external door on the side of the building is frequently propped open. Who should I report this to?

Discuss anything that looks unsafe with your manager, Facilities, Security, or submit a report to the Hotline. There may be very good reasons for this practice, but it's important to raise any concern about safety as a responsible employee.





Protect YETI

Our Assets

We are entrusted with YETI assets and are personally responsible for protecting them and using them with care. YETI assets include funds, facilities, equipment, information systems, intellectual property, data, and confidential or sensitive information.

Personal use of YETI assets is discouraged, but where permitted, should be kept to a minimum and have no adverse effect on productivity and our work environment.

Follow the Code

- ▶ Do not use YETI equipment or information systems to create, store, or send content that others might find offensive.
- ▶ Do not share passwords or allow other people, including friends and family, to use YETI business resources.
- ▶ Only use software that has been properly licensed. The copying or use of unlicensed or “pirated” software on YETI computers or other equipment to conduct YETI business is strictly prohibited. If you have any questions about whether or not a particular use of software is licensed, contact the IT Help Desk.

Protect
YETI

Against the Code

- ▶ Requests by a third-party to borrow or use a YETI laptop.
- ▶ Using personal email or computer for business purposes.
- ▶ Excessive use of YETI resources for personal purposes.

Learn [Acceptable Use Policy](#)
More

Confidential Information and Intellectual Property

YETI commits substantial resources to product development and innovation. The creation and protection of our intellectual property rights are critical to our business. Intellectual property includes items such as patents, trade secrets, trademarks, copyrights, and other proprietary information.

Each of us must be vigilant and protect YETI's confidential information and intellectual property. This means keeping it secure, limiting access only to those who have a need to know in order to do their job, and only using it for authorized purposes.

Be aware that the obligation to restrict your use of YETI's confidential information and intellectual property continues even after employment ends.

Follow the Code

- ▶ Properly label confidential information to indicate how it should be handled, distributed, and destroyed.
- ▶ Use and disclose confidential information only for legitimate business purposes.
- ▶ Protect our intellectual property and confidential information by sharing it only with authorized parties.
- ▶ Only store or communicate YETI information using YETI's systems.

Against the Code

- ▶ Discussions of YETI confidential information in places where others might be able to overhear – for example, on planes and elevators.
- ▶ Sending confidential or sensitive information to unattended printers or via unencrypted email.



Intellectual Property

YETI Intellectual Property (IP) is an important asset that must be protected. Examples include:

- Trade secrets and discoveries
- Methods, know-how, and techniques
- Innovations and designs
- Systems, software, and technology
- Patents, trademarks, and copyrights

Contact the [Legal Department](#) if you receive any statements or questions from third-parties regarding (1) the scope of YETI intellectual property rights, (2) the applicability of YETI rights to another company's products or (3) the applicability of a third-party intellectual property rights to YETI intellectual property rights or products.

Promptly disclose to the [Legal Department](#) any inventions or other IP that you create while you are employed by YETI.

Learn [Global Internal Data](#)
More [Protection and Privacy Policy](#)



Accurate Recordkeeping

The accuracy and completeness of our disclosures and business records are essential to informing senior leadership, investors, and regulators. Our books and records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our accounting practices and policies.

Some employees have additional responsibilities in this area. If you are involved in any aspect of our financial reporting, make sure you meet all applicable procedural and legal requirements. Take care to ensure reports or disclosures about our financial records are full, fair, accurate, complete, objective, and timely, and never falsify or mischaracterize any book, record, account, entry, or transaction that relates to YETI.

Records Management

Documents should only be disposed of in compliance with YETI policies and should never be hidden or wrongfully destroyed. You must never conceal wrongdoing or permit others to do so. Never destroy documents in response to – or in anticipation of – an investigation or audit.

If you have any questions or concerns about retaining or destroying corporate records, please contact the [Legal Department](#).

Remember, everyone at YETI contributes to the process of recording business results and maintaining records. Whether you are filing an expense report, preparing a financial statement, or simply completing a time sheet, always be honest, accurate, and complete.

Follow the Code

- ▶ Create business records that accurately reflect the truth of the underlying event or transaction. Be guided by the principles of transparency and truthfulness.
- ▶ Write carefully in all of your business communications. Write as though someday the records you create may become public documents.

Against the Code

- ▶ Records that are not clear and complete or that obscure the true nature of any action.
- ▶ Undisclosed or unrecorded funds, assets, or liabilities.
- ▶ Improper destruction of documents.

What If? At the end of the last quarter reporting period, my manager asked me to record additional sales, even though I had not yet received the signed agreement or a purchase order from the customer, and the product had not yet shipped. I agreed to do it, since we were all sure that the sale would be completed in the next quarter. Now I wonder if I did the right thing.

No, you didn't. Sales must be recorded in the period in which they are incurred. The sale was not complete and was not incurred by the date you recorded the transaction. It was therefore a misrepresentation and, depending on the circumstances, could amount to fraud.

Learn [Record Retention Policy](#)
More



Communicating with the Public

It's important that we provide honest, professional, and accurate information when communicating to the public, and that those communications are shared using a consistent voice. For this reason, it is important that only authorized persons speak on behalf of YETI.

Full, Fair, and Timely Disclosures

As a public company, YETI is committed to meeting its obligations of full, fair, and timely disclosure in all reports and documents that describe our business and financial results, and other public communications.

Follow the Code

- ▶ If you are contacted by a member of the press or a financial analyst through email, social media, LinkedIn, in person, or through any other channel, direct them to YETI's Public Relations team or YETI's Investor Relations team.

Against the Code

- ▶ Giving public speeches, participating on industry panels, writing articles for news outlets or journals or other public communications without appropriate management approval and first engaging the YETI Public Relations team.
- ▶ Using your title or affiliation with the brand without first being sure how it will be used or how you will be portrayed.

- ▶ Invitations to speak “off the record” to journalists or analysts who ask you for information about YETI, its customers, or its business partners. Always remember –there is no such thing as “off the record” when engaging with the media.

Learn [External Communications Policy](#)
More

Social Media

Always remember that what we post online is forever. If you participate in online discussion groups, bulletin boards, blogs, social media sites, or other electronic communications, even under an alias, do not give the impression that any opinions you share or statements you make are on behalf of YETI.

When new YETI products, experiences, or content is publicly released, you are welcome to highlight it on your social channels. Anything you post in support of YETI may be seen as a legal endorsement or advertisement for YETI, and in such instance, you must identify yourself or otherwise be identifiable, as a YETI employee to help ensure compliance with the Federal Trade Commission rules and regulations.

If you believe an inaccurate statement about the brand has been posted, do not engage with the user or share nonpublic information, even if your intent is to “set the record straight.” Your post might be misinterpreted, start false rumors, or may be inaccurate or misleading.

Learn [Social Media Guidelines](#)
More



Be Responsible

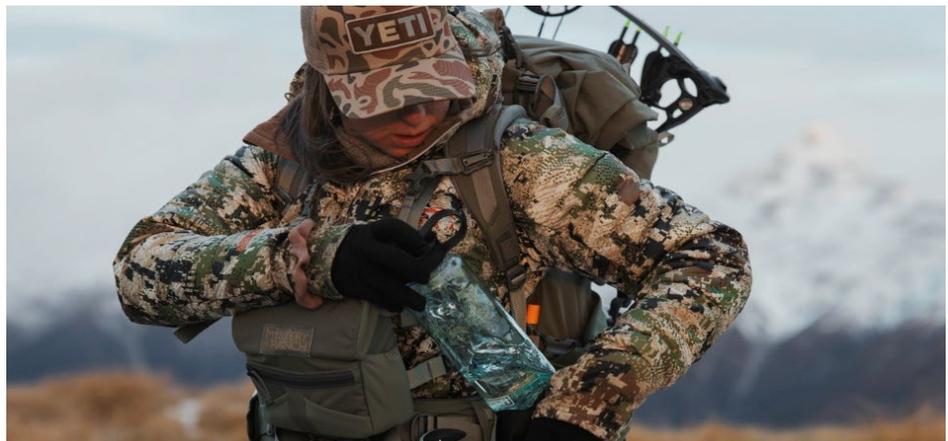
Conflicts of Interest

A conflict of interest occurs whenever you have a competing interest that may interfere with your ability to make an objective decision on behalf of YETI. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict, which can undermine the trust others place in us and damage our reputation.

Conflicts of interest are not always clear-cut. You need to fully disclose potential conflicts of interest to your manager, Talent Business Partner, or the [Ethics & Compliance Department](#) so that we can properly evaluate, monitor, and manage the situation going forward.

Follow the Code

- ▶ Avoid actual or potential conflicts of interest.
- ▶ Always make business decisions in the best interest of YETI.
- ▶ Discuss with your manager the full details of any situation that could be perceived as a potential conflict of interest.



Be Responsible

Be alert to situations, including the following, which are common examples of potential conflicts of interest:

Corporate opportunities

If you learn about a business opportunity because of your job, or through the use of YETI property, it belongs to YETI first. This means that you should not take that opportunity for yourself unless you get approval from Legal or the [Ethics & Compliance Department](#).

Friends and relatives

On occasion, it is possible that you may find yourself in a situation where you are dealing with a close friend or relative who works for a YETI customer, supplier, or competitor. Because it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your manager, Talent Business Partner, or the [Ethics & Compliance Department](#) to determine if any precautions need to be taken.

Outside employment

To ensure that there are no conflicts and that potential issues are addressed, you always need to disclose and discuss outside employment with your manager, Talent Business Partner, or the [Ethics & Compliance Department](#). If approved, you must ensure that the outside activity does not interfere with your work at YETI, or otherwise compete with YETI.

Personal investments

A conflict can occur if you have a significant ownership or other financial interest in a competitor, vendor, supplier, or customer. Make sure you know what's permitted – and what's not – by contacting your manager, Talent Business Partner, or the [Ethics & Compliance Department](#) with any questions.

Board activities

Unless YETI's Senior Leadership team specifically asks you to do so or otherwise approves, you shouldn't accept a seat on the board of directors or advisory board of any of our competitors, suppliers, customers, or partners.

Fair Dealing

We treat our customers and business partners fairly. We work to understand and meet their needs, while always remaining true to our own ethical standards. We tell the truth about our products, services, and capabilities and never make promises we can't keep.

You must also deal fairly with our competitors—you may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

Follow the Code

- ▶ Treat each customer and supplier fairly and with respect.
- ▶ Speak up and talk to your manager if you have concerns about any error, omission, undue delay, or defect in quality or our customer service or interaction with third-parties.
- ▶ Never follow a customer's or supplier's request to do something that you regard as unethical or unlawful.
- ▶ Be clear and honest with customers and suppliers. Only promise what you can deliver and deliver on what you promise.

Gifts and Entertainment

A modest gift may be a thoughtful “thank you,” or entertainment could be a meal that may also be an appropriate setting for a business discussion. If not handled carefully, however, the exchange of gifts and entertainment may create or appear to create a conflict of interest, impropriety, or other misconduct. This is especially true if it happens frequently, or if the value is large enough that someone may think it can improperly influence a business decision. Keep in mind that anything of value can be a gift, including gift cards, paying for a round of golf, favors, or event tickets for you or your family members.

We do not accept or give gifts or entertainment – even if it technically complies with our policies – if the intent is to improperly influence any business decision related to YETI. If you are unsure whether giving or receiving a gift or entertainment is appropriate, contact the [Ethics & Compliance Department](#) to discuss further.

Follow the Code

- ▶ You may give or accept a gift valued at under \$100 without prior internal approval. You must seek approval from your manager and the [Ethics & Compliance Department](#) to keep or give any gifts valued at \$100 or more.
- ▶ Never accept or give cash or cash equivalents (e.g., gift cards or certificates).
- ▶ Only accept meals or other entertainment that occur in conjunction with business meetings, conferences, or other customary business situations, provided that the value of the meal or other entertainment must be reasonable under the circumstances, infrequent, and the supplier or customer must be present.

- ▶ Do not accept gifts of any kind, directly or indirectly, from a business partner with whom you are involved in active contract negotiations or material dispute.
- ▶ Do not request or solicit personal gifts, favors, entertainment, or services.
- ▶ If you are giving a gift or providing entertainment, be sure to comply with the policies of the recipient’s organization before doing so.
- ▶ Raise a concern whenever you suspect that a third-party, or agent of the third-party may be engaged in any attempt to improperly influence a decision by YETI.
- ▶ All gifts and entertainment must comply with applicable laws.
- ▶ Gifts involving government officials are subject to different rules and must comply with YETI’s Anti-Bribery Policy. Contact the [Ethics & Compliance Department](#) for additional information.

What If?

When traveling, I received a gift from a business partner that seems excessive. What should I do?

You need to let your manager and the [Ethics & Compliance Department](#) know as soon as possible. We may need to return the gift with a letter explaining our policy. If a gift is perishable or impractical to return, another option may be to share it with your colleagues or donate it to charity, but ask the appropriate internal resource first.

Learn [Employee Handbook](#)
More [Anti-Bribery Policy](#)

Environmental Stewardship

We recognize our environmental and societal responsibilities. We are committed to sustainability and to minimizing damage to the environment.

Follow the Code

- ▶ Be proactive and look for ways that we can minimize waste, energy, and use of natural resources.
- ▶ Contact YETI's [Legal Department](#) or your Talent Business Partner if you have any questions about compliance with environmental laws or our related policies and practices.

Human Rights

We conduct our business in a manner that respects the human rights and dignity of all, and we support international efforts to promote and protect human rights, including an absolute opposition to slavery, forced labor, child labor, and human trafficking.

Each of us can help support efforts to eliminate abuses such as slavery, forced labor, child labor, and human trafficking.

Revenue from conflict minerals has been linked to funding for groups engaged in extreme violence and human rights atrocities. We work closely with suppliers and vendors of raw materials, parts, and components and communicate our expectation that they will comply with all applicable laws, including laws aimed at providing conflict-free minerals.

Follow the Code

- ▶ Report immediately any suspicion or evidence of human rights abuses related to our operations or in any operations throughout our supply chain.
- ▶ Remember that respect for human dignity begins with our daily interactions with one another and with our suppliers and customers. It includes promoting diversity, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.

Learn [Supplier Code of Business Conduct](#) More

Corporate Citizenship

YETI believes that we have a responsibility to help improve the well-being of our communities where we live and work. As such, YETI proactively organizes events and activities to support our communities and social interests. We encourage and support employees who want to volunteer their time and contribute financial support to local programs we care deeply about. If you would like more information about volunteering in your community, contact your Talent Business Partner.





Be Accountable

Be Accountable

Data Privacy

When people do business with us, they entrust us with their personal information or third-parties' personal information. Our employees do the same when they join YETI. We take our responsibility and obligations to our customers, consumers, and employees seriously. As such, we collect, use, and process any personal information only for legitimate business purposes and protect it from possible loss, misuse, or disclosure.

Keeping personal information secure is critical to our business and our reputation. We recognize this responsibility and follow the laws and regulations requiring us to protect personal information that can identify an individual or that relates to an identifiable individual, also known as personal information (PI). Please know that certain PI can be sensitive and requires an extra level of protection and a higher duty of care based on applicable law. PI can include name, email address, phonenumber, credit card number, medical information, or government identification number.

Follow the Code

- ▶ Only accept and keep relevant data, not all data.
- ▶ Adhere to all applicable record retention requirements.
- ▶ Only grant access to data and systems that is necessary to perform job responsibilities.
- ▶ Consider privacy in the design and implementation of IT systems, and generally regarding our business practices.
- ▶ Encrypt sensitive personal information when in transit and at rest.

Against the Code

- ▶ Sending sensitive PI to unattended printers or via unencrypted email.
- ▶ Failing to shred or securely dispose of sensitive information.
- ▶ Using “free” or individually purchased internet hosting, collaboration, or cloud services without IT approval.

What If? You want to use a third-party software tool to perform analysis on customer buying habits. The tool requires personal information of customers to be uploaded to a third-party website to run the analysis and produce a report. What should you do?

Do not use a third-party software tool without first reviewing the applicable YETI policies and consulting with IT, Legal, or the Ethics & Compliance Department, as sharing personally identifiable information without customer consent is a data privacy violation that may result in legal action against YETI.

Learn [Global Internal Data](#)
More [Protection and Privacy Policy](#)

Insider Trading

It is illegal for you to buy or sell stock or other securities of YETI or any company with which YETI does business while you are in possession of material nonpublic information. It is also illegal for you to disclose such information to anyone, including members of your immediate family or household, who might buy or sell securities in response to such information or to suggest to anyone that they buy or sell securities of the relevant company (known as “tipping”).

Material Information

Material information is the kind of information a reasonable investor would take into consideration when deciding whether to buy or sell a security. Some examples of information about a company that may be material are:

- Actual or estimated financial results.
- A proposed acquisition or sale of a business.
- A significant expansion or cutback of operations.
- A significant product development or important information about a product.
- Extraordinary management or business developments.
- Changes in strategic direction such as entering new markets.



Follow the Code

- ▶ Do not buy or sell securities of any company, including YETI, when you have material nonpublic information about that company.
- ▶ Protect material nonpublic information from the general public including information in both electronic form and in paper copy.
- ▶ Discuss any questions or concerns about insider trading with YETI's Chief Legal Officer.

Against the Code

- ▶ Requests from friends or family for information about YETI or companies that we do business with or have confidential information about. Even casual conversations could be viewed as illegal "tipping" of inside information.
- ▶ Sharing material nonpublic information with anyone, either on purpose or by accident, unless it is essential for YETI-related business. Giving this information to anyone else who might make an investment decision based on your inside information is considered "tipping" and is against the law regardless of whether you benefit from the outcome of their trading.

Learn [Insider Trading Policy](#)
More

What If? I have learned that YETI is considering the acquisition of a small, publicly traded company. My friend just lost his job and really needs money to support his family. Since it will not benefit me personally, can I tell him about this so he can acquire stock of this company in anticipation of the acquisition?

No. Trading on material nonpublic information is illegal and a violation of the Code, whether trading in the stock of YETI or the stock of another company. And the rules do not just prohibit you from buying or selling stock, but also from tipping others to do so. Do not share this information with your friend or anyone else. If you have additional questions, you should contact YETI's Chief Legal Officer.



Anti-Corruption and Anti-Bribery

We believe that all forms of bribery and other corrupt practices are wrong, regardless of local customs. YETI is deeply committed to complying with all applicable anti-corruption and anti-bribery laws everywhere we do business. Laws in some countries distinguish between bribing a government official and bribing someone who is not a government official. For YETI, there is no difference. Payment of a bribe to anyone at any time is prohibited.

We never offer or accept anything of value in order to get business, keep business or gain an unfair advantage. This applies equally to employees and any person or agent who represents YETI.

Key Definitions – Bribery, Corruption, and Facilitation Payments

Bribery means giving or receiving anything of value (or offering to do so) in order to obtain a business, financial, or commercial advantage.

Corruption is the abuse of an entrusted power for private gain.

Facilitation payments are typically small payments to a low-level government official that are intended to encourage the official to perform their responsibilities. Facilitation payments are prohibited by YETI.

It is especially important that we exercise due diligence and carefully monitor third-parties acting on our behalf. We must carefully screen all third-parties, including suppliers, consultants, and vendors who work on our behalf, particularly when dealing in countries with high corruption rates and in any situations where “red flags” would indicate enhanced due diligence is needed before retaining the third-party.

Third-parties must understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

Follow the Code

- ▶ Do not make or offer bribes or facilitation payments regardless of custom in that country.
- ▶ Understand the standards set forth under anti-bribery and anti-corruption laws which apply to your role at YETI.
- ▶ Accurately and completely record all payments to third-parties.

Against the Code

- ▶ Apparent or actual violations of anti-bribery laws by our business partners.
- ▶ Unexplained amounts or fees on invoices.
- ▶ Agents or suppliers who do not wish to have all terms of their engagement with YETI clearly documented in writing.



What If?

I work with a foreign supplier in connection with our operations in another country. I suspect that some of the money we pay him goes toward making payments or bribes to government officials. What should I do?

This matter should be promptly reported to the Chief Legal Officer or the [Ethics & Compliance Department](#) for investigation. If there is bribery and we fail to act, both you and YETI could be liable. While investigating these kinds of matters can be culturally difficult in some countries, any agent doing business with us should understand the necessity of these measures. It is important and appropriate to remind our agents of this policy.

Learn [Anti-Bribery Policy](#)
More [Conflicts of Interest](#)
[Supplier Code of Business Conduct](#)



Antitrust and Fair Competition

We believe in free and open competition, and we never engage in improper practices that may limit competition. We never look to gain competitive advantages through unethical or illegal business practices.

Antitrust laws are complex, and compliance requirements can vary depending on the circumstances, but in general, the following activities are red flags and should be avoided and, if detected, reported to the [Legal Department](#):

- Sharing YETI's competitively sensitive information with a competitor.
- Sharing competitively sensitive information of business partners or other third-parties with their competitors.
- Attempting to obtain nonpublic information about competitors from new hires or candidates for employment.

Follow the Code

- ▶ Do not enter into agreements with competitors or others to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.
- ▶ Do not engage in conversations with competitors about competitively sensitive information.

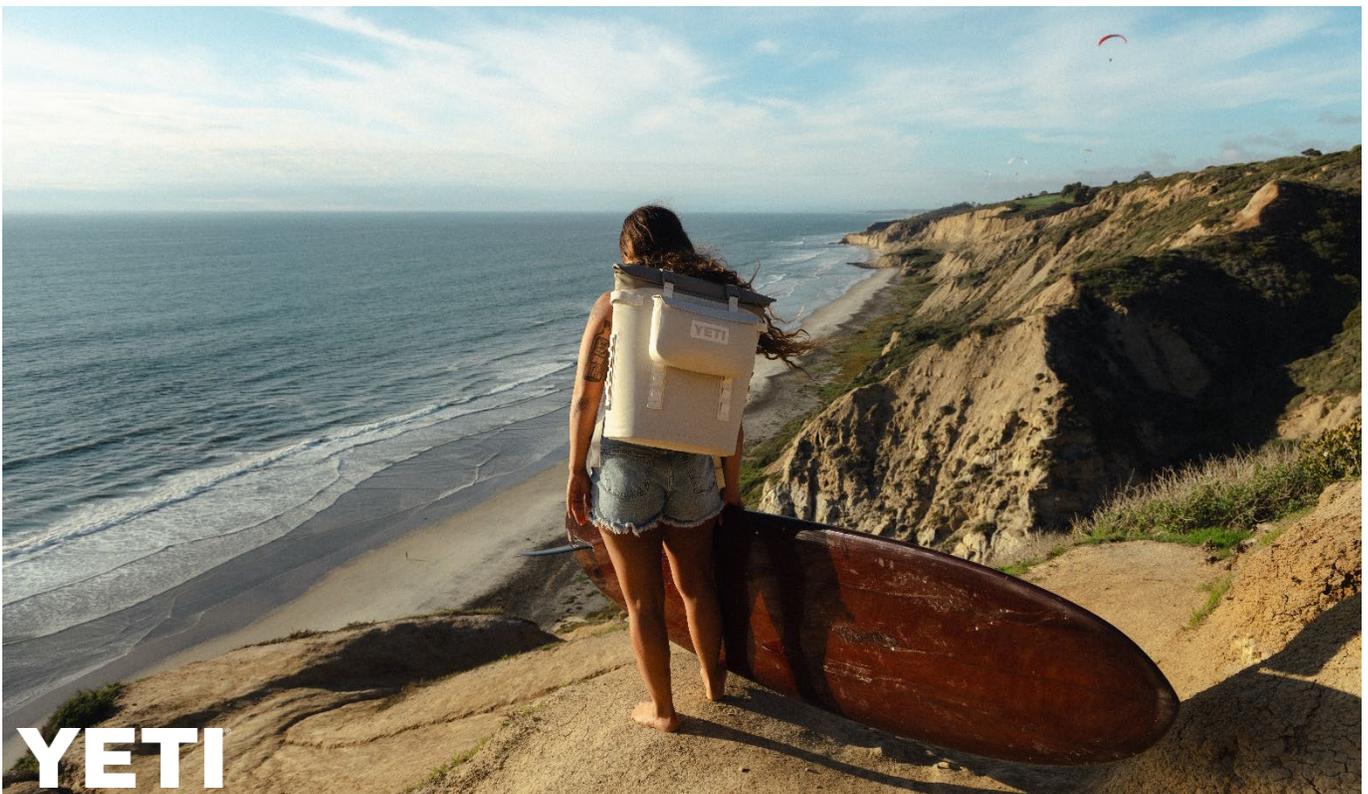
Against the Code

- ▶ Collusion – when companies secretly communicate or agree on how they will compete. This could include agreements or exchanges of information on pricing, terms, wages, or allocations of markets.
- ▶ Bid-rigging – when competitors or service providers manipulate bidding so that fair competition is limited. This may include comparing bids, agreeing to refrain from bidding, or knowingly submitting noncompetitive bids.
- ▶ Tying – when a company with market power forces customers to agree to services or products that they do not want or need.
- ▶ Predatory pricing – when a company with market power sells a service below cost to eliminate or harm a competitor, with the intent to recover the loss of revenue later by raising prices after the competitor has been eliminated or harmed.

What If? I received sensitive pricing information from one of our competitors. What should I do?

You should contact the Chief Legal Officer or the [Ethics & Compliance Department](#) without delay and before any further action is taken. It is important, from the moment we receive such information, that we demonstrate respect for antitrust laws, and we make it clear that we expect others to do the same. This requires appropriate action that can only be decided on a case-to-case basis and may include sending a letter to the competitor.

Learn [Global Competition Policy](#)
More



Anti-Money Laundering

Money laundering is a global issue with far-reaching and serious consequences. It is defined as the process of converting illegal proceeds, including funds generated through drug trafficking or terrorist financing, so that funds are made to appear legitimate. Moreover, money laundering is not limited to only cash transactions.

Involvement in such transactions undermines our integrity, damages our reputation, and can expose YETI and the individuals involved to severe consequences. As such, report any suspicious financial transactions and activities to YETI's Chief Legal Officer or the [Ethics & Compliance Department](#) and, if appropriate, YETI may report such activity to the applicable government agencies.

What If?

A supplier completes its work for YETI in Mexico, but asks for payment to be made to a different company in Venezuela. Can I approve that request?

No, the payment for goods or services should directly relate to the entity performing the work and in the jurisdiction in which the work is performed. Any deviations should receive prior approval from the Controller and the [Ethics & Compliance Department](#).



Product Safety

Our products connect us to our customers, and they trust that our products will be safe. YETI understands that producing anything less could be harmful both to our customers and our reputation, so we will never compromise when it comes to product safety.

We can ensure product safety only when each employee and every vendor and supplier we work with understands and shares YETI's commitment to, and knows their role in helping YETI comply with applicable product safety regulations and testing standards.

Follow the Code

- ▶ Be aware of and follow our product standards and the regulations that apply to the development, production, testing, and distribution of our products – with no exceptions.
- ▶ Full transparency into the components and materials used in producing our products.
- ▶ Properly label and provide warnings to consumers as needed in accordance with applicable laws and regulations.

Against the Code

- ▶ Products that don't meet our high standards – if you're aware of products like these, don't let them leave our control. Let us know about your concerns first so YETI can investigate.
- ▶ Shortcuts or unapproved changes to our engineering, manufacturing, or testing processes.
- ▶ Incomplete or inaccurate documentation related to chemicals, materials, or components used in a product.

What If?

I think there may be an issue with one of the chemicals being used in manufacturing processes at a supplier facility, but we are behind schedule and if I say anything, we will be delayed further as YETI investigates. What should I do?

YETI never sacrifices product safety or quality to meet a deadline or target. You should report the matter immediately to your manager, the Chief Legal Officer, or the [Ethics & Compliance Department](#).

Learn [Product Safety Policy](#)
More

Global Trade

YETI has global operations that support a growing, worldwide customer base. To maintain and grow our brand globally, all employees, officers, and directors must comply with all applicable laws that govern the import, export, and re-export of our products, and with the laws of the countries where our products are manufactured or sold. Moreover, YETI does not conduct unauthorized business with countries or third-parties that are subject to trade embargoes or economic sanctions. Furthermore, as a company based in the state of Texas, we cannot participate in boycotts that the United States does not support. Any violation of these laws, even through lack of awareness, could have a damaging and long-lasting negative impact on you individually and our business.

If your responsibilities include exporting products, or receiving imported products, you are responsible for ensuring that we comply with all applicable export and import requirements, including product classification, valuation, origin determination, and proper labeling.

Follow the Code

- ▶ Report complete, accurate, and detailed information regarding imported product, including its place(s) of manufacture and its full cost.
- ▶ Know the end-user and end-destination of a transaction.
- ▶ Be aware of applicable programs and their requirements to reduce duties.
- ▶ YETI will conduct diligence and screen potential customers, suppliers, and transactions involving our business.
- ▶ Direct any questions you have regarding imports or exports of our products, parts, or technology to YETI's Global Trade Compliance Department.



Against the Code

- ▶ Transferring technical data and technology to someone in another country, such as through email, conversations, meetings, or database access. This restriction applies to sharing information with co-workers, as well as non-employees.
- ▶ Transporting YETI assets that contain certain technology (such as a computer an associate takes on a business trip) to another country may require an export license.
- ▶ Shipping products to a customer that you know will divert our products to a sanctioned country or individual.

Learn [Import/Export Policy](#)
More [Sanctions Policy](#)

What If? To avoid paying customs duties in Canada, an international customer has asked that I sign a certificate of origin identifying that the YETI products originated in Mexico. I know the product was shipped from a warehouse in Mexico, but I am not aware of the manufacturing process and even think it may have been made in China. Can I sign the certificate of origin?

No, origin declarations and certificates of origin are governed by complex regulations, and require a detailed analysis of the manufacturing process under an established set of rules. An incorrect statement may result in false declarations to the customs authorities and subject YETI to significant fines and penalties, even when we are not the importer or exporter. The Global Trade Compliance Department should approve all origin determinations and related documentation.



Resources

Hotline information	1-800-916-7037 Company Code: 9384 For international locations: Campsite
Legal Department	legal@yeti.com
Ethics & Compliance Department	compliance@yeti.com
Privacy team	privacy@yeti.com
Media inquiries	media@yeti.com
Talent team	Contact your local Talent Business Partner
Delegation of Authority	Delegation of Authority
Employee Handbook	Employee Handbook

