

Cotopaxi Human Rights Policy and Commitments

Our Commitment

As a Benefit Corporation, Cotopaxi is committed to conducting business in a manner that respects the **inherent dignity, equality, and human rights of all people** connected to our operations, products, and value chain. This includes, in particular, workers within our global supply chain who may face heightened risk of exploitation.

We recognize that respecting human rights is essential to fulfilling our mission to **alleviate poverty and inspire people to do good**, and that business activity—especially in the apparel industry—can pose real and systemic human rights risks if not carefully managed.

Alignment with International Standards

Cotopaxi's human rights commitments are guided by and aligned with:

- The **United Nations Guiding Principles on Business and Human Rights (UNGPs)**
- The **International Bill of Human Rights**
- The **International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work**
- Relevant ILO conventions, including those related to forced labor, child labor, freedom of association, and migrant workers

The UNGPs provide the foundation for our approach to:

1. **Respecting human rights**
 2. **Conducting ongoing human rights due diligence**
 3. **Enabling access to remedy when harm occurs**
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Our Responsibility to Respect Human Rights

Cotopaxi acknowledges its responsibility to **respect human rights**, meaning that we must:

- Avoid causing or contributing to adverse human rights impacts through our own activities
- Seek to prevent or mitigate adverse human rights impacts that are **directly linked** to our operations, products, or business relationships, even when we have not contributed to those impacts
- Address and remediate adverse impacts when we cause or contribute to them

We recognize that human rights risks are **systemic and pervasive** in the apparel industry. Accordingly, Cotopaxi operates with the assumption that risks—and in some cases violations—may exist within supply chains, and we commit to addressing these risks proactively, transparently, and in partnership with suppliers and stakeholders.

Salient Human Rights Risks

Based on industry risk, geographic context, and worker vulnerability, Cotopaxi has identified the following **salient human rights risks** and prioritizes their prevention, mitigation, and remediation:

- Excessive overtime and working hours
 - Freedom of association and the right to collective bargaining
 - Forced labor, modern slavery, and human trafficking
 - Child labor
 - Wages, benefits, and economic inequality
 - Harassment, abuse, and discrimination
 - **Migrant worker exploitation and predatory recruitment practices**
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Commitment to Protect Migrant Workers and Prevent Predatory Recruitment

Cotopaxi recognizes that **migrant workers are often at heightened risk of exploitation**, including debt bondage, contract substitution, document retention, and coercion. We are committed to working to protect the rights of migrant workers throughout our supply chain.

Our commitments include:

- **No worker should pay for a job.** Recruitment fees and related costs must not be charged to workers, directly or indirectly.
- Prohibiting **predatory recruitment practices**, including:
 - Charging recruitment, placement, or training fees
 - Retention of passports or identity documents

- Contract substitution or deception regarding wages, working conditions, or job terms
 - Ensuring employment terms are:
 - Provided in a language workers understand
 - Clearly communicated prior to employment
 - Honored throughout the duration of employment
 - Working with suppliers to adopt **ethical recruitment standards** aligned with ILO and UN guidance
 - Requiring remediation—including **repayment of recruitment fees**—when abuses are identified
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Human Rights Due Diligence

To uphold our responsibility to respect human rights, Cotopaxi conducts **ongoing human rights due diligence**, consistent with the UNGPs, to:

- Identify and assess actual and potential adverse human rights impacts to the extent possible
- Integrate findings into internal decision-making and supplier engagement
- Take appropriate action to prevent, mitigate, or remediate harm whenever possible
- Track the effectiveness of our actions
- Communicate transparently about our progress and challenges

We will prioritize impacts that are **most severe or irremediable**.

Remediation and Access to Remedy

If Cotopaxi causes or contributes to adverse human rights impacts, we commit to **remediating harm** in collaboration with affected stakeholders. Where impacts are directly linked to our business relationships, we will use our leverage to influence remediation.

Our approach to remedy emphasizes:

- Worker-centered solutions
- Non-retaliation
- Confidentiality and safety
- Continuous improvement rather than disengagement where remediation is possible

We support access to **effective grievance mechanisms**, including anonymous reporting channels and supplier-level grievance systems, and encourage workers to raise concerns without fear of reprisal.

Governance, Training, and Accountability

- Relevant employees will receive training to understand Cotopaxi's human rights commitments and expectations.
 - Leadership champions this policy at the highest levels of the organization.
 - Human rights responsibilities are integrated into relevant roles, including sourcing, procurement, and product development.
 - Cotopaxi's CEO has signed the **UN Global Compact**, reinforcing our commitment to these principles.
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Monitoring, Verification, and Engagement

To identify, prevent, mitigate, and account for human rights impacts, Cotopaxi uses a combination of:

- Supplier audits and assessments (including Higg Index tools)
- External verification and certification programs (e.g., B Corp)
- Supplier surveys, trust-building mechanisms, and ongoing dialogue
- Capacity-building initiatives and corrective action plans
- On-site visits and direct worker engagement where feasible

We engage internal and external expertise, including NGOs, labor organizations, worker representatives, and subject-matter experts, and strive to consult directly with at-risk workers whenever possible.

Transparency and Reporting

Cotopaxi is committed to transparency in our human rights efforts. We publicly report on our progress, challenges, and outcomes through:

- Qualitative and quantitative disclosures
- Impact reporting aligned with recognized frameworks (including GRI, where feasible)
- Public communication of our commitments, standards, and improvements

Continuous Improvement

Respecting human rights is an ongoing process. Cotopaxi commits to continuous learning, adaptation, and improvement as standards evolve, risks change, and worker voices inform better outcomes.

If you have any questions, please contact either Annie Agle (VP of Sustainability) annie@cotopaxi.com or Margot Brendlinger (VP of Sourcing) margot.brendlinger@cotopaxi.com