

California Transparency in Supply Chains Act

Urban Outfitters, Inc. and its affiliated companies, including without limitation Urban Outfitters West LLC, UO.com LLC, Urban Outfitters Wholesale, Inc. and UO Merchandise, Inc. (“Urban Outfitters” or the “Company”) are committed to conducting business in a lawful, ethical and responsible manner. Moreover, the Company expects its manufacturing and market vendors (“Suppliers”) to share this same commitment. Accordingly, the Company has implemented certain controls and programs to verify that its Suppliers are meeting the Company’s expectations.

The Company’s *Statement of Corporate Policy and Code of Conduct* (the “Code of Conduct”), as well as other corporate policies and procedures, set forth the Company’s guiding principles that Suppliers must conduct business in a lawful, ethical and responsible manner. As a condition of doing business with Urban Outfitters, each Supplier must agree to conduct its business in conformance with the Code of Conduct.

Certification

Under the Code of Conduct, Urban Outfitters’s Suppliers certify that they will conduct business in compliance with the law, including, among other things, without child labor, without forced or compulsory labor, without corporal punishment, without discrimination and in compliance with wage and hour requirements, health and safety and environmental laws.

Verification

The Company maintains long-standing business relationships with a limited number of Suppliers which have been vetted through an internal screening process. One element of the screening process includes an internal assessment of the risk that the Supplier will not comply with the Code of Conduct, including the prohibition against human trafficking and slavery. The Company’s production, sourcing and compliance personnel visit manufacturing facilities to evaluate and address the risks of a Supplier’s noncompliance with the Code of Conduct.

Audits

The Company uses a qualified, accredited, third-party, social compliance auditing firm to conduct risk assessments and to audit manufacturing vendors which meet certain risk-related criteria. Audits and inspections of these vendors may be announced or unannounced and these vendors are required to cooperate in any remedial efforts to ensure future conformance.

Internal Accountability Standards

When non-conformance with the Code of Conduct is identified, Urban Outfitters works with the Supplier to identify the cause of the non-compliance and to develop an action plan to assure future compliance. The Company believes that this strategy is in the best interest of the Supplier, its employees and the Company’s customers. Remedial efforts may also include additional audits or inspections. In the event

of continued non-conformance or serious violations of the Code of Conduct, the Company reserves the right to terminate the business relationship with the Supplier.

Training

Urban Outfitters's production and sourcing personnel receive on-the-job training, are members of professional affiliations, and attend external training seminars to help further develop their ability to identify and evaluate risks in the supply chain.