



**GILDAN ACTIVEWEAR INC.
GLOBAL ANTI-HARASSMENT, ANTI-DISCRIMINATION, & ANTI-VIOLENCE POLICY**

I. INTRODUCTION

Gildan Activewear Inc. and its subsidiaries and affiliates (collectively, “**Gildan**” or the “**Company**”) are strongly committed to maintaining a work environment that is free from harassment, discrimination, and violence in any form. This commitment is reflected in Gildan’s core values and embodied in our Code of Ethics. Treating our co-workers with the same compassion and professionalism we would expect to receive ourselves is essential for a healthy work environment. As individuals, we also share a basic right to work without being subjected to harassment, discrimination, or violence. All such behaviour is strictly forbidden at Gildan and will not be tolerated.

II. PURPOSE & SCOPE

The purpose of this Global Anti-Harassment, Anti-Discrimination, and Anti-Violence Policy (this “**Policy**”) is to promote a workplace where all Gildan employees are able to enjoy an environment and employment opportunities that are free from any form of conduct prohibited by this Policy, either intentional or unintentional, as these conducts are described and defined by Applicable Law. For purposes of this Policy, Applicable Law means any law or regulation applicable to an employee at the time, under the circumstances, and in the jurisdiction where the employee is working.

This Policy applies to the traditional physical workplace, i.e. Gildan’s work premises, as well as other locations where the employees are performing their work duties or that are related to work (e.g. work-related social events, corporate activities, meetings, conferences, remote work locations, and business trips).

III. POLICY

Gildan does not tolerate any form of conduct prohibited by this Policy of or by any employee (including a supervisor or member of management) and will make reasonable efforts to prevent such conduct. Similarly, the Company does not tolerate any such conduct of or by any third parties with whom employees interact in the context of their employment, such as clients, customers, service providers, professionals, vendors, suppliers, independent contractors, or temporary employees (each, a “**Non-Employee**”). Any employee of the Company who violates this Policy may face disciplinary action up to and including termination of his or her employment

without notice and/or legal action by the Company. The Company may also take any action it deems appropriate under the circumstances to stop conduct by a Non-Employee that violates this policy, up to and including termination of Gildan's business relationship with that Non-Employee and/or legal action by the Company.

IV. WHAT CONDUCT IS PROHIBITED BY THIS POLICY?

This Policy prohibits: a) workplace harassment in any form (as described below), b) discrimination and c) violence. This section aims at providing guidelines and examples of behaviour and conduct that is prohibited, for illustrative purposes only, and is subject to the Applicable Law.

a) Harassment

Harassment can be psychological or physical, and can take many forms. It includes, but is not limited to, sexual harassment and harassment based on other categories protected by Applicable Law. It is generally defined as physical, verbal, written, or online conduct, comments, actions, or gestures targeted at an individual because of one or more characteristics protected by Applicable Law and that have the following additional characteristics:¹

- **Repeated or serious.** Conduct that is abusive, humiliating, or offensive for the person experiencing it, either as a single serious incident or on a reoccurring basis. This type of conduct can be considered harassment even if the person doing it does not intend it to be abusive, humiliating, or offensive.
- **Hostile, offensive, unwelcome, or unwanted by the employee.** Conduct is considered hostile if it is aggressive, threatening, intimidating, or harmful. Conduct can be unwanted even if the employee does not protest at the time.
- **Affects the dignity or physical or psychological integrity of the employee.** Conduct that makes an employee feel belittled, devalued, or denigrated. Harassment can sometimes lead to permanent psychological or physical injuries.
- **Creates a harmful or hostile work environment.** Behaviour that deteriorates an employee's work environment can occur not only at the workplace but outside the workplace as well, such as during holiday parties, work functions, meetings with customers or vendors, business travel, or conferences.
- **Aggravating comment or conduct.** Comment(s) or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome.

It is not possible to list every type of behaviour that can be considered conduct in violation of this Policy and/or Applicable Law. However, harassment includes, but is not limited to, conduct such as:

- Threatening, intimidating, or hostile acts

¹ Subject to Applicable Law.

- Insulting or degrading remarks, epithets, slurs, jokes, name-calling, or negative stereotyping
- Bullying or systematic exclusion of a coworker
- Online abuse through email, social media platforms (ex: Twitter, Facebook, Instagram, TikTok, etc.), messaging apps (Facebook Messenger, WhatsApp, etc.), or blogging platforms
- Displays of materials, objects, devices, photographs, or pictures, including electronic materials, such as those transmitted by email, cell phone or downloaded from a website that are degrading or offensive
- Targeted vandalism or pranks
- Retaliating against an employee for complaining about harassment

Sexual harassment is a form of harassment and is also prohibited under this Policy. The definition of workplace sexual harassment varies between jurisdictions but includes engaging in a course of aggravating or unwelcome comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. Sexual harassment also includes making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the employee and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is a term or condition of an individual's employment. The requirement may be stated outright or may be implicit, or implied.
- Submission to or rejection of the conduct is a basis for employment decisions.
- Conduct of a sexual nature has the purpose or effect of interfering with work performance.
- Conduct of a sexual nature creates an intimidating, hostile, or offensive working environment.

Sexual harassment may take the form of quid pro quo sexual harassment when:

- submission to such sexual conduct is explicitly or implicitly a term or condition of employment, or
- submission or rejection of the sexual conduct is the basis for employment decisions.

Sexual harassment may take the form of a hostile work environment when:

- the conduct has the purpose or effect of interfering with an employee's work performance or
- the conduct creates an intimidating, hostile, or offensive working environment.

The type of behaviour that is considered sexual harassment (whether opposite-sex or same-sex) in violation of this Policy can include behaviour such as and not limited to:

- Sexually offensive jokes or comments
- Unwelcome sexual advances
- Physical assaults or other touching that is sexual in nature
- Promising favorable treatment or threatening unfavorable treatment based on the employee's response to sexual demands
- Displays of sexually explicit materials, objects, devices, photographs, or pictures including electronic materials, such as those transmitted by email, cell phone or downloaded from a website
- Insulting or degrading remarks or conduct based on gender, gender orientation or gender expression
- Retaliating against an employee for complaining about sexual harassment

Discriminatory harassment is a form of harassment and is also prohibited under this Policy. It occurs when harassment behaviour relates to any of the protected grounds under Applicable Law (see Discrimination section below). It can include behaviour such as and not limited to:

- Disparaging remarks, offensive jokes, innuendoes, or comments that are related to any of the protected grounds
- Displaying or disseminating pictures, depictions or literature related to any of the protected grounds
- Unjustifiably excluding an individual based on a protected ground (e.g. refusing to speak to them, excluding them from discussions, meetings or social events)

Whether conduct constitutes harassment of any kind is measured objectively, meaning that a reasonable person in the same situation would also find the behaviour to be abusive, humiliating, or offensive.

b) Discrimination

Workplace discrimination refers to any behaviour by which an employee would be treated unequally or unfairly based on any of the grounds protected by Applicable Law, which may

include, for example, an individual's age (except as permitted by law), color, disability (physical or intellectual, including medical condition), gender, gender identity/expression, marital/family/civil status, national/ethnic origin, citizenship or place of origin, political convictions, religion, creed, sex, or sexual orientation.

c) Violence

Workplace violence can also take many forms. It is defined differently in different jurisdictions, but includes the exercise, or the attempt to exercise, physical force, or an attempt thereto, that causes or could cause physical injury to the employee against whom the physical force was exercised or a statement or behaviour that can reasonably be interpreted as a threat to exercise physical force against an employee. It can include, but is not limited to, behaviour such as: hitting, punching, kicking, squeezing, pinching, scratching, twisting, grabbing, bumping, knocking into, biting, pushing, throwing objects, kicking objects, or shaking fist. It also includes but is not limited to, the more serious forms of violence such as: attacking, beating, stabbing, shooting or assaulting an employee.

d) What does not constitute Harassment

The following are examples of behaviours that generally do not constitute any Policy violations when they are not based on characteristics protected by Applicable Law:

- Personality conflicts or disagreements
- Work-related stress, challenging work conditions
- The normal exercise of Gildan's management rights, such as: enforcing rules and procedures, monitoring attendance and absenteeism, performance management and reviews, and the imposition of disciplinary or administrative measures

V. REPORTING A POLICY VIOLATION

Each employee has the right to work without being subjected to any Policy violations. If you feel that you have or are being subjected to a Policy violation you are encouraged to communicate clearly to the person you feel is the source of the behaviour that it is unwanted and unacceptable. If you believe this step to be unsafe or you find this step to be uncomfortable or if the behaviour continues after you take this first step, you should report the behaviour immediately as described below. Please note that this first step is in no way a prerequisite to file a formal complaint under this Policy.

Every employee has a responsibility to immediately report Policy violations so that Gildan can address and take reasonable steps to resolve the situation. If you suspect that a Policy violation has taken place at Gildan, you should report the situation right away.

To report Policy violations, or to discuss a situation that you believe may qualify as such, contact your local Human Resources team and/or your immediate supervisor. If you are uncomfortable reporting or discussing the situation with your local HR team or your supervisor, please call our toll-free 24 hour Gildan Ethics and Compliance Hotline or file a report online at the following link:

<https://secure.ethicspoint.eu/domain/media/en/gui/100213/index.html>

Managers have the obligation to immediately report to Human Resources any complaints received from their employees concerning harassment or statements suggesting that harassment may be occurring.

All good faith concerns regarding Policy violations should be reported. False or frivolous allegations or accusations will not be tolerated and may lead to disciplinary action up to and including termination.

VI. PROCEDURE FOR ADDRESSING COMPLAINTS

Gildan's HR team, and/or external resources if required, will thoroughly address reported complaints or incidents of a potential Policy violation in a fair and timely manner for all parties involved. Following a preliminary admissibility analysis, if the complaint falls within the scope of this Policy, Gildan will appoint an internal or external investigator. If the circumstances command it, Gildan may immediately apply temporary measures in view of limiting contact between the individuals involved in the situation at hand, pending the end of the resolution process. Aside from investigation, resolution processes may include informal resolution or mediation, as Gildan deems appropriate under the circumstances.

All concerns relating to Policy violations (including an employee's identity, or the circumstances regarding any concern or complaint) will be dealt with as confidentially as possible. Gildan will permit disclosure to the extent required to conduct any necessary investigation, to engage in any resolution process, to impose corrective measures, if any, or as required by law.

VII. CORRECTIVE MEASURES

Gildan may impose any corrective measures it deems appropriate under the circumstances in the context of this Policy in its sole discretion. Corrective Measures may include, but are not limited to, education and training for the various parties involved, adjustments to the work environment, various forms of apology, undertakings, warnings, suspensions, job transfers of either party or, when the circumstances warrant it, immediate termination of employment for serious reason/just cause and/or legal action by the Company.

The Company will also consider all available recourses against a Non-Employee who violates this Policy, up to and including ending Gildan's business relationship with the Non-Employee and/or legal action by the Company.

VIII. NON-RETALIATION

Gildan will not permit retaliation against employees who raise concerns or make a complaint relating to a Policy violation in good faith. Retaliation against anyone who invokes this Policy or for participates in a related investigation, resolution process, or corrective measures is strictly prohibited. Employees who engage in such retaliation will be subject to discipline, up to and including termination of employment for serious reason/just cause. Gildan will also take appropriate action against any Non-Employees who engage in such retaliation, up to and including ending the Company's business relationship with the Non-Employee.

IX. QUESTIONS

For any questions related to this Policy or its application, employees are invited to contact a member of their local Human Resources team.

X. REVIEW

This Policy will be reviewed as often as necessary, and at least annually, where required under Applicable Law.

XI. INTERPRETATION

This Policy is intended to provide a general overview of rights and obligations for Gildan employees globally. However, depending on their location of employment, additional or different rules, definitions, rights and obligations may apply to them, as well as to Gildan. Each business unit may enact local policies complementing this global Policy, in accordance with local legislation, in compliance with the guiding principles of this document. In case of contradiction between this global Policy and any Applicable Law, it is understood that the latter shall prevail and this Policy is not intended to deprive employees of any rights they shall be entitled to under such legislation.

This Global Anti-Harassment, Anti-Discrimination and Anti-Violence Policy was reviewed and approved by the Gildan Ethic and Fraud Compliance Committee on October 18, 2021.

SCHEDULE A

ADDITIONAL PROVISIONS APPLICABLE TO WORKPLACE VIOLENCE PREVENTION IN ONTARIO

WORKPLACE VIOLENCE RISK ASSESSMENT

The additional provisions set forth herein are applicable to employees and workplace settings within the Province of Ontario, Canada.

The Company will undertake an assessment of the risk of workplace violence that may arise from the nature of the workplace, the type of work or the conditions of work (the “**Risk Assessment**”). The Risk Assessment will consider the circumstances that would be common to similar workplaces, and circumstances specific to the workplace, along with any other elements that may be prescribed by law. It will also consider the existence of potential risks due to interactions with the public, employees and customers/clients, and the Company’s safety plans.

The Risk Assessment process will be repeated as often as the Company considers necessary to ensure that the policy and program continue to protect employees from workplace violence. The Company will implement additional measures and procedures as needed to control any risks identified in the Risk Assessment.

DOMESTIC VIOLENCE

Domestic violence that is likely to expose a Worker to physical injury in the Workplace is also covered by this Policy. Any Worker experiencing domestic violence that is likely to create a risk of danger to themselves or others in the workplace has a duty to report the risk of such violence to their immediate supervisor or Human Resources, so that the Company can take reasonable preventative steps to ensure that the workplace remains safe. All workers have a responsibility to notify their supervisor or Human Resources if there is another Worker or other person attending on Company premises who they suspect may be a victim of domestic violence that is likely to extend to the workplace or who they suspect is involved in a domestic situation that is likely to lead to workplace violence.

SUMMONING IMMEDIATE ASSISTANCE

Where it is necessary to summon immediate assistance regarding workplace violence, a worker should immediately move to a safe location and then contact his or her immediate supervisor or Human Resources. Where it is not practical or safe to report an actual or likely occurrence of workplace violence to an immediate supervisor or Human Resources, a worker should contact the local police and ensure his or her immediate safety, following which the worker must contact their immediate supervisor or Human Resources to provide a report of the incident.