



**GILDAN®**

**WHISTLEBLOWING POLICY FOR EMPLOYEES AND EXTERNAL  
STAKEHOLDERS**

Adopted by the Board of Directors on August 12, 2009  
Last updated in May 2023

*This Policy replaces the "Reporting Employee Concerns of Questionable Acts" Policy Statement and the "Policy for the Receipt, Retention and Treatment of Complaints Received by Gildan Activewear Inc. from Non-Employees Regarding Accounting, Internal Accounting Controls or Auditing Matters" adopted by the Board of Directors on February 3, 2004.*



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*Throughout this Policy, the words “Gildan” or “Company” refer to Gildan Activewear Inc., its subsidiaries and affiliated companies.*

## **I. INTRODUCTION**

In keeping with Gildan’s commitment to maintain high ethical standards in all of its operations worldwide and its aim to foster continuous and meaningful dialogue with its employees and its stakeholder groups, Gildan has established this Whistleblowing Policy for Employees and External Stakeholders for the receipt, retention and treatment of complaints and concerns received by the Company from its employees or from external stakeholders regarding improper practices or questionable acts by Gildan, its employees, officers, directors, consultants, contractors, agents or suppliers (the “Policy”).

## **II. PURPOSE AND SCOPE**

The purpose of this Policy is to provide Gildan’s employees and external stakeholders with communication channels that will allow them to raise concerns in confidence, and anonymously if desired, without fear of reprisals or retaliation of any kind. Employees or external stakeholders who believe improper practices or questionable acts have or will occur are encouraged to report their concerns in accordance with this Policy. Gildan undertakes to investigate, remedy and respond to all good faith complaints or concerns within a reasonable timeframe.

In this Policy, “**external stakeholders**” refers to any person, group, or organization directly or indirectly affected by an issue related to or caused by any of Gildan’s operations or practices worldwide. This may include, but is not limited to, suppliers, contractors or customers (or any of their respective employees), non-governmental organizations (NGOs), and/or members of the communities where Gildan operates.

“**Improper practices or questionable acts**” are terms used in this Policy to describe any illegal, fraudulent, dishonest, or unethical actions by the Company, its employees, officers, directors, consultants, contractors, agents or suppliers. Concerns of improper practices or questionable acts would include, but are not necessarily be limited to:

- questionable accounting practices, internal accounting controls or auditing matters;
- internal control weaknesses;
- theft, corruption or fraud;
- conflicts of interest;
- breaches of confidentiality;
- improper use of the Gildan name or property;

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- violations of human rights practices, community involvement or environmental matters;
- health and safety issues at Gildan or third-party contractor facilities;
- violations of Gildan's Code of Conduct by Gildan or any of its employees, contractors, consultants, agents or suppliers; or
- violations of Gildan's Code of Ethics or any other Company policy by Gildan or any of its employees, officers or directors.

### III. NON-RETALIATION

No person who in good faith reports improper practices or questionable acts shall suffer reprisals or retaliation of any kind, including threats or harassment, or, if the reporter is a Gildan employee, dismissal, demotion, suspension, or any other manner of discrimination in the terms and conditions of employment. Retaliation against a person who has reported any improper practice or questionable act in good faith is a violation of this Policy. In addition, anyone who cooperates in the investigation of improper practices or questionable acts, shall not suffer harassment, retaliation, or adverse employment or other consequences. Any such retaliation should be reported, and Gildan will promptly investigate the report, consistent with the procedures contained in this Policy.

A knowingly false complaint or report, however, is a violation of this Policy. If the reporter is a Gildan employee, such employee could face disciplinary action up to and including termination.

### IV. REPORTING OF CONCERNS

#### 1. Communication Reporting Structure

To assist in the effective receipt, retention, reporting, follow-up and resolution of concerns of improper practices or questionable acts, the following communication reporting structure has been implemented:

##### (i) Management Channels for Employees

Gildan employees who believe improper practices or questionable acts have or will occur are encouraged to report their concerns through normal management channels if they feel comfortable doing so. This means employees should talk to their immediate supervisor, department head, local Human Resources Department, or Legal Department. Employees are not required, however, to report improper practices or questionable acts to anyone whom they believe is participating in or condoning the practice or act.



(ii) Additional Channels of Communication for Employees

Where an employee believes that an improper practice or questionable act cannot be appropriately resolved by reporting through the management channels described above, or that such reporting would not provide the necessary level of confidentiality, the following additional channels of communication are always available:

- A. Concerns may be reported by sending a detailed written description of the issue to the Chair of Gildan's Ethics and Fraud Compliance Committee (the "**Ethics Committee**") via e-mail at [EthicsandFraud@gildan.com](mailto:EthicsandFraud@gildan.com).
- B. If an executive officer of the Company is involved in the matter that is the subject of the complaint, then the reporting employee should send a detailed written description of the issue to the independent Chair of the Board via e-mail at [BoardChair@gildan.com](mailto:BoardChair@gildan.com).
- C. If an executive officer of the Company is involved in the matter and it relates to questionable accounting practices, internal accounting controls or auditing matters, then the reporting employee should deliver a detailed written description of the issue to the independent Chair of the Audit and Finance Committee of the Board via e-mail at [AuditChair@gildan.com](mailto:AuditChair@gildan.com).
- D. If the employee does not feel comfortable reporting the matter directly to the Chair of the Ethics Committee, the Chair of the Board or the Chair of the Audit and Finance Committee, or if the employee wishes to remain anonymous, the employee should report his or her complaint through the confidential external Ethics and Compliance Hotline (the "**Hotline**") (see Section 2 below for more details on the Hotline).

Any supervisor or manager who receives a complaint of improper practices or questionable acts that cannot be adequately addressed through normal management channels must immediately report the complaint through one of the additional channels of communication outlined above.

(iii) Direct Channels of Communication for External Stakeholders

Through its Stakeholder Engagement Policy, Gildan is committed to maintaining a process of continuous dialogue with external stakeholders. This includes providing a platform for external stakeholders to report not only improper practices or questionable acts, but to also share with the Company any feedback they consider relevant, including ideas, areas of improvement, or best practices. External stakeholders are encouraged to report their concerns, issues or feedback through the following direct communication channels, if they feel comfortable doing so:



- A. Concerns, issues or feedback relating to Central America and the Caribbean Basin may be reported by delivering a detailed written description of the issue to the Corporate Citizenship Department via e-mail at [comunicaciones.HON@gildan.com](mailto:comunicaciones.HON@gildan.com).
- B. Concerns, issues or feedback relating to all other regions in which Gildan operates may be reported by delivering a detailed written description of the issue to the Corporate Citizenship Department via e-mail at [CC@gildan.com](mailto:CC@gildan.com).
- C. If the reporter is an employee at one of Gildan's third party manufacturing contractors, or if the concern relates to one of Gildan's third party manufacturing contractors, then the reporter should deliver a detailed written description of the concern, issue or feedback to the Corporate Citizenship Department via e-mail at [worker.hotline@gildan.com](mailto:worker.hotline@gildan.com).

(iv) Additional Channels of Communication for External Stakeholders

Where an external stakeholder believes that an improper practice or questionable act (or any other issue or concern the stakeholder wishes to raise) cannot be appropriately resolved through the direct communication channels described above, or that such reporting would not provide the necessary level of confidentiality, the following additional channels of communication are always available:

- A. Concerns may be reported by delivering a detailed written description of the issue to the Chair of the Ethics Committee via e-mail at [EthicsAndFraud@gildan.com](mailto:EthicsAndFraud@gildan.com),
- B. If an executive officer of the Company is involved in the matter that is the subject of the complaint, then the external stakeholder should send a detailed written description of the issue to the independent Chair of the Board via e-mail at [BoardChair@gildan.com](mailto:BoardChair@gildan.com).
- C. If the external stakeholder reasonably believes that the Company is engaging in questionable accounting, internal accounting controls or auditing practices, or if they have a good faith complaint regarding the Company's accounting, internal accounting controls or auditing matters, then the reporting stakeholder should deliver a detailed written description of the issue to the independent Chair of the Audit and Finance Committee of the Board via e-mail at [AuditChair@gildan.com](mailto:AuditChair@gildan.com).
- D. If the external stakeholder does not feel comfortable reporting the matter directly to the Corporate Citizenship Department, the Chair of the Ethics Committee, the Chair of the Board or the Chair of the Audit and Finance Committee, or if the external stakeholder wishes to remain anonymous, the external stakeholder should report his



or her complaint through the confidential external Hotline (see Section 2 below for more details on the Hotline).

(v) Reporting Complaints

When reporting any concerns through this Policy, employees and external stakeholders are asked to be as factual as possible so as to provide sufficient information on the subject matter. This will allow a thorough investigation to be conducted and will protect other Gildan employees or stakeholders from inaccurate and potentially harmful accusations arising from misconstrued or misunderstood actions, activities or rumours. Employees as well as external stakeholders are encouraged to leave their names and contact information so that an adequate investigation can be performed, but an employee or external stakeholder may make an anonymous complaint if he or she desires.

(vi) Review of Complaints

Complaints received through this Policy will be reviewed as follows:

- A. All complaints received through the Hotline and all complaints received through any other channels of communication that relate to an improper practice or questionable act will be reported to the Legal, Human Resources and Internal Audit representatives designated by the Ethics Committee (the “**Ethics Committee Representatives**”).
- B. The Ethics Committee Representatives will review each complaint received and will determine which person(s) within the Company will have the responsibility for investigating, resolving and concluding on each reported complaint based on the nature, severity and subject matter of the complaint. To the extent reasonably practicable, the persons who have been assigned to investigate complaints will use their departments’ resources, or outside resources, such as independent external verification entities, as considered necessary, for the investigation, resolution and conclusion of such complaints.
- C. The Chair of the Audit and Finance Committee will be involved in the investigation of any complaints received that involve questionable accounting practices, internal accounting controls or auditing matters that, if true, would have a material impact on Gildan.
- D. The Chair of the Board will be involved in the investigation of any complaints received that involve the President and Chief Executive Officer or any member of the senior executive team.



- E. The Ethics Committee Representatives, the Chair of the Board and the Chair of the Audit and Finance Committee, as applicable, may retain and/or consult with external auditors, external legal counsel and other experts, on a confidential basis, as necessary to investigate and resolve the complaint.
- F. Complaints will be addressed by the persons assigned to investigate them with reasonable promptness, considering such factors as the nature, severity and complexity of the issue involved.
- G. The findings and conclusions of each investigation will be presented to the Ethics Committee.

(vii) Follow-Up and Resolution of Complaints

The Ethics Committee Representatives will generally report the findings and conclusions reached at the end of the investigation to the employee or external stakeholder who reported the complaint (if known). If the employee or external stakeholder reported through the Hotline, then the Ethics Committee Representatives will inform the employee or external stakeholder through the Hotline.

(viii) Internal Reporting of Complaints

The Ethics Committee will present a quarterly status report to the Company's executive-level Compliance Steering Committee on the complaints received and, where applicable, investigation results and remedial actions. The Compliance Steering Committee will in turn provide a quarterly report on complaints received (or more frequently, as needed) to Gildan's Board of Directors. This quarterly report will be presented to the Audit and Finance Committee. Where the subject area of the complaint falls within the purview of another committee, the Audit and Finance Committee may refer oversight of any complaint to the Compensation and Human Resources Committee, or Corporate Governance and Social Responsibility Committee, as appropriate, depending upon the nature and severity of the complaint.

## **2. Ethics and Compliance Hotline**

While employees and external stakeholders are encouraged to report improper practices or questionable acts through management and direct communication channels, respectively, the Company also has set up the Hotline as the channel of communication through which employees or external stakeholders can make confidential and anonymous complaints regarding these matters if they are more comfortable doing so. The key features of the Hotline are as follows:





- The Hotline is operated by an independent, third-party service provider that receives, retains, records and reports all incoming complaints received from employees or external stakeholders.
- Employees and external stakeholders may submit complaints through the Hotline by submitting a written report on the Hotline website at <https://secure.ethicspoint.com> or by calling local toll-free<sup>1</sup> telephone numbers specific to each country where Gildan operates. The local Hotline numbers are posted in each office or plant location and are also published on the Gildan website.
- The Hotline operates 24 hours a day, seven days a week, and is available in the local languages of each country in which Gildan operates.
- New employees are informed of the existence of the Hotline by the local Human Resources Department when they begin work at Gildan.
- All employees are reminded of the Hotline through regular training and communication.
- External stakeholders are informed of the existence of the Hotline through Gildan's website, through meetings held with community representatives, as well as through direct engagement with stakeholders.
- Details of the reported complaint are recorded and sorted by its nature (i.e. safety or security matter, accounting, auditing or finance matter, human resources matter, human rights risks, or legal matter).
- The employee or external stakeholder making a complaint is assigned an identification number and can use this identification number to obtain updates on the investigation through the Hotline.
- The Hotline service provider reports all complaints to the Ethics Committee Representatives on a timely basis.
- A complete list of the categories of complaints can be found at <https://secure.ethicspoint.eu/domain/media/en/gui/100213/index.html>.

### **3. Employee and External Stakeholder Confidentiality**

Information concerning a complaint and information obtained during an investigation will be kept confidential and will not be disclosed to others, to the extent reasonably possible, except on a "need to know" basis or as required by applicable law.

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<sup>1</sup> For Bangladesh, employees and external stakeholders who call the local Hotline from a personal landline or other device, including mobile phones, may be subject to in-country charges due to the unavailability of a toll-free option in this jurisdiction.



The Hotline is designed to protect employee and external stakeholder confidentiality and employee or external stakeholder complaints made through the Hotline will remain anonymous. Employees or external stakeholders who use the service will be assigned an identification number registered with the complaint subject, together with a scheduled call back time, so that subsequent communications can be conducted in a confidential and timely manner.

The nature of certain complaints may require employees or external stakeholders to identify themselves to the person responsible for conducting the investigation in order to address and/or correct a situation. In these cases, the investigation will be conducted so as to protect the identity of the employee or external stakeholder to the extent reasonably possible and nothing will be disclosed to others except on a “need to know” basis or as required by law.

Nothing in this Policy, however, is intended to prohibit an employee or external stakeholder from exercising his or her option to report questionable accounting practices, internal accounting controls, auditing matters, or any other matter anonymously.

#### **4. Additional Information**

This Policy is intended as a guideline only. Nothing in this Policy is intended to alter an employee’s at-will employment status or create any contractual obligations on the part of the Company towards any person, or to limit other recourse or remedies available at law. Further, the Company reserves the right to modify or deviate from this Policy in its sole discretion, consistent with applicable law.

Employees with questions regarding this Policy should contact Michelle Taylor, General Counsel, at [mitaylor@gildan.com](mailto:mitaylor@gildan.com) (514) 243-7451.