

# AEO

2025/2026



# Code of Ethics

AMERICAN EAGLE

*aerie*

OFFLINE

by Aerie

TODD SNYDER  
NEW YORK

*unsubscribed*

QUIET

# A Letter From Our CEO

**Together**, for more than forty years, we have ensured that AEO is, without question, an inclusive and welcoming retailer where associates and customers feel empowered, respected and recognized. We believe in our **People**. We foster **Innovation**. We approach every product and project with **Passion**. We act with **Integrity**. And we celebrate **Teamwork**. Those are our Values, and this Code of Ethics is intended to support each of you in upholding them in everything you do at and for AEO.

This Code is built around our Better Together culture, and it governs every business decision we make, whether in our offices, distribution centers, stores or boardroom. Put simply, this Code of Ethics is our guide to making thoughtful, ethical, and honest decisions - and it embodies our commitment to each other, to our customer base, and to our shareholders.

When you are reading the pages that follow, please give thought to how the principles contained in this Code are applicable to the work that you do and the responsibilities that you fulfill. These principles remain the cornerstone of AEO's Better Together culture, and they guide our portfolio of beloved and enduring brands.



# We are Better Together

At AEO, our **Better Together** culture and our corresponding Values are at the heart of everything we do.

The culture we build together empowers all of us to excel, drives future growth, and leads to exceptional results and opportunities for our business, our customers, and our associates. It fosters the relentless pursuit of innovation, encourages honest and authentic behavior and communication, and allows us to celebrate all of our many wins with a collective desire to succeed.

**Together, we motivate each other through a shared belief that we can deliver exceptional results when we are:**

## **Curious + Collaborative**

We share ideas, we respect our people and customers, and we serve our communities

## **Humble + Hungry**

We do the right thing, we are always learning, and we're relentless in our drive to improve and collectively achieve

## **Transparent + Trusting**

We share information, we act with integrity, we uphold our reputation and we foster meaningful relationships

## **Accountable + Aligned**

We hold ourselves (and our partners) accountable, we act consistently with our shared Values, and we work toward common goals

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# Curious + Collaborative

We share ideas, we respect our people and customers, and we serve our communities

## HOW WE TREAT ONE ANOTHER

In 2018, AEO (also referred to herein as, "Company") launched its first formal Inclusion & Diversity ("I&D") initiative and strategic plan. It has evolved into Inclusion, Diversity, Equity, and Access ("IDEA"), becoming foundational to our culture. We strive to do more than just have a diverse associate population – we strive to create working conditions where a diverse population can thrive, so that AEO, too, can thrive.

Since AEO began, it has been fundamental that we do not tolerate discrimination, bullying, harassment, or retaliation in any of our workplaces. All employment decisions, including hiring, training, advancement, compensation, scheduling, discipline, and termination, are to be made without regard to race, ethnicity, color, age, gender, gender identity, gender expression, sexual orientation, religion, creed, marital status, pregnancy, genetic information, medical condition, national origin/ancestry, citizenship, physical/mental disability, military or veteran status, or any other characteristic protected by law or AEO policy. Each of these characteristics is known as a "protected status" and AEO policy goes well beyond what the law requires.



### Harassment, bullying, and discrimination can take many forms, including:

- Unwelcome remarks, gestures, or physical contact.
- Unwanted invitations to non-work events or exclusion from such invitations when others within the team are included.
- The display or circulation of offensive, derogatory, crude, or explicit pictures or other materials, including by email, text, or through social media.
- Offensive or derogatory jokes, "teasing," or other comments (whether explicit or by innuendo)
- Verbal or physical abuse or threats

Being respectful and inoffensive does not mean we will always agree with one another. It also is not meant to discourage anyone from speaking up or exercising any legally protected rights. We encourage our associates to think critically, stand up for what they believe is right and to challenge each other. However, it does mean that we want all associates to feel a sense of belonging, feel valued, enjoy a healthy environment and embrace Better Together. You can find more detail about our expectations and standards in our [Workplace Culture Policy](#).

**Q: I have a very different political view than most of my co-workers. I am sometimes uncomfortable at work when people start talking about politics or, even more generally, about “liberal versus conservative” issues and views. I just want to come to work, get my job done, and go home without having to engage in politics. Isn’t that my right?**

**A:** You certainly are not required to engage with anyone about politics or even “liberal versus conservative” or take any other position on any issue that is not related to your job. If you feel you are being forced to do so or feel uncomfortable with the conversation taking place, you should talk with your manager or with the HR department to find a solution. Holding different viewpoints from others, even from a majority, is not unethical. What is unethical at AEO is engaging someone who has different viewpoints with offensive comments, name-calling, or threats, or ostracizing that person from work-related information or activities because of their different views.

**Q: I disagree with the Company’s position on some social issues – what can I do?**

**A:** AEO’s Values are clear, and if you believe we are doing or saying something inconsistent with those Values, we encourage you to Speak Up! Please remember, though, that we represent many and diverse stakeholders, not just internally but also in terms of our customers and our shareholders. How (and whether) we choose to communicate internally and/or externally are decisions we do not and cannot take lightly. However, we always welcome input from our associates, and we welcome associates’ feedback whether to our Chief Inclusion & Diversity Officer, Chief Human Resources Officer, Human Resources Business Partner, or any member of our ELT. Although we cannot guarantee that we will be able to address your concerns to your satisfaction, you will always be heard.

**Q: I do not identify as a person of color. One of my colleagues made what might have been a racist joke as we were eating lunch. I found it offensive, but there were no people of color at the lunch table and no one else seemed to be offended. Should I do anything?**

**A:** We each have an obligation to ensure that AEO is a great place to work for all associates, and potentially offensive behavior can impact our work environment. If you felt it was offensive, there is a good chance someone else did as well. It is also possible this colleague has been warned in the past about his or her “jokes” or that the colleague simply wasn’t considering the consequences. Also, you do not need to identify as a person of color or member of any specific category to call out offensive conduct. If you feel uncomfortable speak with your colleague directly, contact your manager, partner with HR, or contact Compliance to discuss the best course of action.

## HANDLING PERSONAL RELATIONSHIPS AT WORK

We recognize and respect your rights to socialize and pursue personal relationships with your fellow associates. You should use good judgment to make sure these relationships don't negatively impact your job performance or the overall workplace environment. Associates who find themselves in an intimate relationship or friendship should use tact and sensitivity to make sure they are not creating an uncomfortable work environment for others.

Favoritism, open displays of affection, and business decisions based on emotions or friendships – rather than on the best interests of the Company – are examples of inappropriate conduct.

Personnel decisions can become difficult if you supervise someone you are romantically involved with, living with, or related to – leading to a possible real or perceived conflict of interest. Supervisors are prohibited from engaging in intimate or romantic relationships with subordinates in the same reporting line. If you are related to, living with, or romantically involved with someone in your reporting line, you must inform your manager and Human Resources immediately, whether or not there is a direct reporting relationship. This policy applies not only to existing relationships but also where an organizational or personal change puts you in the same reporting line.

### Q: Can I be social media friends with associates I supervise?

**A:** You should use good judgment when it comes to communicating with other associates on social media sites. Developing personal relationships with associates you supervise can distort the lines between work and personal life, which can potentially create a real or perceived conflict of interest and/or make it difficult to remain fair and objective in your decision-making at work. Also, how you communicate with subordinates on social media will be viewed by others as if you are communicating with them as a supervisor – even if you intend to communicate as a friend. So comment and tweet only if you would be willing to say the same thing in the workplace!

## HOW WE TREAT OUR CUSTOMERS

An amazing customer experience is a top priority at AEO. In addition to offering the best product and innovation, we should treat our customers as we treat one another – with respect and dignity. This means, for example, that we never harass, tease, joke about, discriminate, or bully our customers. Additionally, we strive to treat our customers equally – within our stores, with our products, and across our brands.

We maintain a variety of policies and procedures to ensure consistency in our provision of excellent service to customers across all aspects of the customer journey. These policies include, for example, AEO's [Returns Policy](#) and [Shoplifting Prevention Policy](#).



## HOW WE WORK WITH OUR SUPPLIERS

As a part of our commitment to social and environmental responsibility, we direct our business relationships to those suppliers (including our sourcing agents, vendors, factories and their own suppliers) who share our vision of ethical and fair working conditions. Our [\*\*Supplier Code of Conduct\*\*](#), which is based on internationally accepted standards, including the International Labor Organization's core conventions and the Universal Declaration of Human Rights, outlines the minimum standards that we require of our suppliers. We require our suppliers to comply with all applicable legal

regulations and encourage our suppliers to incorporate best practices into their workplaces. In addition to these expectations, we are committed to respecting the rights of the workers in our global supply chain, and we do not tolerate the use of any form of forced or compulsory labor. Due to reports of forced labor and other violations of human rights in certain regions and by certain parties, we have developed a [\*\*Prohibited Sourcing Regions and Entities Policy\*\*](#). This policy proactively prohibits our suppliers from sourcing from certain regions and from doing business with certain entities.



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# Humble + Hungry

We do the right thing, we are always learning, and we're relentless in our drive to improve and collectively achieve

## LEAD BY EXAMPLE

Managers are important at AEO and play an incredibly vital role. We expect Managers to:

- Lead and act with integrity;
- Regularly reinforce the importance of the Code with their team;
- Encourage associates to raise questions and concerns;
- Ensure their team completes all required compliance training;
- Take prompt and effective action when appropriate; and
- Partner with Human Resources or seek help from Compliance when needed.

## WHEN IN DOUBT, ASK!

The Code is not able to provide specific advice for every situation you may encounter at AEO. However, most issues (and most problems) you encounter can be resolved (or avoided) by: (a) referring to the Code; and (b) when in doubt, asking for help.

## SPEAKING UP (& REPORTING CONCERNS)!

Just as we are responsible for living up to our Code (and acting with integrity), associates have the responsibility to speak up if they believe someone is not living up to our Code (or other policy or the law). AEO cannot act unless it is aware.

If you feel you have been subject to discrimination, harassment, or retaliation, believe someone is not living up to our Code (or other policy or the law), have a question or concern, or if you are unsure how to handle a situation, you should:

Report the issue promptly to your supervisor, manager, Human Resources, or to Compliance. You can find specific resources, including contact information, at the end of the Code; or

If you are not sure whether a scenario or encounter raises an ethical concern, ask yourself:

- Is this the right thing to do?
- Is this legal?
- Am I authorized to do this?
- Is it consistent with our Code and other policies?
- Will it negatively affect the customer experience?
- Is this in line with AEO's reputation or my personal reputation?
- Would I want to see this reported in the media?
- Would I want to see everyone making the same decision so that it became the standard of behavior at AEO?

If the answer to any of these questions is **NO, you should speak up!**

If you are not comfortable with speaking with the above referenced individuals, you should email Compliance at [Compliance@ae.com](mailto:Compliance@ae.com) or use the **AEO Hotline** (<https://aeohotline.com/speakup> or +1.800.490.1089) (the "AEO Hotline"). The AEO Hotline is free, confidential, and available online and by telephone 24 hours a day, seven days a week, around the world (interpreters are available). You can choose to report a concern anonymously.



Every report will be fairly, promptly, and thoroughly investigated. A reported concern will be kept confidential to the extent possible, and disclosure of information will be limited to persons with a need to know. If any employee is found to have violated the Code (or other policy), we will take appropriate corrective action, which may include termination.

All associates are expected to fully cooperate with investigations. Failure to cooperate may lead to discipline, including termination.

## **NO RETALIATION**

Anyone who reports a concern, asks a question in good faith, or participates in an

AEO investigation, is protected from retaliation. Prohibited retaliation includes, but is not limited to, demotion, pay decrease, termination, reassignment, or failure to promote.

If you feel you have been subject to retaliation, or you believe you have witnessed retaliation in the workplace, please report it to your supervisor, manager, Human Resources, or Compliance.

Every complaint will be fairly, promptly, and thoroughly investigated, and we will take appropriate action, up to and including termination, to prevent violations of this policy.

### **Q: What happens when I speak up?**

**A:** Reporting a concern does not mean you have "tattled" on someone or that you are about to open yourself (or someone else) to hours of interrogation. Every case is different and must be handled as the facts dictate, but, in general, when you call or email Compliance or make a report through the AEO Hotline, you will be asked questions intended to gather information about your concerns. The information you provide will only be shared to the extent necessary to allow Compliance to review and, if necessary, take action. It is possible that you will be asked follow-up questions, depending on where the investigation leads. The intent is to have all of the facts so that the Company can determine if action is necessary and, if so, what that action should be. Once the investigation is complete, you will be informed as to the closure of the case with as much information as we can provide while respecting others' rights to privacy.

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# Transparent + Trusting

We share information, we act with integrity, we uphold our reputation and we foster meaningful relationships



## RECORDING YOUR TIME

AEO is committed to ensuring that all work performed for AEO is compensated correctly. If you are a non-exempt (i.e., hourly) associate, you must accurately record your time worked (as required by law or policy where you work)—whether scheduled or unscheduled, overtime or straight time, authorized or unauthorized. If you are having any problems recording your time, please let your supervisor or manager know as soon as possible.

### **Managers, you should never:**

- Ask an associate to work “off-the- clock”; or
- Ask an associate not to record their hours of work accurately.

### **Associates, when recording your time, you should never:**

- Work without pay, including not recording hours for work done remotely;
- Fail to report overtime, whether approved or unapproved;
- Record time for a fellow associate;
- Inaccurately record time worked, including attestations for meal and rest breaks; or
- Remove correctly recorded hours from a time record.

**Q:** I like to start checking my email and running reports before my shift actually starts because it helps me to be prepared for the day. Is this okay?

**A:** No. While we appreciate your dedication, we schedule shifts with the understanding that you will get your work done within those scheduled hours. Starting work before your shift or working after you have clocked out (without advanced approval from your manager) is a violation of Company Policy. If you have any questions, please contact your supervisor, manager or Human Resources.

**Q:** I had just clocked out, but my manager asked that I help with a few additional tasks in the stock room. It only took me a couple of minutes. Was this ok even though I wasn't clocked in?

**A:** No. Working off the clock is strictly prohibited by AEO. Any requests to work off the clock must be reported to the HR department or Compliance.

## ANTI-BRIBERY AND ANTI-CORRUPTION

**"Bribery"** is the offering or promising of anything of value to get someone to do (or to not do) something they otherwise would (or would not) do without the bribe.

**"Corruption"** is a dishonest or illegal act (of both an individual or an organization), using entrusted authority or power to make a personal gain or other unethical or illegal benefits.

While competition, innovation, and passion are core to AEO's standards, we maintain a zero tolerance policy for bribery and corruption to achieve those goals. Specifically, under no circumstances should an AEO associate or anyone acting on behalf of AEO give or accept bribes, kickbacks, or other improper cash payments (of cash or anything else of value) to or from government officials, civil servants, or anyone else, or otherwise engage in any corruption or corrupt activities.

In addition to being in direct conflict with the Code and AEO's standards, both bribery and corruption are illegal under the United States Foreign Corrupt Practices Act ("FCPA"), Canada's Corruption of Foreign Public Officials Act ("CFPOA"), Mexico's National Anti-Corruption System, and many other country-specific laws and regulations.

**AEO's prohibitions on bribery and corruption include a prohibition on:**

- Any direct or indirect offers or promises of payment; and
- Except for services where a government-issued receipt is provided, any payment made for convenience or to facilitate or expedite performance of routine government functions (e.g., you cannot pay to bypass a two-hour wait in line for a government service or approval).

Even if bribery or corruption appear as accepted local practice in a country, it still is against the law (and against AEO's [Anti-Bribery & Anti-Corruption Policy](#)), and associates are explicitly prohibited from engaging in such activity. Failure to comply can result in corporate fines, legal actions (against both AEO and the associate), and imprisonment, and harm to AEO's reputation.

If you become aware of a potential violation of AEO's prohibitions on bribery and corruption (or of any anti-bribery or anti-corruption laws), you must contact the Chief Legal Officer, immediately. Similarly, you must contact the Chief Legal Officer if a government official solicits or requests a bribe or kickback.



## RED FLAGS

To assist in the identification of potential bribery or corruption, we have included the below "red flags" (which are indicators for potential bribery or corruption-related activity). When evaluating a scenario for the possible presence of bribery or corruption activity, ask yourself whether any of the following "red flags" are present:

- Unreasonably high fees or commission payments are being requested?
- Unusual payment methods, such as requests for payments in cash or wires to bank accounts in countries outside of the transaction?
- Lack of transparency in expense or accounting records?
- Deliverables that sound too good to be true?
- Unnecessary intermediaries involved in business transactions?
- Invoices with false information or very vague information regarding services rendered?
- Requests for political or charitable contributions?

If your answer is **YES** or even **MAYBE** to any of these questions, contact the Chief Legal Officer for further guidance.



**Q:** In order to open a new store location, AEO must obtain an approved government permit in the corresponding jurisdiction. I am responsible for working with the government agency to obtain the permit. When I apply for the permit, an agent at the government agency requests that I make a cash payment to him/her prior to the issuance of the store permit (and the government agent will not provide me any sort of government receipt). Should I make this payment?

**A:** No. The scenario at issue contains several “red flags” indicating this request could be a bribe or bribery-related request. You should not make the payment, and you should immediately contact the Chief Legal Officer.

**Q:** We use an agent to facilitate relations with local government officials. Recently the agent asked us to increase his commission, and I suspect the agent wants to pass this money on to the local officials. What should I do?

**A:** If you suspect that the agent is making illegal payments on behalf of AEO, the Company is under an obligation to investigate whether this is the case and to halt any such payments. You should report your suspicions immediately to the Chief Legal Officer.

**Q:** A vendor asked me to provide a positive testimonial and case study in exchange for reduced rates. Is this ok?

**A:** No. Promising positive or favorable testimonials (in any form) can never be made on behalf of AEO – and especially not in the context of rate negotiations. All of us at AEO have worked hard to develop our reputation, and the ways in which we use our name and our brands must be firmly protected. If you believe a testimonial (of any kind) truly would be in AEO’s best interest, you must first speak with the VP of your department and the Sr. Director of Corporate Communications.

## ANTI-MONEY LAUNDERING

**“Money laundering”** is the process by which persons or groups try to conceal the proceeds of illegal activities to try to make the sources of their illegal funds look legitimate.

AEO complies with all laws that prohibit money laundering or financing for illegal or illegitimate purposes, and AEO maintains a zero tolerance policy for such activities.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. Additionally, when conducting business, check for “red flags”, such as:

- Request for large cash payments
- Requests for unusual payment terms
- Requests for payment from unusual banking accounts (or from accounts in third countries that are not otherwise a part of the business transaction).

If you become aware of a potential violation of any money laundering law or policy, you must contact the Chief Legal Officer immediately.

## GIFTS & ENTERTAINMENT

Business-related gifts and entertainment on a modest scale are commonly used to build goodwill and strengthen working relationships among business partners. At AEO, providing or accepting occasional meals, small Company mementoes, and tickets to sporting and cultural events may be appropriate in certain circumstances. Occasionally, it may also be appropriate at AEO to accept or provide offers involving travel for business events with our business partners. However, if offers of gifts, entertainment, or travel are frequent or of substantial value, they may create the appearance

of – or an actual – conflict of interest or illicit payment.

A gift, entertainment, or travel should never be accepted or given if it will create a sense of obligation, compromise your professional judgment, or create the appearance of doing so.

### At AEO, the following types of gifts and entertainment are absolutely prohibited from being given or accepted:

- Cash or cash equivalents (including gift cards) in any dollar amount.
- Any solicited gift, entertainment or recreation opportunity.
- Any entertainment that can be viewed as excessive in the context of the business occasion.
- Any “adult” entertainment or any sort of event involving nudity or lewd behavior.
- Any gift intended to influence a business decision.
- Trading items of value with other businesses, including other retailers and restaurants, also is strictly prohibited.

To prevent difficult situations, we discourage you and your family members from giving, soliciting, or receiving gifts or entertainment or recreation opportunities from anyone doing business with (or wishing to do business with) AEO. Gift examples include samples, discounts, event tickets, personal favors, recreation, and transportation. Entertainment could include tickets to sporting events, concerts, golf, and other events you attend or participate in with the outside individual.

However, we recognize that business circumstances may call for the exchange of gifts or attendance at an entertainment or sporting event. Any gift (including tickets to entertainment events) must be sent to your work address – under no circumstances should any gift consistent with this policy be sent to your home or a personal address. While no policy can cover every situation, please understand the following guidelines:

**Gifts of Nominal Value:** A gift of nominal value – such as a coffee mug, pens, or similar tokens – may be given or accepted if it is given as a common business courtesy.

**Traditional gift-giving seasons/holidays:** As long as you share them with your team, you are allowed to accept non-cash holiday gift items such as gift baskets, cookies, chocolates, flowers, moon cakes, Ochugen and Oseibo gifts, or other such non-cash gifts.

**Business Meals & Entertainment:** In most circumstances, business meals and attendance with vendors at sporting/entertainments events where the vendor is present that are infrequent and that are reasonable (US \$100-150 per person) and customary to your location are not considered gifts or entertainment, and may be accepted. However, it is critical that any business meal or entertainment does not create a sense of obligation or result in favored treatment – including the discussion of otherwise confidential information – with a vendor or business partner. Also, consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. For example, if the meal is offered during contract negotiations, you must always politely decline the invitation. Talk to your manager if you are unsure.

*NOTE: Tickets to sporting or cultural events provided to AEO associates and not attended by the host are “gifts” – not “entertainment” – and are subject to the guidelines regarding gifts (e.g., US \$100 limit).*

**Charity Donations:** Donations made to charity efforts supported by the AEO Foundation are permissible. Associates are not permitted to solicit vendors for charity donations on Company time or using Company resources.

If an associate solicits or receives a charity donation from a vendor in excess of **US \$100** in the aggregate, it must be reported to the Chief Legal Officer immediately.

**Other Gifts:** Do not accept a gift of any kind – including entertainment where the vendor is not present – in excess of **US \$100**. In any calendar year, you should limit gifts from any one vendor or business associate to **US \$150** per year. If you receive gifts in excess of **US \$150** (or equivalent) from any single source or gifts and entertainment exceeding **US \$250** from all sources combined, you must notify Compliance.

#### **Third-party Trainings & Conferences:**

Payment for certain conferences or trainings by third-parties may also be accepted with prior approval from the Chief Legal Officer.

Associates who receive a gift at a business event of a ceremonial nature that might not be appropriate under these guidelines but is impractical or offensive to refuse may accept the gift and then promptly report it to their immediate supervisor. The supervisor can discuss with Compliance the appropriate response.

**Q: What should I do if I am given a gift that I think might violate the Code?**

**A:** You should politely refuse the gift. You should politely let the vendor know that AEO's policy prohibits you from accepting the gift. "Thank you, but I cannot accept this" should suffice. Our vendors have been trained specifically on our policies and understand when AEO associates decline gifts - no one should be offended and it will not impact your employment with AEO.

Regardless of the amount at issue, ask yourself before accepting a gift of any kind:

- Is this gift or entertainment intended to influence business negotiations?
- Will the exchange appear to others to have influenced business negotiations?
- Does the gift or entertainment conflict with the AEO mission, Code, policies, or the law?
- Will the exchange result in any special or favored treatment?
- Will the exchange embarrass me if it was made public?
- Will the exchange embarrass AEO if it was made public?
- Would I be comfortable if someone else made the same decision?

If your answer is YES to any of these questions, do not participate in the exchange or contact Compliance for further guidance.

**Q: I mentioned in conversation to a vendor that my partner's favorite football team is playing in the Super Bowl in Arizona. A week later, a vendor offered two tickets to me and offered to let us stay at his Arizona vacation home for the week. Can I accept it? What if I just go to the game with the vendor?**

**A:** No, there is no business-related reason for this offer, as the vendor will not participate in the event with you. In addition, even if the vendor were present, the Super Bowl is not a "reasonable and customary" event, so you would need permission from the Chief Legal Officer before attending the event with the vendor.

**Q:** I am based out of the Pittsburgh office. I have been asked by a vendor to speak at a conference in New York City and attend corresponding vendor meetings. The vendor offers to pay for my conference registration fee and corresponding travel to the conference. Can I accept the vendor's offer?

**A:** Maybe. With prior approval from your VP, Compliance, and Corporate Communications, you may be able to accept the vendor's offer to pay for your conference registration and corresponding travel.

**Q:** My team and I recently attended a demonstration of a new software solution offered by a potential vendor. Afterwards, the potential vendor wanted to show their thanks by sending a \$10 Starbucks gift card to each associate who attended the demo. What should I do? Can I accept the gift cards and distribute them to my team?

**A:** No, although the gift is nominal and there does not appear to be any ill-intent by the potential vendor, gift cards are considered cash and associates are not permitted to accept gift cards of any kind, regardless of amount. You should politely decline and inform [Compliance@ae.com](mailto:Compliance@ae.com) of the offer.

**Q:** At the start of the holiday season, a vendor I work closely with sent me a box of chocolates and some other holiday treats. Can I keep it?

**A:** Yes, this is completely acceptable as long as you share these with your team.

**Q:** A vendor I work with just finished an important project for me on time and under budget. I would like to show my appreciation somehow with a gift or a nice dinner for the vendor's team. What is appropriate?

**A:** When we give gifts or entertainment, we set the tone for how we conduct business – purely on business considerations. Keep this in mind when selecting a gift for a vendor. As a general rule, associates should limit gifts to or from any one vendor or business associate to US \$150 per year. Also consider that they also have a Company Gifts & Entertainment policy. Just as we want others to respect our standards, we want to be mindful of theirs.

## CONFLICTS OF INTEREST

A “**conflict of interest**” is when your personal interest or involvement in a situation interferes or appears to interfere with your ability to make decisions objectively and act in the best interest of AEO.

At AEO, it is important we avoid both (a) conflicts of interest and (b) activities that create or appear to create a conflict of interest. Even when nothing wrong is intended, the appearance of conflicting interests can hurt your reputation and the Company's image.

If a potential (or actual) conflict of interest arises, or if you suspect a conflict of interest to exist, you must report it either to your manager, the Vice President in charge of your business unit, or to Compliance directly.



### Activities and/or situations to avoid:

- Giving, receiving, or soliciting tips, gifts, entertainment, discounts or other personal benefits without approval and outside of Company policy.
- Directing business to third parties when you know they are owned or managed by your family members or close personal friends without full disclosure and approval.
- Misusing Company resources, your position or influence to promote or assist an outside activity, including a second job
- Using business relationships to further a personal interest, including support for charitable organizations without prior approval from the Chief Legal Officer.
- Holding a significant financial interest in a supplier, competitor, or vendor of the Company without prior approval from the Chief Legal Officer.

If you suspect a conflict of interest in a situation/activity, make sure to ask yourself:

- Will the activity influence my business decision?
- Will I or a family member or friend benefit personally from my involvement in this situation?
- If this situation becomes public knowledge, would the Company or I be embarrassed?
- Will the participation in this activity interfere with my ability to do my job?

If the answer to any of the above is **YES** or even **MAYBE**, you may have a conflict of interest and should discuss the situation with your manager or Compliance for help.

**Q: A construction vendor I work with offered to build wedding designs for my wedding (utilizing the vendor's resources) as a favor to me. Is this okay?**

**A:** No. This would be considered using a business relationship to further a personal interest, which is a conflict of interest and prohibited. However, with prior approval from Compliance and proof that you paid a market rate for the favors, the vendor would be able to make your wedding favors.

**Q: I am responsible for selecting (and managing) vendor relationships for certain marketing and marketing-related services. My sister-in-law happens to own a marketing agency and I believe her agency would be a great fit for an upcoming campaign. I would love to hire her company but I feel this would be a conflict. Am I right? Is this okay?**

**A:** Yes, this is a situation that contains a potential conflict of interest. However, if you take the appropriate steps by notifying Compliance and removing yourself from the decision making and relationship management process, your sister-in-law's company may be considered if it is in the best interest of AEO. Before directing business to vendors owned or managed by family members or close personal friends, you must fully disclose the relationship to your manager and Compliance. The vendor may be considered through AEO's standard vendor analysis and selection process.

**Q: I suspect, but don't know for sure, that a vendor that does work for us is in a romantic relationship with my manager? I don't have any reason to believe the vendor's work is questionable, but I have noticed my manager's increased inclusion of the vendor in our department RFPs. I don't want to cause problems, but should I say something? To whom?**

**A:** Yes, you should speak up. Reporting good faith concerns is not making trouble - it is doing the opposite, helping avoid potential problems. Often conflicts can be mitigated - it's the failure to disclose them that usually create real issues for everyone involved. Transparency is the best way to avoid and deal with problems before they become an issue for associates and the Company. You should feel free to talk to any manager in your department, HR, Compliance, or the AEO Hotline.

## ANTI-BOYCOTT

In accordance with U.S. anti-boycott laws, AEO (and its employees) are not permitted to participate in foreign boycotts that the United States does not sanction (including, by way of example, the Arab League's boycott of Israel). As a Company, we are required to report any such requests to support a boycott (e.g., requests from a vendor or business partner) to the U.S. government.

Boycott-related requests may come in many forms and contexts, and they may be both written or oral. They may be found, for example, in invitations to bid, purchase orders, terms and conditions of sale, proposed contracts, shipping instructions, letters of credit, bid or performance guarantees, consular requirements, or visa applications.

If you encounter a situation that raises an issue regarding foreign boycotts, you must contact the Compliance department, immediately.



## WORKING OUTSIDE OF AEO

Generally, AEO does not prohibit you from maintaining employment elsewhere. However, as an AEO associate, you have certain obligations to the Company, including a responsibility not to create a real or perceived conflict of interest (whether that conflict comes from a hobby that generates income or a second job).

As such, certain employment (e.g., employment with competitors) and employment activities (e.g., competing with AEO) are prohibited because of the inherent conflicts of interest created by the circumstances.

You are required to get the approval of your manager and Human Resources before accepting another job or working outside of AEO.

You also need written approval from the Chief Legal Officer before working for any AEO supplier, vendor, competitor or landlord. AEO reserves the right at all times to require you to end outside employment.

**Exception:** if you work in a store or distribution center and do not supervise other employees, you are pre-approved to work for other employers (including other retailers) as long as the work does not interfere with your AEO responsibilities or schedules.

**Q: I have a lot of social media followers, so I am often asked to promote products. I don't see it as another job, just a way to either get free products or make a little extra cash. Is this a problem?**

**A:** It depends. There are two questions you will be asked or should ask yourself: (1) Is this a product made or promoted by an organization that AEO considers to be a competitor? and (2) Is this product the same or similar to the core products we currently sell at either the AE or Aerie brand? If your answer to either question is "Yes," then you shouldn't promote the product. If you are unsure, just ask – call the HR department or ask the Chief Legal Officer directly.

**Q: I am a corporate associate, and I am contemplating part-time secondary employment during the holiday period. I am searching for secondary employment as a store associate at a brick-and-mortar retailer. Am I allowed to do this?**

**A:** It depends. Generally, AEO does not prohibit you from maintaining secondary employment (provided there are no real or perceived conflicts of interest). So long as you are not working for a competitor of AEO, and you properly receive approval from your manager and HR, you may be able to do this.

**Q: As a hobby, I am passionate about sustainability and reusable life cycles of retail products. My sister and I would like to create an ETSY page to sell sustainable retail products. Is this allowed at AEO?**

**A:** We encourage passion and the pursuit of hobbies with our associates. So long as you properly receive approval from your manager and HR, you may be able to do this. Please note, depending on the products you anticipate selling (e.g., products of competitors), AEO may have additional requirements, restrictions or considerations to take into account.



## MATERIAL INFORMATION & INSIDER TRADING

In your role at AEO, you may become aware of important Company information before it has been made available to the public. When this Company information could influence a decision to buy or sell AEO's stock, it is called "material information." Material information can include financial information (margins, earnings, sales, inventory), significant proposed transactions or management changes, planned dividends or stock splits or anything else that could affect the stock price of AEO or another company.

Trading on material information before it has been made public (i.e., insider trading), is illegal, unethical, and strictly prohibited by AEO. Insider trading can have severe consequences. Specifically, the SEC (and similar government agencies)

are authorized to bring both civil and criminal lawsuits against both companies and individuals that trade on inside information or that provide material information to third-parties.

You should be familiar with our [Insider Trading Policy](#), which provides you more detail than we can provide in this Code. To be clear, with respect to confidential, non-public information, you are not permitted:

- To buy or sell the stock (or other securities) of AEO or another company when you are aware of material information that has not been made public; or
- To share material information with others (other than as required to do your job), or advise others to buy or sell the Company's stock until the material information has been made public.

Once material information has been fully disclosed to the public, you may trade in the Company's stock. Adequate public disclosure requires that the information be widely disclosed (such as to the national wire services through a press release) and that a sufficient period of time elapses for the information to be effectively disseminated. While there are no formal rules around what a sufficient time period is, this generally means at least two full trading days after the information was widely disclosed.

**For example**, if the Company announces material non-public information prior to the market opening on a Wednesday, then you may execute a transaction in AEO securities after the market opens on Friday.

**In deciding whether something is material information, consider if the information makes you think of buying or selling AEO stock or the stock of another company. If the answer is YES, it would likely have the same effect on others and is probably material information.**

If you are unsure whether information is material, or has been released to the public, please contact the Chief Legal Officer before trading.

**Q: My family and friends often ask me about AEO and whether they should buy the stock. Usually I just tell them whether the business is doing well or not and let them decide whether to buy the stock. Is this a problem?**

**A:** If a relative or friend buys or sells stock based on non-public information that you give him or her, both of you could be responsible for violation of securities laws. Furthermore, you could be in violation simply for sharing material non-public information, regardless of whether or not your family or friend uses it or benefits from it. Of course, you won't know if your comments were permissible or impermissible until a government agency, judge, or jury decides. Therefore, your best course of action is to simply tell your family and friends that you are not able to talk about AEO's performance with them for both your and their protection.



## SALES PRACTICES & ADVERTISING

AEO stands behind the merits of its merchandise and the quality of its customer service, including in its sales and advertising practices. Our communications with customers (and potential customers) must be truthful and accurate. Additionally, when we say something about our merchandise or services, we must be able to substantiate it.

## FINANCIAL INTEGRITY

Accurate business records are both essential to managing a successful company and required by law. Records must be complete and accurate and include all transactions related to the Company, in any way, without regard to materiality. At AEO, associates are responsible for ensuring Company records are clear, truthful, and accurate. For example, your expense reports, time records, payments, and any other transactions must be correctly classified, approved, and recorded.

As a public company, we are required to periodically report relevant financial information to the public and government regulators. These reporting requirements include disclosure of material information that may influence the decision making of current or potential shareholders. We also periodically report on the effectiveness of our internal controls over financial reporting. The accurate reporting of financial transactions is both a required and critical part of ensuring that the information disclosed to the public is accurate. Internal policies, procedures, and controls must be followed at all times to ensure that this information is complete and accurate.

## TRAVEL & EXPENSE INTEGRITY

As an important component of the Company's expectations for financial integrity, AEO requires its associates to comply with the principles contained in AEO's [Travel & Expense Policy](#).

In accordance with this policy, reimbursement of travel costs and other business related expenses should be requested only in the event that these expenses relate directly to the completion of your work as an associate of the Company. Additionally, falsifying expense reimbursement requests in any way is not acceptable or in line with our Code.

In the event that the policy is unclear, associates are expected to seek clarification from their manager, HR, or the Travel Team before booking travel or submitting a reimbursement request. Approval by your supervisor is required and should be discussed prior to expenses being incurred.

Regarding managerial expectations, managers must review, and are required to perform an approver role for, all reimbursement requests from their reports to ensure validity and prior approval. You must take your role as an approver of reimbursement requests as seriously as you take other parts of your job. You create the culture in your department, including around how we approach expenses and reimbursement requests, and you will be held accountable for your approvals. If you have any questions or any doubts, just ask your manager, the HR department, or escalate your question to Compliance.



## PRODUCT QUALITY

AEO is committed to producing high-quality merchandise across all of its brands. We maintain consumer trust by manufacturing superior merchandise, and we are committed to developing new merchandise in an ethical and responsible manner.

If you are involved in any aspect of developing, handling, packaging, producing, manufacturing, or storing our product, you are expected to:

- Know the product quality standards, policies, and procedures that apply to the merchandise at your location;
- Follow good manufacturing practices and testing protocols; and
- Comply with all applicable safety laws and regulations.

## INTELLECTUAL PROPERTY RIGHTS

At AEO, our brands are extremely valuable to our success. AEO continues to grow and develop more of its own intellectual property, including trademarks, logos, trade secrets, "know how," copyrights and patents. Our intellectual property rights are some of our most valuable assets we have, and these rights must be protected. Unauthorized use or disclosure of our intellectual property can lead to the loss of (or serious harm to the value of) such intellectual property rights.

As an associate, the things you create for AEO belong to the Company. This includes inventions, discoveries, ideas, improvements, software programs, artwork, and works of authorship (collectively referred to as "work product"). More specifically, the work product that you create or develop, in whole or in part on Company time, as a part of your job

responsibilities, or through the use of Company resources or information, is AEO property. You must promptly disclose to AEO, in writing, any such work product and cooperate with the Company's efforts to obtain protection for AEO.

To ensure that AEO receives the benefit of any work done by third-parties (including vendors, outside consultants, and partners), it is essential that an appropriate written agreement or release be in place before any work begins.

Just as we expect others to recognize the legal rights we have in our brands and designs, we respect and recognize the legal rights of others. Associates should not: (a) make unauthorized copies of material from books, magazines, newspapers, films, videotapes, music recordings, websites, products, or computer programs; or (b) utilize artificial intelligence (or products or services that utilize artificial intelligence) to create any work product or other intellectual property. Additionally, written materials and music may be subject to copyright protection and should be copied only when permitted.

If you have a question about what materials you can or cannot use, or how to protect AEO intellectual property and intellectual property rights, contact the Legal department.

## FAIR COMPETITION AND ANTITRUST

Many of the countries where we do business (including the United States) have fair competition and/or antitrust laws. These laws generally prohibit business practices that interfere with competition, including price-fixing or allocation of either markets or vendors. AEO (including its associates) must make its own business decisions, free from understandings or agreements with competitors or suppliers that restrict competition.

### To this end, when conducting AEO business, all associates must:

- Not discuss pricing, production, conditions of sale, or markets with competitors.
- Not agree with competitors to refuse to deal with certain vendors or distributors.
- Not try to influence the prices at which franchisees or other third-parties retail our merchandise.
- Not make any statements or written records, even in jest, that suggest that a proposed course of action will eliminate competition.
- Not present AEO merchandise and services in a manner inconsistent with our core values.
- Not induce a third-party to breach an existing agreement.
- Never act in a manner that could be seen as an attempt to exclude present or potential competitors or to control market prices.

We consider compliance with fair competition laws of critical importance. These laws reinforce our own standards and expectations – it is not business at any cost, and everyone needs to be able to compete fairly in a free market.

AEO associates and directors are required to comply with our policy and local laws. Any associate who violates this policy may be subject to disciplinary action, including termination, significant monetary damages or fines, and even imprisonment.

**Q:** I am close friends with a merchant that works for a competitor. Occasionally we talk about what we are working on. Should I be concerned?

**A:** If you are revealing confidential information that AEO has invested time and money to develop – and has not yet made that information public, then YES. You are not being fair to AEO or your fellow associates. You may also be violating fair competition laws if you are discussing marketing and pricing.

**Q:** I am benchmarking supply chain practices with competitors' supply chain teams. During the benchmarking, one of the competitor teams introduces a conversation about rates/pricing and wants to collectively establish price points for negotiating with specific carriers. Should I be concerned?

**A:** Yes. Fair competition laws general prohibit the discussion of pricing, price-fixing, and conditions of sale with competitors. In this scenario, you should announce that you are unable to discuss such topics and you should exit the conversation.



## COOPERATING WITH AUDITS

Transparency and full cooperation are essential to maintaining the integrity of the audit process and ensuring that ethical standards and legal obligations are upheld.

At AEO, we cooperate fully with audits and auditors, both our internal audits/auditors and external audits/auditors. This standard applies to audits of all subject matters, including financial audits, operational audits, and compliance audits.

If you are asked, requested, or otherwise required to participate in an audit at AEO, you are required to provide all necessary information (including access) required by auditors to ensure a thorough and accurate review of processes, procedures, and regulatory adherence. Additionally, you are prohibited from taking any action to influence the results of an audit. This includes any action to coerce, manipulate, mislead or fraudulently influence any internal or external auditor, engaged in any type of audit.

## GOVERNMENT AGENCY REQUESTS

AEO cooperates appropriately with proper government requests, including requests for information, audits, investigations, reviews, and inspections. If you are contacted by a government official, contacted about a government request, or if a government representative visits your workplace, immediately notify the HR department and the Legal department.

Regarding participation with government requests, you should always give truthful, accurate information, and never try to obstruct, influence, or impede the request for information. You also should not alter, falsify, mutilate, cover up, dispose of or destroy any

documents or records related to a government request, investigation, or legal proceeding. Occasionally, an applicant, customer, or current/former employee may file – or threaten to file – a complaint against AEO with the government. If you are contacted about a potential government complaint, immediately notify Compliance.

## BOARD SERVICE

**For-Profit Organizations:** You are required to receive approval from the Chief Executive Officer and Chief Legal Officer before serving as a director or officer of any other for-profit company. Please note, you are prohibited from serving as a director or officer of an AEO competitor, potential competitor, or a company with a significant line of merchandise that competes with those offered by AEO, or a company that does business with AEO.

**Non-Profit Organizations:** We encourage you to serve as a director, trustee, or officer of a non-profit organization on your own time. Prior to the initiation of your service, however, you must inform the Chief Legal Officer.

If you serve as a director or officer of a non-profit organization on your own time, always remember that you may not use Company resources to support any activity of the non-profit organization. Additionally, although your service is outside of working hours, remember that the actions of your non-profit organization can impact your work at AEO, no matter how well-intentioned.

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# Accountable + Aligned

We hold ourselves (and our partners) accountable, we act consistently with our shared Values, and we work toward common goals.

## NON-MERCHANDISE PROCUREMENT

AEO's Non-Merchandise Procurement Department ensures that we procure quality, non-merchandise products and services in the most cost-effective and efficient manner, while maintaining the highest ethical standards and ensuring purchases are aligned with Company objectives.

If you are involved in any aspect of engaging non-merchandise vendors on behalf of the Company, you are required to know, understand, and follow our [\*\*Non-Merchandise Procurement Policy\*\*](#). This policy includes the guidelines for engagement with the Non-Merchandise Procurement Department, processes for executing purchases, and processes for executing contracts.

## MEDIA INQUIRIES

AEO's Corporate Communications department manages, reviews and approves all media inquiries and external engagement for AEO, Inc. Associates are not permitted to speak to reporters, participate in external presentations, or provide written commentary on behalf of AEO unless specifically authorized to do so. This includes, but is not limited to, press, digital publications, podcasts, blogs, case studies, trade shows and speaking opportunities. If you speak directly to the media or third-party outlet without first going through the Corporate Communications department, you risk providing incorrect information, revealing proprietary strategies, or damaging our Company's reputation. Instead, direct all media and external engagement inquiries to the Corporate Communications department.

## SOCIAL MEDIA

Every day, people discuss, debate, and embrace AEO and our brands in thousands of online conversations, including among our associates. We recognize the vital importance of participating in these online conversations and are committed to ensuring that we participate in social media the right way. You should explore and engage in social media communities at a level at which you feel comfortable. Have fun, but be smart. The best advice is to approach online communities in the same way we do the physical one - by using sound judgment and common sense, by adhering to AEO's values, and by following this Code.

AEO has four guiding principles for its participation in the social media community:

**Transparency.** The Company does not condone the manipulation of social media by creating fake destinations or posts designed to mislead followers or control a conversation. We require bloggers and influencers to disclose to their readers when we are associating with them, and we monitor whether such bloggers and influencers are complying with this commitment.

**Protection.** We protect our customers' privacy, which means we are conscientious regarding any personal information that we collect, including how we collect, store, use, or share that personal information.

**Respect.** We respect copyrights, trademarks, rights of publicity, and other third-party rights in the social media space, including with respect to user-generated content ("UGC").

**Responsibility.** We will not use or align the Company with any organizations or websites that deploy the use of excessive tracking software, adware, malware or spyware.

We respect the rights of our associates to use blogs and other social media tools, not only as a form of self-expression but also as a means to further the Company's business. When doing so, keep in mind:

**Adhere to the Code.** All associates, from the CEO to every intern, are expected to adhere to AEO policies including, but not limited to, this Code and the Workplace Culture Policy. AEO respects that our associates have many different passions and interests outside of work. However, it is important to realize that conduct outside of the workplace can impact how others view you or AEO. Therefore, when posting or engaging in conversations, please keep our values and policies in mind. As mentioned in the relevant policies, these expectations are not intended to prohibit or infringe upon an associate's right to report violations of law or engage in any other type of behavior that is protected by law (such as the right to engage in organizing or other activities protected by the National Labor Relations Act).

### **You are responsible for your actions.**

Anything you post that can potentially impact the Company's image will ultimately be your responsibility.

### **Be a "scout" for compliments and criticism.**

We understand that it is exciting to see good things about the Company, or troubling when you come across critical comments. We appreciate that you may feel protective of the Company or other associates; however, please do not speak or otherwise respond on behalf of the Company unless you are an authorized online spokesperson. However, we are committed to continuous improvement and if you come across positive or negative remarks about the Company or its brands online that you believe are important, consider sharing them by forwarding them to [LineMedia@ae.com](mailto:LineMedia@ae.com) or by speaking with the **Corporate Communications team at +1.412.432.4500**. By doing so, we can lean in on what we are doing well and improve on what we could do better.

**Be aware.** Online, your personal and work lives are likely to intersect. The Company respects the rights of its associates, but you must remember that customers, colleagues, and other third-parties often have access to the online content you post. Keep this in mind when publishing information online that can be seen by more than friends and family, and know that information originally intended just for friends and family can be forwarded on.



## MANAGING COMPANY INFORMATION

AEO generates a large volume of electronic and paper records and information every day. The records you work with must be managed in accordance with the AEO Global Records & Information Management Policy and retained for the periods identified in the Records Retention Schedule prior to being destroyed.

In the event you receive a hold notice from the Legal or Tax departments for litigation, audit, or government investigation, applicable records will need to be held beyond their normal retention periods and must not be altered or destroyed until the hold has been rescinded.

## CUSTOMER AND FELLOW ASSOCIATE PRIVACY

Protecting our customers' and associates' privacy and information is critical to AEO's growth and success. Customers and associates entrust us with their personal information, and it is our responsibility to safeguard that data at all times. When AEO takes all reasonable steps to protect personal information, customers are more likely to become, and remain, loyal to our brand and our Company. If this trust is broken, AEO risks not only losing our valued customers and associates, but also negative publicity, fines and lawsuits, lost sales, business damage, and damage to our reputation.

You are responsible for knowing what customer information is, how to protect it, and appropriate methods for handling, storing, and destroying this data.

## SAFEGUARDING CONFIDENTIAL & PERSONAL INFORMATION

Depending on your role within the Company, you may have access to (or the ability to access) non-public, confidential information about our Company, such as unannounced product information or designs, business or strategic plans, financial information, supplier information, organizational plans, and other materials.

Additionally, you may have access to (or the ability to access) personal information related to fellow associates, customers, consultants, vendors, or other individuals, such as names, addresses, email addresses, telephone numbers, government identification numbers (such as Social Security Numbers), employee ID numbers, and credit card or bank account information. Personal information also may include demographic information, including race, gender, age, sexual orientation, religion, medical condition, and similar information. It can also include computer and mobile device identifiers, customer transaction history, and employment history.

We are all responsible for protecting and securing AEO's confidential and personal information in accordance with our policies (including our [Personal Information Policy](#)) and applicable laws, both while we are associates and after our employment ends. Failure to do so: (a) may damage our relationships with associates, customers, and suppliers; (b) may negatively impact our Company reputation; and (c) could expose the Company to legal ramifications and liability. Unauthorized use, disclosure, or any action impacting the confidentiality of the information may lead to disciplinary action, including termination.

If you become aware of any inappropriate use or disclosure of AEO's confidential or personal information, you must contact the Legal department, the IT Security department, or Compliance.

## KEEPING AEO'S SYSTEMS SECURE

As a part of your role within the Company, you may have access to AEO systems and networks, including email, shared drives, laptops, mobile devices, and software applications. We each have a responsibility to use Company technology appropriately and to keep our systems secure from unauthorized access. Data breaches and cybersecurity incidents can happen in many ways, including the loss of a laptop, sharing passwords, connecting to an unfamiliar WiFi network, downloading malicious software, and other compromises of Company systems and security measures. If you become aware of any inappropriate use of Company technology or systems, you must contact the Legal department, the IT Security department, or Compliance.

## ARTIFICIAL INTELLIGENCE

We recognize that artificial intelligence is a transformative technology that has the capacity to create new opportunities for competitive advantage and innovation. We also recognize that artificial intelligence also presents a variety of risks to the Company that we all are obligated to mitigate.

Google Gemini is AEO's official Enterprise AI solution and is the approved tool for company use. Gemini is vetted to ensure AEO information is not used to train its public models, which is a crucial safeguard that not all other AI tools provide.

We monitor and comply with all applicable international, federal, and state laws, rules, regulations, and best practices regarding the

evaluation, development, and use of artificial intelligence. Additionally, we maintain implementation and deployment standards that are intended to enable the Company's decision-makers (including technical, business, legal, and compliance decision-makers) to leverage artificial intelligence tools while (a) staying true to AEO's Values and (b) mitigating risks. If you are involved in any aspect of developing, or engaging non-merchandise vendors, on behalf of the Company that utilize artificial intelligence you are required to comply (and familiarize yourself) with our [\*\*AI Implementation and Deployment Standards Policy\*\*](#).

**Q: Am I allowed to use ChatGPT in the performance of my standard job responsibilities?**

**A:** Google Gemini is AEO's designated Enterprise AI solution. It is the mandatory, first-use platform for all generative AI applications within the company. Before using other generative AI solutions, in accordance with [\*\*AEO's Technology Acceptable Use Policy \("TAUP"\)\*\*](#), you must first obtain approval from the IT Security department and the Legal department prior to utilizing ChatGPT (or any other generative AI or similar AI model) while performing work for AEO.

## COMPANY PROPERTY

Company property (including Company merchandise, samples, supplies, and equipment) should be used for business purposes only. As such, associates are prohibited from: (a) using Company property for personal use, personal purposes, or for any illegal purposes; and (b) engaging in any activities that involve fraud, theft, embezzlement, or misappropriation of Company property. For avoidance of doubt, taking or using Company property for personal purposes (including personal use) without permission is considered stealing.

If you suspect any misuse of Company property in any store, distribution center, home office, or other facility, speak with your manager or contact the AEO Hotline.

## COUNTERFEIT MERCHANDISE

As our brands continue to grow internationally, we encounter increasing problems with third-parties (including "pirates" and/or "jobbers") who sell counterfeit merchandise and/or use our trademarks without our permission. In addition to prohibiting this counterfeit merchandise, we prohibit our vendors from "selling off," or otherwise improperly distributing any merchandise bearing our trademarks, without our consent.

If you become aware of any instances of counterfeit merchandise, improper distribution of merchandise, or unauthorized uses of our trademarks, you should promptly report such instances to the Legal department and the Trademark team.

## WORKPLACE HEALTH, SAFETY & SECURITY

Associates are expected to follow all applicable safety rules and practices, cooperate with Company associates and other officials who enforce these rules and practices, take necessary steps to protect themselves and others, attend required safety training, and immediately report all accidents, injuries and unsafe practices or conditions.

### ZERO TOLERANCE FOR WORKPLACE VIOLENCE

**LENCE:** AEO has zero tolerance for workplace violence. Any act or threat of physical violence, including intimidation, harassment, and/or coercion by any associate or third-party that involves or affects our associates, the Company, or Company property will not be tolerated and are expected to be reported immediately. You may not have or possess any weapon while in an AEO store, distribution center, or corporate office or on any other AEO property.

### ZERO\* TOLERANCE FOR DRUGS & ALCOHOL:

You may not use, sell, possess, purchase or transfer illegal drugs - or sell, transfer or distribute personal prescription drugs - on AEO premises, in Company vehicles, or during work hours. You also may not be under the influence of any substance during work hours that impairs your ability to work safely or that creates a risk to your own safety, the safety of others, or Company property.

\*There is one limited exception to this policy: If you are of legal drinking age, you may drink alcohol responsibly at Company sponsored events at which the Company provides alcohol. You are expected to maintain appropriate behavior at all times. Being under the influence of alcohol will not be a defense to any behavior that otherwise violates this Code or other AEO policies.

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# Resources

## RESOURCES

AEO Compliance provides information and resources that supports ethical business practices. If you have a compliance, legal, or ethics concern, please contact Compliance or any of the following resources as appropriate.

### **Ethics & Compliance Hotline:**

+1.800-490.1089 (United States & Canada)  
800-681-1552 (Mexico)  
800-900-754 (Hong Kong)

### **Ethics & Compliance Website:**

<https://aeohotline.com/speakup>

### **Ethics & Compliance Email:**

[Compliance@ae.com](mailto:Compliance@ae.com)

### **Chief Legal Officer:**

[Compliance@ae.com](mailto:Compliance@ae.com)

### **Vice President Commercial & Compliance Law:**

+1.412.432.3545

### **Sr. Program Manager Compliance:**

+1.412.432.4892

In addition, you can also contact the following resources with situation- specific questions or concerns:

- For questions, concerns, or complaints regarding workplace health, safety or security, you can contact the **Vice President of Global Asset Protection** at +1.412.432.0884.
- For questions, concerns, or complaints regarding **Gifts & Entertainment**, **Anti-Boycott**, **Conflicts of Interest**, or **Working Outside of AEO** contact the **Chief Legal Officer** (see above).

For questions, concerns, or complaints regarding **Fair Competition, Sales Practices & Advertising, Material Information & Insider Training, Government Agency Requests for Information & Complaints**, or **Board Service** contact the **Chief Legal Officer** at [Compliance@ae.com](mailto:Compliance@ae.com) or the **VP - Corporate Governance** at +1.412.432.3368

For questions, concerns, or complaints regarding **Intellectual Property Rights or Trademarks & Counterfeit Merchandise**, contact the **Associate General Counsel for Intellectual Property** at +1.412.432.3309.

For questions, concerns, or complaints regarding **AEO systems**, including data breaches or unauthorized access, contact [GroupITSecurity@AE.com](mailto:GroupITSecurity@AE.com).

For questions, concerns, or complaints or concerns regarding any possible illegal payments and any questionable accounting or auditing matters, you can report on a confidential or anonymous basis to **Internal Audit**, contact [InternalAudit@ae.com](mailto:InternalAudit@ae.com) or the **Vice President of Internal Audit** at +1.412.432.4649.

For all other inquiries, you can contact your **Human Resources Business Partner** or the **Chief Human Resources Officer** at +212.340.6321

The general mailing address for **AEO Headquarters** is:  
77 Hot Metal Street  
Pittsburgh, Pennsylvania 15203

# AEO

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AMERICAN EAGLE *aerie* OFFLINE  
by Aerie

TODD SNYDER  
NEW YORK

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