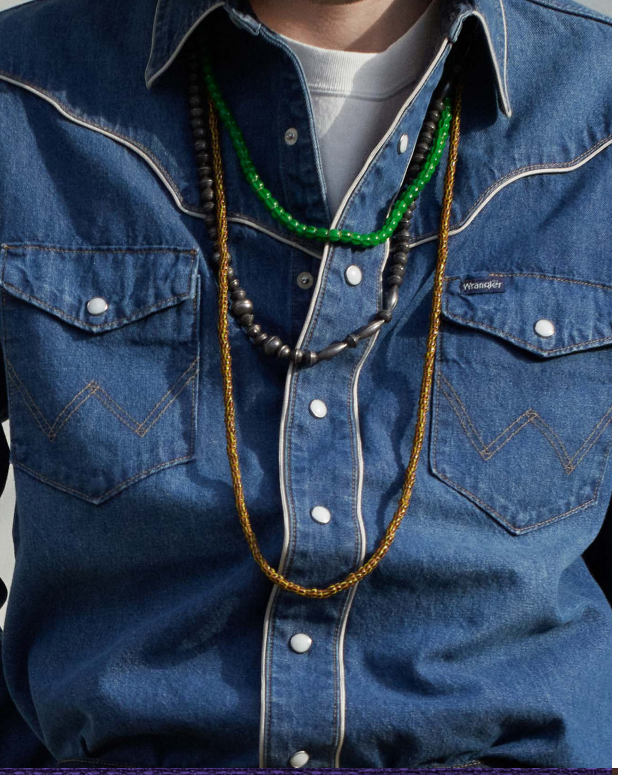


CODE

OF BUSINESS CONDUCT

KONTOOR





HONESTY • INTEGRITY • RESPECT


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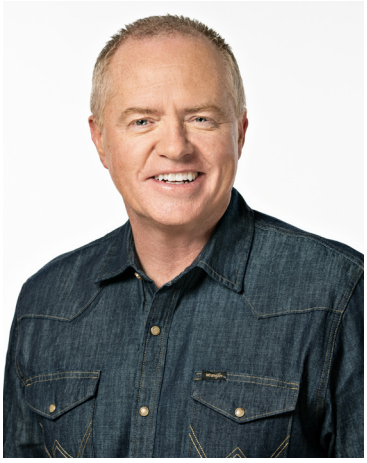
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LETTER FROM OUR PRESIDENT AND CEO

To All Associates of Kontoor Brands, Inc.

DEAR COLLEAGUES:



As we work to grow our iconic brands, solidify Kontoor's reputation as an employer of choice and protect our position as a valued partner, it is imperative that we always act with integrity and transparency to earn the trust of our customers, shareholders, employees, suppliers and the communities where we live and work. Together, we share the responsibility to always operate with honesty, integrity and respect, and our Code of Business Conduct establishes the standards, expectations and policies that everyone at Kontoor Brands must adhere to every day, including guidance for interacting with each other, our customers, third parties and within our communities.

While it's not possible for the Code to address every business situation we may encounter, it does give us the guidance we need to assess a variety of situations, the expectations that are incumbent on all of us and the resources to ask or help when we need it. More than a simple rule book or a set of guidelines, our Code is an essential part of our operations, and it is critical to achieving success as an organization.

By understanding and embracing our Code of Business Conduct, we'll not only achieve goals that we can be proud of but earn an exemplary record of how we conduct business in pursuit of success.

Thank you for your attention to this important document and for your commitment to always acting with integrity.

Sincerely,

Scott Baxter
President & Chief Executive Officer



OUR COMMITMENTS

Our commitment to operate ethically and lead with integrity is embedded in the five principles of our Code. Our Code guides us on upholding this commitment as we interact with each other, our partners, our consumers and our stakeholders.

1	WE WILL LEAD WITH **INTEGRITY.**
2	WE WILL TREAT EVERYONE WITH **DIGNITY AND RESPECT.**
3	WE WILL COMPETE **FAIRLY AND HONESTLY.**
4	WE WILL **FOLLOW THE LAW** EVERYWHERE WE DO BUSINESS.
5	WE WILL STRIVE TO MAKE OUR **COMMUNITIES BETTER.**

THE ESSENTIALS

FOCUSED ON:

- Why We Have A Code
- Who Must Follow Our Code
- Ethical Decision Making
- Seeking Guidance and Raising Concerns
- Our Commitment to Preventing Retaliation
- Further Expectations for Managers
- Approvals, Amendments and Waivers





1

WE WILL LEAD WITH *INTEGRITY*

WHY DO WE HAVE A CODE?

At Kontoor Brands, integrity never goes out of fashion. Our success is a direct result of the values we embrace as a company and as people. To us, values such as honesty, integrity and respect are more than words—they are embedded in everything we do.

Our Code of Business Conduct ("Code") demonstrates how our core values come to life in our day-to-day business dealings. It lays out common scenarios, and gives us the guidance we need—or the resources to turn to when guidance isn't enough—to help ensure we act ethically at all times.

By setting forth the high standards we are expected to uphold, our Code also serves as a pledge we make to our shareholders, our customers and each other. We commit to act with integrity—not only because it contributes to our success, but also because it is the right way to achieve success.

WHO MUST FOLLOW OUR CODE?

This Code and all relevant corporate policies apply to everyone who conducts business on behalf of Kontoor Brands, including associates and members of Kontoor Brands' Board of Directors, regardless of seniority or location. We are all responsible for reading and understanding our Code.

We also expect our business partners to follow similar principles, and we aim to work only with those who meet our exacting standards.



NEED TO KNOW

Due to local laws, the Ethics Helpline can only accept reports regarding audit or accounting fraud, bribery, or banking or financial concerns in certain countries. If you are calling from a country where anonymous reporting is limited, you will be directed to report your concerns to local management.

ETHICAL DECISION MAKING

Maintaining our Company's high standards for ethical business conduct requires us to act with honesty and lead with integrity. There may be times when you need to make a business decision, but the right thing to do is not immediately clear. In those instances, asking these questions can be helpful:

- Is it legal?
- Is it consistent with our Code of Conduct?
- Does it reflect our company's values?
- Would you be comfortable if others knew about it?

If the answer to any of these questions is "no," don't move forward

with the action. If you are not sure, seek guidance. **See our Resources Section, page 32.**

SEEKING GUIDANCE AND RAISING CONCERNS

Raising concerns as soon as they arise and seeking guidance before acting can help Kontoor Brands improve processes and solve problems quickly. Since this Code cannot address every situation you might encounter, always ask for help whenever you have a question.

The following resources are ready to assist you:

- Your manager, or another manager you feel comfortable speaking with
- Your Human Resources representative
- Your department head, controller or Chief Financial Officer ("CFO")
- Kontoor Brands' General Counsel and other members of the Legal Department
- Kontoor Brands Ethics and Compliance or Our Ethics Helpline: Ethics.KontoorBrands.com

The Ethics Helpline is free, confidential and available 24 hours a day, 7 days a week around the world. If you don't want to identify yourself, you can make a report anonymously where allowed by law.

Kontoor Brands makes every effort to investigate reported concerns appropriately and consistently. Associates are required to cooperate in all investigations of alleged misconduct.

Kontoor Brands takes violations of our Code seriously, and the outcome for offenders may include termination. Each officer and department head is responsible for monitoring and enforcing the Code within his or her area of responsibility.

OUR COMMITMENT TO PREVENTING RETALIATION

Kontoor Brands will never tolerate retaliation toward any associate for coming forward with a good-faith report or participating in an investigation. "Good faith" means making a report with honest intentions and providing all relevant information. Retaliatory acts—such as demotions, harassment or loss of employment—are prohibited by Kontoor Brands If you believe you have been subjected to or have witnessed retaliation, you should report it to Human Resources or Kontoor Brands Ethics and Compliance immediately. For more information, see our Non-Retaliation Policy.

FURTHER EXPECTATIONS FOR MANAGERS

Our managers have additional responsibilities to implement and uphold our values by:

- Acting as role models and leading with integrity
- Promoting a diverse and inclusive environment
- Encouraging our speak-up culture in which associates feel comfortable raising concerns
- Escalating reports from associates, as appropriate and
- Never allowing or ignoring acts of retaliation.

It falls on our managers to set the standard for all associates at Kontoor Brands This means creating a positive work environment, learning and understanding our Code and modeling ethical behavior every day. At Kontoor Brands, we strive for integrity at every level of our operations, starting with our leaders.

APPROVALS, AMENDMENTS AND WAIVERS

Our Code has been approved by Kontoor Brands' Board of Directors. Waivers of this Code for the CEO and senior financial officers may only be granted by the Board of Directors, and will be promptly disclosed to Kontoor Brands' shareholders. Any waivers for other associates may only be granted in writing by Kontoor Brands' General Counsel. Material amendments to this Code must be approved by Kontoor Brands' Board of Directors, and any amendments that are applicable to the CEO and the senior financial officers will also be promptly disclosed to the Company's shareholders.

OUR COLLEAGUES

FOCUSED ON:

- Communicating Openly
- Embracing Inclusion and Diversity
- Preventing Harassment and Discrimination
- Ensuring Health and Safety
- Protecting Employee Privacy
- Protecting Consumer and Third-Party Data



COMMUNICATING OPENLY

We believe open communication and the free expression of diverse and differing ideas is the best way to collaborate, solve problems and create a winning team. So, come forward when you have concerns, maintain your integrity in your interactions with your colleagues, and encourage each other to share the ideas that contribute to our success. See our Open Door Policy for additional guidance.

EMBRACING INCLUSION AND DIVERSITY

Kontoor Brands is committed to creating an inclusive environment that welcomes and values our differences. We know that our continued success and growth will be enhanced by a diverse workforce that encompasses a wide range of perspectives, skills and abilities. This also means Kontoor Brands makes employment decisions based only on merit and without regard to race, color, religion, national origin, sex, age, disability, sexual orientation or any other characteristic protected by law.



2

WE WILL TREAT EVERYONE WITH ***DIGNITY*** AND RESPECT.



PREVENTING HARASSMENT AND DISCRIMINATION

We believe in treating each other respectfully and do not tolerate harassment within our workplace. “Harassment” is any unwelcome conduct—whether physical, verbal or sexual—that has the purpose or effect of creating an intimidating, hostile or offensive workplace. Avoiding harassment means avoiding any of the following types of conduct:

- Slurs, offensive remarks or jokes based on a person’s race, color, religion, national origin, sex, age, disability, sexual orientation or other similar characteristics
- Unwanted touching, assault or intimidating gestures such as blocking a person’s movement
- Requests for sexual favors or unwanted sexual advances, such as leering or making sexual gestures or
- Repeated invitations for dates when the other person has declined.

If you experience or witness harassing behavior of any kind, you are encouraged to report it immediately. You will never face retaliation for making a report in good faith. See our Harassment-Free Work Environment Policy for additional guidance.

QUESTION — ANSWER

Q: Ana has recently accepted a new role, which requires her to work closely with Chad. At first she is flattered when he compliments her looks, but as time goes on, his comments become more personal until he begins making crude gestures to express how attractive he thinks she is. Ana is upset by this behavior, but she wants to handle this the right way. What should she do?

A: If asking Chad to stop has no effect, Ana should not hesitate to go to her manager or another resource listed in this Code. Chad’s unwanted attention is creating a work environment that is uncomfortable for Ana, and his behavior should stop immediately. Ana can rest assured that she will not face retaliation for reporting Chad’s behavior, because Kontoor Brands is committed to creating a respectful, secure work environment for us.

ENSURING HEALTH AND SAFETY

Because Kontoor Brands values our work and our well-being, our Company goes to great lengths to foster a safe and healthy work environment.

Associates may not sell, possess, distribute, use or purchase illegal drugs—or sell, transfer or distribute prescription drugs—on Company premises or during working hours. Associates must never work while impaired by alcohol or drugs.

If you are concerned about a substance-abuse problem, please seek confidential assistance through your benefits provider.

In addition, Kontoor Brands does not tolerate any action that threatens people, property or our Company, including verbal threats, harassment, physical attacks, damage to Company property, possession of any weapon on Company property or any other behavior that would make others feel unsafe.

If you become aware of any health or safety concern, report it to a manager immediately. For additional guidance, see our Substance Abuse and Violence-Free Workplace Policies.

PROTECTING EMPLOYEE PRIVACY

We respect the privacy of our fellow associates and will safeguard the confidentiality of sensitive personal information that we receive in the course of our work. This includes personal health information, contact information, government-issued identification numbers and confidential employment information, including salary and evaluation details. If your job involves having access to such information, you must take care to safeguard it. Only use other associates' private information for valid business purposes, and never access it or share it with others—even colleagues—unless necessary to fulfill your job responsibilities.

PROTECTING CONSUMER AND THIRD-PARTY DATA

We also strive to protect the confidential information of our consumers and third parties and safeguard their confidential personal information against unauthorized access, use or disclosure. Consult the Legal Department with any questions about the use and handling requirements of consumer and third-party data.

OUR COMPANY

FOCUSED ON:



- Understanding Conflicts of Interest
- Outside Employment Or Financial Interests
- Working With Family Members And Close Friends
- Board Memberships Or Leadership Roles
- Corporate Opportunities
- Gifts and Entertainment
- Using and Protecting Company Property and Information
- Appropriate Use of Social Media
- Keeping Accurate Accounting and Financial Records
- Public Release of Corporate Information and Quality of Public Disclosures
- Insider Trading
- Government Contracting





3

WE WILL COMPETE *FAIRLY* AND HONESTLY.

UNDERSTANDING CONFLICTS OF INTEREST

A **"conflict of interest"** arises any time your personal interests interfere with your ability to make objective decisions on behalf of Kontoor Brands Because of the risk for harm to our Company, we each have a duty to avoid situations that could create—or even appear to create—a conflict of interest.

Associates, including officers and directors of Kontoor, may not own any interest in (excluding publicly-traded securities) or have any personal contract or agreement of any nature with suppliers, contractors, customers or others doing business with Kontoor that might tend to influence a decision with respect to the business of Kontoor.

In order to avoid conflicts of interests at the executive level, each of the CEO and senior financial officers must disclose to Kontoor Brands' General Counsel any material transaction or relationship that reasonably could be expected to give rise to such a conflict. The General Counsel will notify the Nominating and Governance Committee of any such disclosure. Conflicts of interest involving the General Counsel will be disclosed to the CEO, and the CEO will notify the Nominating and Governance Committee.



OUTSIDE EMPLOYMENT OR FINANCIAL INTERESTS

While Kontoor Brands recognizes that some associates will work second jobs, associates should never engage in any outside employment or other activity that violates obligations to Kontoor Brands, such as confidentiality. In addition, if you have an ownership interest or financial stake (excluding publicly traded securities) in any company with which Kontoor Brands does business, you must disclose this to your manager.

WORKING WITH FAMILY MEMBERS AND CLOSE FRIENDS

Working with family members or those with whom you may have a significant personal relationship can lead to the appearance of bias. Sometimes, this may conflict with the best interest of Kontoor Brands, especially if there is a reporting relationship between two close individuals. If one of your family members or someone with whom you have a significant personal relationship works for Kontoor Brands, you should not be involved in the decisions related to the hiring, compensation, evaluation or promotion of that individual. See our Working Relationships Policy for additional guidance.

A conflict of interest can also arise if you, your family member or close friend works for a company that has a relationship with Kontoor Brands —such as one of our suppliers, resellers, customers or competitors. These business relationships should be based only on what is best for Kontoor Brands If you find yourself interacting with a company that a relative or close friend has ties to, notify your manager immediately and remove yourself from the decision-making process. Do not use your position at Kontoor Brands to influence the bidding process or any negotiation based on a personal relationship.

NEED TO KNOW

"Family members" includes parents, siblings, spouses, legal guardians, children, in-laws, grandparents, grandchildren, step-relatives or any other person regularly residing in your household.

QUESTION — ANSWER

Q: Amy is responsible for the selection and management of Kontoor Brands' sales agents in Europe. Amy selects the sales agency her husband works for to cover the Eastern European region. The agency is one of the best-known and most effective in Europe, and is willing to work for a commission that is substantially less than that paid to other agents. Did Amy do the right thing?

A: No. Although this arrangement appears to substantially benefit our Company, it is still a conflict of interest. Amy should not be involved in a selection process that involves the company her husband works for.

BOARD MEMBERSHIPS OR LEADERSHIP ROLES

Before accepting a position to serve on the board of directors or in a leadership role for an outside company that does business with Kontoor Brands or that is in a similar market or industry, seek approval from your manager to ensure that no conflict of interest exists and that serving will not affect your ability to do your job at Kontoor Brands.

CORPORATE OPPORTUNITIES

Part of our shared commitment to Kontoor Brands is to never use company property, information or our positions at Kontoor Brands for personal gain. You should never compete with Kontoor Brands, whether by engaging in the same line of business or by taking away any opportunity for sales or purchases of products, services or interests. For more information, see our Conflict of Interest Policy.

QUESTION — ANSWER

Q: Bill is a product designer at Kontoor Brands specializing in clothing for the outdoors. Bill and his brother have started a small company that has recently applied for a patent associated with a new jacket's moisture-wicking and thermal characteristics. Bill completed the patent application on his lunch breaks using a Kontoor Brands computer. Bill asks his manager whether Kontoor Brands might be interested in licensing the patent. What problems have Bill's actions created?

A: This situation is a conflict of interest for Bill. He personally stands to benefit if Kontoor Brands licenses the patent, while at the same time his responsibilities at Kontoor Brands involve potential applications for the patent. Further, Bill should not have used Kontoor Brands property to apply for registration of the patent, since it could be used to manufacture products that would compete with Kontoor Brands' products.

NEED TO KNOW

A gift is any item of value and includes gift cards and other cash equivalents, personal favors and event tickets.

QUESTION ANSWER

Q: A Kontoor Brands supplier is sponsoring a nationally recognized sporting event and has invited Herman, a Kontoor Brands brand manager, to attend the event. The supplier tells Herman that some of their key executives and factory representatives will also attend. Herman wants to take the supplier up on his offer. How should he handle the invitation?

A: Herman should consider the following questions:

- Is there any exchange of cash involved?
- Has Herman received frequent gifts or entertainment from this supplier?
- Will accepting the invitation influence or give the impression that it is influencing a business decision?
- Is the expense of the entertainment extravagant?

If the answers to these questions are all "no," and attending will help build or maintain the business relationship for the benefit of Kontoor Brands, Herman may be able to attend. Before accepting the invitation, Herman must obtain his manager's approval.

GIFTS AND ENTERTAINMENT

You must avoid even the appearance of making business decisions based on illegal, unethical or compromising influences. Business courtesies such as the exchange of gifts or attending entertainment events may be appropriate only under certain circumstances.

Kontoor Brands associates may exchange gifts of insignificant value with suppliers, customers or others who are doing business with Kontoor Brands, provided the following guidelines are adhered to:

- Gifts may not be extravagant
- Gifts must be infrequent and
- A gift should not give the impression that it will influence a business decision.

Gifts of money (cash or cash equivalent) are never acceptable.

Promotional items, branded items or holiday gifts of nominal value are permissible. Entertainment among Kontoor Brands and others may be appropriate if participation will help build or maintain a business relationship for Kontoor Brands' benefit, business topics will be discussed during the event, or members of the existing or proposed relationship teams will be in attendance. Before accepting such an invitation, however, be sure to obtain approval from your manager.

Also, family members may not receive compensation, commissions, gifts or entertainment perks from companies or organizations that deal with Kontoor Brands if doing so could reasonably be construed to influence Company decisions.

Remember that the rules for providing gifts and entertainment to government officials are much stricter than the rules laid out here. Never offer or provide a gift to a government official without prior authorization from the Legal Department.

For questions, email: ethics@kontoorbrands.com.

For guidance on gifts and entertainment, see the Gifts and Entertainment section of our Anti-Corruption Policy.



USING AND PROTECTING COMPANY PROPERTY AND INFORMATION

Acting with integrity means that we are each responsible for safeguarding Company property and protecting it from loss, damage, theft, vandalism, or unauthorized use or disposal. This applies to property located in the office, at home or on customer premises. Kontoor Brands' property includes:

- Physical property, including equipment, facilities and supplies, inventory and vehicles
- Intellectual property, including trademarks, patents, copyrights, work methods and practices, and trade secrets
- Proprietary information, including any non-public information that might be useful to a competitor or that could be harmful to Kontoor Brands or its associates, customers or suppliers if disclosed and
- Information technology resources, including computer software, computer networks, storage devices, e-mail and voice mail.

Company property is intended to be used for appropriate Company business purposes. While incidental personal use of Kontoor Brands' information technology resources is permitted on a limited basis, such use must not interfere with your job responsibilities or productivity levels. All Company proprietary information must be maintained in strict confidence, except when disclosure is authorized by Kontoor Brands or required by law. Upon leaving Kontoor Brands' employment, associates must return all Company property.

Also, remember the following:

- Lock your computer and other devices when you're away from them
- Use passwords that adhere to Kontoor Brands' Information Security Policy
- Do not open e-mails and attachments unless you can identify the sender
- Keep sensitive materials close at hand when you are traveling
- Be aware of your surroundings, taking care not to discuss sensitive or confidential information in public places where others may overhear you, and
- Never share your passwords with others.

QUESTION — ANSWER

Q: Karina has invited a prospective business partner to tour the Kontoor Brands facility where she works. What should Karina keep in mind while planning the visit to keep from disclosing trade secrets or other proprietary information?

A: Karina and her coworkers should make sure that:

- Patterns, confidential business plans and product designs are not left in plain sight
- Product prototypes are kept in secure areas where the visitors are not allowed
- Visitors are not shown any process that could be considered a trade secret
- Visitors are asked to not take pictures or videos of our processes and equipment

If Karina sees anything suspicious during the visit, she should report it to her manager.

APPROPRIATE USE OF SOCIAL MEDIA

The presence of social media across our lives and daily activities requires each of us to be mindful of how we use it. Only authorized associates are permitted to use social media on behalf of Kontoor Brands However, all associates should follow general best practices when using social media, even for personal use, to help prevent unintended consequences that could negatively impact Kontoor Brands' reputation.

If you mention Kontoor Brands online, you must clearly state your association with Kontoor Brands and adhere to the following guidelines:

- Do not discuss Kontoor Brands' confidential or proprietary information, remembering that the internet is a public forum
- Never make vulgar or intimidating remarks about colleagues or consumers, as this may constitute a form of discrimination or harassment
- Always communicate honestly
- Do not make disparaging or misleading remarks about our competitors
- Use the Code and Kontoor Brands' values as your guide.

Also, keep in mind your work commitments. If social media is not a part of your job responsibilities, make sure the time you spend using social media does not interfere with your work.

Refer to our Social Media Policy for additional information.



KEEPING ACCURATE ACCOUNTING AND FINANCIAL RECORDS

Kontoor Brands is responsible for furnishing reliable financial information on a periodic and timely basis to its shareholders, potential shareholders, creditors, governmental agencies and others.

We must do our part to ensure that the accounting and financial records of the Company are maintained based on valid, accurate and complete data with adequate supporting information to substantiate all entries to Kontoor Brands' books of account. Kontoor Brands' books and accounting records are maintained in compliance with generally accepted accounting principles, and properly established controls must be strictly followed. Never falsify any record or document for any reason. Comply with all Kontoor Brands systems of internal controls and do not attempt to circumvent any such process or control. You must report any suspected fraud in the company's financial reporting, disclosures or internal controls. Do not conceal information from management or from the Company's independent auditors or internal auditors. In addition, everyone must take steps to protect the integrity of our corporate information by adhering to our policies on retaining and disposing of Company records. For more information, see our Fraud Reporting and Records and Information Management Policies.

PUBLIC RELEASE OF CORPORATE INFORMATION AND QUALITY OF PUBLIC DISCLOSURES

Kontoor Brands is a publicly held corporation and its shares trade on a U.S. national securities exchange. Accordingly, the public is entitled to regular communications concerning financial and operating information of the Company. It is essential that the credibility of such information be maintained.

Kontoor Brands communicates effectively and simultaneously with shareholders and the public so they have access to full and accurate information, in all material respects, about the Company's financial condition and results of operations. It is of the utmost importance that the distribution of this type of information is carefully planned and coordinated by Kontoor Brands' Legal, Investor Relations and Corporate Communications teams. Senior representatives of these functions, among others, compose Kontoor Brands' Disclosure Committee, which assists senior management in fulfilling their responsibility for oversight of the accuracy and timeliness of such disclosures. Kontoor Brands' reports and documents filed with or submitted to the Securities and Exchange Commission and our other public communications shall include full, fair, accurate, timely and understandable disclosure.

Interviews with security analysts, members of the press and other interested parties may only be conducted by designated members of corporate management. Any such interviews must be approved and facilitated by Kontoor Brands' Investor Relations or Corporate Communications teams.

The distribution of corporate financial releases, booklets, brochures and publications for general public mailings will also be made through the Corporate Communications Department.

Never disclose material company information unless the disclosure has already been made available to the public. This includes posting product or other company information on social media before an authorized public announcement is made. Also, never use inside corporate information for personal gain or disclose it to others who might use it for personal gain. Such action will result in immediate dismissal. See our "Insider Trading" section, below, for additional guidance.

For additional information, view our Regulation Fair Disclosure Policy.

INSIDER TRADING

Kontoor Brands has a long-standing commitment to comply with all securities laws and regulations. These laws prohibit us from purchasing or selling shares of Kontoor Brands securities (including Kontoor Brands common stock, bonds or options)—or those of any public company—based on material, non-public (or "inside") information. This practice is known as "insider trading," and it is illegal.

Never use material non-public information for personal gain prior to its official public release. Such action will result in immediate dismissal. Examples of material information include:

- Possible mergers, acquisitions or divestitures
- Actual or estimated financial results or changes in dividends
- Purchases and sales of investments in companies
- Obtaining or losing significant contracts
- Important management changes
- The threat or development of major litigation or
- Major changes in business strategies.

Information is considered non-public until it has been made available to investors generally, such as through a press release. Just as we may not use material non-public information for our own benefit, we also may not provide it to our family members, friends or anyone else—a practice known as "tipping."

Tipping and insider trading are illegal and carry severe consequences, including possible criminal charges. If you are unsure about whether the information you possess is inside information, seek guidance from Kontoor Brands' General Counsel before acting.

Refer to our Insider Trading Policy for more information.





GOVERNMENT CONTRACTING

We commit to always acting with honesty and integrity, but interactions with government customers have additional obligations and requirements. If you are involved in transactions with the government such as bids, tenders or negotiations, be sure to understand the applicable statutory, regulatory and contractual provisions and controls. Never make unauthorized or incorrect charges or submit inaccurate information regarding costs or pricing. Be mindful of our obligation to protect classified or confidential information. In addition, be diligent in requiring that consultants, resellers and other third parties that interact with governments on our behalf meet all qualification and performance standards, undergo appropriate due diligence and understand our expectations for ethical business conduct. Always involve the Legal Department when engaging in government contracting.

QUESTION — ANSWER

Q: Kontoor Brands is in private talks to acquire a publicly held clothing company. Brian has been working on the deal and thinks the stock will shoot up once the news is made public. He tells his mother to buy 200 shares of the clothing company's stock and quietly tells his Administrative Assistant, Ethel, that she should do the same. What should Ethel do?

A: Brian has engaged in "tipping" confidential information to his mother and Ethel. Ethel should immediately contact Kontoor Brands' General Counsel or the Ethics Helpline to report the details of her conversation with Brian. Insider trading and tipping are serious crimes that could result in severe civil and criminal penalties for Kontoor Brands and any individuals involved. Kontoor Brands will protect any associate who makes a good-faith report of suspected misconduct, and Ethel should not be concerned about retaliation.

OUR MARKETPLACE

FOCUSED ON:

- Fair Dealing
- Fair Competition
- Interacting with Our Partners
- Creating Quality Products
- Anti-Corruption
- Imports and Exports
- International Trade Compliance





4

WE WILL
FOLLOW THE LAW
EVERYWHERE WE DO BUSINESS.

FAIR DEALING

Kontoor Brands engages in fair-dealing practices—meaning we conduct business ethically—at all times. To this end, we do not make disparaging or untrue statements about our competitors. Nor do we make inaccurate or unfair comparisons between our competitors' products and services and our own. We are forthright and fair in our marketing practices and when discussing the quality, features or availability of our products and services. Violations of these practices could lead to civil or criminal liability for the individuals involved and our Company.

FAIR COMPETITION

Our Company is committed to competing fairly by complying with the laws of the countries where we do business. Most of the countries where we operate have fair-competition laws—sometimes known as "antitrust" laws. These laws regulate how we can compete in various markets.

Competition laws pertain to our dealings with customers, suppliers and competitors, and it is important that you know your responsibilities under applicable competition laws wherever you are located. Certain activities are strictly prohibited, including:

- Monopolistic practices
- Price fixing
- Bid rigging
- Market and customer allocation and
- Illegal boycotts.

Remember, antitrust violations frequently take the form of an "agreement between competitors," whether the agreement is in writing, verbal or merely implied. For this reason, you must take special care when interacting with competitors, such as at trade shows or trade association meetings. If a competitor attempts to engage you in conversation about any prohibited topic, stop the conversation immediately and report the incident to the Legal Department.

For additional information, see our Antitrust and Competition Law Policy.



INTERACTING WITH OUR PARTNERS

Just as we protect Kontoor Brands' intellectual property—and expect our business partners to do the same—we, in turn, respect the legal rights of others with whom we do business. Do not make unauthorized copies of copyrighted material, including computer programs for which Kontoor Brands does not have appropriate approvals.

Keeping up-to-date with others in our industry helps Kontoor Brands stay competitive, but we must take care to only collect competitive information in an ethical manner. Never use deceptive or illegal tactics to obtain information about our competitors, and do not ask or allow our associates to share confidential information about former employers. Remember that requesting or accepting confidential information from another company without consent may have legal consequences.

When we do exchange confidential or proprietary information with our business partners, first make sure our documents are labeled appropriately and have a properly executed non-disclosure agreement in place. Seek help from the Legal Department if you have questions.

CREATING QUALITY PRODUCTS

At Kontoor Brands, we take pride in our brands and the quality of the products they represent. We adhere to the strictest standards for quality, and expect the same of our supply chain.

If you become aware of any flaw in our processes or products, or those that are supplied to us, or if you suspect the use, sale or production of counterfeit products or components, report it to your manager or a member of the Supply Chain management team immediately.

ANTI-CORRUPTION

As a global company, Kontoor Brands is subject to several laws prohibiting bribery and corruption, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. We comply with these laws and take pride in competing based on the quality of our products, versus an improperly obtained advantage. At Kontoor Brands, we do not pay bribes to anyone, for any reason.

Never offer or accept a "kickback," which is a sum paid as a personal reward for making or fostering business arrangements. Because of the risk that they could be misconstrued as a bribe, Kontoor Brands prohibits "facilitating payments," which are small, infrequent payments made to expedite the performance of routine government actions, such as the issuance of work permits and visas. Associates and third parties who refuse to pay a bribe will not suffer any penalty, demotion or other adverse consequence, even if it results in loss of business.

Money laundering is a crime and Kontoor Brands strictly prohibits any efforts to conceal illegally gained funds or otherwise make illegal funds look legitimate. Notify your Chief Financial Officer or Kontoor Brands Ethics and Compliance if you are asked to participate in money laundering or if you notice warning signs such as overpayments accompanied by a request for a refund to a different account or payment by someone who is not a party to the contract. For additional information, review the Money Laundering section of our Anti-Corruption Policy.

Anti-corruption laws often do not differentiate between acts made by a company or someone acting on the company's behalf. For that reason, we must be certain that we only deal with third parties that apply the same high standards of ethical business conduct as we do. When working with third parties be sure to complete all required due diligence and take reasonable steps to monitor third-party conduct. Report any possible misconduct to your manager or Kontoor Brands Ethics and Compliance.



Remember, anti-corruption laws are especially strict with regard to interactions with government officials. These include:

- State or local government employees
- Candidates running for political office
- Employees of businesses owned by a government
- Customers, suppliers or anyone working on behalf of the government and
- In some instances, royalty or tribal leaders who may hold dual roles in commercial and government settings.

Also, we may never permit a third party to make any improper payment on our behalf.

If you need more information about identifying and reporting corruption, seek guidance from Ethics and Compliance. For additional information, see our Antitrust and Competition Law Policy.

NEED TO KNOW

A bribe is anything of value given to influence a decision or business outcome, or gain some other improper advantage. Examples include cash payments, offers of employment, excessive travel or entertainment or favors for family members.

QUESTION ANSWER

Q: Bolin is involved in expanding the Company's presence in an emerging market. He speaks with a local consultant who mentions her close relationship with local government officials and suggests her firm can help get permits more quickly. The consultant assures Bolin that her process is legal. What should he do?

A: Bolin should probe further and ask questions to understand the consultant's process for obtaining permits, then consult with his manager and the Legal Department. Although the consultant has not requested money to pay bribes, part of the consulting fees could be used for that purpose. In addition, Bolin must not retain the consultant without ensuring the appropriate third-party due diligence procedures take place and that our written agreement with the consultant clearly prohibits making improper payments on our behalf.

IMPORTS AND EXPORTS

Because we produce and deliver Kontoor Brands' products globally, it is vital to our business that we follow all applicable import and export regulations that apply to our work. Keep in mind that an "export" can mean not only the goods we distribute, but also technology and certain information we supply across national borders, or to citizens of other countries. An "import" occurs when we purchase goods from one country to bring these goods into another country. Both import and export activities generally require the filing of certain documentation and payment of taxes and fees. To retain our Company's ability to do business around the world, we must closely follow all trade regulations that apply to us. The rules regarding imports, exports and re-exports can be complicated, so be sure to involve Kontoor Brands' Customs Compliance professionals or the Legal Department while engaging in international trading activity.





INTERNATIONAL TRADE COMPLIANCE

Some countries where Kontoor Brands conducts business impose sanctions or adhere to sanctions imposed by multi-national organizations, such as the United Nations or the European Union. These sanctions restrict or prohibit dealings with certain countries or individuals. Because Kontoor Brands is a U.S. corporation, we must adhere to the economic sanctions administered by the U.S. Office of Foreign Assets Control (OFAC). These include, but are not limited to, restrictions on financial transactions, travel, and imports and exports. If you handle international business, it is your duty to understand and follow the most current regulations.

Kontoor Brands and all our affiliates worldwide also must comply with U.S. anti-boycott laws. These laws impose penalties for refusing to do business with a country, company or person that is "friendly" to the U.S. based on the request of another. This practice is known as "unsanctioned boycotting," and Kontoor Brands must promptly report any request to support or participate in a boycott to the U.S. government. Boycott activity is not always obvious and may include:

- Bid invitations that require us to provide information about our past, present or prospective relationships with other countries
- Letters of credit that contain boycott terms and conditions such as "goods of Country X not permitted" or
- Meetings during which we are questioned about who we would or would not do business with.

Contact the Legal Department if you believe you are being asked to participate in an unsanctioned

boycott. For more information, see our International Trade Compliance Policy.

OUR COMMUNITIES

WHAT YOU'LL LEARN:

- Sustainability and Responsibility
- Kontoor Brands' Responsible Sourcing Program
- Local Community Relations and Volunteerism
- Charitable Donations
- Political Activities



SUSTAINABILITY AND RESPONSIBILITY

Kontoor Brands is aware of the impact our industry has on people and the environment—from the production of raw materials like cotton to the manufacturing of finished goods. While we comply with all environmental laws, we follow strict standards for the well-being of our associates and the communities in which we operate, always seeking to minimize our impact on the natural resources we use.

We have launched multiple programs across our organization and brands in recent years to monitor and reduce our social and environmental impacts—and wherever possible to begin generating positive impacts. Together, our Sustainability and Responsibility efforts are focused on three distinct areas: Planet, Products and People. In each of these areas, we encourage our associates to work across our Company and brands to set targets and strive for ever higher performance.

Associates who have suggestions for how we can further improve Kontoor Brands' environmental conservation efforts are encouraged to contact their local Sustainability and Responsibility representative.



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WE WILL STRIVE TO *MAKE OUR COMMUNITIES BETTER*

KONTOOR BRANDS' RESPONSIBLE SOURCING PROGRAM

At Kontoor Brands, we have adopted Global Compliance Principles to govern all facilities that produce goods for our Company. These principles reflect our commitment to individual rights throughout our operations, including the right to work freely, bargain collectively and be compensated fairly.

Kontoor Brands follows applicable labor laws in place wherever we operate, and does not permit the use of forced or involuntary labor in any of our operations or the operations of facilities that produce goods for Kontoor Brands We do not permit discrimination against or harassment of our colleagues who choose to be represented by a trade union. For additional information, see our Global Compliance Principles.

LOCAL COMMUNITY RELATIONS AND VOLUNTEERISM

Kontoor Brands believes that each of us has a responsibility to help improve the well-being of our communities. We believe volunteering can be transformational for our associates as well as beneficial to the community. Across the globe, Kontoor Brands associates volunteer their time and contribute financial support to local programs we care deeply about. If you would like more information about volunteering in your community, contact your local Human Resources representative.

CHARITABLE DONATIONS

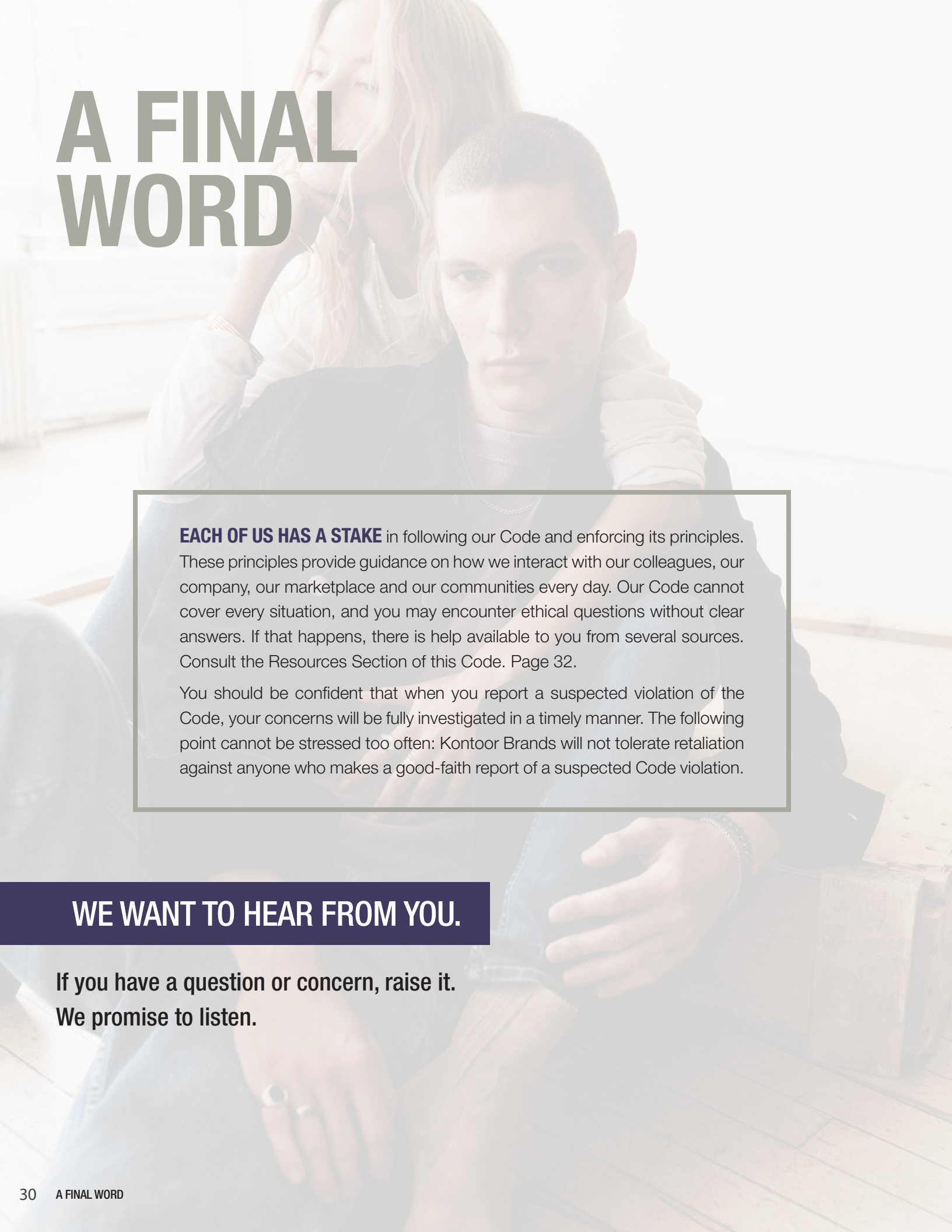
Kontoor Brands is engaged in philanthropic work in many of our local communities and we continue to consider opportunities to make a difference through corporate philanthropy on an ongoing basis. We are constantly exploring new ways to help generate even larger positive impacts at scale.

POLITICAL ACTIVITIES

Kontoor Brands encourages associates to support political parties and candidates for public office of their choice. However, any partisan political activity must take place on associates' own time, at their own expense and not on Company premises. This means associates may not use Company resources—including e-mail or office supplies—to promote political candidates. Never pressure colleagues to vote a certain way or support a particular cause or candidate.

If your job involves regular interaction with legislators, regulators, executive branch officials or their staffs, it is your responsibility to adhere to lobbying disclosure rules. If you are unsure whether an activity is considered lobbying, check with the Legal Department before proceeding.

A FINAL WORD



EACH OF US HAS A STAKE in following our Code and enforcing its principles. These principles provide guidance on how we interact with our colleagues, our company, our marketplace and our communities every day. Our Code cannot cover every situation, and you may encounter ethical questions without clear answers. If that happens, there is help available to you from several sources. Consult the Resources Section of this Code. Page 32.

You should be confident that when you report a suspected violation of the Code, your concerns will be fully investigated in a timely manner. The following point cannot be stressed too often: Kontoor Brands will not tolerate retaliation against anyone who makes a good-faith report of a suspected Code violation.

WE WANT TO HEAR FROM YOU.

If you have a question or concern, raise it. We promise to listen.

RESOURCES



Regardless of how you choose to raise a question or concern, all reports will be taken seriously and handled confidentially. Rest assured that you will not face retaliation at Kontoor Brands for raising an issue in good faith.

YOUR MANAGER

In most cases, your manager will be in the best position to help you with questions or concerns since he or she understands your position and responsibilities. If you prefer not to speak with your manager, you can speak with another manager you trust.

HUMAN RESOURCES

Human Resources can help resolve concerns or point you in the right direction.

CONTROLLER OR CFO

If you have a concern about accounting, internal controls, or auditing matters, you can bring the issue to your local Controller or CFO.

LEGAL DEPARTMENT

Kontoor Brands' Legal Department, including the General Counsel, can advise you on issues related to the laws and regulations we must follow.

To reach the Legal Department you can send an e-mail to: Legal.Department@KontoorBrands.com.

ETHICS AND COMPLIANCE

Ethics and Compliance is available to answer questions about any topic related to this Code or to discuss possible violations of the Code, Kontoor Brands policies or the law. To contact Ethics and Compliance send an e-mail to Ethics@KontoorBrands.com.

OUR KONTOOR BRANDS ETHICS HELPLINE

The Kontoor Brands Ethics Helpline is free, confidential and available 24 hours a day, 7 days a week around the world. If you don't want to identify yourself, you can make a report anonymously where allowed by law.

TO CONTACT THE HELPLINE

Visit Ethics.KontoorBrands.com for a list of phone numbers by country or to make a report online.



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HONESTY • INTEGRITY • RESPECT

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