



# Burlington

CODE OF CONDUCT

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# A MESSAGE FROM OUR CEO

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## A MESSAGE FROM OUR CEO

Dear Burlington Team,

Burlington is a fast-growing off-price retailer committed to delivering great merchandise value to our customers. Our business requires flexibility and speed, and we are successful because we are focused on driving results. However, the way we conduct ourselves and our business is just as important as the results we achieve. Burlington's Code of Conduct and our Core Values will guide you in these efforts.

I ask that every member of the Burlington community – every associate, officer, and leader – take the time to read, understand, and adhere to our Code. By making a personal commitment to follow our Code of Conduct, we can ensure that across the entire organization, Burlington is operating with integrity and the highest ethical standards.

If you have any questions or concerns about the Code, please refer to the resources outlined in the Code.

I thank you for your commitment to the company, to our Core Values, and to building a great workplace where everyone matters.

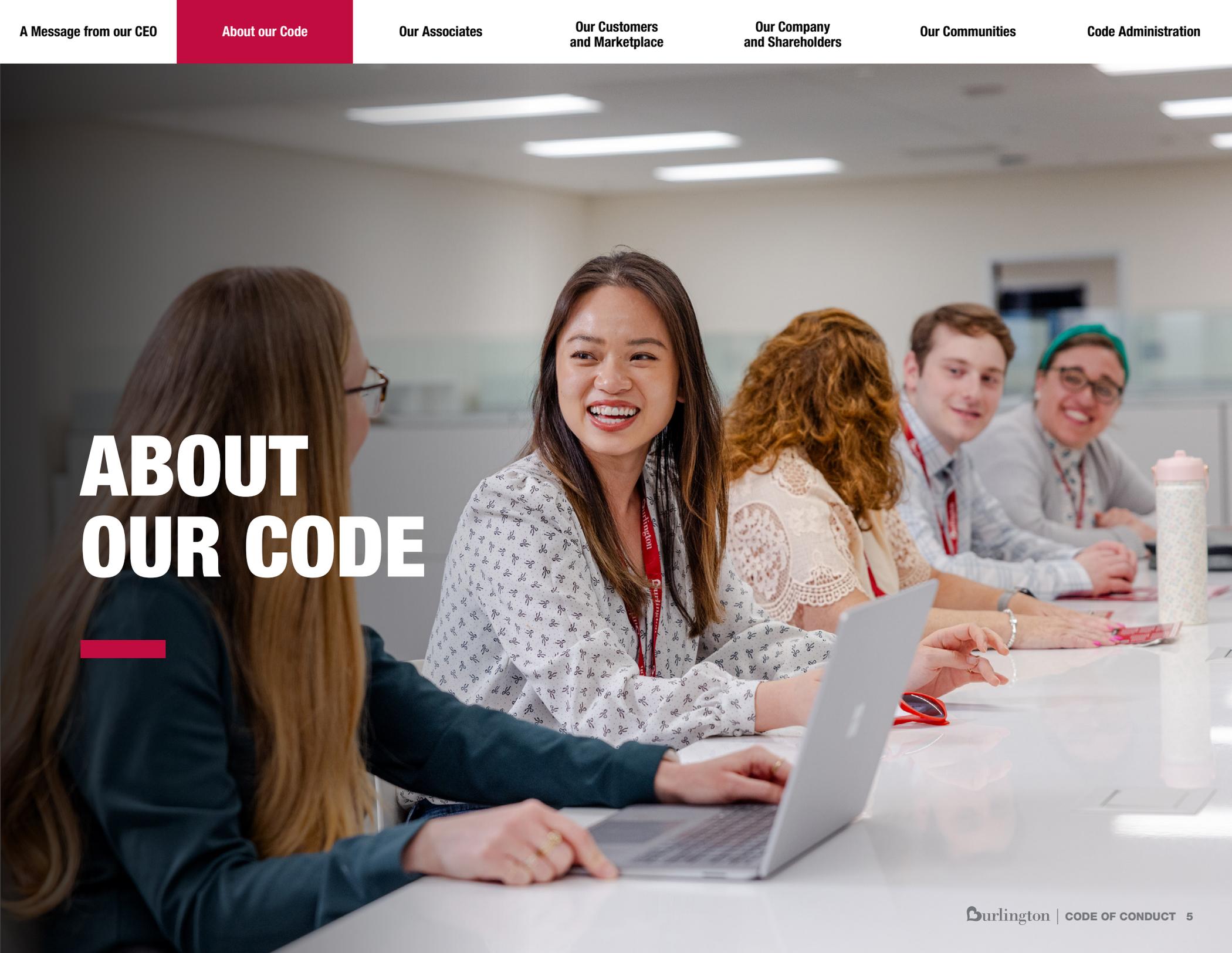
Sincerely,



A handwritten signature in black ink, appearing to read 'M O'Sullivan'.

**Michael O'Sullivan**  
Chief Executive Officer

# ABOUT OUR CODE



## ABOUT OUR CODE

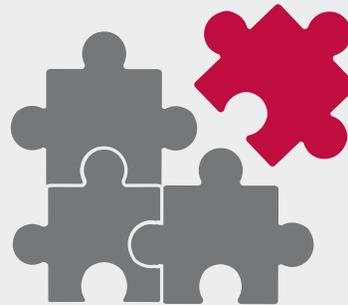
Burlington is built on a foundation of integrity and trust. Our Code of Conduct serves as a guide for how we conduct business and how we represent ourselves with integrity, providing the ethical framework for everything we do. Every member of the Burlington community—associates, officers, and directors—is responsible for understanding and following the Code, as well as all laws. We also expect our third-party partners to uphold these principles when doing business with us.

The Code reflects our daily commitment to act ethically and demonstrate our Core Values.

### DRIVE RESULTS

Our fast-paced workplace and culture allow us to continuously evolve the off-price model. We hold ourselves and each other accountable for our business success and have a shared sense of ownership to achieve our company goals.

### CORE VALUES



### BUILD TEAMS & PARTNERSHIPS

Through collaborative teamwork, we solve complex business challenges together.



### TRUST & RESPECT EACH OTHER

The way we do business is equally as important as the results we achieve. We have a shared commitment to conduct business ethically, and treat customers, business partners, and each other with trust and respect.



Our Code is organized into sections that reflect those we serve: Our Associates, Our Customers and Marketplace, Our Company and Shareholders, and Our Communities. In sections, we highlight key takeaways with a  to represent the heart of the message for our Burlington community.

It is important that you speak up if you have any questions or see or suspect violations of the Code.

The Code is available on the company's website at [www.burlington.com](http://www.burlington.com) and on the company's internal HeartBeat portal.



## ETHICAL DECISION MAKING

We are responsible for recognizing ethical issues and doing the right thing. But not all circumstances we encounter are straightforward. Consider the following when faced with a difficult decision or situation:

Is it consistent with the **Code of Conduct** and our policies?

.....

Is it consistent with our **Core Values**?

.....

Would I be comfortable if this were **made public**?

.....

Is this the **right thing to do**?

If the answer to any of these is **NO** or you are not sure, do not move forward with the action, and contact your manager, HR representative, or **Ethics & Compliance** for additional guidance.



## ETHICS & COMPLIANCE

**Ethics & Compliance** is a team within the Legal Department whose objective is to support associates across the Company with resources and tools to promote integrity, ethical decision-making, and an overall culture of compliance. If there is a question or concern, please e-mail **Ethics & Compliance** at [compliance@burlington.com](mailto:compliance@burlington.com).

## OPEN DOOR POLICY

If you find yourself in a position where you are unsure about what to do, the Code can guide you; however, no code can anticipate every situation. If you ever need additional support, Burlington's Open Door Policy encourages open and honest communication and effective problem solving. Whether you have a question, a concern, or need to report a potential violation of the Code, we all have a shared responsibility to speak up. If you believe anyone is not living up to our Code or policies or have a question or concern, do not hesitate to contact your manager, HR representative, or **Ethics & Compliance**.

## NO RETALIATION

Retaliation against any associate who participates in an investigation or who, in good faith, reports a possible violation of the Code, company policies, or the law is strictly prohibited and will not be tolerated. Any act of retaliation, or attempt to retaliate, will result in disciplinary action, which may include termination of employment.



**RESOURCE**  
Open Door Policy



## INTEGRITY HOTLINE

In conjunction with the Open Door Policy, Burlington has an **Integrity Hotline** for issues involving ethics and compliance. You can contact the **Integrity Hotline** by telephone (**1-877-371-0680**), via the internet ([www.burlington.ethicspoint.com](http://www.burlington.ethicspoint.com)), or at the QR code below.



You can remain anonymous when contacting the **Integrity Hotline**; however, the more information provided, the better the Company can investigate and take appropriate action. Anonymous reports that lack enough details or information for follow-up may not be actionable by the Company.

**Pursuant to our Policy and Procedures for Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters adopted by our Audit Committee, concerns regarding accounting, internal accounting controls, or auditing matters should be submitted to:**

- Our Legal Department by e-mail [BSIsubmissions@burlington.com](mailto:BSIsubmissions@burlington.com)
- By writing to our General Counsel
- By contacting the **Integrity Hotline**.



## HOTLINE REPORTS

We take every report of misconduct seriously and have clear processes in place to ensure that any report made to the **Integrity Hotline** is reviewed promptly. When necessary, an internal investigation will be conducted by qualified and trained professionals to ensure fairness and accuracy. Upon receiving the report, they:

- ✓ **Engage only the necessary partner(s) to evaluate the reported concern.**
- ✓ **Keep information strictly confidential to the best extent that they can.**
- ✓ **Treat everyone involved in the internal investigation with dignity and respect.**

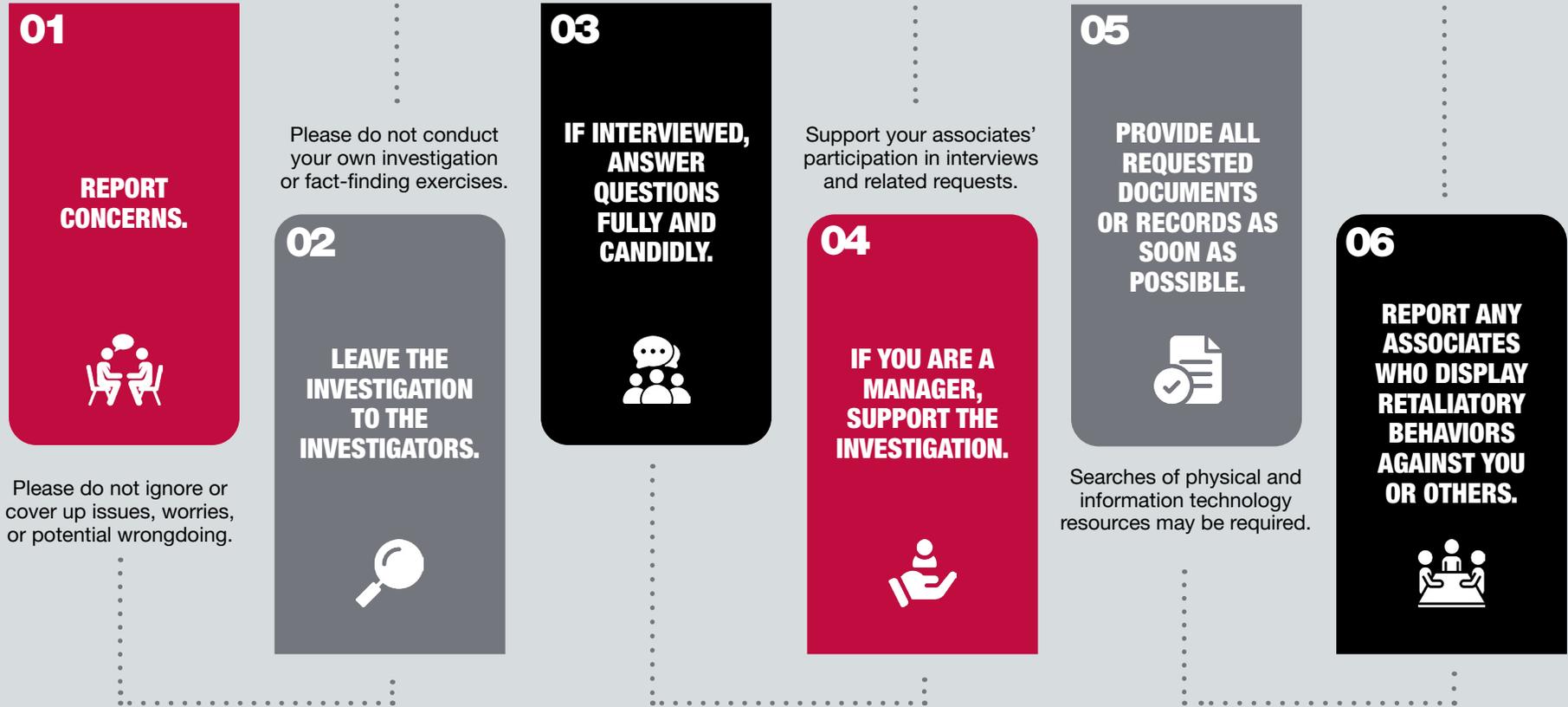


### RESOURCES

[Open Door Policy](#)

[Policy and Procedure for Complaints Regarding Accounting, Internal Accounting Controls or Auditing Matters](#)

If you are involved in an investigation, you are expected to cooperate fully and candidly in the following ways:

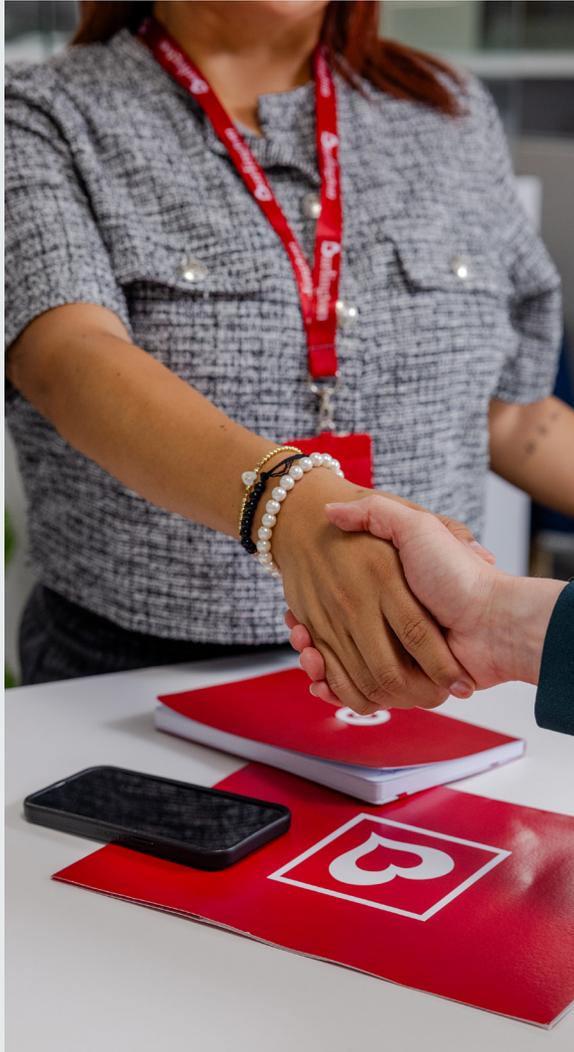


What do you need to know about reporting?

**You might not learn the result of an investigation**  
this protects the privacy of those involved and complies with all laws.

**Avoid discussing the issue or investigation with others**  
this helps maintain confidentiality.

**There will be discipline for violations of this Code or Company policy**  
this includes disciplinary action, up to and including termination of employment. Some violations may also be reported externally.



## MANAGER RESPONSIBILITY

As a manager, you play an important role in fostering a culture of trust and ethics within your team. Success comes from creating an environment where compliance is expected, and ethical behavior is part of everyday practice. By modeling the following principles, you can demonstrate our Core Values and uphold the highest standards of integrity:

### LEAD BY EXAMPLE

Help your team understand the Company's expectations for ethical conduct. Communicate your support for our Core Values and purpose and be clear that you expect actions that are consistent with them.

### BE OPEN

Foster an inclusive environment where associates feel comfortable asking questions and expressing their ideas and opinions. When an associate raises a concern, listen carefully, maintain confidentiality, and be objective.

### STAY ALERT

Always be on the lookout for situations or actions that may be unethical or potentially damaging to the Company's reputation. Contact the **Integrity Hotline** or **Ethics & Compliance** if you suspect such situations.

### SEEK SUPPORT

If you have questions or aren't sure if you can resolve a concern on your own, contact the **Integrity Hotline** or **Ethics & Compliance**.

# OUR ASSOCIATES



## OUR ASSOCIATES

*We respect the individuality of our associates and maintain a workplace culture that allows you to perform to your highest potential. We are committed to a safe, secure, and inclusive environment where we treat each other with dignity, trust, and respect and where workplace laws are followed.*



### CULTURE AND COMMUNITY IMPACT

At Burlington, we stand for equality and the dignity of each person. We believe that everyone deserves to be treated with respect and understanding.

Fostering a workplace that welcomes associates from a wide range of backgrounds, perspectives, and experiences is key to driving creativity and innovation, strengthening decision-making, increasing productivity and associate engagement, and enhancing our ability to serve our customers and communities.

### NO DISCRIMINATION OR HARASSMENT

All forms of discrimination or harassment are not tolerated at Burlington – from the most obvious and offensive behavior to the more subtle.



If you ever experience or witness potential discrimination or harassment, speak up. You can reach out to your manager, HR representative, or contact the **Integrity Hotline**. Every concern is taken seriously, because your voice truly matters. Together, we can ensure Burlington remains a place where everyone feels safe, valued, and respected.

Burlington treats everyone equally. Employment-related decisions are based on qualifications, skills, contributions, and performance, and not on personal characteristics. We are committed to providing equal employment opportunity as well as access to workplace benefits to individuals with disabilities.

We do not condone harassment of any kind, including unwanted sexual advances, requests for favors, or any behavior that’s abusive, offensive, or degrading. And it doesn’t matter how it happens – spoken words, e-mails, notes, photos, memes, texts, social media – harassment in any form is against our policy and our Core Values.



#### RESOURCES

[Anti-Discrimination and Harassment Policy](#)  
[Equal Employment Opportunity Policy](#)

## WORKPLACE SAFETY

We are committed to ensuring that all Burlington work locations are safe and secure for our associates. We comply with all applicable workplace safety and health laws and foster a culture where associates can report safety concerns, hazards, and accidents, or injuries without fear of retaliation.

Workplace violence or threats of violence are never tolerated, and weapons are strictly prohibited in the workplace. Our Safe and Secure Workplace Program and Workplace Violence Management Policy provide the foundation for these commitments. We provide training on the Safe and Secure Workplace Program where required by law and make this training accessible to all associates.



Reporting concerns helps keep all associates safe.

## DRUGS AND ALCOHOL

Associates are not permitted to possess or use illegal drugs, unprescribed substances, or alcohol while at any Company location or conducting Company business. In the rare instances where alcohol consumption is allowed at approved Company events or vendor meetings, we ask that you do so responsibly and exercise sound judgment.

## WAGE AND HOUR RULES

We want to make sure that you are properly paid for your work. Our non-exempt associates must not work off the clock, must record time worked accurately, and take meal and rest breaks in accordance with our policies. All eligible overtime work should be approved by your manager first. Managers who are responsible for associate timekeeping must follow all wage and hour laws and Burlington policies.

We also provide paid time off and paid sick time to eligible associates to support healthy work-life balance and to ensure that you can take time away from work – with pay – to deal with personal and family health issues and other challenging situations.



### RESOURCES

[Drug and Alcohol-Free Workplace Policy](#)  
[Pay Practices Policy](#)  
[Safe and Secure Workplace Program](#)  
[Weapons-Free Workplace Policy](#)  
[Workplace Violence Management Policy](#)

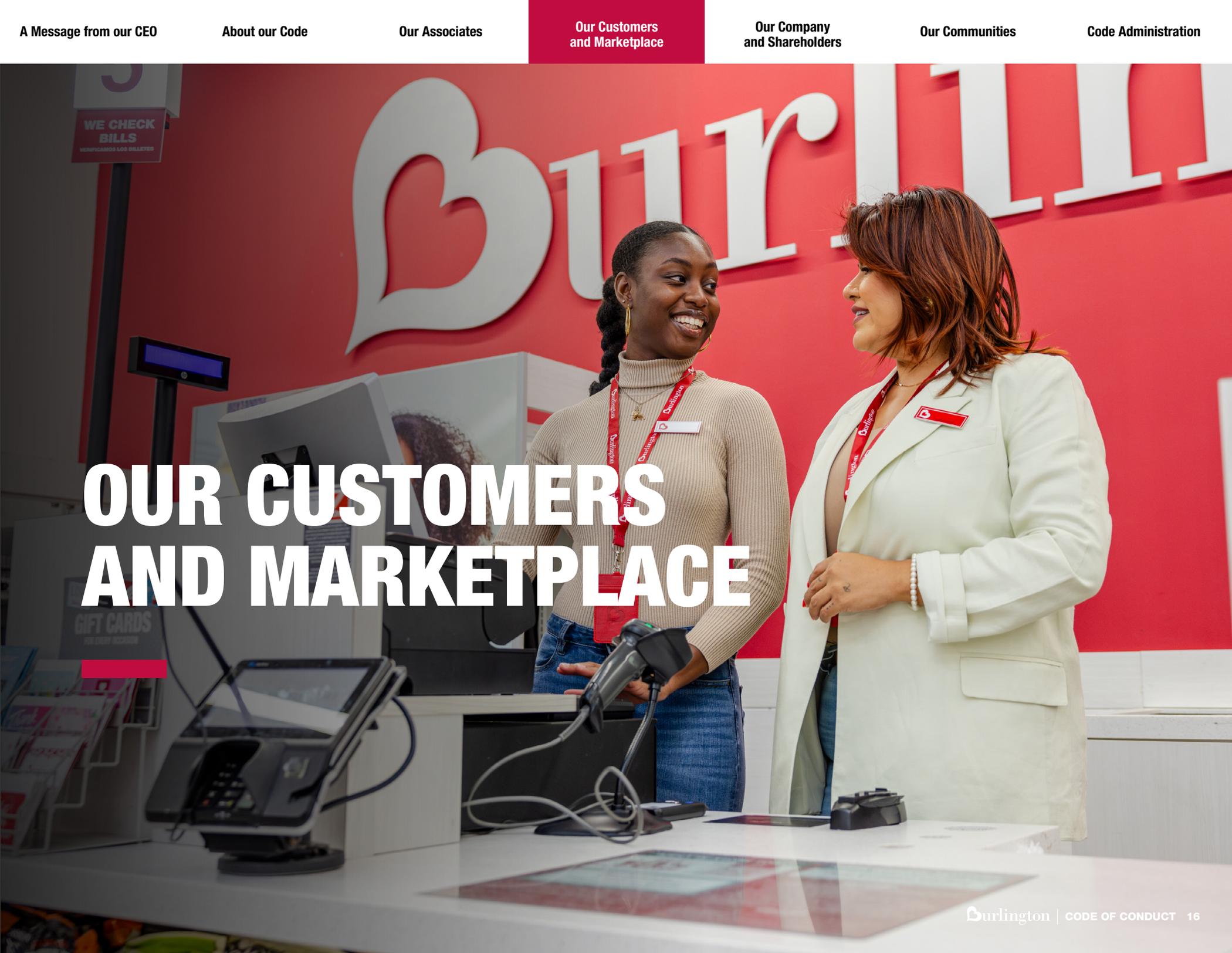
## FOR OUR NON-EXEMPT ASSOCIATES

### DO'S

Clock in/out so that you are paid for all hours worked.  
 Take your meal and rest breaks on time.  
 Use your time off resources as needed.

### DONT'S

Change time punches without proper authorization.  
 Work during your meal and rest breaks.  
 Work off the clock.



# OUR CUSTOMERS AND MARKETPLACE

## OUR CUSTOMERS AND MARKETPLACE

*We treat each other, our customers, and vendors with trust and respect. We compete fairly and with integrity.*



### INTEGRITY WITH OUR CUSTOMERS

Our customers are our top priority. We strive to ensure every customer feels respected and welcomed in our stores. We make honest, accurate statements and take pride in delivering great merchandise values every day.

### VENDOR RELATIONS

We work with many vendors who supply goods and services to Burlington. We treat all vendors fairly, using objective criteria such as cost, quality, credit worthiness, and proven performance. We do not provide preferential treatment based on factors unrelated to these standards.



We expect vendors to comply with all laws and regulations, as well as our vendor code of conduct. If you become aware of any violation by a vendor regarding its business practices, you should contact **Ethics & Compliance**.



#### RESOURCES

[Emergency Response and Safety Guide](#)  
[Open Door Policy](#)

### PRODUCT SAFETY

We are committed to offering products that are safe and compliant with all laws. Our policies and procedures require merchandise vendors and suppliers to meet product safety standards informed by U.S. federal, state and local regulations, as well as hazard and risk-based considerations. If there are claims of unsafe or non-compliant merchandise, we will investigate and take appropriate action. If there are any questions, contact the Product Safety team at [product.compliance@burlington.com](mailto:product.compliance@burlington.com)



**A regulator came to our store and made an unannounced visit. What should I do?**



**Contact the BRIC and refer to the Emergency Response and Safety Guide as a resource.**

## COMMERCE AND TRADE

We conduct business ethically, with integrity, and in compliance with all international trade laws and regulations. These high standards extend throughout our supply chain. All vendors and agents acting on behalf of Burlington must understand relevant international trade regulations, local laws, and import requirements. We also observe all applicable government sanctions and watch lists. If your role involves importing, you must be familiar with these requirements.

## ANTI-BOYCOTT

We do not cooperate with foreign boycotts that are not approved by the U.S. government. If you receive a request related to any boycott, do not respond and immediately contact **Ethics & Compliance**.

## ANTI-BRIBERY AND ANTI-CORRUPTION

We are committed to conducting business with integrity and do not engage in, tolerate, or permit bribery, corruption or unethical business practices. We comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, in every aspect of our business, here and worldwide. These laws and our company policies strictly prohibit offering or accepting bribes — whether involving government officials, vendors, or others. Bribes can include gifts, cash, kickbacks, commissions, profit sharing arrangements, or payment of expenses for you or your family members. If you have questions or suspect a violation, please reach out to **Ethics & Compliance**.



## FAIR DEALING

We compete solely on the merits of the goods we sell. We do not use unfair means to help our business or hurt a competitor's business. All comparisons of our goods with those of our competitors must be accurate and factually supported. You should never resort to untrue or disparaging comments about a competitor's offerings. We are truthful in our advertising, sales, and marketing practices.

## FAIR COMPETITION

Antitrust and competition laws are intended to foster competition among businesses and also support Burlington's own values to ethically conduct business.



If you have any questions about competitor information, including how it was gathered, contact [Ethics & Compliance](#).

You may not use unfair, illegal, or unethical methods to gather competitive information. This includes, but is not limited to, using the proprietary information or trade secrets of another company, or attempting to obtain such information from past or present associates of other companies.

We do not engage in anticompetitive conduct that unfairly restricts competition. We should not enter into anticompetitive agreements or exchange competitively sensitive information with vendors or competitors.

**We cannot use our influence to pressure a vendor to stop selling to our competitors. Also, we cannot allow a vendor to pressure us from doing business with a competitor of that vendor. In addition, while a vendor may suggest a retail price, only Burlington can set that retail price. Please see our Fair Competition Policy for additional examples, along with permitted and prohibited practices.**



**RESOURCE**  
[Fair Competition Policy](#)

## CONFLICTS OF INTEREST

A conflict of interest occurs when your personal interest or involvement interferes with your ability to make decisions objectively and act in the best interest of the Company. Even the appearance of a conflict of interest can hurt your reputation and undermine Burlington’s integrity. It is important to avoid activities that create, or even appear to create, a conflict of interest. Consider the following questions:

**WILL MY PERSONAL INTERESTS, RELATIONSHIPS, AND/OR THIS ACTIVITY INFLUENCE MY DECISION MAKING?**



**DOES THIS INVOLVE A FAMILY OR FRIEND?**



**WILL MY INVOLVEMENT IN THIS ACTIVITY IMPACT MY ABILITY TO DO MY JOB AT BURLINGTON?**



**COULD SOMEONE ELSE SEE THIS AS A CONFLICT?**

If your answer to any of the questions is **YES** or you are not sure, you may have an actual, potential, or perceived conflict of interest that needs to be disclosed. You may complete the Conflict of Interests Disclosure Form below.

 **[Conflict of Interest Disclosure Form](#)**

Undisclosed conflicts of interest are always prohibited, but certain conflicts of interest can be addressed and remediated if they are disclosed in advance.

**Q** Can my sister apply for a job opening in my department?

---

**A** Yes, so long as the position is not in your chain of command, she would not report to you, and you do not influence any hiring or other personnel decisions with the job position. You should disclose this relationship to your manager, HR representative, or **Ethics & Compliance**. You can also disclose via the Conflict of Interest Disclosure Form, available here.

 **[Conflict of Interest Disclosure Form](#)**

**Q** My department is hiring a vendor and I was asked to review the bids for the work. I noticed that one of the bids is from my son’s good friend who just started his own business. What should I do?

---

**A** You should let your manager, HR representative, or **Ethics & Compliance** know. You can also disclose via the Conflict of Interest Disclosure Form, available here.

 **[Conflict of Interest Disclosure Form](#)**

This way, the conflict can be assessed and you may be removed from the decision-making process, if necessary, in order to avoid any actual or perceived conflict of interest. Additionally, it is important to advise the Procurement group to ensure the integrity of the bidding process.

## COMMON EXAMPLES OF CONFLICTS OF INTEREST



### CORPORATE OPPORTUNITIES

Taking personal advantage of corporate opportunities.

### RELATIVES AND PERSONAL RELATIONSHIPS - AT BURLINGTON

Supervising, reviewing, or having influence over a relative or personal relation.

### RELATIVES AND PERSONAL RELATIONSHIPS - OUTSIDE OF BURLINGTON

Doing business with a relative or personal relation who works at a current or potential Burlington vendor, or if a relative or personal relation has a leadership or ownership position at a competitor.

### FINANCIAL INTERESTS AND INVESTMENTS

Situations in which your judgment or objectivity may be influenced by your own financial interest or gain (or that of a relative or personal relation). For example, a financial interest in a vendor, business partner, or company that does business with or competes with Burlington.

### OUTSIDE EMPLOYMENT

External work, including social media influencing, affiliate marketing, consulting or other personal services, and self-employment.

- If you are an hourly associate, who works in a store or distribution center, you may work for other employers (including retailers), so long as your work does not interfere with your Burlington responsibilities.

### BOARD MEMBERSHIP AND SERVICE

Includes board membership at:

- A *for-profit* company
- A *non-profit* organization if you are representing or receiving support from Burlington

Disclosure is important, as Board service can interfere with your obligations to the Company and create a conflict of interest in some cases.



### RESOURCES

[Conflict of Interest Disclosure Form](#)  
[Employment of Relatives and Close Relations/  
 Personal Relationships Policy](#)  
[Open Door Policy](#)

Conflicts may arise as shown above or in other situations, and when in doubt, please ask your manager, HR representative, or **Ethics & Compliance** for support. You may also complete the Conflict of Interest Disclosure Form available here.



[Conflict of Interest Disclosure Form](#)

## GIFTS, ENTERTAINMENT, AND MEALS

Good business relationships are built through trust and integrity, not through the exchange of gifts or other favors. Always avoid even the appearance of making business decisions based on inappropriate or unethical influences, and never solicit gifts, entertainment, or meals.

From time to time, it may be appropriate to accept a nominal gift or participate in a business-related meal or entertainment paid for by a vendor. Please note that the rules governing gifts apply regardless of where the gift is received. If you feel that your judgment will be influenced by accepting a gift, regardless of value, you should decline.

You may only provide gifts, entertainment, or meals of nominal value to vendors if permitted by the vendor's gift policy.

The tools below can help guide you and your manager on how to proceed in a variety of scenarios. Contact [Ethics & Compliance](#) if guidance is needed or questions arise.

### Gifts



#### GIFTS FROM VENDORS - ACCEPTABLE

- ✓ Gifts valued at or below \$100
- ✓ Perishable gifts (e.g., chocolates, food gift baskets, flowers)



#### GIFTS FROM VENDORS - NOT ACCEPTABLE

- ✗ Gifts valued over \$100
- ✗ Cash and cash equivalents (e.g., gift card)
- ✗ Samples
- ✗ Personal favors (e.g., soliciting vendors for donations to personal charities or nonprofits)
- ✗ Tips or commissions
- ✗ Loans
- ✗ Special orders through a vendor

If you receive a gift that is not acceptable, notify your SVP+ and [Ethics & Compliance](#). [Ethics & Compliance](#) can assist with returning or donating the gift.

## Entertainment, Professional Events, and Experiences - Hosted by Vendors

### ✓ PERMITTED - WITH APPROVAL

- ✓ Conferences, training, and retreats
- ✓ **Entertainment** - includes sporting events, golf outings, spa visits, concerts, etc. with vendors, that are not extravagant.
- ✓ **Shopping at a vendor's store** - discount given is to be the same as what is provided to all shoppers.

The vendor also needs to attend the event. The event must be approved by your SVP+ before attending. If approved, the ticket(s), meals, and gift/giveaways valued at \$100 or less (if given to all attendees) associated with the entertainment or conference/training/retreat, may be accepted.

If approved, Burlington will pay for the transportation and lodging/hotels.

For SVP+ attendees, notify **Ethics & Compliance** by e-mail prior to the event, if the vendor is paying for any portion.

### Meals

For meal invitations from a vendor, ask yourself the below questions. If the answer is **YES** to all questions, you may attend the meal with VP+ pre-approval. For all other meals (e.g., meals paid for by Burlington), please refer to the Travel, Expense, and Credit Card Policy.

Is this meal  
infrequent in nature?

Is this meal  
not extravagant?

Will this meal  
maintain objectivity  
(e.g., no special treatment)?

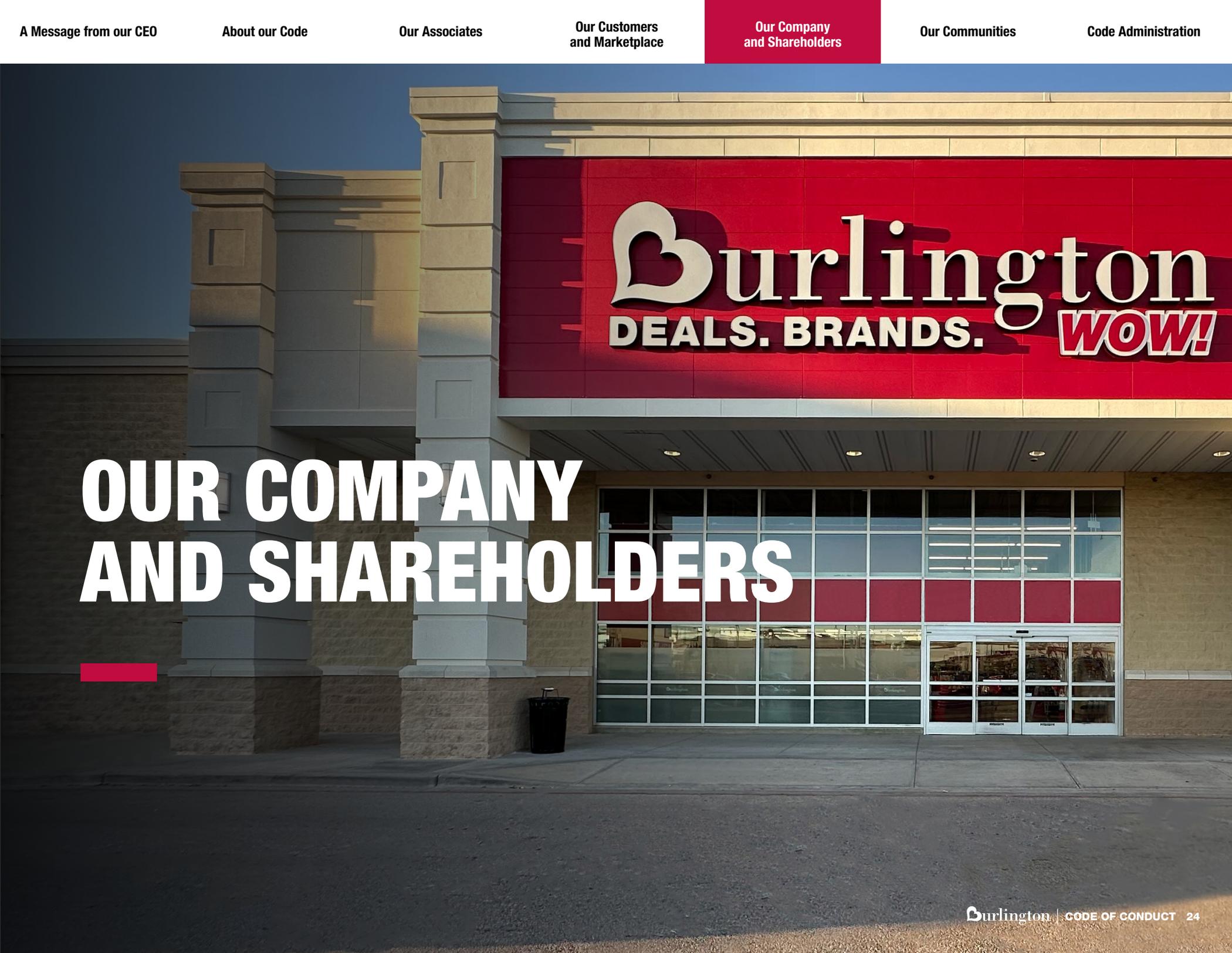
Will the vendor  
be present at the meal?



#### RESOURCES

Fair Competition Policy

Travel, Expense, and Credit Card Policy



**Burlington**  
**DEALS. BRANDS. WOW!**

# OUR COMPANY AND SHAREHOLDERS

## OUR COMPANY AND SHAREHOLDERS

*We uphold the highest standards of integrity at our Company and do not engage in dishonest business practices.*



### CONFIDENTIALITY

Confidential Information is non-public information, in any form, related to our business, obtained through employment or engagement with Burlington. It may include information related to Company operations, strategic planning, sales, marketing, finances, associates, and third parties. We are committed to protecting our Confidential Information. Inappropriate use or disclosure of Confidential Information can cause serious financial, reputational, and legal harm to Burlington, as well as to the individuals involved.



**RESOURCE**  
Confidentiality Policy

Nothing in this Code or Burlington’s Confidentiality Policy is intended to restrict your right to participate in or cooperate with a government investigation or pursue legal action.



Respect the confidentiality of Company information and do not share outside of Burlington without appropriate authorization.

Confidential Information should only be shared within Burlington on a need-to-know basis.

For examples of Confidential Information and associate expectations, including permitted and prohibited practices and guidance regarding third party requests for information, see our Confidentiality Policy. Please contact **Ethics & Compliance** if you have any questions.

## COMPANY RESOURCES

Burlington resources should always be used responsibly and in ways that comply with the law, respect others, and support job performance. Using company property for personal purposes without proper permission is not allowed. Limited personal use of Burlington technology resources is acceptable as long as it doesn't interfere with productivity. Please keep in mind that activities on company technology are not private. Additionally, personal messaging apps should not be used for substantive work communications.

## PRIVACY AND PROTECTING YOUR INFORMATION

We are committed to safeguarding the privacy of our customers and associates. Personally identifiable information (PII)—such as names, addresses, Social Security numbers, or any data that can identify an individual—must be handled with the highest level of care and security. PII should only be used or shared when authorized for legitimate business purposes and in compliance with company data security policies and procedures, and applicable laws and regulations.

## ARTIFICIAL INTELLIGENCE

Artificial Intelligence (AI) is transforming how business operate, including here at Burlington, but it also brings potential risks—such as inaccurate or biased outputs, intellectual property concerns, and unintended disclosure of confidential or sensitive information.

We are committed to using AI responsibly and ethically. Our AI Policy provides clear guidance, including following a gatekeeper process for reviewing new AI tools. AI should only be used for lawful and ethical business purposes. When using AI, keep these principles in mind:



### RESOURCES

[Acceptable Use Policy](#)  
[AI Policy](#)

- Understand the limitations of the tools and avoid over-reliance.
- Carefully review outputs for accuracy and potential errors.
- Never enter confidential, sensitive, or personal information into an AI tool unless explicitly approved.

If you have questions, concerns, or suspect a policy violation, please contact your manager or the IT Department.



**Is it okay to take home samples or defective merchandise?**



**No, it is not okay, unless it is purchased at a Company-sponsored sample sale or received at a company-sponsored activity.**

## INTELLECTUAL PROPERTY

Our intellectual property is one of Burlington's most valuable assets. This includes copyrights, trademarks, trade secrets, designs, logos, and other creative works. Protecting and enforcing these rights is essential—without doing so, we risk losing them. Burlington-owned intellectual property, including our name and logo, may only be used with proper authorization and in accordance with our brand guidelines. We also respect the intellectual property of others. Never use third party intellectual property without permission. Please note that any design, creative work, concept, or idea you develop during your employment at Burlington belongs to the company. Additionally, before any third party begins work, an appropriate agreement must be in place to ensure Burlington owns all resulting work product.

## FINANCIAL INTEGRITY AND FRAUD

The Company is committed to conducting our business with honesty, transparency and integrity. We all have a responsibility to ensure the accuracy of company business and financial records. We prepare our company records accurately and timely, in compliance with our policies, generally accepted accounting principles, and regulatory requirements. Our stakeholders rely on Burlington to keep honest, accurate, and complete records that fairly reflect our actual transactions and activities. Maintaining financial integrity is critical to our reputation and credibility.

Fraud, dishonesty or any form of deception is strictly prohibited. Fraud includes any intentional act or omission designed to mislead, deceive, or defraud the Company, our shareholders, customers, suppliers, or other stakeholders.

### EXAMPLES OF FRAUD:

- Falsifying, altering or improperly creating company books, records, or accounts
- Misrepresenting or intentionally misstating financial results, transactions or disclosures
- Improper revenue recognition or expense manipulation
- Submitting false or misleading expense reports, invoices, or reimbursement requests
- Misappropriating company funds, assets or property

**Q** While reviewing financial reports, you identify discrepancies in some key metrics. After reviewing available information, you are unable to determine the cause of the variance. What should you do?

**A** We all have a responsibility to ensure that all company records are complete, accurate, and timely. If questions remain after speaking to your manager, or if you are uncomfortable raising through normal business channels, additional guidance and reporting resources are available through **Ethics & Compliance**, the **Integrity Hotline**, or email [BSIsubmissions@burlington.com](mailto:BSIsubmissions@burlington.com)

## ANTI-MONEY LAUNDERING

Money laundering is the process of making funds from illegal activity appear legitimate. Our Company forbids knowingly engaging in transactions that facilitate money laundering. Anti-money laundering laws require transparency of payments and the identity of all parties to transactions. We are committed to full compliance with anti-money laundering laws and will conduct business only with third parties involved in legitimate business activities and transactions.

## RECORD RETENTION

You should routinely consider whether information is a record that fits into one of the categories listed in our Record Retention Policy. You have a responsibility to retain these records for the length of time specified in our policies and the law. Please see the Record Retention Policy for more information on how these records must be preserved as well as discarded.

## INSIDER TRADING AND INSIDE INFORMATION

You may become aware of important Company information before it has been made available to the public. This information is called “material information” or “inside information” when it could be expected to affect the Company’s stock price, whether it is positive or negative. Such information may include sales or operating results, internal forecasts or budgets, significant management developments or changes, significant acquisitions or dispositions, or a significant litigation, governmental investigation, or cybersecurity incident.

You are not allowed to buy or sell stock of Burlington or another Company when you are aware of material or inside information that has not been made public. It is also illegal to provide inside information to others so that they may trade stock based on that information. It is important to remember that if you become aware of inside information about Burlington or another Company, you may not take personal advantage, economic

or otherwise, of that inside information, until the information becomes public or is no longer material. Also, you may not pass that inside information to anyone outside of Burlington. Immediate family members are also subject to insider trading rules. Remember, you can be guilty of insider trading without personal gain.

For more details, please see the Insider Trading Policy.



**When I’ve completed a project, should I delete all of my project files?**



**No. You should consider whether there are any retention requirements or business needs before deleting a file.**



### RESOURCES

[Insider Trading Policy](#)

[Record Retention Policy](#)

## CORPORATE COMMUNICATIONS

Only designated company spokespersons are authorized to speak with the media, investors or the general public about company matters.



We ensure that our external and internal communications and activities are accurate and consistent with our Core Values.

- If the media approaches you for information regarding the Company, you should state that you are not an authorized spokesperson and refer them to the Media Relations Department at [media.relations@burlington.com](mailto:media.relations@burlington.com).
- If anyone from the investor community approaches you for information regarding the Company, you should state that you are not an authorized spokesperson and refer them to the Investor Relations Department at [investor.relations@burlington.com](mailto:investor.relations@burlington.com).

Refer to the Media Relations Guidelines and the Confidentiality Policy for more information.

## USING SOCIAL MEDIA

Social media includes various modes of publishing content online, including but not limited to website(s) and applications for social networking and micro-blogging sites and online discussion forums. Activity that is not permissible in the workplace is not permissible online. This includes making discriminatory remarks, harassment, threats of violence, retaliation or other unlawful conduct. You should never post any confidential information about Burlington, and you should make it clear that your opinions are yours, not Burlington's. Refer to the Social Media Policy for more information.

## SPEAKING OPPORTUNITIES

You may be offered external speaking opportunities, such as at trade conferences. Before accepting a speaking engagement, you must obtain approval from your SVP+. Your SVP+ will coordinate with Investor Relations, Marketing, and the General Counsel as needed. Be sure to familiarize yourself with the Media Relations Guidelines and the Confidentiality Policy, including the restrictions around the sharing of Confidential Information.

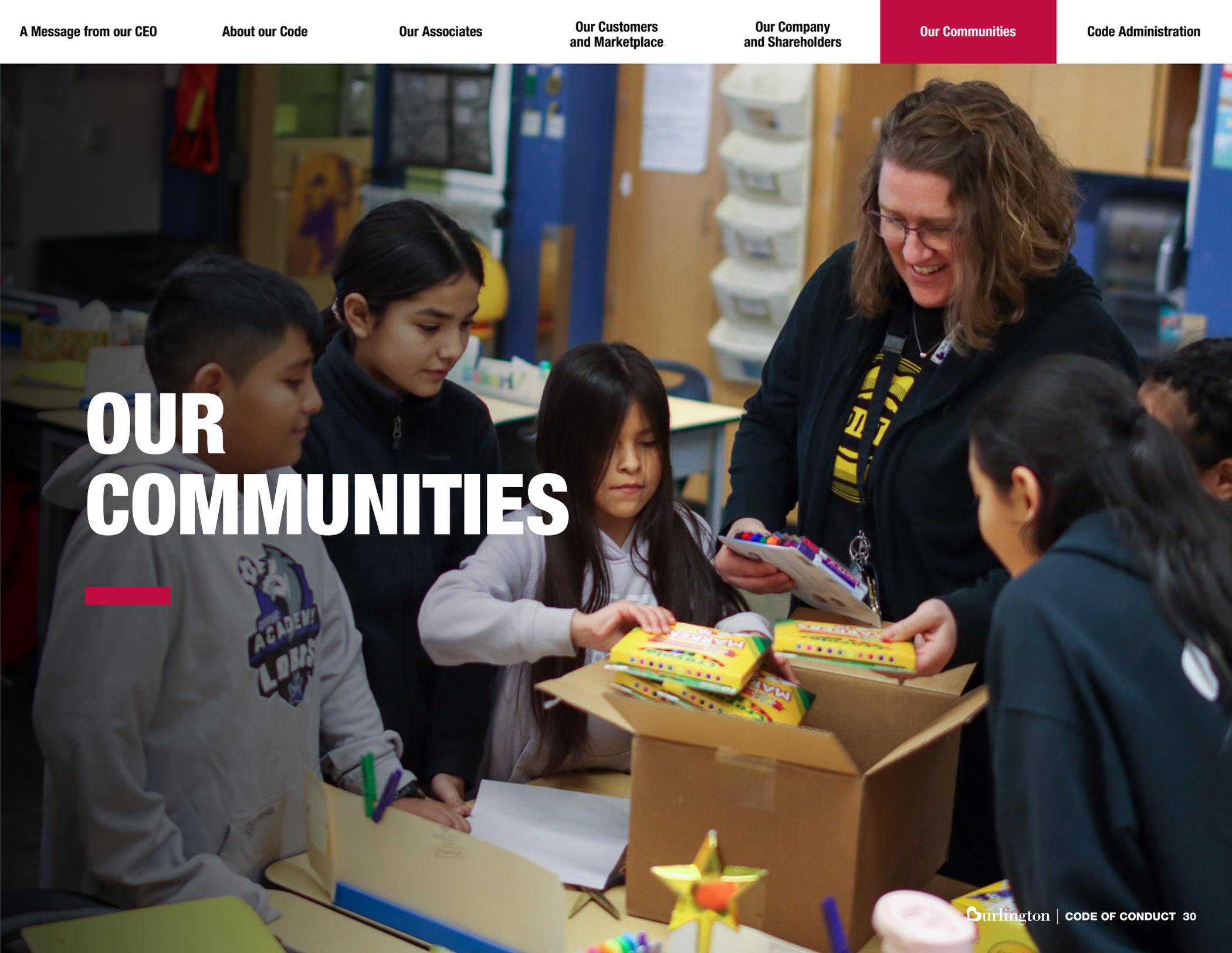
Any proposed use of Burlington's name, logo, or data by an external party needs to be reviewed by Marketing.



### RESOURCES

[Confidentiality Policy](#)  
[Media Relations Guidelines](#)  
[Regulation FD Policy](#)  
[Social Media Policy](#)

# OUR COMMUNITIES

A woman with glasses and a dark jacket is smiling and interacting with a group of children in a classroom. They are gathered around a table with a large cardboard box filled with art supplies, including boxes of markers and crayons. The children are looking at the supplies with interest. The woman is holding a small box of markers. The background shows a typical classroom environment with desks, chairs, and educational materials.

## COMMUNITIES

*We are residents and good corporate citizens of the communities in which we operate.*



Photo courtesy of YouthBuild Lake County

### THE ENVIRONMENT

As a successful company, we take pride in being responsible stewards of the natural environment. We work to reduce environmental impacts by improving operational efficiency across our stores, distribution centers, and offices. Compliance with environmental laws and regulations is a key part of this commitment. Please make sure you understand and follow all environmental requirements that apply to your role, including proper handling and disposal of hazardous substances.

### LABOR AND HUMAN RIGHTS

At Burlington, we firmly believe that child, forced, or trafficked labor should never be used in the production of goods we sell. We are committed to protecting workers—both locally and globally—by promoting ethical and lawful labor practices.



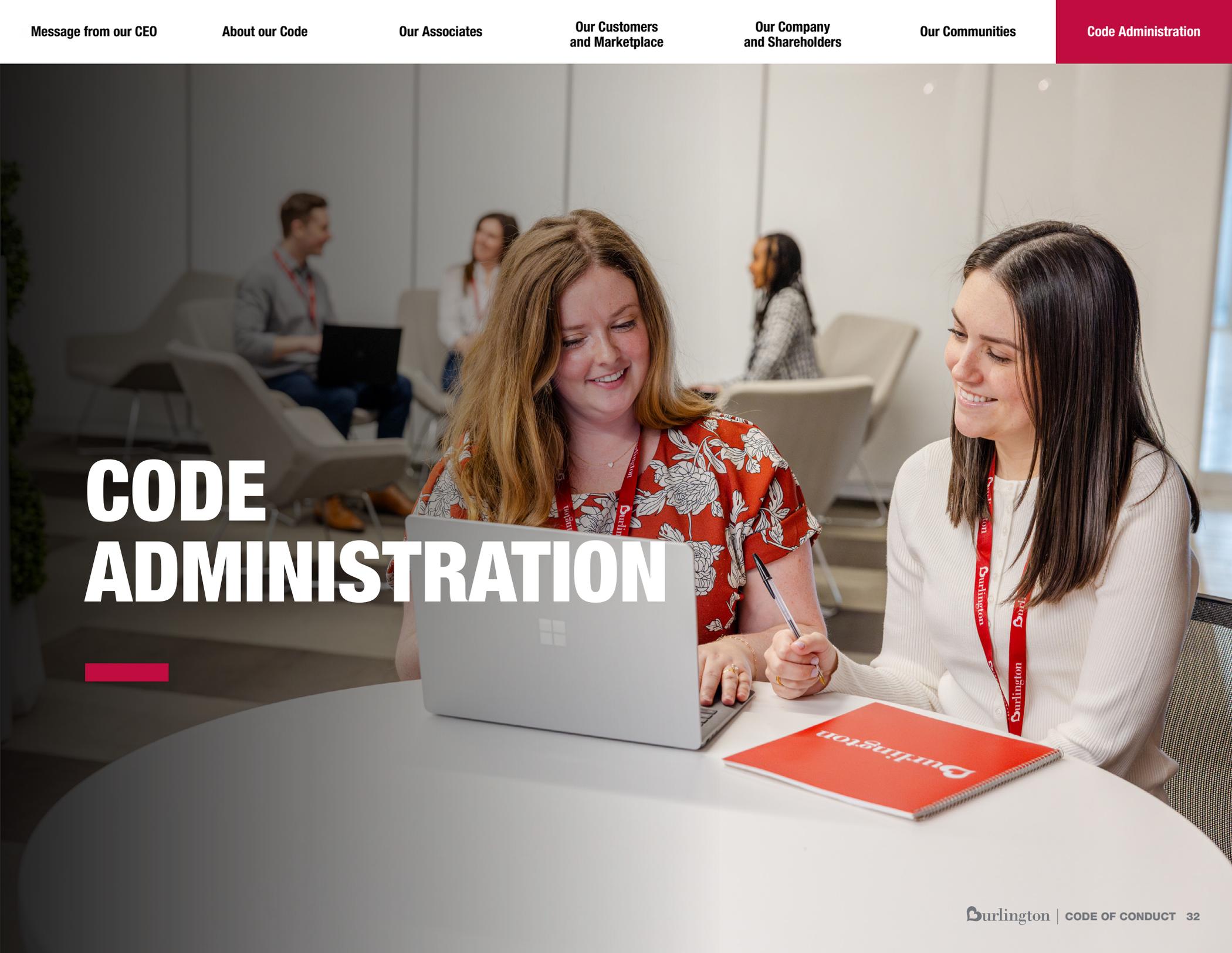
We expect all vendors to comply with domestic and international labor laws, as well as adhere to our vendor code of conduct.

### COMMUNITY AND CIVIC INVOLVEMENT; POLITICAL ACTIVITIES

We are committed to acting as good corporate citizens in our communities. We encourage you to do the same and give back to the communities where we live and work. However, if you choose to engage in a charitable and/or civic cause or political activities, you should do so on your own time and using your own resources. You should also make it clear that your involvement and views are your own individual views, and are not that of Burlington.

We respect each other's choices about political participation. However, if you are seeking appointed or elected public office, you must first obtain approval from **Ethics & Compliance**.

The Company does not make direct contributions of corporate funds to candidates or political parties. The Company generally does not participate in direct lobbying activities, on behalf of any political party. You may not engage in any lobbying activities, or the appearance of lobbying activities, on behalf of the Company without first obtaining approval from **Ethics & Compliance**.



# CODE ADMINISTRATION

## CODE ADMINISTRATION

This Code of Conduct provides general guidelines for conducting business with the highest standards of ethics and integrity. If you have questions about the Code, please use the Open Door Policy or reach out to your manager, HR representative, or **Ethics & Compliance**.

## WAIVERS OF THE CODE

Burlington generally does not grant waivers or exceptions to the Code. Any waiver for associates must be approved by the General Counsel, while waivers for executive officers or directors can only be granted by the Board or a Board committee.

U.S. English 2026



## CONTACT INFORMATION

<b>Burlington Response and Investigations Center (BRIC)</b>	From a store: 555-BRIC Outside line: 609-387-7800 ext.52742 bric@burlington.com
<b>Customer Service</b>	customerservice@burlington.com
<b>Ethics &amp; Compliance</b>	compliance@burlington.com
<b>Human Resources</b>	Contact your HR representative
<b>Integrity Hotline</b>	1-877-371-0680 www.burlington.ethicspoint.com
<b>Investor Relations</b>	investor.relations@burlington.com
<b>IT Security</b>	secops@burlington.com OR phishing@burlington.com
<b>Legal Department</b>	legal.department@burlington.com
<b>Media Relations</b>	media.relations@burlington.com
<b>Privacy</b>	privacy@burlington.com
<b>Product Safety</b>	product.compliance@burlington.com

You can contact the **Integrity Hotline** at  
www.burlington.ethicspoint.com, 1-877-371-0680, or at the QR code here:



Policies are also available on the HeartBeat Portal.

## POLICY LINKS

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**“Ethics are at the heart  
of Burlington’s business.  
Thank you for your  
commitment to integrity  
and our Core Values.”**



A handwritten signature in black ink that reads "Karen Leu".

**Karen Leu**  
General Counsel