



Third Party Code of Conduct

Tilly's is committed to complying with the law and upholding the highest standards of third party conduct everywhere we do business. We promote appropriate labor standards for employees, honest and ethical third party practices and a safe and healthful environment for workers and the general public. This commitment does not end with us, as we expect all companies and individuals with whom we work to do the same. We count on each of our third party associates – our suppliers, merchants, customers, vendors, agents, and other third parties – to follow the values and principles set forth in this policy.

Tilly's will work with third parties who share its commitment and Tilly's may stop doing business with any party who does not comply with this policy. The decision to change or enforce this policy rests solely with Tilly's. This policy does not give any rights to any party other than Tilly's.

Following Laws and Providing a Safe Working Environment

Tilly's is committed to protecting the working rights and safety of the people who produce the merchandise it sells and goods it purchases. Therefore:

1. We prohibit the use of illegal child labor, forced prison or slave labor and physical abuse of workers;
2. We expect all vendors to comply with the labor and environmental laws and regulations of the country where the merchandise is produced;
3. We expect vendors to produce all goods in facilities that provide workers with a safe and healthy work environment and in compliance with all health and safety laws; and
4. We expect all merchandise and products sold to Tilly's to be safe and in compliance with the law at the time of delivery and sale to customers.

In addition, if the following standards are not mandated by law, Tilly's encourages all third parties to adopt the following practices:

- Educate workers on the importance of health and safety, and good sanitation; take steps to prevent accidents and properly train employees;
- Have available general first-aid medical supplies and, in case of serious injury, provide workers with prompt access to outside medical facilities;
- Provide easily accessible and clearly marked exit doors and stairways;
- Provide proper lighting and properly ventilated work areas, including fans during periods of hot temperatures and heating during periods of cold temperatures, without risk to safety;

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- Provide protective clothing to workers, at no cost, when needed; and
- Provide adequate and clean toilet and hand-washing facilities with basic hygiene amenities.
- Provide a means of communication (e.g., 1-800 number, website) for employees to report legal violations.

Avoiding Conflicts of Interest

At Tilly's we believe upholding the highest standards begins by example. Therefore, it is our goal to work with all third parties in a fair, honest and open manner and we believe all transactions with third parties must be carried out on an arms-length basis. Therefore, it is our policy to prohibit conflicts of interest between our employees and third parties with whom we work, or may work. This policy includes, among other things, limiting the receipt of gifts, meals and other consideration from third parties. Please refer to the section regarding conflicts of interest in our Code of Ethics and Business Conduct regarding our limitations on transactions with third parties. We expect our employees and all third parties to follow these limitations.

Access for Inspections

Tilly's reserves the right, as a condition of working with a third party, to conduct unannounced audit inspections of our third party's facilities and practices to verify compliance with this policy. All third parties agree to inform Tilly's of the identity of any subcontractors used and arrange, at Tilly's request, for the inspection of the subcontractors' factories and other facilities. All third parties are expected to cooperate fully and to provide Tilly's or its representatives or agents with any and all information requested that is necessary to demonstrate compliance with this policy. If we determine that any third party has violated this policy, we may terminate our relationship. This policy applies to all vendors, suppliers and other business partners who provide merchandise, goods or services to Tilly's.

Who to Contact at Tilly's

If you have questions regarding this policy or want to report a violation, you may contact:

1. Department manager with whom you are working;
2. Tilly's Legal Department by calling (949) 609-5599 or by writing to Tilly's, 10 Whatney, Irvine, California, 92618, Attn: Legal Department; and
3. Tilly's Integrity in Action Hotline by calling 1-888-TILLYS-1 or by accessing this website: <https://www.reportlineweb.com/tillys>.