



Human Rights Policy

Introduction

The journey to making better things in a better way is a long one, and we're just getting started. At Allbirds, Inc. ("Allbirds"), we are dedicated to making the most sustainable footwear possible, to serve as a driving force in a new age of sustainable manufacturing, and to holding ourselves accountable for the impacts we make. Allbirds strives to be transparent in our business for our employees, customers, communities, and suppliers, and our human rights efforts are no exception. While each team at Allbirds contributes to operationalizing our human rights commitments, our Global Sustainability team oversees both our environmental and social impacts from our raw materials through to our retail operations.

This Human Rights Policy sets out our commitment to respecting and upholding all human rights wherever we operate, and to respecting the rights of those who are directly or indirectly impacted in our operations and supply chain. In particular, Allbirds is focused on issues surrounding Living Wage, Forced Labor, Diversity, Equity, Inclusion and Belonging (DEIB), and providing robust grievance mechanisms and, while also recognizing that other human rights are crucial and may become priority areas in the future. At its core, our human rights approach considers the potential impacts by and to our four key stakeholder groups:

- Employees
- Customers
- Suppliers and their employees and contractors
- Communities

This policy outlines our commitments, potential human rights risks, and efforts to reduce these risks and uphold human rights. We seek to ensure that our policies respect and promote human rights in such a way that drives meaningful, lasting positive change.

Our Commitments

The [UN Guiding Principles on Business and Human Rights](#) (“UN Guiding Principles”) set out the expectation that business enterprises should respect human rights, and recognizes the important role that business plays in identifying, mitigating, and preventing any adverse human rights impacts with which they are involved. Our human rights commitments align with the UN Guiding Principles, and are founded upon the International Bill of Human Rights and other international standards. We are thus committed to respecting and upholding the principles established in the [UN Universal Declaration of Human Rights](#), the [International Covenant on Civil and Political Rights](#), the [International Covenant on Economic, Social and Cultural Rights](#), the [ILO Fundamental Principles and Rights at Work](#) (including those conventions related to occupational health and safety), and the [OECD Guidelines for Multinational Enterprises](#). Furthermore, we are committed to following the standards as enumerated in [The Convention on the Elimination of All Forms of Discrimination Against Women](#), and the [Convention on the Rights of the Child](#). Should these international standards be more stringent than the national laws of any state in which we have operations, we commit to adhering to the higher standards set by these international conventions.

Diversity, Equity, Inclusion & Belonging (DEIB)

Our approach to [Diversity, Equity, Inclusion and Belonging \(DEIB\)](#) is about fully embracing the power and uniqueness of our people, place, planet, and product. We build employee experiences that provide everyone with the opportunity to thrive, and a community where all voices belong regardless of race, gender, ethnicity, or any other protected category.

People First

We believe everyone in our community plays a role in DEIB. Our Employee Resource Groups (ERGs) elevate the voices of underrepresented employees at Allbirds and partner across the organization to build a culture of connection, community, and advocacy. Our DEIB Council brings together cross-functional partners working to integrate DEIB into our company's strategy.

Community

We believe doing good always makes a difference. For us, this means treating our people well and giving them regular opportunities to connect with surrounding communities.

Planet

We believe climate change is the most urgent issue of our time. In part, because it is connected to so many other issues. Climate change and racial justice are interdependent. We think that those most impacted by climate change should be at the center of solutions and seek to promote their work.

Human Rights Commitments

Our human rights policy and commitments were developed with guidance from both internal and external experts. This helps us identify our most salient human rights issues and the appropriate policies and procedures to address and mitigate those risks. Allbirds commits to regularly reviewing our approach and policies related to human rights, updating them as necessary.

Allbirds is thus committed to developing and implementing the necessary steps, including additional policies and procedures as needed, to drive toward the realization of our human rights commitments. To this end, we engage in monitoring, oversight, and due diligence of our operations to help ensure that any potential human rights violations are prevented or remedied. Allbirds employees may also report concerns through our whistleblower hotline.

Human Rights Risks

As part of our commitment to transparency, we performed an initial screening to identify our principal human rights risks. We have determined, as a result of this screening, that our likely potential risks can be categorized into four main groups: Labor Risks¹; Access to Remedy²; Ethical Business Practices³; and Other⁴ risks. We have policies in place to address each of these main categories, as well as the sub-issues contained within each. Furthermore, we will seek to ensure that our mechanisms to prevent, mitigate, and address these potential risks are robust and effective. As part of this process, we use both a grass-roots and a top-down approach, consulting with employees, management, and executives, as well as external professionals, to monitor the landscape to identify new or changing risk profiles and to develop our responses to these risks in the short, medium, and long term.

Key Stakeholders

Fundamentally, Allbirds has built our human rights commitments around four central stakeholder groups. Our capacity to mitigate adverse human rights impacts and promote meaningful human rights developments is focused on our employees, customers, communities, and suppliers.

¹ Labor Rights risks include issues of forced labor, child labor and young workers, and workplace harassment and violence, as well as the possibility of violations of the freedom of association and collective bargaining, working hours, wages (including living wage), benefits, reasonable accommodation, and the right to occupational health and safety.

² Access to Remedy risks include both grievance mechanisms and access to remedy, as well as anti-retaliation and whistleblowing.

³ Ethical Business Practice risks include Anti-bribery, Anti-corruption, Anti-trust law, Financial integrity, Fair dealing, Transparency, Non-discrimination and equal opportunity, Diversity, Equity, and Inclusion, Employee recruitment, development, and benefits, and Responsible Sourcing.

⁴ Other risks include Environmental Practices, Animal Welfare, and Information Security and Privacy.

Our Employees

Employee conduct is guided by the Employee Handbook. The Employee Handbook establishes our policies around harassment, discrimination, anti-retaliation, reasonable accommodation, and the complaint process. The complaint process allows for individuals to report to a variety of individuals, as well as anonymously through our whistleblower hotline. On the corporate and retail sides in particular, we have robust systems in place to support our teams, as well as anonymous reporting systems. Broadly speaking, the Employee Handbook also addresses various human rights topics related to each of our four overarching risk categories.

Complementing the Employee Handbook is the [Code of Business Conduct and Ethics](#), which reflects the business practices and principles of behavior that support Allbirds' commitment to maintaining the highest standards of business conduct and ethics. It is largely concerned with those risks related to Ethical Business Practices.

Our DEIB approach is critical to our business, people and culture, where we build employee experiences that provide everyone with the opportunity to thrive, and a community where all voices belong.

Our Customers

Our potential risks related to our customers are limited, but we still place significant emphasis on ensuring that our customers continue to trust Allbirds. Our Employee Handbook emphasizes the importance of this trust and notes that we are dedicated to preserving it. Employees owe a duty not only to Allbirds and its shareholders, but also to our customers to uphold our reputation for integrity and excellence. This requires careful observance of both the letter and also the spirit of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

Our customers know that we are committed to making better things in a better way and that we are working to act as a driving force in a new age of sustainable manufacturing. This extends to our human rights risks and related commitments. We seek to ensure that our business is transparent; hence, why we have chosen to publish our most pressing human rights risks.

Our Communities

Allbirds would not exist without our communities, from New Zealand to California and everywhere in between. Our Allgood Collective is dedicated to the idea that doing good feels good, and that

the Collective is a global community creating positive change for the planet and its people. We've built a program to support local leaders and activists.

Additionally, a core tenet of our B Corporation and Public Benefit Corporation status is supporting the communities in which we operate and managing our business and affairs in a manner that balances the interests of our stockholders and the best interests of those materially affected by our conduct, namely, communities. Additionally, our B Corp designation helps continually evaluate our intentionality related to governance, workers, community, environment, and customers.

Our Suppliers

Allbirds recognizes that the majority of our human rights risks exist in our extended supply chain and with our suppliers. Through our [Supplier Code of Conduct](#) and [Responsible Sourcing Factory Audit Program](#), we require our suppliers and their suppliers to adhere to both the local laws of the countries in which they operate as well as the ILO Core Standards. We source from a select number of strategic suppliers willing to certify via our contracts and the Supplier Code of Conduct, which helps to ensure that workers are treated with dignity, fairness, and an elevated regard for their health and safety. As part of our commitment to transparency, we also expect full transparency of our suppliers' own supply chains – providing us with the names and locations of their sub-suppliers.

Allbirds also reserves the right to terminate the business relationship with any supplier who is unwilling or ultimately unable to comply with the Supplier Code of Conduct and Responsible Sourcing policy. The Supplier Code of Conduct addresses the various categories of human rights risks as listed above.

For suppliers to become approved, they must undergo a 10-step approval process once the supplier has signed all legal documents to begin the potential relationship. This includes passing a social and environmental audit. For those existing suppliers, Allbirds reserves the right to conduct audits with or without advance notice using independent third-party expert auditors. Suppliers agree to both announced and unannounced onsite assessments and/or monitoring visits. Allbirds strives to audit all factories producing Allbirds' goods at least once per year. Allbirds believes in continuous improvement and will partner with the factory to develop a Corrective Action plan as needed, based on the audit findings. Suppliers are required to follow up and improve upon any identified deficiencies in a realistic and timely manner, with an emphasis on the need for root-cause-analysis and management systems to ensure long-term performance and accountability.

The Supplier Code of Conduct and Responsible Sourcing Factory Audit Program also highlight some of the more salient risks that exist within our supply chain, and our efforts to address them; for example, the issue of forced labor among foreign workers has been a major risk for our retailers and

brands for years. Recognizing that most standard social compliance audit protocols are insufficient to identify and flag potential risks associated with foreign migrant worker recruitment, Allbirds has the option of adding the Foreign Migrant Worker Assessment Tool for facilities that have large foreign migrant populations, even if this was not specifically disclosed prior to an onsite visit.

Upholding Human Rights

Should any instance of impropriety occur, we actively encourage our employees, officers, and directors to report the misconduct, including any potential violations of human rights. We have several policies addressing the responsibility of Allbirds personnel to report potential issues, as well as policies related to raising these types of concerns.

Governance

In addition to our Code of Business Conduct and Ethics and the Employee Handbook, Allbirds has several other policies promoting high standards of integrity in our business operations. The Anti-Corruption Policy and Insider Trading policies both establish standards of conduct for Allbirds and its directors, officers, employees, among others. Additionally, we expect our suppliers to comply with the principles enshrined in each policy as well.

Internally, human rights topics are managed by a variety of groups depending on the specific workstream. Depending on the issue, ranging from living wage to supply chain concerns, among others, different teams may provide their input.

Raising Concerns

Should an instance arise that may be a violation of local or international laws, or company policies, Allbirds is committed to providing employees with a channel to communicate concerns about such violations. The Whistleblower policy, supplementing the Code of Business Conduct and Ethics, encourages employees to promptly report good faith complaints or concerns on a variety of issues, including potential human rights violations.

Employees are able to access the anonymous Compliance Hotline either by calling (866) 454-2119, via a form on <https://www.whistleblowerservices.com/BIRD>, or by mailing a complaint to c/o Allbirds, Inc., 730 Montgomery Street, San Francisco, CA 94111, Attn: Compliance Officer.

The reporting process is strictly confidential and prohibits retaliation of any kind. All reports will receive a prompt follow up with a corresponding investigation. Allbirds will strive to keep the identity of the complaining individual as confidential as possible. To this end, Allbirds provides its

employees and staff access to an anonymous whistleblower hotline, which specializes in providing independent third-party ethics hotline services.

This independent, anonymous hotline also manages any internal complaints related to harassment, discrimination, retaliation, or other prohibited conduct violations.

In our pursuit of transparency and continuous improvement, we want to be sure that staff feel adequately empowered to speak up should they identify a potential issue within or related to our operations. Beyond our direct operations, suppliers and their employees are able to submit reports of non-compliance during the audit process run by Elevate.

Conclusion

Allbirds' human rights policy establishes our commitment to continue to respect and promote human rights for our people, our customers, our suppliers, and our communities. We plan to share the policy out externally with partners and internally with our employees to elicit feedback, which will allow us to put in place the most inclusive and thoughtful policy possible. This human rights policy, as well as those other policies referenced herein, set out at a high level the policies and procedures we have in place to address any potential human rights risk. We will remain informed, however, and commit not only to a regular review of this policy, but also a regular review of our potential human rights risks.

The journey to making better things in a better way is a long one, and we're just getting started.

If you have any questions about this policy, please contact: sustainability@allbirds.com.

____ *Joe Vernachio* _____

Authorized Representative of Allbirds, Inc.

____ COO _____

Title of Representative of Allbirds, Inc.

____ 3/2/23 _____

Date