

ACUSHNET COMPANY SUPPLIER CITIZENSHIP POLICY

(Revised October 2018)

At Acushnet Company, we are dedicated to operating ethically, protecting the environment, and supporting the communities in which we do business. Our associates are guided by our Code of Conduct, which is based on our key beliefs of uncompromising integrity, values and our constant respect for people. These key beliefs are vital to Acushnet Company's success. To support this success, the Acushnet Company Supplier Citizenship Policy establishes guidelines that respect human rights, workplace safety and protection of the environment.

Acushnet Company expects each of its suppliers worldwide to conduct their business activities in accordance with the elements contained in this policy. These elements are the Acushnet Company's minimum standards and are not intended to supersede any applicable governmental regulations or requirements. All suppliers are expected to conduct their activities, including activities related to their employees, in compliance with all applicable national and international laws and regulations. Where differences or conflicts in standards arise, the highest standard shall apply. Each supplier and its individual operations are expected to comply with this policy and, upon request, provide evidence of compliance.

Acushnet Company Supplier Citizenship Policy Elements

1. Working Conditions/Health and Safety
2. Child Labor
3. Forced Labor
4. Discrimination
5. Harassment and Abuse
6. Freedom of Association and Collective Bargaining
7. Working Hours
8. Wages and Benefits
9. Environmental
10. Management Systems
11. Suppliers and Contractors

Acushnet Company Supplier Citizenship Policy Elements

1. Working Conditions/Health and Safety

Employees must be provided with a safe and healthy working environment. The supplier will take adequate steps, as appropriate, to reasonably prevent and minimize accidents and injuries to health within the workplace. The supplier will provide adequate means of evacuation and train employees in emergency preparedness.

Personnel should receive appropriate training on safety and health concerns in the workplace including fire safety, first aid, use of protective equipment, chemical management, and machinery safety. Such training should be documented and include newly hired and reassigned employees.

If provided, the supplier will ensure that dormitory facilities are clean, safe and meet the basic needs of employees.

2. Child Labor

All workers must meet or exceed the local minimum age law requirements, but in no event shall workers be employed who are under 15 years of age or under the age for completion of compulsory education, whichever is higher. Depending on the nature of the work being performed, the supplier may seek to limit employment to workers over 18 years of age.

3. Forced Labor

The supplier will not allow the use of bonded or involuntary prison labor, indentured labor, or other forms of forced labor.

4. Discrimination

The supplier shall prohibit engaging in or supporting discrimination in hiring, remuneration, access to training, promotion, discipline, termination or retirement based on race, national origin, social group or ethnic origin, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status.

The supplier shall respect employees' observance of tenets or practices relating to race, national origin, social group or ethnic origin, sexual orientation, religion, age, gender, disabilities, discipline, political affiliation or veteran status.

5. Harassment and Abuse

The supplier shall prohibit behavior, including gestures, language and/or physical contact, that is sexually coercive, threatening, abusive or exploitative. These abuses include, but are not limited to, sexual harassment, corporal punishment, mental or physical coercion, psychological and verbal harassment or abuse, and physical abuse.

6. Freedom of Association and Collective Bargaining

Suppliers must recognize and respect their employees' rights to freedom of association and to enter into collective bargaining units.

7. Working Hours

Except in extraordinary circumstances, employees shall (i) not be required to work more than (a) 48 hours per week and 12 hours overtime or (b) the limits on regular and overtime hours allowed by applicable local laws and industry standards or, where the laws of such country do not limit the hours of work, the regular work week in such country plus 12 hours overtime; and (ii) be entitled to at least 24 consecutive hours of rest in every seven day period. Supplier's goal shall be that all overtime worked is voluntary/consensual.

In addition to compensation for regular hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture, or in those countries where such laws do not exist, at a rate at least equal to not less than one-and-one-quarter times their regular hourly compensation rate.

8. Wages and Benefits

All legal requirements relating to wages and benefits must be met. Wages must equal or exceed the minimum wage required by law and the Supplier shall provide the prevailing industry wage, if higher. Every full time worker has the right to total compensation that is sufficient to meet basic needs and provide some discretionary income. Where total compensation does not meet worker's basic needs and provide some discretionary income, the Supplier shall consider actions that seek to progressively realize a level of compensation that does.

Employees must be provided with clear information about their wages and benefits on a regular basis.

9. Environmental

Suppliers will conduct their business activities such that it is in compliance with applicable environmental laws, norms and regulations.

Suppliers should mitigate negative impacts that the workplace has on the environment and promote protection of the environment and the conservation of natural resources.

10. Management Systems

A supplier's local policy shall be consistent with the requirements set forth in the Acushnet Company Supplier Citizenship Policy and communicated to its employees. If the supplier does not have a local policy, it shall communicate the contents of the Acushnet Company Supplier Citizenship Policy to its employees.

The supplier's management system shall include practices to include investigating, addressing and responding to the concerns of employees with regard to compliance with this Policy. The supplier shall not discipline or otherwise discriminate against any employee for providing information concerning the supplier's compliance with the Acushnet Company Supplier Citizenship Policy.

The supplier will periodically review the adequacy, suitability and continuing effectiveness of the systems implemented to meet the requirements of the Acushnet Company Supplier Citizenship Policy. The supplier will implement appropriate corrective actions to address any identified non-conformance.

11. Suppliers and Contractors

Acushnet Company's suppliers will establish and maintain appropriate procedures to evaluate and select their suppliers and contractors, and where appropriate, their sub-suppliers and sub-contractors, on their ability to demonstrate evidence of conformance with the requirements of the Acushnet Company Supplier Citizenship Policy.

Acushnet Company's suppliers will maintain reasonable evidence that the requirements of the Acushnet Company Supplier Citizenship Policy are being met by their suppliers and contractors, and, where appropriate, by their sub-suppliers and sub-contractors. This evidence may include certification forms, written questionnaires, audits, inspections or other appropriate documentation.