

## **Acushnet Holdings Corp.**

### **Global Human Rights Policy**

Acushnet Holdings Corp., together with each of its operating subsidiaries (collectively, “Acushnet Company,” the “Company,” “our” or “we”) is committed to conducting business with the highest ethical standards and in compliance with applicable laws and Company policy.

This Global Human Rights Policy (the “Policy”) establishes standards for global business conduct related to human rights and labor for Acushnet Company employees and suppliers, wherever they are located. This Policy is informed by, among other things, the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the Ten Principles of the United Nations Global Compact and the International Labour Organization Declaration on Fundamental Principles and Rights at Work.

This Policy goes beyond mere compliance with law. When differences arise between standards and legal requirements, the higher standard applies. We also expect our employees and suppliers to conduct themselves in accordance with all other Acushnet Company policies, including the Supplier Citizenship Policy, [available here](#), and our Code of Business Conduct and Ethics, [available here](#).

Suppliers will be selected, and then monitored, based in part on compliance with these policies and global citizenship supplier expectations will be communicated to each supplier chosen. Acushnet Company suppliers will maintain reasonable evidence that the requirements of this 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. Violations of this Policy may affect the supplier’s business relationship with Acushnet Company, up to and including termination of the business relationship by us. To ensure suppliers demonstrate compliance with our aforementioned policies, or evidence they are working towards such compliance, the Company performs regular supplier audits in accordance with its Supplier Review Program.

The Company’s Nominating and Governance Committee of its Board of Directors has oversight responsibility for the matters contemplated by this Policy. Company management is responsible for the ongoing administration of this Policy.

This Policy is applicable to all Acushnet employees and applicable Acushnet employees will receive training on the requirements of this Policy. Suppliers are expected to provide training on the requirements of this Policy to appropriate employees.

### **Human Rights Principles**

We respect human rights and are committed to ensuring that our employees, workers in our supply chains and individuals in the communities affected by our activities are treated with dignity and respect. We are committed to engaging with stakeholders in the communities where we operate to ensure that we are listening to, learning from and taking into account their views as we conduct our business and administer this Policy. As part of our commitment to human rights, we expect Company employees and suppliers to adhere to the following principles.

### *Fair Treatment*

We strive to comply with all relevant labor and employment laws and expect our employees and suppliers to do so as well. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Without limiting the foregoing, we 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.

### *Equal Opportunity and Diversity*

We value the diversity of the people with whom we work and the contributions they make. We are committed to equal opportunity, intolerance of discrimination and harassment and maintaining workplaces that are free from discrimination or harassment on the basis of race, national origin, social group or ethnic origin, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status.

We require suppliers to respect their workers' observance of tenets or practices relating to race, national origin, social group or ethnic origin, sexual orientation, religion, age, gender, disabilities, political affiliation or veteran status.

### *Health and Safety*

We provide a safe and healthy working environment that complies with applicable safety and health laws, regulations and internal requirements, and expect our suppliers to do the same. We also are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury and exposure to health risks. In addition, we are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

As part of our commitment to a safe and healthy workplace, to the extent applicable, we expect Company employees and suppliers to, as applicable:

- Comply with applicable safety and health laws, regulations and Company policies.
- Ensure that all workers and contractors are qualified and equipped to perform activities safely.
- Promptly inform Acushnet Company of any significant health and safety incidents that occur while performing services for or on behalf of, or delivering goods to, Acushnet Company.
- Provide adequate resources to manage workplace safety and to ensure that all personnel understand and properly exercise safety practices and procedures. Supplier personnel should receive appropriate training on emergency preparedness and 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 workers.

- Suppliers are expected to provide adequate means of evacuation.
- If worker housing is provided by the supplier, ensure the housing is clean and safe and has adequate lighting, ventilation, heating and cooling and access to electricity, water and sanitary facilities. Housing must be segregated from work areas and provide for privacy and workers must be free to come and go.

Acushnet Company further acknowledges that the right to water is a fundamental human right. Our employees, as well as workers throughout our supply chain, should have access to safe drinking water.

#### *Forced Labor and Human Trafficking; Recruitment Fees*

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor and slave labor, and any form of human trafficking. Acushnet Company employees and suppliers must ensure that all work is voluntary, conducted only through freely agreed upon and documented employment terms and paid in accordance with all applicable laws and regulations.

Employees of Acushnet Company and its suppliers' workers must have the right to freely terminate employment in accordance with applicable laws and regulations without fear of physical, psychological, sexual or verbal abuse. Employees of Acushnet Company and its suppliers' workers may not be required to lodge deposits of identity papers, including passports or work permits.

Recruitment fees may not be charged to workers or potential workers.

#### *Child Labor*

All workers must meet or exceed the local minimum age law requirements, but in no event shall workers be 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 be required to limit employment to workers over 18 years of age.

#### *Work Hours, Fair Compensation and Benefits*

We compensate employees competitively relative to the industry and local labor market.

All legal requirements relating to wages and benefits must be met. Wages must equal or exceed the minimum wage required by law, and shall meet the prevailing industry wage, if higher. Acushnet Company and its suppliers must provide all workers with clear, written information about their employment conditions with respect to wages before they enter employment and as required by law throughout their term of employment. Deductions from wages as a disciplinary measure are not permitted, unless permitted by applicable law.

Except in extraordinary circumstances, Acushnet Company employees and suppliers' workers 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. Our goal is that all overtime worked must be voluntary and consensual. All overtime worked must be paid in accordance with all applicable laws and regulations. In those countries where such laws do not exist, overtime must be paid at a rate at least equal to not less than one-and-one-quarter times the worker's regular hourly compensation rate.

#### *Freedom of Association*

Workers must be allowed to exercise freedom of association and to enter into collective bargaining units.

#### *Reporting Concerns*

If you witness a violation of this Policy or have any other concerns, please discuss them with a supervisor. In addition, you can ask questions or report possible violations to another manager, the Human Resources Department, the Legal Department, the Compliance Committee, or the Nominating and Governance Committee of the Board of Directors. If you are uncomfortable with any of these internal reporting channels, you can report violations or ask questions via the Telephone Ethics Hotlines listed in our Code of Conduct or at [www.acushnetcompliance.com](http://www.acushnetcompliance.com).