



CONFLICT MINERALS POLICY

I. Preamble

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”), which requires publicly traded companies to file a report with the U.S. Securities and Exchange Commission disclosing whether their products contain gold, tantalum, tin, and tungsten (“3TG”) sourced from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, or Zambia (“Covered Countries”). By enacting the relevant provisions of the Dodd-Frank Act, Congress is seeking to eliminate the market for 3TG minerals from the Covered Countries, which have been used to fund armed conflict and human rights abuses in the Covered Countries.

II. Policy Scope

This Policy applies to all Carter’s products, purchased from its agents and suppliers, which contain 3TG minerals that are integral to the functionality or production of those products.

III. Carter’s Commitment

Carter’s is committed to ensuring that metals and other minerals contained in its branded products are obtained, produced, and used in an environmentally and socially responsible manner. The Company strives to source in ways that do not contribute to human rights abuses and will work with its agents and suppliers to achieve the goal of not sourcing 3TG from the Covered Countries. Carter’s expects its agents and suppliers to ensure that none of its products include 3TG from the Covered Countries.

To meet its obligations under the Dodd-Frank Act, Carter’s will conduct an annual inquiry into the origin of 3TG minerals that are necessary to the functionality or production of its products. The inquiry will be reasonably designed to determine whether any 3TG minerals originated in the Covered Countries or came from recycled or scrap sources. Carter’s expects its agents and suppliers to participate fully in this inquiry, including providing complete and timely responses to surveys and other inquiries.