

POSITION STATEMENT REGARDING SOURCING OF CONFLICT MINERALS

At Columbia Sportswear Company, we value ethical manufacturing practices and are committed to working with manufacturing partners who share these values. The minerals Tin, Tantalum, Tungsten, and Gold and their derivatives (“3TG minerals”) are present in many consumer products and may be present in our products in, among other things, zippers, hooks, rivets, solder on metal parts, and outdoor equipment. We strive to ensure that 3TG minerals used in our products are obtained from certified suppliers that verify and validate responsible sourcing throughout all regions within our supply chain. In doing so, Columbia follows the framework guidance provided by the Organisation for Economic Co-operation and Development (OECD) in conducting due diligence to determine whether products include 3TG from non-certified smelters and refiners.

Columbia expects all of its suppliers to avoid the use of non-certified 3TG. Columbia endorses efforts of industry organizations that seek to ensure smelters’ sourcing practices are assessed by independent third party auditors, and encourage suppliers to do the same. These certification bodies are setting standards, monitoring 3TG chain of custodies, creating trade documentation and fostering the development of good trading practices.

- CFSI (Conflict Free Sourcing Initiative): <http://www.conflictreesourcing.org/>
- CFSP (Conflict Free Smelter Program): <http://www.conflictreesourcing.org/conflict-free-smelter-program/>
- LBMA (London Bullion Market Association): <http://www.lbma.org.uk/>
- RJC (Responsible Jewelry Council Chain-of-Custody Certification): <http://www.responsiblejewellery.com/>

Suppliers are to establish policies, due diligence frameworks, and management systems, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk areas, that are designed to accomplish this goal. Specifically, suppliers are expected to maintain records on the source and chain of custody for all 3TG minerals used in the manufacturing of Columbia, its divisions and affiliates products and may be required to provide information with respect to its supply chain in compliance with the Conflict Minerals provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. This policy applies to all vendors, suppliers and licensees of the Company, its divisions and affiliates collectively referred to as “Suppliers”. Suppliers providing product or components to Columbia (or who are otherwise contracted to brand products with a Columbia-owned trademark) that include 3TG minerals are required to:

- Maintain adequate records regarding its supply chain sources, including the identity of the vendor’s immediate suppliers and/or, if known, source, including adequate contact information; and
- Cooperate with Columbia and respond in a timely manner to information requests by Columbia and its representatives with respect to the Supplier’s sources of 3TG minerals.

Columbia continues to align with industry working groups in order to seek greater assurances about the sources of 3TG minerals in our products. We are committed to working with our vendors and independent manufacturers to promote adherence to industry protocols and ethical standards across Columbia’s supply chain.

QUESTIONS: If you have any questions, comments or concerns regarding this policy statement, please email our Conflict Minerals group at cm@columbia.com