



## **Corporate Social Responsibility**

Just as we continually strive to create high-performing and innovative products, we also seek to follow the law on social issues important to our employees, shareholders and customers. This includes raising awareness with our employees and within our supply chain about how we can make the right decisions on issues like product safety and work environments affecting those who help us make our products.

### **Human Rights**

"We conduct our global business honestly, ethically and legally, believing that good ethics is good business." This is the foundation of Callaway's policy of respecting internationally recognized human rights throughout our global operations; a policy that considers the principles described in the Universal Declaration of Human Rights (UDHR).

[View the Company's Human Rights Policy](#)

### **Transparency in Supply Chains Act & UK Modern Day Slavery Act**

Effective January 1, 2012, revised July 8, 2016

#### **About This Policy**

This policy describes Callaway Golf Company's ("the Company") response to California's "Transparency in Supply Chains Act of 2010" and the United Kingdom "Modern Slavery Act 2015". On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) went into effect in the State of California. The UK Modern Slavery Act came into force in October 2015. These laws describe the information to be made available by manufacturers and retailers regarding their efforts (if any) to address the issue of slavery and human trafficking. Click to view [California's Transparency in Supply Chains Act of 2010](#). Click to view [UK Modern Slavery Act of 2015](#).

[View the full Transparency in Supply Chains Act & UK Modern Day Slavery Act Policy.](#)

### **Corporate & Supplier Codes Of Conduct**

#### **Company Code of Conduct**

The Company's Code of Conduct is part of Callaway Golf Company's effort to conduct its global business legally. The Code applies to all board members, officers and employees of the Company and its subsidiaries. All Company employees are required to comply with the Company's Code of Conduct, which includes provisions designed to address the principle that child, prison, or forced labor are not permitted at any Company supplier operation. The Company's Code of Conduct is applicable throughout the world, and the Company trains all employees, including management, on these standards as part of new hire training for all incoming employees and ongoing training for all company employees on a periodic basis. Employees in key business functions that may interact with government officials also receive a more robust anti-corruption training, which is currently created by Thomson Reuters. Additionally, those who have direct responsibility for supply chain management have ongoing training that addresses education on human trafficking and slavery prohibitions within the product supply chain.

[View the Company's Code of Conduct](#)

#### **Supplier Code of Conduct**

The Company has also adopted and implemented a "Supplier Code of Conduct." The Supplier Code of Conduct describes the business practices and employment standards applicable to the Company's direct suppliers on a global basis.

[View the Supplier Code of Conduct](#)

### **Supplier Responsibility**

Callaway Golf strives to follow the applicable law on socially responsible business practices among our employees and throughout our supply chain. Our Supplier Code of Conduct is designed to educate our suppliers about the importance of providing safe working conditions, treating workers with respect and using responsible manufacturing processes. If you have any questions about our supplier responsibility efforts, please send inquiries to [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com).

### **Supplier Audits**

The Company's audit program evaluates suppliers' compliance with the Company's Supplier Code of Conduct. Various types of announced audits are conducted under this program, including onsite



audits conducted or attended by Company personnel, collaborative or self-audits, and periodic third-party on-site audits of practices and underlying management systems. If deficiencies are identified, suppliers are directed to produce corrective action plans. The corrective action plans typically outline how a supplier will resolve issues uncovered in audits. If any compliance issues are identified, the Company may terminate the supplier relationship or will require action by the supplier to rectify the problem within a designated timeframe.

Currently, site audits are scheduled at most direct supplier sites every two years. These audits are conducted by the Company or by a third party auditing company. The audits are semi-announced audits. This means that the suppliers are given a window of time when the audit will take place, but the exact date of the audit within the timeframe is unannounced.

[View our Social Compliance Annual Summary](#)

## **Conflict Free Sourcing**

The Company has policies and procedures to reasonably assure that the use of the tantalum, tin, tungsten and gold in the products manufactured do not directly or indirectly finance armed groups in Covered Countries as defined by the Conflict Minerals Rule issued by the U.S. Securities and Exchange Commission (SEC) under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. Click to view the Company's [Conflict Mineral Policy](#).

## **Reporting Human Rights Violations**

If human rights violations are suspected at a Company facility or a facility supplying product to the Company, please contact us at [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com). Violations can also be reported by calling +1 (760) 931-1771 and requesting to speak with the Chief Ethics Officer.

## **How To Contact Us**

If you have any questions about this policy you can email us at [corporatecompliance@callawaygolf.com](mailto:corporatecompliance@callawaygolf.com). If you would like to write to us, our U.S. address is: Compliance Question, Callaway Golf Company, 2180 Rutherford Road, Carlsbad, California 92008

# **Environmental, Health and Safety Responsibility**

## **Environmental, Health and Safety Policy**

Callaway is committed to conducting its business in a sustainable, safe and compliant manner. We value the environment and the health and safety of the individuals that make and use our product. We promote a safe and healthy environment by providing leadership, establishing policies, setting expectations and validating progress throughout our Company and Supply Chain.

[View our EH&S Policy](#)

## **Environmental, Health and Safety Leadership**

Callaway maintains its Environmental, Health and Safety policies, procedures, safety aids and related forms in our Enterprise Level Document Management Center.

Callaway's commitment to implementing Environmental, Health and Safety standards internationally is aligned with Callaway's core value to always act with integrity and respect. Callaway is committed to working with our suppliers and licensees to meet ensure compliance with our policies and applicable law. Our [Supplier Code of Conduct](#) sets forth the standards Callaway expects each supplier to meet. Our licensee agreements establish additional standards of licensee conduct. Click here to view a summary of our [Environmental, Health and Safety Leadership initiatives](#).

## **Product Compliance**

The Company strives to ensure that products comply with applicable laws and regulations through education, testing, certifications, and audits.

Click here to learn more about our product compliance initiatives in our [Environmental Summary](#).

## **Children's Products**

We test and certify compliance of children's products according to the Consumer Product Safety Improvement Act of 2008 (CPSIA) and use guidance provided by the Consumer Product Safety Commission (CPSC). CPSIA Certificate Lookup