

KIRKLAND’S, INC.

Supplier Code of Conduct

Kirkland’s (the “Company” or “Kirkland’s”) is committed to achieving high standards of business and personal and ethical conduct for itself. Kirkland’s expects our valued partners and vendors will work together with us in upholding high environmental, social and governance (ESG) performance. This Supplier Code of Conduct (the “Code”) sets forth our principles and the minimum standards that we expect our vendors, factories, and all external suppliers to uphold.

In the Code, “Supplier” is defined as any person, company, corporation, or entity that sells, or seeks to sell goods or services to the Company. Suppliers are expected to comply with the standards outlined in the Code and encouraged to hold their suppliers and subcontractors accountable to these standards. Suppliers are expected to support and respect our high sustainability and corporate responsibility standards and commitments.

Compliance

Suppliers shall respect and comply with all international, regional and local laws and regulations concerning its activities, including but not limited to corporate governance, business ethics, human rights and labor standards, health and safety, environmental protection and business operations as set forth and applicable in the Company’s Code of Business Conduct and Ethics.

Suppliers shall also strive to meet the principles set out in the UN Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

Environmental Protection

Supplier shall conduct its operations in compliance with all applicable international, national, and local environmental laws and regulations.

Suppliers are encouraged to put in place an environmental policy and management system and to minimize its negative environmental impact. This includes maximizing resource use efficiency and preventing or mitigating any environmental pollution. Suppliers shall document and maintain records of their compliance and performance regularly. Suppliers shall source materials responsibly, reduce unnecessary packaging, and promote sustainable packaging.

Human Rights

Kirkland's recognizes the importance of human rights, and we have zero-tolerance for forced labor, modern slavery, and human trafficking in our business. We expect the same from Suppliers. Forced, bonded, compulsory, or child labor, or those below the minimum legal employment age for their respective jurisdiction, should not be employed by the Supplier. It is the Supplier's own responsibility to verify the age of its employees and maintain a copy of its employee's proof of age.

Suppliers should provide fair wages to employees, irrespective of gender, age, ethnicity, race, sexual orientation, socio-economic background, and/or lifestyle choices. Actions should be taken to ensure this is maintained throughout its business activities. Suppliers should have a zero-tolerance policy towards harassment in any of its forms – verbal, physical, psychological, or sexual. Where freedom of association and collective bargaining are not restricted by law, employees of Suppliers shall have the right to join or form trade unions and bargain collectively, and Suppliers shall not interfere nor obstruct.

Suppliers are expected to promote an inclusive environment that fosters mutual respect, diversity, and equal opportunity with employees. The rights of minorities, including women, visible minorities, persons with disabilities, and the LGBTQ+ community, among others, should be protected. Suppliers shall ensure that no person is subject to any form of discrimination in employment on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Suppliers are expected to provide a fair and safe workplace that is harassment-free and secure.

Health and Safety

Suppliers shall provide a safe working environment to workers in compliance with all applicable laws and regulations to prevent accidents and injuries arising out of, associated with, or occurring in the course of or as a result of their operations. Suppliers will be required to provide proof of employee training regimes upon request. Suppliers shall take active employee safety protective actions, such as the provision of appropriate Personal Protective Equipment for employees performing tasks with corresponding hazards and setting machine guarding on or around equipment with high risks.

Business Integrity

Suppliers shall comply with all company laws and regulations, maintain proper licenses, true and accurate financial documents and records.

Suppliers must comply with all applicable anti-corruption and anti-money laundering laws as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations.

Suppliers shall, to the best of their abilities, avoid any conflict of interest. An appropriate system should be set up to govern the offering and receipt of any gifts and favors, which must be relatively small and customary in nature. Entertainment and hospitality must be reasonable and proportionate. Suppliers shall treat Kirkland's employees fairly and with respect. There shall not be any giving or receiving of bribes and undisclosed payments to any Kirkland's employees.

Suppliers shall neither employ anti-competitive practices nor seek competitive advantage through illegal or unethical business practices. Fair dealing should be adopted at all times, based on the price, quality, and performance standard of products and services.

Evaluation and Update

The Code may be updated from time to time at Kirkland's sole discretion. Suppliers should refer to Kirkland's website for the latest version of the document. Kirkland's reserves the right to conduct an independent assessment or audits to assess a Supplier's conduct.