



HOME OFFICE

Employee Handbook

URBAN OUTFITTERS, INC.

This handbook is intended for informational purposes only, and to provide an overview of employee policies and benefits. Many of these policies and benefits are described in more detail in the benefit plans or other documents. If any conflict should arise between this handbook and documents such as, but not limited to, company policies and procedures and any benefit plan documents, these other documents control and their terms will govern.

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Introduction

Much of the success that Urban Outfitters, Inc. (“URBN” or the “Company”) has achieved is due to the dedication and support of our employees. This handbook has been created to help you understand how you can contribute to our success. What follows is a description of policies and procedures that affect all URBN Home Office employees. Your manager can answer any questions you may have regarding specific department procedures and functions.

There are several things that are important to keep in mind about this handbook:

- It contains only general information and guidelines. It is not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your manager or to the Benefits and Employment Administration Department.
- The procedures, practices, policies and benefits described in this handbook may be modified or discontinued from time to time. We will try to inform you of any changes as they occur.
- This handbook and the information in it should be treated as secret and confidential. No portion of this handbook should be disclosed to others, except URBN employees and others affiliated with URBN whose knowledge of the information is required in the normal course of business.
- Some of the subjects described in this handbook are covered in detail in official policy documents or benefit plan documents. You should refer to these documents for detailed information since this handbook only briefly summarizes those benefits. Please note that the terms of the benefit plan documents are controlling. Federal, state or local law supersede any conflicts, omissions or errors that may occur in this handbook.



Employment Laws & Regulations

Employment at Will

Neither this handbook nor any other Company document confers any contractual right, either express or implied, to remain in the Company's employ or obligates the Company to institute corrective action or progressive discipline prior to termination. Nor does it guarantee any fixed terms and conditions of your employment. Your employment is not for any specific time and may be terminated at will, with or without cause and without prior notices, by the Company or you may resign for any reason at any time. Examples of specific grounds for termination set forth in this handbook or elsewhere are not all-inclusive and are not intended to restrict the Company's right to terminate employment for any reason. No supervisor or other representative of the Company (except the Chief Executive Officer) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

Equal Employment Opportunity

URBN subscribes wholeheartedly to all Equal Employment Opportunity legislation. Simply stated, employment is based upon personal qualifications without regard to race, color, sex, religion, age, sexual orientation, disability, national origin, gender identity or expression, or any other protected characteristic as established by law.

This policy of Equal Employment Opportunity applies to all policies and procedures relating to recruitment and hiring, promotion, compensation, benefits, termination and all other terms and conditions of employment.

If you have questions or concerns regarding equal employment opportunity, you should direct them to the **Sr. Manager of Employment Administration**.

Non-Discrimination and Anti-Harassment Policy

URBN is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, URBN expects that all relationships among employees, customers and vendors in the workplace will be professional, free of bias, prejudice and harassment.

URBN prohibits and will not tolerate discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, sexual orientation, gender identity or expression, or any other characteristic protected by law.

Definitions of Harassment

Sexual harassment constitutes discrimination and is unlawful under federal, state, and local laws. For the purposes of this policy, sexual harassment is defined as:

Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance, or creating an intimidating, hostile or offensive work environment.

Depending on the circumstances, such conduct may include unwelcome sexual advances, requests or demands for sexual favors and other verbal, physical or visual conduct of a sexual nature. URBN will not tolerate sexual harassment from or against any employee, vendor, contractor, or customer.

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, religion, national origin, age, disability, sexual orientation, gender identity or expression, or any other characteristic protected by law that:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- has the purpose or effect of unreasonably interfering with an individual's work performance; or
- otherwise adversely affects an individual's employment opportunities.

Depending on the circumstances, such conduct may include epithets, slurs, negative stereotyping, and threatening, intimidating or hostile acts.

Professionalism and Respect

URBN expects that all relationships among its employees, customers and vendors will be professional, respectful, ethical and free of bias, prejudice, discrimination and unlawful harassment.

Under certain circumstances, the following conduct may rise to the level of unlawful harassment or discrimination:

Verbal/Written Conduct

- Profanity or obscenity
- Name calling or ridiculing
- Sexually suggestive or explicit jokes
- Religious practices
- Using degrading words to describe a person
- Racial or ethnic slurs

Visual Actions

- Displaying sexual, racial or otherwise offensive pictures, writings or objects
- Indecent letters, e-mails or invitations
- Staring at an individual's anatomy
- Sexually oriented gestures

Physical Conduct

- Unwanted touching
- Pinching and/or grabbing
- Intentionally blocking movements
- Physically interfering with another's work

Mental Acts

- Repeated requests for dates
- Ignoring or snubbing people because they are not one of "them"
- Threatening reprisals after receiving a negative response to sexual advances
- Remarks regarding a person's anatomy or appearance
- Commenting on a person's sexual preferences or orientation
- Threatening retaliation for reporting harassment or misconduct

Policy Coverage

These policies apply to all applicants and employees, and prohibit harassment, discrimination and retaliation whether engaged in by fellow employees, by a supervisor or manager or by someone not directly connected to URBN (e.g., an outside vendor, consultant, or customer).

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

Retaliation Prohibited

URBN prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of a claim of harassment or discrimination is a serious violation of this policy and, like harassment and discrimination itself, will result in disciplinary action.

Complaint Procedure

URBN strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. If you believe that you have experienced conduct that is contrary to URBN's policy or you have concerns about such matters, you should bring your concerns to the Sr. Manager of Employment Administration before the conduct becomes severe or pervasive.

If anonymity is preferred, you should call the Confidential Voice Mailbox at 1-800-NOW-PREV (1-800-669-7738) or visit nowprev.urbn.com.

Employees who have experienced conduct they believe is contrary to this policy have an obligation to take advantage of this complaint procedure. Early reporting and intervention have proven to be the most effective methods of resolving actual or perceived incidents of harassment or discrimination. Therefore, while no fixed reporting period has been established, URBN strongly urges the prompt reporting of complaints or concerns so that prompt and remedial action can be taken. URBN will make every effort to stop alleged harassment or discrimination before it becomes severe or pervasive, but can only do so with the cooperation of its employees.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing or discriminatory conduct from promptly advising the offender that his or her behavior is unwelcome and requesting that it be discontinued.

The Investigation

Any reported allegations of harassment, discrimination or retaliation will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality will be maintained throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action techniques.

Responsive Action

Misconduct constituting harassment, discrimination or retaliation will be dealt with promptly and appropriately. Responsive action may include, but may not be limited to, training, referral to counseling, monitoring of the offender and/or disciplinary action such as a warning, reprimand, withholding of a promotion or pay increase, reduction of wages, demotion, reassignment, temporary suspension without pay or termination, as URBN believes appropriate under the circumstances.

Fraternization

While URBN recognizes and respects the rights of employees to associate freely and to pursue personal relationships with those they encounter in the work environment, employees must use good judgment in ensuring that those relationships do not negatively impact their job performance or their ability to supervise others. If those relationships do have a negative impact, disciplinary action up to and including termination may be taken.

Additionally, it is against URBN's policy for any manager to date an employee who is directly or indirectly reporting to them. If a social relationship between a manager and an employee develops, it is the responsibility of the manager to disclose the relationship to their manager and/or the Department Head. Failure to do so may result in disciplinary action up to and including termination. Once the Department Head has been notified, the manager may not participate in directly overseeing the employee, administering performance reviews or counseling the employee. The Department Head will attempt to determine an arrangement that best supports the business and balances each employee's interests. Such an arrangement may involve a transfer for either employee.

Please note that fraternization guidelines apply while at work and outside of work at social gatherings where URBN employees may be in attendance.

Reasonable Accommodations for Individuals with a Disability

URBN is committed to complying with all applicable provisions of the Americans with Disabilities Act (“ADA”) and similar state and local laws. It is URBN’s policy not to discriminate against any qualified employee or applicant with regard to any terms or conditions of employment because of such individual’s disability or perceived disability so long as the employee can perform the essential functions of the job with or without reasonable accommodation. Consistent with this policy of non-discrimination, the Company will provide reasonable accommodations to a qualified individual with a disability, as defined by the ADA, who has made the Company aware of his or her disability, provided that such accommodation does not constitute an undue hardship on the Company.

URBN encourages individuals with disabilities to come forward and request a reasonable accommodation. Employees with disabilities who believe they need a reasonable accommodation to perform the essential functions of their job should contact the Sr. Manager of Employment Administration.

After receiving an employee’s accommodation request, we will meet with the employee to discuss and identify the precise limitations resulting from the disability and the potential accommodation that URBN might make to help overcome these limitations.

URBN will determine the feasibility of the requested accommodation considering various factors, including, but not limited to, the nature and cost of the accommodation, the accommodation’s impact on the operation of the business, including its impact on the ability of other employees to perform their duties. URBN will inform the employee of its decision on the accommodation request. Any employee or job applicant who has questions regarding this policy may contact the Sr. Manager of Employment Administration.

Religious Accommodations

URBN is committed to complying with all applicable provisions of Title VII of the Civil Rights Act and similar state and local laws. It is URBN's policy not to discriminate against any employee or applicant with regard to any terms or conditions of employment based on such individual's religion. Consistent with this policy of non-discrimination, the Company will accommodate an individual's sincerely held religious beliefs or practices, as defined by the ADA, who has made the Company aware of their request for an accommodation to follow their religious beliefs or practices, provided that such accommodation does not constitute an undue hardship on the Company.

Employees who believe they need an accommodation to follow their religious beliefs or practices should contact their manager. URBN will determine the feasibility of the requested accommodation considering various factors, including, but not limited to the nature and cost of the accommodation, the accommodation's impact on the operation of the business, including its impact on the ability of other employees to perform their duties. URBN will inform the employee of its decision on the accommodation request. Any employee or job applicant who has questions regarding this policy may contact the Sr. Manager of Employment Administration.

Public Accommodations

URBN is also committed to providing a welcoming environment to the public and subscribes wholeheartedly to all public accommodation legislation. It is URBN's policy to provide services to the public without regard to race, color, ethnicity, national origin, religion, disability, sex, sexual orientation, gender identity or expression, or any other characteristic protected by law. Discrimination in the provision of services on the basis of these protected characteristics is strictly prohibited and will result in disciplinary action up to and including termination.

Open Door Policy

URBN is extremely interested in establishing and maintaining open lines of communication with every employee. You are encouraged to express your comments, ideas and concerns to your manager.

If you have a concern or problem that your manager cannot resolve, or if you wish to discuss the situation with someone else, you are encouraged to express your concerns to your manager's manager or directly to your Department Head.

If you are still dissatisfied, you may speak with the Chief Operations Officer or the Chief Executive Officer for your brand (if applicable) or you may speak with the Chief Administrative Officer or the Chief Executive Officer for Urban Outfitters, Inc.



Health & Safety

Safety Preparedness

URBN strives to maintain a safe working environment for its employees. You are responsible for helping to keep the workplace safe. URBN conforms to the Occupational Safety and Health Act (“OSHA”) regulations.

It is important to be prepared for any emergency by familiarizing yourself with the location of emergency exits and fire extinguishers in your work area.

The following safety rules have been developed to minimize the chance of injury. These rules are strictly enforced.

- Do not subject yourself to strain by using improper lifting methods or by trying to lift too heavy a load. Generally, when lifting, remember to:
 - Bend at the knee
 - Keep your back straight
 - Lift with your legs
- If you have any doubt about your ability to lift a heavy item, always ask for assistance; never try to lift something if you don’t feel comfortable.
- Do not leave any obstruction in the walkways of your work area (for example, reams of paper).
- Do not use any tools you are unfamiliar with until you receive proper instruction—you are responsible for asking for instruction when you need it.
- Do not climb onto any shelving or desks/work stations—always use a ladder.
- Do not block any exits or electrical panels.
- In the event of a fire, sound the alarm and call the fire department immediately. Know where the fire extinguishers are kept.
- Clean any spills immediately.
- Horseplay and running are prohibited in work areas.

Evacuation Procedures

The following evacuation procedures have been developed to ensure your safety in the event of an emergency:

- At the sound of a fire alarm, proceed to the nearest emergency exit stairwell immediately—do not take the elevator!
- Exit the building in an orderly fashion and stay calm.

- Do not re-enter the building until you have been instructed to do so by a member of the building management.

Evacuation drills will be conducted periodically. Please note that evacuation drills are conducted for your safety and your participation is required.

Reporting Requirements

Employees must **immediately** report the following to a manager:

- All equipment defects. Under no circumstances should an employee operate or attempt to repair defective equipment.
- Any unsafe conditions or practices.
- Any incident, whether or not any apparent injury resulted.
 - At the scene of an incident, be helpful and courteous. Avoid argument or discussion of the situation. Document conditions and details using the appropriate form(s).
- Any injury and/or property damage/loss.

Workers' Compensation

Workers' compensation is a benefit payable when any URBN employee is injured "on the job." If the injury is serious or fatal, a manager should contact their Direct Supervisor immediately and then contact the Employment Administration Department. For non-emergency related incidents, the employee should notify their Direct Supervisor. Please refer to the *Workers' Compensation Policy* for the Home Office, as well as the *Workers' Compensation Quick Reference Guide*, for more information and instructions on reporting emergency and non-emergency injuries.

Smoking, Drugs, and Alcohol

In keeping with URBN's intent to provide a safe and healthy working environment, smoking, drug use and alcohol use are prohibited throughout the workplace. Please be advised that the URBN campus has designated areas outdoors where you may smoke; please abide by these designations. This policy applies equally to all employees and visitors.



Attendance & Breaks

Attendance

In working together as a team, we provide mutual support to each other. When someone is late or absent, all team members must work harder to accomplish the Department's goals. Employees should be mindful of their fellow team members with regard to tardiness and absenteeism.

Because of the negative impact tardiness has on the entire staff, every employee is required to report to work on time for every scheduled workday.

Tardiness

Employees are required to contact their manager as soon as possible if they are running late. Lateness should be reported directly to your manager and not to co-workers or subordinates. Excessive tardiness may result in corrective action.

Absenteeism

If you are going to be absent from work, you must inform your manager at least 3 hours prior to your scheduled start time. Absences should be reported directly to your manager and not co-workers or subordinates. Excessive absenteeism that is not protected by law may result in corrective action.

For more information on extended absenteeism, refer to the *FMLA Policy* and *Leave of Absence Policy*.



Compensation

Pay Period

The Company pay period runs 14 days, from Sunday through Saturday. Paychecks are distributed on the Thursday following the end of the pay period. In cases where the Company is closed on a regular payday because of a holiday, employees will receive their paychecks on Wednesday. Employees enrolled in direct deposit will always receive their pay on the payday.

Employees must register for ADP Self-Service (MY.ADP) to view their bi-weekly pay stubs and to update their personal, pay and benefit information. Registration instructions are posted on the Employee Portal page of the onboarding tour and are also available on the Company Intranet.

Overtime

Hourly employees will be paid time-and-a-half for hours worked which exceed 40 hours in one week (Sunday – Saturday), and for hours worked on a Company holiday.

Timekeeping

Each employee must be paid for all compensable time worked. Hourly employees are required to accurately record their time when they arrive to work, leave for and return from meal breaks, and finish working for the day. The employee's manager will provide instructions on how to record hours worked.

Employees are not permitted to clock in or out for a co-worker, or to falsify time records in any way. All hours worked must be accurately reported. Infractions of this policy will result in corrective action up to and including termination. If the timekeeping system is not working or you forget to clock in or out, alert your manager as soon as the error is realized. Refer to the *Home Office Timekeeping Policy* for more information.

Breaks and Meals

Hourly employees working in Pennsylvania are entitled to at least a 30-minute unpaid meal period if they work a six-hour shift. They are also permitted to take paid rest breaks of short duration. Excessive breaks which negatively impact an employee's productivity or otherwise disrupt the work environment are not permitted and may result in disciplinary action. Refer to the *Home Office Timekeeping Policy* for more information.

Home Office employees working in locations outside of Pennsylvania should refer to the *Store Timekeeping Policy* for specific information relating to rest breaks and meal periods.



Employment Information

Employment Categories

Full-time employees are those employees who are scheduled to work **30 hours or more** per week on a regular basis. Part-time employees are those employees who are regularly scheduled to work **less than 30 hours** per week.

Temporary employees are those employees who are hired for a specific, temporary period of time or a discrete project with a defined ending period, typically not to exceed 6 months. Temporary employees who continue to work beyond the initial temporary period must be reclassified to regular employment status or terminated.

Change in Employment Status

Part-time or temporary employees who change status to full-time/regular will receive credit for time worked as a part-time or temporary employee with respect to benefit eligibility requirements for vacation, medical benefits, holiday pay, etc. in accordance with applicable law.

For more information, refer to the *Home Office Timekeeping Policy*.

Exempt Employees

Management positions that are classified as exempt from overtime require, among other things, that the employee primarily engage in management activities. Any employee who is classified as exempt due to their managerial role but who does not regularly engage in management activities at least 50% of the time must notify their manager/supervisor that they are not meeting the expectation for the exempt classification.

Administrative positions that are classified as exempt from overtime require that, among other things, the employee exercise discretion and independent judgment with respect to matters of significance. Any employee who is classified as exempt due to their administrative role but who does not regularly exercise discretion and independent judgment with respect to matters of significance must notify their manager/supervisor that they are not meeting the expectation for the exempt classification.

Exempt employees are paid on a salary basis, which means that, with limited exceptions, they may not have their pay reduced for variations in the quantity or quality of work performed. Any exempt employee who feels that his or her pay has been improperly reduced should report this immediately, following the complaint procedure described below.

Improper Deductions are Prohibited

Exempt employees typically must receive their full salary for any week in which they perform any work, without regard to the number of days or hours worked. However, exempt employees need not be paid for any workweek in which they perform no work at all for the Company.

Deductions from pay for any of the following reasons in a week in which an exempt employee performs any work are **prohibited** by the Fair Labor Standards Act (FLSA):

- Jury duty;
- Attendance as a witness;
- Temporary military leave;
- Absences caused by the Company or the operating requirements of the business;
- Partial day absences, other than those specifically listed below.

Managers or supervisors violating this policy will be subject to disciplinary action up to and including termination.

Permissible Deductions under the FLSA

Deductions from pay for any of the following reasons in a week in which an exempt employee performs any work are permitted:

- Absences of one or more full days for personal reasons (partial days will be paid at the full daily rate of pay);
- Absences of one or more full days due to sickness or disability where the employee is in the waiting period for vacation and personal or sick time, or where the employee has exhausted their personal, sick or vacation time;
- Fees received by the employee for jury or witness duty or military leave may be applied to offset the pay otherwise due. However, no deductions will be made for failure to work for these reasons;
- Penalties, in any monetary amount, imposed by the Company for infractions of safety rules of major significance, as determined by the Company;
- Deductions for the first and last week of employment, when only part of the week is worked by the employee;
- Deductions for unpaid leave of any length taken pursuant to the Family and Medical Leave Act.

Complaint Procedure

Employees who believe their pay has been improperly reduced should contact the Sr. Manager of Employment Administration immediately to request an investigation. Any such employee will be asked to specify in writing the circumstances of the pay deduction and whether it has occurred on other occasions.

If the deduction was, in fact, improper, the Company will reimburse the employee as promptly as possible, but in no case longer than two pay periods after confirmation of the problem by the Company. No employee will suffer an adverse employment action or retaliation for making a good faith complaint about his or her wages, or improper deductions from them.

Personnel Transfers

Employees must be in their current position for 6 months before applying for an open position with the Company. Refer to the *Internal Transfer Policy* for more information.

Jury Duty

URBN believes it is the responsibility and privilege of every employee to serve on a jury when called; however, you should check with your manager to determine if your absence would create an undue hardship and, if so, you or the Company may take steps with the appropriate jurisdiction to reschedule your service.

- You must inform your manager as soon as you receive “notice” of jury duty.
- Up to a maximum of 40 hours (not to exceed 5 days) of paid leave will be granted for jury duty, except in those jurisdictions which may require more generous benefits. In those cases, URBN will follow the laws of the jurisdiction.
- If you are chosen to serve on a jury, you are entitled to your normal pay less any compensation you receive from the government.
- Checks received from the government may be endorsed to Urban Outfitters, Inc., and sent to the Payroll Department, or copies of checks may be sent to Payroll and Payroll will deduct the amount from your pay for the week. If you do not use Jury Duty time, you may keep the government check.

For more information, please refer to the *Home Office Timekeeping Policy*.

Family and Medical Leave Act (FMLA)

Generally, under the FMLA, eligible employees will be granted up to 12 weeks of unpaid leave during a rolling 12-month period (or 26 weeks of unpaid leave in a single 12-month period only for the military caregiver leave). Certain states provide additional leave, which may run concurrently with the FMLA leave.

Eligible employees are those who have worked for at least 12 months and who have worked at least 1,250 hours in the 12 months preceding the commencement of the leave. Certain states may have different requirements regarding eligibility.

Eligible employees may take leave:

- Upon the birth or the placement of a child with the employee for adoption or foster care (entitlement to leave expires at the end of the 12-month period from the date of the birth or placement of the child).
- When the employee is needed to care for a child, spouse, or parent who has a serious health condition.
- When the employee is unable to perform the functions of his or her position because of his or her own serious health condition.
- Upon qualifying exigency arising out of the employee's spouse, child, or parent being on covered active duty or being called to covered active duty status (or having been notified of an impending call or order to covered active duty).
- When the employee is needed to care for a spouse, child, parent, or next of kin who is a covered service member (i.e., current member of the Armed Forces or covered veteran) with a serious illness or injury (military caregiver leave).

When foreseeable, employees must provide notice of their request for leave at least 30 days in advance. In other cases, employees must request leave as soon as the need for leave is known. Employees requesting leave may be required to submit medical certification and periodic updates during the leave. The Company may require a second medical opinion where appropriate.

During the leave, the employee will continue his or her current health coverage as long as the employee contribution to the monthly premium continues to be made. At the end of an approved leave of up to 12 weeks, the employee will, in most cases, be returned to his or her same position or an equivalent position.

For more information, refer to the *Family Medical Leave Act Policy*. Questions regarding FMLA may be directed to the Employment Administration Department.

Paid Parental Leave

URBN provides eligible employees with up to 6 weeks of paid parental leave following the birth of a child or placement of a child with the employee for adoption. This benefit shall run concurrently with leave under the FMLA and all other applicable leave laws. Please refer to the ***Paid Parental Leave Policy*** for more information.

Leave of Absence

URBN will allow employees to take an official Leave of Absence, without pay, for reasons that are acceptable to the Company. Generally, a leave of absence is limited to a maximum of 4 weeks, including any vacation, personal and/or sick time taken by the employee at the beginning of the leave period.

If you are a victim of, or a witness to, a crime; a domestic violence or sexual assault victim; or are subpoenaed to testify in court in a criminal matter, you may be eligible for certain types of leave depending on the jurisdiction. Please contact your supervisor regarding these types of leave.

For more information, please refer to the ***Leave of Absence Policy***.

Reserve Duty

Leave will be granted in accordance with the current law.

Bereavement Leave

URBN provides paid bereavement leave to assist eligible employees who are coping with the loss of an immediate family member. Eligible employees are full-time regular employees who have been employed with the Company for at least 90 days. Please refer to the ***Bereavement Leave Policy*** for more information.

Employment Verification Requests

All employment verifications are processed through a third-party verifier, uConfirm. Please refer to the ***Employment Verification Policy*** for information on submitting an employment verification request. Questions regarding this policy or an employment verification request should be directed to the Employment Administration Department.



Privileges & Benefits

Vacation

Full-time regular employees (hourly and salaried) are eligible for vacation after 6 months of service and are then transitioned into the fiscal year allocation schedule as soon as possible. Once transitioned into the fiscal year allocation schedule, vacation will be allocated on February 1st for the first half of the year and August 1st for the second half of the year. Part-time and temporary employees are not eligible for vacation.

Vacation time allocated on February 1st for the first 6 months of the fiscal year may be carried over into the second 6 months of the same fiscal year with manager's permission. Vacation allocated on August 1st for the second 6 months of the fiscal year must be taken by January 31st of that fiscal year unless otherwise required by law. For more information, refer to the *Home Office Vacation and Personal Time Policy*.

Employees will be paid for unused vacation upon separation from the Company based on the Pro-Rated Vacation Allocation Table, as set forth in the *Home Office Vacation and Personal Time Policy*. Vacation may not be taken as part of the notice period, and the date of termination may not be extended to allow for the use of unused vacation days.

Personal Time

Full-time regular employees (hourly and salaried) who work in Pennsylvania will receive personal days at the beginning of each fiscal year (February 1st) to be used during that fiscal year. The employee's date of hire is used to determine the amount of personal days the employee will receive in the first fiscal year only.

Personal days may be used after 90 days of employment with the Company. Personal days may be taken for sick time, personal time, family obligations, funerals, and religious observations. Personal days must be used in the fiscal year in which they are received, and do not carry over from fiscal year to fiscal year. Unused personal days are not paid out upon termination unless otherwise required by applicable law.

Sick Leave

Home Office employees who work outside of Pennsylvania, and part-time regular employees, temporary employees, and interns who work in Pennsylvania will receive sick leave at the beginning of each fiscal year to be used during that fiscal year. The employee's date of hire is used to determine the amount of sick leave the employee will receive in the first fiscal year only.

Sick leave may be used after 90 days of service with the Company. Sick leave may be used for the employee's own health needs and for any reason permitted under state or local law. Since sick leave is allocated or front-loaded, sick leave does not carry over from fiscal year to fiscal year unless otherwise required by applicable law. Unused sick leave is not paid out upon termination unless otherwise required by applicable law.

For more information on vacation, personal time, and sick leave, please refer to the *Home Office Vacation and Personal Time Policy*.

Holidays

URBN provides employees time to observe designated holidays. All Home Office full-time regular employees are eligible for holiday pay immediately upon hire. Part-time and temporary employees (including interns) are not eligible for holiday pay.

All **hourly employees** who work on a holiday (whether part-time or full-time) will receive time-and-a-half for all hours worked that day. All **salaried employees** who work on a holiday will receive another day off that week.

Holidays recognized by URBN are:

- New Year's Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving
- Christmas

On occasion, the Company will decide to close the Home Office in observance of other holidays or for the day before or after a holiday. In those situations, the day shall be treated as a holiday for purposes of holiday pay only. Employees who wish to observe holidays not recognized by URBN may use personal or vacation days.

For more information, please refer to the *Home Office Timekeeping Policy*.

Employee Health and Welfare Benefit Plans

All full-time employees are eligible for health and welfare coverage after ninety (90) days of continuous employment. All full-time employees are automatically enrolled in long-term disability, short-term disability and basic life insurance/accidental death and dismemberment insurance at no cost to the employee. Detailed plan documents and/or summary plan descriptions exist which govern specific rights and obligations, and address any questions concerning eligibility or other terms and conditions.

Employees can access plan information by logging into the ADP Benefit Portal. Employees should direct any questions to the Benefits Department.

401(k) Savings Plan

All full-time and part-time employees are eligible to participate in the 401(k) Savings Plan after three (3) months of service. Detailed plan documents and a summary plan description exist which govern specific rights and obligations, and address any questions concerning eligibility or other terms and conditions.

Employees can access enrollment/plan information via www.401k.com. Employees should direct any questions to the Benefits Department.

Employee Discount

All employees of Urban Outfitters, Inc. are entitled to a discount when purchasing merchandise in Urban Outfitters, Inc. stores and through the brand websites, and when dining at URBN Food & Beverage locations.

Misuse of the employee discount by the employee or an eligible user, to the extent the discount is offered to eligible users, may result in disciplinary action up to and including immediate termination.

Misuse by an employee or an eligible user includes, but is not limited to, the following:

- Use of the discount to purchase merchandise for people not eligible for this benefit in exchange for monetary or other consideration.
- Reselling merchandise purchased with the discount for profit, including, but not limited to, on the Internet or at flea markets.
- Reselling or returning merchandise purchased at a sample sale for a profit.
- Giving your discount number to another person to use when purchasing merchandise online.

Employees should refer to the *Employee Discount Policy* and visit www.URBN.com/employeediscount for discount guidelines, terms and conditions, and exceptions.



Travel

Employees who travel on behalf of URBN should exercise prudent management of business travel and entertainment expenses to support their Brand's business objectives. URBN wants to ensure that the traveler has a safe and successful business trip while enjoying reasonable accommodations and meals. For more information, please refer to the *Travel Policy*.

All employees who regularly travel (more than five times a year on business) or are expected to submit more than five expense reports during a calendar year are encouraged to utilize the Purchasing Card for all business travel expenses (it benefits the Company to utilize the Card, but employees are not required to use it). Please refer to the **P-Card Agreement** available on the Company Intranet for complete details.

Booking Travel

URBN provides an online booking tool and an in-house travel agent for all travel arrangements. By centralizing our travel bookings, URBN is able to achieve volume discounts and monitor expenses effectively. For more information, please see the *Travel Policy*.

Expense Reimbursement

Employees must complete an Expense Report to receive reimbursements for business expenses. Expense Reports can be found on the Company Intranet. Employees who use a Purchasing Card should not complete an Expense Report. Please see the *Expense Reports Policy* for more information.



Code of Conduct & Ethics

Over the years, the Company has developed a reputation for integrity and fair business practices. In order to maintain this reputation, each of us as employees of the Company must strive to conduct all of our business affairs fairly and honestly.

In pursuit of this goal, URBN has adopted a Code of Conduct and Ethics by which its employees are expected to conduct all Company business. This Code of Conduct and Ethics can be found in its entirety at www.URBN.com and on the Company Intranet. All Urban Outfitters, Inc. employees are obligated to be familiar with the full Code of Conduct and Ethics and shall be held accountable for any breaches of the full Code of Conduct and Ethics. Such breaches may result in disciplinary action up to and including termination.

Employees are encouraged to talk to supervisors or other appropriate personnel about observed illegal or unethical behavior in violation of the Code of Conduct and Ethics or whenever in doubt about the best course of action in a particular situation. Everyone is expected to cooperate in internal investigations of misconduct. Urban Outfitters, Inc. will not retaliate against anyone for good faith reports of misconduct or violations of the Code of Conduct and Ethics.

Solicitation and Distribution of Literature

Distribution of literature or solicitation by individuals who are not employees of URBN is not permitted on the premises of URBN at any time. Distribution of literature and/or solicitation by URBN employees is prohibited during working hours in working areas, or in areas frequented by the public during hours when URBN is open for business.



Computer Security Awareness & Electronic Communication

The Company's *Computer Security Awareness and Acceptable Use Policy* outlines the acceptable use of computer equipment at Urban Outfitters, Inc. The *Computer Security Awareness and Acceptable Use Policy* can be found in its entirety on the Company Intranet.

Some key guidelines are highlighted below for your reference.

- There is no right of privacy in connection with e-mail and all software, data, and files of any and all types on URBN computing equipment. URBN may at any time monitor, inspect or remove e-mails, files, programs or other software that resides on such equipment, either remotely or directly on the equipment.
- Employees are responsible for the security of their passwords and accounts. Passwords must be changed every 90 days and comply with minimum password strength requirements. Passwords must never be written down or shared with anyone, including the URBN IT Department or any computer support personnel.
- The internet is a tremendous resource to URBN and important to many of us in our jobs. It is also a source of material entirely unrelated to our work. To protect URBN's interests and prevent exposure to unnecessary liabilities, our internet policy is as follows:
 - Access to the internet during work hours must be appropriate, and must be consistent with one's professional role, obligations, and job responsibilities.
 - No employee should ever transmit any information on the internet that could be considered defamatory.
 - Company employees will comply with U.S. securities laws prohibiting "insider trading." Employees who are in possession of material containing nonpublic information about the Company are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct Company business.
 - This policy also relates to the Company's clear policy against sexual harassment and discrimination. Use of Company computers in any way which is sexually offensive, harassing or discriminatory under the Company's policy or under applicable law is expressly prohibited.
 - In order to make these policies effective, internet access will be monitored and/or audited from time to time.

- An electronic mail system has been installed by the Company to facilitate business communications. The email system belongs to the Company and the contents of email communications are accessible at all times by management for any business purpose. All email messages are Company records. The contents of email, properly obtained for legitimate business purposes, may be disclosed within the Company without your permission. Employees who misuse the email system will be subject to disciplinary action up to and including termination.
- Employees are responsible for the physical security of any Company-issued equipment (e.g., laptop) at all times, and should take all reasonable measures to protect Company equipment from theft or damage. Theft of Company-issued equipment **must** be reported to the IT Department as soon as possible. Stolen equipment **must** be immediately reported to the police and **must** be accompanied by a police report. If a police report is not provided, the employee must reimburse the Company for the cost of the stolen equipment.
- All hardware and software must be purchased through the URBN IT Department. This will ensure that all corporate discounts are applied, and that licensing meets corporate requirements. In addition, this will ensure ongoing management, including software updates and hardware maintenance.
- Employees must not install Company software onto a personal computer or other personal electronic device and/or install personal software onto Company-owned equipment or Company systems or networks.
- The Company Intranet serves as a valuable source of information for employees. Please keep in mind that the information (including sales numbers) contained on our Intranet is confidential. Sales figures must not be disclosed to anyone outside the Company until financial results are released following each quarter.

URBN's policies must be followed at all times. Employees who engage in any conduct which conflicts with, or is not in the best interests of the Company, its philosophy and reputation, or any employee who engages in conduct which adversely affects his or her ability to perform their employment responsibilities, will be subject to disciplinary action up to and including termination.



Corrective Action

All employees of URBN are required to abide by certain rules and procedures. Failure to comply with any of these rules or procedures, or abuse of privileges, will result in corrective action and/or termination. The corrective action may include verbal counseling, a written warning, probation, suspension and termination. URBN reserves the right to take whatever disciplinary measures it feels is appropriate, including termination.

Your manager may take any of the following corrective action steps with the support of the Department Head if performance or conduct is not up to standards:

- Verbal counseling may be given. This counseling may be documented and placed in the employee's personnel file.
- If performance or conduct continues to be substandard, a written warning and/or a written performance improvement plan may be issued.
- Employment may be terminated.

URBN, in its sole discretion, may decide to skip or alter any or all of the above steps and may terminate an employee's employment immediately, depending on the circumstances.

Serious Infractions

Employees who engage in any conduct which conflicts with, or is not in the best interests of the Company, its philosophy and reputation, or any employee who engages in conduct which adversely affects his or her ability to perform their employment responsibilities, will be subject to disciplinary action up to and including termination.

Some examples of serious infractions that are unacceptable and may result in immediate termination include, but are not limited to:

- Theft (this includes keeping samples for personal use. All samples are owned by URBN until purchased at a sample sale. For more information, refer to the *Samples and Company Property Policy*.)
- Falsifying URBN reports or records (including time records)
- Abuse of discount privilege (including abuse of the privilege by a family member, spouse, significant other, and/or any person designated as an eligible user)
- Intentional or negligent damage to URBN property, or reckless disregard of safekeeping of URBN property
- Disclosure of confidential information
- Reporting to work (including employee or work-related meetings) under the influence of illegal drugs or alcohol
- Any type of discrimination or harassment
- Failure to follow directives or to perform assignments
- Unapproved absence from work
- Direct insubordination
- Direct or indirect, written or verbal, threats made to any customer or employee of URBN, on or off URBN premises
- Misuse of Company equipment or systems
- Use of physical force to cause bodily harm, with or without intent
- Dishonesty
- Misappropriation of Company funds
- Serious safety violations

- Physical fighting
- Restricting or impeding the work process
- Bringing to work or possessing any type of firearm or weapon while on Company property
- Inconsiderate treatment of Company guests
- Taking or giving bribes of any nature, or anything of value, as an inducement to obtain special treatment, to provide confidential information or to obtain a position. Acceptance of any gratuities or gifts must be reported to a supervisor or manager.
- Rude, discourteous or un-businesslike behavior
- Creating a disturbance on Company premises or creating discord with guests or fellow employees
- Use of abusive language
- Failure to observe scheduled work hours
- Unauthorized absence from assigned work area during regularly scheduled work hours
- Sleeping during regular work hours
- Recording time for another employee or having time recorded to or by another employee
- Falsification of one's employment application or employment history
- Illegal or un-businesslike conduct, whether on or off Company premises, which adversely affects the Company's services, property, reputation or goodwill in the community, or interferes with work

Nothing contained in the **Corrective Action Policy** alters an employee's status as an at-will employee. URBN reserves the right to terminate employment immediately, for any reason, without prior corrective action.

Employee Handbook Acknowledgment Form

The Employee Handbook describes important information about Urban Outfitters, Inc., and I understand that I should consult my manager regarding any questions not answered in this handbook. I have entered into my employment relationship with Urban Outfitters, Inc. voluntarily and acknowledge that there is no specified length of employment.

Urban Outfitters, Inc., in its sole discretion, reserves the right to change or delete any of these policies as it sees fit. Since the information, policies and benefits described in this handbook are subject to change, I acknowledge that revisions to this handbook may occur, except to Urban Outfitter's, Inc.'s policy of Employment at Will. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies.

Furthermore, I acknowledge that this handbook is for informational purposes only. It is not a contract and does not create any contractual right or agreement between Urban Outfitters, Inc. and me.

Any state or local laws whose requirements differ from the policies set forth in this handbook will be adhered to by Urban Outfitters, Inc.

I have received the link to the online handbook, and I understand that it is my responsibility to read and comply with the policies contained herein and any revision made to it.