



DXL HUMAN RIGHTS POLICY

Destination XL Group, Inc. is committed to respecting all human rights and to treating all persons with dignity, respect and fairness. This commitment applies to our associates, our customers, our communities, our business allies, our vendors, our shareholders, and our suppliers. All references to “we,” “our,” “us” and “the Company” refer to Destination XL Group, Inc. and its consolidated subsidiaries.

We seek to establish relationships with entities that share the same principles and values as us. We also promote human rights awareness and respect for those rights throughout our value chain.

In alignment with the United Nations Guiding Principles of Business and Human Rights, we strive to conduct human rights due diligence and seek to avoid adverse impacts on human rights resulting from our own business activities and those of our suppliers. We are guided by the principles articulated in the following international human rights standards as to best practices for managing human rights risks and impact:

- The International Bill of Human Rights, including the Universal Declaration of Human Rights
- International Labour Organization (ILO)’s Declaration on Fundamental Principles and Rights at Work
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises

This human rights policy is further supported by our internal policies, standards and strategies, our Employee Handbook, our Codes of Conduct and our internal training programs.

We believe our key responsibilities are the protection of our associates’ human rights and addressing the risk of human rights violations within our supply chain.

Non-Discrimination and Harassment

We are committed to providing a friendly and professional work environment free of any form of harassment, discrimination, hostile work environment, quid pro quo, or retaliation (including but not limited to the protection of women’s rights, the protection of minority groups, protections from discrimination based on race, color, religion, sex, gender, gender identity, ethnicity, national origin, ancestry, marital status, sexual orientation, age, disability, pregnancy, military service, veteran status, genetic information or any other characteristic covered under applicable law). All associates of the Company are protected and required to abide by this policy, which is expanded upon in the Employee Handbook

and reinforced by our specific training courses that all associates are required to complete.

The Company's Business Abuse Hotline (1-888-662-5025) is monitored by a third party and offers a confidential toll-free option for reporting concerns. Associates are encouraged to report any violations of Company policy, illegal activity or that which is detrimental to any associate, guest or to the business in general. Operators are available 24 hours/day, 7 days/week. Associates may call anonymously. The Company promptly investigates all reports in a fair and expeditious manner. Every attempt will be made to protect the identity of the victim, the alleged harasser/offender and any other associate who reports an incident or takes part in an investigation. Associates are encouraged to refer to the Employee Handbook, under "Investigation and Reporting Guidelines" for a more detailed discussion.

While associates are encouraged to report incidents internally, if an associate believes that they have been subjected to any form of harassment, discrimination or retaliation, they may file a formal complaint with their state human rights agency or commission or the Equal Employment Opportunity Commission (EEOC). Further, utilizing the Company's internal complaint procedure does not prohibit an associate from also filing a complaint with the EEOC or state agency. The Company will not tolerate any retaliation against any associate or other whistleblower who utilizes any of these avenues to report a concern.

Child labor

We will not tolerate the use of child labor. We also will not conduct business with any vendor that utilizes child labor in any manner in their contracting, subcontracting or other relationships for the manufacture of their products. No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

Forced Labor

We have zero tolerance for modern slavery, forced labor and human trafficking, and will ensure that our operations are free from these practices. In addition, we work with our business allies and suppliers to ensure they recognize that modern slavery, forced labor and human trafficking will not be condoned. The Company will not accept products from vendors who utilize forced labor in any manner in their manufacturing, contracting, subcontracting or other relationships for the manufacture of their products.

Freedom in Employment

All work is voluntary. Our associates and those of our business allies and suppliers must have the freedom to terminate their employment at any time without penalty, given notice of reasonable length. Employment terms shall be those to which the worker has voluntarily agreed. All employment decisions, including hiring, training, advancement, compensation, scheduling, discipline, and termination, are to be made without regard to race, color, religion, sex, gender, gender identity, ethnicity, national origin, ancestry, marital status, sexual orientation, age, disability, pregnancy, military service, veteran status, genetic information or any other characteristic covered under applicable law.

Our compensation and benefit programs are designed to attract, retrain and motivate associates. We offer benefits and compensation to our associates which are competitive relative to the retail industry and are committed to complying with all applicable laws and regulations governing the payment of wages, working hours and benefits. In addition, we align management's compensation to the Company's performance.

Freedom of association/collective bargaining

Specifically with reference to the guidance outlined in Principle Three of the UN Global Compact Initiative, the Company upholds the freedom of association and the effective recognition of the right to collective bargaining. We respect our associates' right to join, form or not to join a labor union without fear of reprisal, intimidation, or harassment.

Occupational Health and Safety

We will provide a safe and healthy work environment that complies with all applicable laws pertaining to health and safety in the workplace.

Expectations of our Vendors and Others in Our Supply Chain

The Company respects the rights of workers in our supply chain and requires vendors and suppliers for both our private brands and national brands to operate ethically with respect to the human rights of their workers. Our Vendor Code of Conduct outlines our minimum standards, which we enforce through our assessment, audits and remediations. Through our Vendor Code of Conduct, we expect all our suppliers to commit to respecting the human rights of their workers consistent with the ILO's Declaration on Fundamental Principles and Rights at Work, including the freedom of association, the right to collective bargaining, and the right of all individuals not to be subject to forced labor, child labor, or discrimination.

Reporting, Oversight and Stakeholder Engagement

Considering the harmful impact any human rights violation can cause, we will prioritize appropriate actions to identify, prevent or mitigate the impact in our value chains. Where we identify that we have caused or directly contributed to an adverse human rights impact, we will unilaterally, or in cooperation with other stakeholders, engage in appropriate remediation processes.

The Company's senior leadership is responsible for implementing the principles laid out within this policy with the Nominating and Corporate Governance Committee of the Board maintaining oversight responsibility for this Human Rights Policy at least annually.

We will regularly review this Human Rights Policy with feedback from our stakeholders and make amendments as necessary. We also have policies in place to annually audit our vendors and suppliers to ensure they are acting ethically and are aligned with our Vendor Code of Conduct.

If any associate believes that someone is violating our Human Rights Policy or the law, they are asked to report it immediately to their manager, Human Resources, our General Counsel or the DXLG Business Abuse Hot Line, which provides the caller the ability to remain anonymous, if they so choose. Further, we expect our business allies and other parties, whose actions may be directly linked to our operations or products, to respect and not infringe upon human rights, and likewise to report such infringements. External stakeholders who would like to raise any concerns regarding our operations may reach us at the following address:

Corporate Secretary
Destination XL Group, Inc.
555 Turnpike St.
Canton, MA 02021
United States