



CODE OF BUSINESS CONDUCT AND ETHICS

Columbia Sportswear Company's success has been built on great product offerings, tremendous relationships with customers and suppliers, and the loyalty of our employees and agents. Our success also depends on our character, integrity and trustworthiness. We are committed to continuing to build a company of which we can all be proud -- not only of the results that we achieve, but the manner in which we achieve them. As used in this Code "CSC" shall refer to Columbia Sportswear Company and its subsidiaries.

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It does not cover every legal and ethical issue that may arise, but it does set out basic principles to guide all CSC officers, directors and employees worldwide, as well as representatives, consultants, vendors, agents and other third party intermediaries (collectively, "Representatives") in their dealings with or on behalf of Columbia Sportswear Company and its subsidiaries and affiliates. Employees and Representatives, as applicable, are also responsible for understanding and complying with CSC's other corporate policies. All of our employees must conduct themselves in accordance with all CSC corporate policies and endeavor to avoid even the appearance of improper behavior.

If you violate the standards in this Code, either directly or indirectly, you will be subject to disciplinary action up to and including termination of employment or termination of your relationship with CSC, as applicable. In addition, you may face imprisonment and other severe civil and criminal penalties if you fail to comply with the law. If you or someone you know are in a situation which you believe may violate or lead to a violation of this Code, please follow the compliance procedures described in Section 9.

1. HONESTY, ACCURACY AND FAIR DEALING

You should act in good faith, responsibly, with due care, competence and diligence, and without misrepresenting material facts. All of CSC's books, records and accounts must accurately reflect the nature of transactions recorded and must be timely prepared. All cash, bank accounts, investments, and other assets must always be recorded on the official books of CSC. Bank accounts should be opened or closed only upon the prior written approval of the Chief Executive Officer, the Chief Financial Officer or their designee. No undisclosed or unrecorded fund or asset shall be established in any amount for any purpose. No transaction or arrangement shall be structured to circumvent CSC's internal controls system. No false or artificial entries shall be made for any purpose. No payment shall be made, nor purchase price agreed to, with the intention or understanding that any part of such payment is to be used for any purpose other than that described in the document supporting the payment. If you become aware of records that may be inaccurate, report the situation immediately to the Finance or Legal Department or by following the compliance procedures described in Section 9.

You should respect the rights of and deal fairly and honestly with CSC's customers, suppliers, competitors, and other team members. You should not steal proprietary information, possess trade secret information that was obtained without the owner's consent or induce disclosures of such information from past or present employees of other companies, nor should you take unfair advantage of anyone through misrepresentation of material facts, fraud, abuse of privileged information, or any other unfair dealing practice.

2. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

Complying with the letter as well as the spirit of the law is the foundation of CSC's ethical standards. All CSC team members and Representatives must respect and obey the local, state and national laws of the localities in which we operate. We encourage employees to consult regularly with their supervisor or the Legal or Human Resources Department regarding required compliance with laws, rules and regulations.

Competition. We pride ourselves on our ability to thrive in a highly competitive industry, growing our business while taking care to comply with the antitrust and competition laws in each country in which we do business. You should not engage in illegal anti-competitive conduct. In particular, you should treat all customers fairly, avoid entering into any understandings with one customer that will negatively affect another customer or potential customer and avoid illegally telling any customer what prices to charge for products.

Customs. CSC must comply with customs laws and regulations in every country in which we do business. As with everything that we do, the most important thing to remember is that we must be truthful and accurate. We will not inaccurately lower customs values, describe products in misleading terms or make any intentional misrepresentations relating to custom entries.

Payments to Government Personnel. The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to foreign government officials or political candidates in order to obtain or retain business. You must not pay any bribe, kickback or other improper or illegal payment to government officials of any country to secure any kind of concession, contract or favorable treatment for you or CSC.

The U.S. government also has a number of laws and regulations that restrict business gratuities that may be accepted by U.S. government personnel. You must not promise, offer or deliver to a U.S. government official or employee a gift, favor or other gratuity in violation of these rules. State and local governments, as well as foreign governments, may have similar rules with which you must comply.

Insider Trading. As a CSC team member or Representative, you may have access to confidential information about CSC or companies with which we do business. You are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. To use confidential information for personal benefit or to "tip" others who might use the information for personal benefit or to make an investment decision is not only unethical but also illegal. It is important to avoid even the appearance of impropriety. To assist you in complying with laws against insider trading, CSC has adopted a detailed Insider Trading Policy. Employees should carefully review this Policy for complete guidelines regarding their trading obligations.

3. CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

Conflict of Interest. A "conflict of interest" exists when a person's private interest interferes in any way with the interests of CSC. With respect to CSC employees, conflicts of interest may also arise when you or members of your family receive improper personal benefits as a result of your position with CSC. Loans to, or guarantees of obligations of, you or your family members may create conflicts of interest. Conflicts of interest may not always be clear-cut, so if you have a question, you should follow the compliance procedures described in Section 9. All employees must disclose to their managers in writing any conflict of interest with CSC; directors and executive officers may choose instead to disclose the issue to the General Counsel or Board of Directors. Managers or other permitted persons to whom

disclosures are made will determine, in consultation with Legal, Human Resources or Internal Audit, as necessary, if a conflict exists and how to resolve it. Conflicts may be waived only by the Board of Directors, Chief Executive Officer, General Counsel, or Chief Financial Officer. The employee is responsible for memorializing the resolution in writing.

Employees, who are uncertain whether a conflict exists, should consult with their manager and should avoid situations that could be perceived as a conflict of interest.

Corporate Opportunities. If you are a CSC employee, you must not take for yourself personally opportunities that are discovered through the use of CSC property, information or position. You may not use CSC property, information or position for improper personal gain, nor may you compete with CSC directly or indirectly. You owe a duty to CSC to advance its legitimate interests when the opportunity to do so arises.

4. GIFTS AND HOSPITALITY

Employees must not give or accept gifts if the value of the gift may be construed to indicate an intent to influence improperly the business relationships between CSC and its suppliers, customers, competitors or any outside party. Gifts given or received must be for a legitimate business purpose, such as to promote, demonstrate or explain a company product, position or service. Insignificant gifts such as mugs and t-shirts or the exchange of nominal social amenities are permitted. To the extent that you are entertaining another party or being entertained, there must be a clear business purpose and no intention or appearance of improper influence.

Although CSC generally relies on your good judgment to comply with its gift policy, you are specifically prohibited from (a) accepting gifts for relatives, friends or other associates, or (b) accepting a cash gift at any time. If you are offered a cash gift, you must promptly report the gift to the Legal Department. If the return of the cash gift may result in undue embarrassment, or if the donor of the cash gift cannot be readily identified, the cash gift must be turned over to CSC.

If you receive a non-cash gift with a value in excess of two hundred fifty U.S. dollars (\$250.00) (or such lower amount as established by management for a particular office or region in consultation with the Legal Department), or if you are in doubt about the value of a gift, you should report it to CSC's Legal Department. Non-cash gifts may include benefits that you do not routinely think of as a "gift," such as trips, concert or other event tickets, or social outings (including these types of benefits paid for by a potential or existing vendor of CSC). You may be required to turn over any such gifts to CSC.

You must comply with all applicable federal, state or local laws or regulations relating to gifts. In particular, keep in mind that gifts to government officials may violate the U.S. Foreign Corrupt Practices Act or other U.S. or foreign laws or regulations regarding business gratuities. Under no circumstances may you give or accept kickbacks in any form to or from a supplier, customer or any other party. More information on CSC's policies around gifts to government officials can be found in our Anti-Corruption/Anti-Money Laundering and Hospitality Policy.

5. PROTECTION AND PROPER USE OF CSC RESOURCES

Assets. You are responsible for taking all reasonable steps to protect CSC's assets. Any suspected fraud, theft or misuse of CSC assets should be immediately reported to CSC in accordance with the compliance procedures described in Section 9. Your obligation to protect CSC's assets extends to CSC's property, products and intellectual property including trademarks, trade secrets, patents and copyrights, as

well as business, marketing and service plans, manufacturing ideas, designs, records, and any unpublished data and reports.

Information. In consideration of your employment or other relationship with CSC, you must comply with your obligations under this Section. These obligations continue even if your relationship with CSC ends. Unless disclosure is authorized by CSC or required by law or regulation, you must hold and maintain confidential information in trust and confidence for the benefit of CSC and take reasonable security precautions and other actions necessary to ensure that there is no use or disclosure of confidential information in violation of these obligations. Confidential information (or “protected information”) includes all information relating to CSC that is not publicly available or that is treated by CSC as confidential or business secrets, as well as all information provided to CSC by a customer or other third party with an expectation of confidentiality. Employee confidentiality obligations and the definition of “protected information” are more fully described in CSC’s Confidentiality Policy.

6. PUBLIC DISCLOSURES

As a publicly traded company, CSC is subject to laws and regulations that govern how and when we disclose information. Only Columbia Sportswear Company’s Chief Executive Officer, Chief Financial Officer, Director of Investor Relations, or a person authorized by one of them, is permitted to speak with investors or investment analysts about CSC, or to speak with the media about matters involving CSC’s financial condition, results of operations, future business prospects or similar topics. General media relations should be coordinated by Columbia Sportswear Company’s Public Relations Department. Employees should always refer news reporters, stock analysts or others seeking information about CSC to one of the individuals listed above or to Columbia Sportswear Company’s Public Relations Department.

Disclosures in securities filings and public communications should be complete, fair, accurate, timely, and understandable. If you become aware of any information concerning (a) material defects in the disclosures made by CSC in its public filings; (b) significant deficiencies in the design or operation of internal controls; (c) any violation of this Code that involves management or other employees who have a significant role in CSC’s financial reporting, disclosures or internal controls; or (d) any material violation of the law or this Code, you should follow the compliance procedures described in Section 9.

7. EMPLOYEE RELATIONS

Our goal is to make CSC an exciting and dynamic place to work, where all employees are given the opportunity to achieve their potential. A crucial factor in reaching this goal is ensuring that CSC’s work environment is one that is safe and free of illegal discrimination or harassment of any kind. Employees should become familiar with CSC’s Employee Handbook for complete information regarding CSC’s employment policies.

8. SOURCING AND MANUFACTURING

We are committed to ensuring that decent and humane working conditions are provided to the employees of the manufacturers that we contract with around the world. You should review CSC’s Standards of Manufacturing Practices for complete information regarding CSC’s manufacturer selection and monitoring requirements.

9. COMPLIANCE PROCEDURES

If you are a CSC employee and have questions about this Code of Business Conduct and Ethics, or if you have concerns about conduct that you believe violates or may lead to a violation of this Code, it is important that you raise them through one of the channels described below.

- **Discuss with a supervisor.** You are always encouraged to bring questions or concerns to your supervisor. Management can only make appropriate decisions if fully informed; it will be helpful if you present as complete a picture as possible to your supervisor. It is the responsibility of every supervisor to assist in resolving these questions or concerns.
- **Discuss with another member of management.** If you are more comfortable bringing your question or concern to a member of management who is not your supervisor, you are encouraged to contact a member of the CSC Compliance Team (Columbia Sportswear Company's General Counsel, Chief Human Resources Officer, Chief Financial Officer, and Director of Internal Audit) or any other member of management.
- **Call the CSC Compliance Line.** If you feel uncomfortable discussing your questions or concerns with your supervisor, a member of the Compliance Team or someone else in management, or if you are concerned that your supervisor or other member of management may be engaged in conduct in violation of this Code, please call the confidential *CSC Compliance Line* at (888) COLM-CCL (1-888-265-6225) or at the local line available in your region. Your call will be answered by an independent agency outside of CSC, and you will not be required to identify yourself.

Reports of violations of this Code received by a supervisor or other member of management should be promptly forwarded to the Compliance Team. All employees are required to cooperate fully with any internal investigations of misconduct.

Representatives should report any violations of this Code to a member of CSC management or via the CSC Compliance Line.

10. NON-RETALIATION

Please be assured that CSC does not tolerate retaliation against anyone who in good faith reports possible violations of law, this Code, or other company policies, questions on-going or proposed conduct, or participates in an internal investigation. Retaliation can include, among other things, demoting, transferring, or terminating anyone for raising a question or speaking up in good faith about a possible violation of the Code, company policy or law. Employees who retaliate or attempt to retaliate against anyone who reports a concern in good faith or participates in an internal investigation are subject to discipline up to and including termination. Employees who believe they have experienced retaliation should contact the Human Resources or Legal Department immediately.

11. ADMINISTRATION AND ENFORCEMENT

The Board of Directors is responsible for the administration and enforcement of this Code of Business Conduct and Ethics, but may delegate its responsibility to a committee of the Board. The Board shall take reasonable steps to monitor and audit compliance with the Code and to ensure that the Code continues to comply with all applicable rules and regulations. Any questions relating to how this policy should be interpreted or applied should be addressed to the General Counsel.

Any waiver of this Code for an executive officer or director must be approved by the Board of Directors and will be promptly disclosed as required by law or regulation. Any waiver for any other

employee or Representative must be approved by the Board, the Chief Executive Officer, the General Counsel or the Chief Financial Officer.

This Code of Business Conduct and Ethics was adopted by the Board of Directors on September 1, 2003 and amended by the Board of Directors on January 23, 2009, January 31, 2014, January 29, 2016, and January 27, 2017. Amendments or changes to this Code may only be made by the Board of Directors. A copy of the most current version of this Code shall be posted on Columbia Sportswear Company's website and intranet.