

SHEIN CODE OF BUSINESS CONDUCT AND ETHICS

1. Introduction

SHEIN is a global online fashion and lifestyle retailer committed to making the beauty of fashion accessible to all. With the scale of our business and operational footprint, we recognise our responsibility to hold our employees, suppliers and business partners to high standards of ethics and integrity, in order to safeguard and maintain the trust of our customers and stakeholders globally.

We believe that ethical business practices are the foundation of long-term success, and are committed to operating responsibly across all areas of business, in line with leading international standards. That is why we have established this Code of Business Conduct and Ethics – to provide clear guidance on how we conduct our business and reinforce our shared responsibility in upholding SHEIN’s ethical standards. These fundamental standards will remain constant as the lodestar for our business conduct, even as our company and our ecosystem of partners continue to evolve and grow in the future.

2. Applicability

This Code of Business Conduct (the “Code”) applies to all employees, officers, and directors of SHEIN, as well as to all suppliers, contractors, manufacturers, service providers, consultants, agents, and all business partners acting on our behalf, regardless of location or role.

Our commitment to ethical and responsible business practices extends across all areas of our operations worldwide, whether in our corporate offices, warehouses, pop-up stores, manufacturing facilities, or distribution centers. Every individual representing SHEIN is expected to uphold the principles in this Code and to ensure that our values are reflected in their behaviour and in every interaction, decision-making, and outcome.

Compliance with this Code is a condition of continued employment, partnership, or collaboration with SHEIN. We expect all parties to be familiar with its contents. This Code is freely accessible and may be found on our website <https://www.sheingroup.com/our-business/operating-responsibly/#our-policies>.

3. Compliance with Laws

SHEIN is committed to complying with all applicable local, national, and international laws, regulations, and industry standards in every location where we operate. It is the responsibility of every employee, supplier, service-provider and business partner to understand and follow the laws relevant to their role and to seek legal guidance when unsure.

4. Conflicts of Interest

A conflict of interest occurs when personal interests, relationships, or activities—financial or otherwise—interfere, or appear to interfere, with an individual’s ability to act in the best interests of SHEIN. This includes situations where stakeholders and/or their immediate family members could benefit personally from professional decisions, or where outside commitments compromise their integrity.

SHEIN prohibits individuals from using their position with us or through related relationships for private gain or to obtain benefits for themselves or close relatives. Prohibiting personal or family benefits includes instances of financial benefits or maintaining relationships that could impair independent judgment or influence decisions to the detriment of SHEIN.

5. **Anti-Corruption and Anti-Bribery**

SHEIN is committed to conducting business with integrity, and fairness, ensuring all transactions are accurately recorded and compliant with company policies and legal requirements. Accordingly, SHEIN strictly prohibits all forms of bribery, corruption, and improper payments in any business dealings, whether with public officials, or private individuals or entities. All stakeholders including but not limited to employees, representatives and third-parties acting on behalf of the company must not offer, give, solicit, or accept any bribe, kickback, or other improper benefit (whether in the form of money, gifts, favours, entertainment, or anything else of value), to secure improper advantages or promotion of our business, or to improperly influence any act or decision to obtain or retain business or to secure any advantage for SHEIN in any respect.

We expect full compliance with anti-bribery and anti-corruption laws in all markets in which we operate including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, the Canadian Corruption of Foreign Public Officers Act, Prevention of Corruption Act (Singapore) and all relevant applicable regulations.

6. **Anti-money laundering**

SHEIN is committed to preventing our products, services, and operations from being used for money laundering or other financial crimes that attempt to conceal the origins of illegally obtained money to make it appear legitimate. We comply with all applicable anti-money laundering laws and regulations everywhere we operate.

7. **Anti-trust/Competition**

SHEIN believes that fair competition protects our reputation and ensures a level playing field for all and is committed to ethical business practices and strict compliance with all applicable antitrust and competition laws in the markets where we operate. SHEIN prohibits practices that include but are not limited to unlawful price-fixing, tying arrangements, bid-rigging, market allocation, and abuse of market dominance. We do not enter into agreements, formal or informal, that unlawfully restrict competition or harm consumers.

8. **No forced labour or child labour**

SHEIN believes in upholding the fundamental rights of all workers and believes strongly that work must always be voluntary. Accordingly, SHEIN has a strict prohibition on the use of all forms of forced, bonded, or involuntary labour, including but not limited to child labour, human trafficking and slavery, in any part of our operations or supply chain. All third-parties associated with SHEIN, including suppliers, contractors, service providers and business partners are expected to adhere to this standard and ensure that their operations are free from forced, compulsory or child labour.

9. **No discrimination**

SHEIN believes that maintaining a work environment where every individual is treated with dignity and respect is essential to our success. SHEIN promotes equal opportunities for all and maintains a zero-tolerance policy towards any form of discrimination, including but not limited to nationality, ethnicity, race, creed, sex, gender, gender identity, gender expression, ancestry, age, location, appearance and figure, religion, sexual orientation, political views, physical or mental disability, protected medical condition, family background, marital status, or any other characteristic protected by applicable law.

10. **No Harassment**

SHEIN is committed to providing a work environment that is free from all forms of harassment. Harassment of any kind, whether sexual, verbal, physical, visual, or digital is strictly prohibited. This includes but is not limited to unwelcome sexual advances, derogatory remarks, discriminating behaviour, or any conduct that could generate intimidating, offensive or hostile situations that violate SHEIN's values or applicable laws.

11. **Confidential Information, Data and Privacy**

SHEIN recognises that the information we generate and use, both our own and that of third parties, is vital to its business and it is important to use and manage confidential information and data responsibly. Employees, contractors, suppliers, and all business partners are required to keep confidential the various business, technical, and financial information they receive in the course of their work. This includes the handling of personal data responsibly and in compliance with all applicable data protection and privacy laws, and ensuring that confidential and personal information is only used for authorized business purposes and never for personal gain or disclosure to unauthorized individuals.

12. **Intellectual Property**

SHEIN respects and acknowledges the importance of intellectual property rights in promoting innovation and ensuring fair competition. SHEIN is committed to protecting the intellectual property rights of all individuals and entities, including third-party owners and creators. SHEIN employees, partners, and stakeholders shall respect and uphold the intellectual property rights of others, including those belonging to SHEIN and to third parties, by complying with all applicable laws and regulations in the markets in which we operate. In safeguarding the intellectual property rights of others,

all parties shall also refrain from any unauthorized use, reproduction, distribution, or disclosure of proprietary materials.

13. Audit and Supervision

SHEIN reserves the right to audit and monitor compliance with this Code of Business Conduct at any time, with or without prior notice. SHEIN reserves the right to conduct audits, inspections, and examinations of records, systems, facilities, operations, and practices to ensure compliance with this Code and/or all applicable laws, regulations, and industry standards. All employees, suppliers, service providers and business partners of SHEIN shall cooperate with internal and/or external audits duly attending to their requests for information which can include but not be limited to financial records, documentation, employee interviews, site visits, and relevant technical systems.

14. Reporting Violations of this Code, No Retaliation

SHEIN believes that being vigilant and reporting violations of this Code are integral to seeing policy in practice. Accordingly, SHEIN strongly encourages all employees, contractors, service providers, and business partners to speak up if they become aware of any conduct that may violate this Code, SHEIN's company policies, or applicable laws, including illegal, unethical, or fraudulent activities. Violations may be reported, even anonymously, to ethics@shein.com, SHEIN's confidential reporting hotline.

SHEIN prohibits any kind of retaliation or threat of retaliation against reporters of violations to the Code, who have done so in good faith, or against persons who cooperate in an investigation. A communication made in good faith is one that is honest and objective, and submitted with the belief that the information provided is complete and accurate to the best of the individual's knowledge at the time, even if it is subsequently found to be unsubstantiated or incorrect.

15. Violations of the Code

Violations of this Code of Business Conduct will not be tolerated and may result in disciplinary action or other enforcement of SHEIN's rights at the sole discretion of SHEIN. Such measures may include, depending on the severity of the violation, verbal or written warnings, mandatory training, corrective action plans, penalties, liquidated damages, suspension, and/or termination of employment or contractual relationship.

Given the serious disruption to our business and damage to SHEIN caused by such violations, any entity, individual, business partner, whose conduct results in harm to SHEIN agrees to fully indemnify and hold harmless the Company, its affiliates, officers, directors, and employees from any losses, liabilities, costs, or expenses incurred as a result of such violations.

SHEIN reserves the right to pursue all available legal remedies in response to any breach of this Code or applicable laws, which may be detailed in contracts.

This Code serves as an overarching framework and does not supersede, replace, or override any internal policies, guidelines, or regulations applicable to specific stakeholder groups. It is

intended to complement such policies, guidelines, or regulations, and should be read in conjunction with them.

This Code shall be reviewed periodically to assess whether updates are required as a result of legislative developments, internal policies changes, emerging risks, or shifts in the business or operating environment, or any other relevant circumstances.