

CODE OF CONDUCT

BJ's Wholesale Club Code of Business Conduct

BJ's Wholesale Club is dedicated to ensuring that its products are manufactured under conditions which reflect our commitment to human rights in the workplace. As a global corporation, we support internationally recognized norms for the safety and well being of the employees who are responsible for the manufacture of our products, and we believe that it is incumbent upon ourselves to ensure that the employees' working environments around the globe meet or exceed these norms. This policy is intended to implement standards which are fair, reflect marketplace conditions, are appropriate to the variety of cultures and peoples which are an important part of our success as a brand, and encourage self-respect amongst our suppliers' and vendors' employees with a sense of pride and accomplishment.

Compliance with Laws and Regulations

BJ's Wholesale Club prefers, as a matter of policy, to do business with Vendors/Suppliers who meet or exceed the standards set by the applicable laws and regulations relating to employee rights and working conditions. Vendors/Suppliers must, at a minimum, comply with all applicable laws and regulations including but not limited to age, hours of work, minimum wage, overtime, provisions for vacation and holidays, pregnancy and menstrual leave, and required retirement benefits. If an industry standard is higher than the legal minimum, Vendors/Suppliers must apply the industry standard in lieu of the inferior law or regulation. Vendors/Suppliers must comply with all applicable laws and regulations relating to the exportation and importation of merchandise including country of origin, labeling, customs classifications and valuation and all laws prohibiting counterfeiting trademarks or transshipment of merchandise.

Hours of Work/Overtime/Days Off/Holidays

BJ's Wholesale Club prefers to do business with Vendors/Suppliers who do not require more than 60 hour workweeks on a regular basis. Except in extraordinary circumstances, employees shall not be required to work in excess of 48 hours per week and 12 hours overtime, and shall be entitled to at least one day, consisting of 24 consecutive hours, off in every 7 day period. Full-time employees must have a minimum of two weeks, or level stated in local law, whichever is higher, paid annual leave.

Wages/Benefits

BJ's Wholesale Club will seek business partners who share our commitment to the betterment of wage and benefit levels that address the basic needs of workers and their families so far as possible and appropriate in light of national, regional, and industry practices and conditions. Employees must be paid at least the cash equivalent of the minimum legal wage or a wage that is consistent with local industry standards, whichever is greater. Legally permissible deductions for benefits provided by the employer may not effectively reduce the wages and benefits to a level, which prohibits the employee from providing the basic needs for the employee and his or her family. Wages should be paid directly to the employee in cash or check or equivalent; information relating to wages should be available to employees in an understandable form, with accurate and complete records, kept according to generally accepted accounting principles, available for inspection. Wage rates for overtime or any time exceeding 48 hours in a given work week should be at such premium rate as is legally required, but in any event should be higher than the rates for regular hours.

Forced Labor

BJ's Wholesale Club will not do business with Vendors/Suppliers who employ forced labor. Vendors/Suppliers may not utilize imprisoned, indentured, bonded or any other form of compulsory labor in the manufacture of BJ's Wholesale Club products, including labor that is imposed as a means of political coercion or as a punishment for political or religious views.

Child Labor

BJ's Wholesale Club will not do business with Vendors/Suppliers that use child labor. No person shall be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) in apparel factories or 18 in footwear factories, or younger than the age for completing compulsory education in the country of manufacture where such age is higher than 15.

Safety and Health

BJ's Wholesale Club is committed to the health, safety and welfare of the employees manufacturing its products. Vendors/Suppliers must treat all employees with respect and dignity and provide them with a safe and healthy working environment. Factories shall comply with all applicable laws and regulations regarding the working environment, and must be free of any hazardous conditions. Vendors/Suppliers who provide residential accommodations for employees must apply similar standards to their residential facilities.

Worker's Insurance

BJ's Wholesale Club prefers Vendors/Suppliers who provide appropriate health and life insurance for their employees. Vendors/Suppliers must comply with all appropriate local laws and regulations requiring health insurance, life insurance and worker's compensation.

Environment

BJ's Wholesale Club is committed to preserving the environment. Vendors/Suppliers must comply with all applicable local environmental laws and regulations and abide by BJ's Wholesale Club's own environmental regulations.

Equal Opportunity

BJ's Wholesale Club is absolutely committed to non-discriminatory employment practices. BJ's Wholesale Club will only do business with Vendors/Suppliers who share BJ's Wholesale Club's vision that discrimination is unwelcome in the workplace. Vendors/Suppliers must not discriminate in hiring, salary, benefits, advancement, discipline, termination or retirement on the basis of race, color, nationality, gender, disability, sexual orientation, religion, social or ethnic origin, political or other beliefs. Employees should be hired and promoted on the basis of ability, not on the basis of personal characteristics or beliefs.

Freedom of Association

BJ's Wholesale Club prefers Vendors/Suppliers who acknowledge each employee's basic rights to freedom of association. Vendors/Suppliers must ensure that each of their employees has the right to establish and join organizations of the employee's choosing. Vendors/Suppliers must respect and recognize the rights of all employees to lawfully organize and bargain collectively. Vendors/Suppliers shall not discipline any person in their employment due to that person's non-violent exercise of such right.

Disciplinary Practices

BJ's Wholesale Club is firmly committed to the belief that everyone is entitled to be treated with dignity. Vendors/Suppliers must not inflict or threaten to inflict corporal

punishment or any other forms of physical, sexual, psychological or verbal abuse or harassment on any of their employees.

Documentation and Inspection

Vendors/Suppliers must maintain on file such documentation, kept according to generally accepted business practice, as may be needed to illustrate compliance with this Code of Business Conduct and agree to make these documents available for BJ's Wholesale Club's review upon request. Vendors/Suppliers shall post this Code of Conduct conspicuously at its factories where it may be seen and understood by all employees in both English and the employees' native language. Copies shall be supplied to individual employees at their request, and at least once annually, included with the employees' regular pay.

BJ's Wholesale Club's Code of Business Conduct applies to any and all Vendors/Suppliers. Vendors/Suppliers must ensure that any parties supplying them with materials and/or labor in the manufacture of BJ's Wholesale Club products also abide by the provisions of BJ's Wholesale Club's Code of Business Conduct. Although it is the intent of BJ's Wholesale Club to work with the Vendors/Suppliers in conforming to BJ's Wholesale Club's Code of Business Conduct, in the event of any willful, non-compliance with these regulations, BJ's Wholesale Club may terminate or refuse to renew supply agreements with a Vendor/Supplier. BJ's Wholesale Club will apply the standards set forth in this Code of Business Conduct in its selection of new Vendors/Suppliers, as well as its continuation of business with existing Vendors/Suppliers. To assure proper implementation and the on-going compliance with these standards, Vendors/Suppliers must allow BJ's Wholesale Club full access to its facilities and records from time to time, with or without notice.