

Enterprise Human Rights Policy

The first guiding value in Callaway Golf Company's Mission Statement states:

"We conduct our global business honestly, ethically and legally, believing that good ethics is good business."

This is the foundation of Callaway's policy of respecting internationally recognized human rights throughout our global operations; a policy that considers the principles described in the Universal Declaration of Human Rights (UDHR).

This guiding value also establishes our Enterprise Level Human Rights Policy and aligns with the commitments and expectations described in our Supplier Code of Conduct. Among other things, Callaway seeks its workplace (including in supply chains) to be free from discrimination and harassment, child labor, forced labor and human trafficking, and other unsafe, unhealthful, or unlawful working conditions.

This policy applies to Callaway and our current direct and indirect subsidiaries (collectively "Callaway"), and is applied to newly acquired ventures within a reasonable period after acquisition.

Our commitment to respect internationally recognized human rights supports Callaway's value to always act with integrity and respect and to treat others the way you want to be treated. Callaway's culture is rooted in our people and is what brings us together as a team, as an organization, and as an industry leader.

Callaway is committed to working with our suppliers and licensees to meet this policy's principles. Our Supplier Code of Conduct sets forth the standards Callaway expects each supplier to meet. Our licensee agreements establish additional standards of licensee conduct.

Callaway drives compliance with this policy by 1) using administrative controls such as contracts and agreements, 2) providing new supplier on-boarding review and approval, 3) conducting internal and third party supplier audits, and 4) giving employee and supplier training and education.

We benchmark with industry associations, NGOs and peers to understand human rights related concerns and issues. Callaway has procedures in place to review and correct issues and concerns as appropriate. When gaps or issues are identified, Callaway takes the opportunity to improve performance to close these gaps and correct any issues in order to strengthen our processes and business.

Callaway maintains a Legal Compliance Committee to address compliance issues on a global basis and to develop systems and procedures that address ongoing compliance issues in the locations where we conduct operations. The Legal Compliance Committee meets on a regular basis and the Chief Ethics Officer provides updates of key findings to the Company Board of Directors. A Sustainability Team also meets on a regular basis with semi-annual updates to the Executive Sustainability Committee and annual updates to the Board of Directors.

We encourage our employees to report any circumstance or action that violates, or appears to violate, the Code of Conduct, enterprise policy or applicable law. To the extent employees become aware of such an issue, we encourage them to report it. If human rights violations are suspected at a Company facility or a supplier's facility, please contact us at corporatecompliance@callawaygolf.com.

You can also report violations by calling +1 (760) 931-1771 and requesting to speak with the Chief Ethics Officer. Callaway takes all reports of violations seriously and will conduct or arrange for prompt investigations.

Callaway will not take action against an employee who raises an ethical issue in good faith. Callaway does not tolerate any reprisal by any individual against an employee for raising a concern or making a report in good faith.