



SUPPLIER CODE OF CONDUCT

This Supplier Code Of Conduct sets forth the minimum standards Callaway Golf expects each supplier to meet. The Supplier Code Of Conduct is designed to ensure that all Callaway Golf suppliers adhere to socially responsible business practices, and that all products made for Callaway Golf are produced under lawful, humane and ethical conditions.

Suppliers, defined as any entity involved in the production and/or manufacture of products or business materials for Callaway Golf, must strictly comply with these standards under all circumstances or risk losing Callaway Golf's business.

EVERY SUPPLIER MUST:

COMPLY WITH LOCAL LAWS, INCLUDING ANTI-BRIBERY LAWS

Suppliers must comply with all workplace laws and regulations in all locations where their business is conducted, and with the Foreign Corrupt Practices Act.

USE VOLUNTARY EMPLOYMENT

Suppliers may not use involuntary or forced labor - indentured, bonded, or otherwise.

ENSURE THAT EMPLOYEES ARE 16 YEARS OR OLDER

Suppliers may not hire any employee under the age of 16, or under the age interfering with compulsory schooling, or under the minimum age established by law, whichever is greater.

PROVIDE A HARASSMENT & ABUSE-FREE WORKPLACE

Suppliers must provide an environment free of harassment, abuse or corporal punishment in any form.

ENSURE ACCURATE COMPENSATION

Suppliers must pay their employees at least the minimum total compensation required by local law, including all mandated wages, allowances and benefits (including all national and local insurance requirements).

ENSURE THAT WORKING HOURS ARE NOT EXCESSIVE

Suppliers may not exceed the legal limitations with regard to hours worked each day and hours worked each week in the countries in which items are produced. Suppliers will provide at least one day off in every seven-day period, except as required to meet urgent business needs.

USE FAIR EMPLOYMENT TERMS

Suppliers must employ, pay, promote and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.

PROVIDE A HEALTHY & SAFE WORKPLACE

Suppliers must provide a safe and healthy work environment, including proper guarding and personal protective equipment. Where residential housing is provided for workers, suppliers will provide safe and healthy housing. Suppliers will provide health checks as required by law.

ALLOW FREEDOM OF ASSOCIATION

Suppliers must recognize and respect the right of employees to exercise their lawful rights of free association, including joining or not joining any association.

TAKE ENVIRONMENTAL RESPONSIBILITY

Suppliers must comply with environmental rules, regulations and standards applicable to operations, and observe environmentally conscious practices in all locations where their business is conducted.

ENSURE CONFLICT FREE SOURCING

Suppliers must implement a policy and process(es) to reasonably assure that the use of the tantalum, tin, tungsten and gold in Callaway Golf products do not directly or indirectly finance armed groups in Covered Countries as defined by the Conflict Minerals Rule issued by the U.S. Securities and Exchange Commission (SEC) under the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

COMPLY WITH CUSTOMS

Suppliers must comply with applicable customs law and, in particular, establish and maintain programs to comply with customs laws regarding illegal transshipment of products. Suppliers must also cooperate with local, national and foreign customs and drug enforcement agencies to guard against illegal shipments of drugs.

Callaway Golf and its respective, duly authorized representatives have the right during reasonable business hours, upon advance written notice to the supplier, to inspect and audit the supplier's compliance with the standards listed above.