VENDOR CODE OF CONDUCT AND HUMAN RIGHTS POLICY

This Vendor Code of Conduct and Human Rights Policy ("Code") applies to vendors/suppliers who provide merchandise to BJ's Wholesale Club, Inc. or any of its subsidiaries, divisions, affiliates or agents ("BJ's").

BJ's is dedicated to ensuring that its products are manufactured under conditions which reflect our commitment to human rights in the workplace. BJ's conducts its business in a legal and ethical manner and we expect our business partners to share our ethical concerns. While recognizing and respecting the cultural and legal differences found throughout the world, BJ's is committed to ensuring the safe and fair treatment of all employees around the world who are involved with the manufacture of products supplied to BJ's. We expect all of our vendors/suppliers and the factories which manufacture the merchandise, to provide their employees with a safe and healthy workplace and to respect the rights of their employees.

To achieve that purpose, this Code sets forth the basic requirements that all such vendors/suppliers must meet in order to do business with BJ's. This Code is intended to implement standards that are fair, reflect marketplace conditions, are appropriate to the variety of cultures and peoples that are an important part of our success as a brand, and encourage self-respect with a sense of pride and accomplishment amongst our vendors' and suppliers employees. Since no code can be all inclusive, we expect our vendors/suppliers to ensure that no abusive or exploitative conditions and practices or unsafe working conditions exist at the facilities where our merchandise is manufactured. As a condition of doing business with BJ's, each and every vendor/supplier must comply with this Code. 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 the Code. If BJ's has determined that any vendor/supplier has violated this Code, BJ's reserves the right to cancel a purchase order, return or revoke acceptance of affected goods, and/or require the vendor/supplier to implement a corrective action plan, or terminate its business relationship with the vendor/supplier.

Compliance with Laws and Regulations. *Vendors/suppliers must comply with all applicable laws and regulations of their respective countries relating to employee rights and working conditions, including, but not limited to age, hours of work, minimum wage, overtime provisions for vacation and holidays, pregnancy and/or family leave and required retirement benefits. If a generally accepted industry standard is higher than the legal minimum, vendors/suppliers must apply the higher industry standard.*

Vendors/suppliers must also comply with all other applicable laws and regulations including, without limitation, 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 of trademarks or transshipment of merchandise. Vendors/suppliers must also develop security processes and procedures consistent with Customs-Trade Partnership Against Terrorism ("C-TPAT"), a joint effort between U.S. Customs and the trade community to reduce the threat of terrorism by means of protecting the integrity of cargo imported into the United States. From time to time, BJ's will ask vendors/suppliers to confirm compliance with the C-TPAT requirements. Updated C-TPAT requirements can be found at the U.S. Customs and Border Protection website www.cbp.gov.

Ethical Business Behavior. *Vendors/suppliers must comply with all applicable anti-corruption laws including, but not limited to, the Foreign Corrupt Practices Act. Vendors/suppliers must not, under any circumstance, offer, promise or provide anything of value directly or indirectly to a government official for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage.*

Hours of Work/Overtime. *Vendors/suppliers must comply with all applicable laws on regular working hours and overtime hours. Vendors/suppliers must not require their employees to work, on a regularly scheduled basis, more than 60 hour work weeks.*

Wages/Benefits. *BJ's 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. Vendors/suppliers must pay employees the minimum legal wage or a wage that is consistent with local industry standards, whichever is greater and provide legally mandated benefits. The wage structure, with any employer contributions and legitimate deductions, is to be itemized clearly in writing for the worker and in accordance with the local law. Wages should be paid directly to the employee in cash or check. Wage rates for overtime should be at such premium rate as is legally required.*

Forced Labor. *Vendors/suppliers must not use forced labor, whether in the form of prison labor, indentured labor, bonded labor, labor that is imposed as a means of political coercion or as a punishment for political or religious views, or otherwise, or any other form of compulsory labor in the manufacture of BJ's products.*

Child Labor. *Vendors/suppliers must not use child labor. No person will be employed at an age younger than 15 (or 14 where the law of the country of manufacture allows) in any factory (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 is committed to the health, safety and welfare of the employees manufacturing its products. Vendors/suppliers must provide employees with a safe and healthy working environment in accordance with applicable laws and regulations. Factories shall comply with all applicable laws and regulations regarding the working environment and must be free of any hazardous conditions. Factories producing merchandise being*

supplied to BJ's will provide adequate safety equipment (appropriate to the industry), ventilation, first aid supplies, fire extinguishers, fire exits, well-lit workstations, clean restrooms and ensure that all are well maintained and in good working order. Vendors/suppliers who provide residential accommodations for employees must apply similar standards to their residential facilities.

Workers' Insurance. *BJ's 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 social insurance, health insurance, life insurance and worker's compensation insurance.*

Environment. *BJ's is committed to preserving the environment. Vendors/suppliers must comply with all applicable local environmental laws and regulations regarding protection and preservation of the environment in their country. We expect our suppliers to understand the environmental impacts of their operations and products and to maintain systems appropriate to their size, industry, and business activities to identify, track, and manage those impacts over time. We also expect suppliers to pursue practical opportunities to reduce their environmental footprint across their operations, supply chains, and products, and to work toward continual improvement in a manner that reflects their capabilities, resources, and business priorities. We encourage suppliers to communicate with us about their environmental initiatives and progress.*

Equal Opportunity. *BJ's is committed to non-discriminatory employment practices. BJ's will only do business with vendors/suppliers who share BJ'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. *Vendors/suppliers must respect and recognize the rights of all employees to lawfully meet. Vendors/suppliers will not discipline any person in their employment due to that person's non-violent exercise of such right.*

Disciplinary Practices. *BJ's is firmly committed to the belief that everyone is entitled to be treated with respect and 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 or local law, as may be needed to illustrate compliance with this Code and will make these documents available to BJ's or to BJ's designated agent upon request. At any time, with or without notice, BJ's reserves the right to audit and/or authorize a third party to audit, any of vendor/supplier's facilities to verify compliance with this Code. Copies of the Code will be supplied to individual employees at the employee's request.*

Reporting Misconduct. *BJ's has an Ethics and Integrity Hotline at https://bjs.alertline.com if you wish to raise a concern involving what you believe to be a potential violation of local laws or regulations, the Code, personal misconduct by a BJ's employee, or unethical behavior. Please leave sufficient details about the issue so that we can investigate and follow up. Reports may be made completely anonymous if you wish, and reports will be kept confidential to the extent requested, subject to applicable laws, regulations and legal proceedings.*