

Madewell

RESPONSIBLE SOURCING POLICY

As of July 30, 2019

Madewell is committed to a standard of excellence in every aspect of our business, including legal, ethical and responsible conduct and responsible sourcing in all of our operations.

Madewell upholds such principles and practices throughout its own business and its supply chains and works with its suppliers to promote Madewell's values and approach to responsible business and ethical conduct.

Madewell provides standards to its suppliers in order to help assure that Madewell does not knowingly use any materials in its products that are under any threat of extinction, may be endangered or jeopardize worker well-being or animal welfare or have a negative impact on biodiversity or conservation.

Madewell has developed this Responsible Sourcing Policy, which has been communicated to its suppliers and includes but is not limited to:

SANDBLASTING

Sandblasting is a finishing process that is primarily used to achieve a worn look for denim. The method involves sand particles being applied to garments under high pressure. The use of sandblasting without proper protective equipment endangers the health of factory workers. To ensure the well-being of the workers who manufacture Madewell products, we have banned the use of sandblasting for all Madewell's products.

UZBEKISTAN COTTON

Madewell is aware of and takes very seriously the reports of government-sponsored forced child labor in the harvesting of cotton in Uzbekistan. The use of forced child labor is inconsistent with the requirements set forth in Madewell's Vendor Code of Conduct. We are firmly opposed to the use of forced child labor in the harvesting of Uzbek cotton and are collaborating with a multi-stakeholder coalition to raise awareness of this very serious concern and press for its elimination. We commit to not knowingly sourcing Uzbek cotton for the manufacturing of any of our products until the government of Uzbekistan ends the practice of forced child labor in its cotton sector.

TRACEABILITY

Traceability is the ability, on an ongoing basis, to track, monitor and certify a raw material throughout the supply chain to guarantee that it's produced in an ethical and environmentally sustainable way. Suppliers should be able to trace materials back to country of origin and provide supporting documentation to Madewell upon request. Madewell does not tolerate the illegal harvesting of raw materials. This can include but is not limited to exotic skins obtained from poachers or cellulosic fibers sourced from endangered rain forests.

ENDANGERED SPECIES

Madewell prohibits the use of materials derived from any endangered species as defined by the United States Fish and Wildlife Service Endangered Species program (<http://www.fws.gov/endangered/>).

BRIBERY AND ANTI-CORRUPTION

Madewell seeks to comply fully with the letter and the spirit of the laws and regulations governing bribery and corrupt behaviors in the jurisdictions in which we operate. Many of these laws are broadly written and carry significant legal penalties for individuals and companies. All Madewell associates, Directors and representatives must comply with the U.S. Foreign Corrupt Practices Act (FCPA). The FCPA prohibits offering, giving or promising to give, directly or indirectly through a third-party representative, *anything of value to a foreign official* to obtain or retain business or to obtain some other improper business advantage.

Anything of value includes anything that has value to the recipient, including, cash, gifts, entertainment, samples, above-market commissions, consulting fees for unspecified services, charitable contributions or other business opportunities.

Foreign officials include non-U.S. elected officials, employees of a foreign government or any of its agencies, candidates for non-U.S. political office and employees of non-U.S. wholly or partly state-owned or nationally-owned companies. The term “foreign official” also is interpreted broadly to include spouses or family members of a foreign official.

At no time should a Madewell associate, Director, supplier or other representative offer *anything of value* to a government official in order to obtain or retain business. In addition to the FCPA requirements, under no condition should our associates or representatives offer or accept bribes to or from any person or company.

We consider bribery to be a very serious issue and will reevaluate our business relationship with any factory that offers a bribe to a Madewell associate or representative.