

Madewell

**VENDOR
CODE OF
CONDUCT**

As of July 30, 2019

The fundamental principles of Madewell’s Responsible Sourcing Program are outlined in our Madewell Vendor Code of Conduct (“Code”). The Code sets forth the essential foundation upon which our program is built. While Madewell recognizes that there are different legal and cultural environments in which our Suppliers operate throughout the world, the “Code” sets forth the guiding principles for our Responsible Sourcing Program, applicable to all Suppliers.

CHILD LABOR

Madewell Suppliers must not employ workers younger than 15 years of age. However, if the age for completing compulsory education or the minimum working age in the country of manufacture is greater than 15, Suppliers must comply with all other applicable child labor laws and must ensure workers under the age of 18 do not perform work that may jeopardize their health or safety.

FORCED LABOR

Madewell Suppliers must not use any type of forced, bonded, compulsory or prison labor. Suppliers shall ensure that all employment is voluntary and free from violence, threats, financial penalties or coercion. There shall be no restrictions on movement or withholding of personal documents or deposits. Suppliers must take adequate steps to ensure that workers are not trafficked or otherwise exploited.

DISCRIMINATION

Madewell Suppliers must not discriminate in employment practices including recruitment, hiring, compensation, training, benefits, advancement, termination or retirement on the basis of race, color, ancestry, national or social origin, religion, gender, marital status, age, sexual orientation, gender identity or expression, disability, political opinion or any other personal characteristics or beliefs.

HARASSMENT AND ABUSE

Madewell Suppliers must treat all workers with respect and dignity. No worker shall be subject to corporal punishment or physical, sexual, psychological or verbal harassment or abuse. Suppliers shall not use monetary fines as a disciplinary practice.

WAGES AND BENEFITS

Madewell Suppliers must comply with all applicable laws and regulations relating to wages and benefits. Workers shall be paid at least the minimum wage or a wage that is consistent with prevailing local industry standards; whichever is higher. Overtime work shall be compensated at the premium rate as is legally required. Compensation must be provided at least monthly and should be provided without illegal or inappropriate deductions or penalties.

HOURS OF WORK

Madewell Suppliers must comply with all applicable laws and regulations relating to hours of work. Except in extraordinary business circumstances, workers shall not be required to work more than 60 hours per week (including overtime). Suppliers shall provide workers with at least one day off every seven day period.

FREEDOM OF ASSOCIATION

Madewell Suppliers must recognize and respect the rights of workers to freedom of association and collective bargaining. Where such rights are not provided by law, Suppliers should take steps to provide an open means of communication with workers.

HEALTH AND SAFETY

Madewell Suppliers must comply with all applicable laws and regulations governing workplace health and safety. Suppliers shall provide their workers with a clean, safe and healthy work environment. The same applies for dormitory facilities, where provided.

LAWS AND REGULATIONS

Madewell Suppliers must operate in full compliance with all applicable local, national and international laws, standards and regulations relevant to the conduct of their business.

CUSTOMS AND SECURITY

Madewell Suppliers must comply with all applicable local, national and international customs laws including those prohibiting transshipment. Suppliers shall implement security measures consistent with the recommendations set forth by the Customs-Trade Partnership Against Terrorism (C-TPAT).

ENVIRONMENTAL STANDARDS

Madewell Suppliers must adhere to applicable local, national and international laws and regulations regarding the protection and preservation of the environment.

SUBCONTRACTING

Madewell Suppliers must not subcontract any portion of the manufacturing process without prior written approval from Madewell. As a condition of approval, subcontractors shall agree to comply with the Madewell Vendor Code of Conduct.

TRANSPARENCY

Madewell is committed to working with Suppliers who are open and honest with us. Madewell Suppliers shall maintain complete and accurate records and information so that compliance can be effectively assessed. Suppliers must not falsify or understate any aspects of their operations to Madewell or our representatives. Suppliers must not coach employees on how to answer questions or respond to inquiries by Madewell or our representatives.

MONITORING AND COMPLIANCE

Madewell reserves the right to conduct announced and unannounced inspections of all manufacturing facilities. Suppliers should ensure that the requirements in this Code are understood and implemented at every level and must maintain all documentation necessary to demonstrate compliance with the Madewell Vendor Code of Conduct. Suppliers must allow representatives of Madewell full access to facilities, documents and workers. Suppliers shall submit an improvement plan to address any issues of noncompliance that may be found during the course of compliance inspections. Madewell reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with the provisions set forth herein.