

Madewell

**SOCIAL
RESPONSIBILITY
APPROACH**

As of March 30, 2021

RESPONSIBLE SOURCING OVERVIEW

At Madewell we believe that fair and decent working conditions, the freedom of opinion and expression and an adequate standard of living are basic human rights.

This is why we are committed to sourcing our products in an ethical, responsible and legal manner—and expect our suppliers to share our core values and to partner with us in our commitment to continuous improvement, and in promoting better working conditions.

We do this by holding our suppliers and ourselves accountable, by identifying issues and their root causes and by building capacity for positive change.

The cornerstones of our program are our Vendor Code of Conduct, our monitoring program and capacity building efforts, as well our multi-stakeholder collaborations

MADEWELL VENDOR CODE OF CONDUCT

The Madewell Vendor Code of Conduct is based on the International Labor Organization (ILO) conventions and other internationally recognized labor rights. We expect these standards to be followed by all factories, subcontractors, suppliers and agents who are affiliated with the production of J.Crew goods (“Suppliers”).

While Madewell recognizes that there are different legal and cultural environments in which our suppliers operate throughout the world, the Madewell Vendor Code of Conduct (“Vendor Code”) forms the guiding principles for our Responsible Sourcing program. By choosing to do business with Madewell, Suppliers commit to following our policies including the Vendor Code. As such, adherence to the Vendor Code constitutes a contractual obligation between J.Crew and its Suppliers.

MONITORING FACTORY CONDITIONS

While it’s relatively simple to communicate our expectations to our Suppliers, it is more complicated to verify compliance throughout all areas of our supply chain. In order to ensure objectivity, we carefully select independent external firms to conduct both semi-announced and fully unannounced inspections of our manufacturing facilities. We

also make sure that each facility will not be inspected by the same third party on a continuous basis in order to ensure integrity.

All new Suppliers are subject to inspection before any purchase orders are placed. Existing factories are inspected based on their compliance performance and overall external risk factors.

A typical inspection consists of document review, private worker interviews and a walk-through of the facility to assess worker well-being and workplace health and safety. Where we may deem necessary, we also may employ additional measures such as more in-depth auditing, focused inspections, surveillance or off-site interviews, for example, depending upon the key concerns identified.

IMPROVING WORKING CONDITIONS AT FACTORIES

We believe that sustainable and positive change can only happen in partnership with our Suppliers. To this end, we provide our Suppliers with the tools they need to improve working conditions, including training and in-factory consultations.

We also believe that the ability for workers to raise grievances and to collectively address issues and concerns to management are pivotal in improving working conditions. This is why we promote the establishment of worker committees at our factories through our participation in such programs as the Better Work and Fair Trade programs.

Our goal is to work to address issues of non-compliance in a cooperative manner in partnership with our Suppliers. However, in cases where a critical issue of noncompliance is identified or when a Supplier may be unwilling to meet our requirements, despite our efforts and engagement, we will terminate our business relationship where we deem necessary.

ZERO-TOLERANCE APPROACH TOWARD FORCED LABOR

At Madewell, we recognize our responsibility to source our products in a legal, ethical and responsible manner consistent with the highest standards. Our Code of Conduct, which must be followed by all factories, subcontractors, suppliers and agents who are affiliated

with the sourcing and/or production of Madewell goods, is based on International Labour Organization conventions, in addition to other internationally recognized labor rights standards.

Embedded in our Code of Conduct is our commitment to our zero-tolerance policy to ensure that no forced labor or trafficked persons are being used in any parts of our business or in our global supply chain. Business partners must not use forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

Specifically, based on multiple region-wide Withhold Release Orders on products made by forced or slave labor in the Xinjiang region, issued by U.S. Customs and Border Protection, we prohibit the manufacture of any product or the use of any cotton from the Xinjiang Uyghur Autonomous Region (XUAR) in China, as well as other areas where forced labor is knowingly practiced, including Uzbekistan.

Additionally, we are committed to working with our suppliers, industry groups, governments and other stakeholders to develop strategies to address forced labor throughout the supply chain. We participate in the Retail Industry Leaders Association (RILA), the American Apparel & Footwear Association (AAFA) and with the Mekong Club to help advance human rights worldwide, which includes stopping the practice of forced labor. We also support the [Joint Statement](#) published by our industry partners in July 2020.

INDUSTRY COLLABORATION AND PARTNERSHIPS

Industry collaborations matter when it comes to improving overall working standards and standards of living. While we make sure to work with each of our factories, there are certain issues that only can be most effectively be addressed in a collective manner. That is why we partner with several international organizations committed to improving global labor standards and conditions.

Madewell is a member of Fair Factories Clearinghouse (FFC),

a nonprofit organization that allows participating brands to share reports, thereby increasing transparency. For more information, please visit fairfactories.org.

Madewell is also a member of Business for Social Responsibility (BSR), an organization for companies committed to socially responsible business practices, and we are proud to partner with them on initiatives that are committed to improving working conditions around the world. More information on BSR can be found at www.bsr.org.

Madewell is a Partner with Better Work, a partnership between the International Labor Organization (ILO) and the International Finance Corporation to improve social dialogue and worker engagement in supplier factories. Better Work advisors engage with suppliers to improve working conditions by building out worker committees, establishing solid grievance mechanisms and providing training to factory supervisors. We currently work with Better Work in our factories in Vietnam, Indonesia and Cambodia.

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT (SB 657) AND UK MODERN SLAVERY ACT DISCLOSURE STATEMENT 2017

The ILO Forced Labor Convention No. 29 defines “Forced Labor” as “work or service exacted from a person under threat of any penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered himself/herself voluntarily.”

According to ILO data, human trafficking is the second most prevalent form of illegal trade in the world, just after the illicit drug trade and equal to the sale of illegal arms. Sometimes referred to as modern day slavery, it is also the fastest growing illegal business in the world.

Madewell strictly prohibits the use of any form of forced labor or the trafficking in persons across all of our company operations and in our global supply chain. In accordance with our Code of Conduct standards, business partners must not use forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. No employee may be compelled to work through force or intimidation of any form, or as a means of political coercion or as punishment for holding or expressing political views.

For more details, please [see our policies](#).