

STEVE MADDEN

GLOBAL HUMAN RIGHTS POLICY

INTRODUCTION

At Steven Madden, Ltd. (the “Company” or “Steve Madden”), our commitment to human rights is an essential part of the way we do business on a global basis. We are committed to upholding mutual respect in the workplace, collaboration with business colleagues, accountability to our stockholders and conducting our business in accordance with the standards set forth in the United Nations Guiding Principles on Business and Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. These principles are embedded in our Company Code of Conduct and our Vendor Code of Conduct.

Steve Madden’s Global Human Rights Policy (“Policy”) is a formal enterprise-level policy which provides additional guidance to our employees and partners around the world to ensure that our business practices and processes reflect the Company’s support for and commitment to human rights, and to help them understand their own role in, and responsibility for, upholding human rights and equality in the workplace. Steve Madden has an Open Door Policy to encourage employees and partners to ask questions and voice concerns regarding any Company policies, procedures or actions that implicate human rights and to offer suggestions and solutions without fear of retribution or retaliation.

The Policy applies to all employees, our business partners, vendors and suppliers across the globe. Steve Madden expects all business partners to permit ongoing monitoring and inspection in order to assess and insure the maintenance of Company standards of practice. Through proactive due diligence, we seek to identify and prevent human rights risks to employees in our business and we are committed to the fair and equitable remediation of any identified adverse human rights impacts resulting from or caused by our business activities.

The Policy is overseen by the Company’s Board of Directors, including the Chief Executive Officer.

POLICY SUMMARY

At Steve Madden, we must use appropriate standards and processes to ensure we are not complicit in any human rights abuses within our sphere of influence.

- Steve Madden strictly prohibits all forms of labor in the workplace that are harmful to the health or safety of children;
- Steve Madden strictly prohibits human trafficking, slavery and forced labor for any employee;
- Steve Madden respects employees’ rights to freedom of association and to participate in a collective bargaining process should they choose to do so; and
- Steve Madden promotes, protects and helps ensure all employees, including those with disabilities, enjoy their deserved human rights

POLICY REQUIREMENTS

Steve Madden will not tolerate any behavior or actions prohibited by the requirements herein.

Child Labor Restrictions

In all forms, Steve Madden prohibits child labor. When employing persons under the age of 18, managers must comply with all Steve Madden-established or legally required limitations on minimum hiring age, work hours and tasks performed by these employees, and to ensure that any work performed does not interfere with the employee's health, safety, mental and physical development, education or morals. We also maintain data on the age of all employees for auditing and reporting purposes and require all employees under the age of 18 to provide a current work permit.

Equal & Non-Discriminatory Practices

We believe recruiting, employing and retaining people from all backgrounds, ethnicities, genders, lifestyles and belief systems is the cornerstone of meeting the needs of our diverse consumer base and building a global business. By embracing a diverse and inclusive workplace, we create a comprehensive environment that offers all of us opportunities to succeed.

Steve Madden is committed to providing a working environment free from all forms of unlawful harassment and discrimination, whether based upon race, color, religion, ancestry, national origin, age, marital or veteran status, physical or mental disabilities, on-the-job injuries, sex, sexual orientation, pregnancy or pregnancy-related condition or any other legally protected characteristic or status. Recruitment, hiring, placement, development, training, compensation and advancement at Steve Madden is based on qualifications, performance, skills and experience. We do not tolerate any conduct that harasses, disrupts, or in any way interferes with another's work performance or which creates an intimidating, offensive or hostile work environment.

Human Trafficking, Slavery and Forced Labor

We do not employ involuntary labor of any kind and will not knowingly conduct business with any partner that does. Involuntary labor includes prison labor, indentured labor, bonded labor or labor obtained through human trafficking or slavery.

Wages & Working Hours

We adhere to all applicable wage laws and regulations. All workers must be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. In addition, workers must be compensated for overtime hours at a rate legally required by local laws and must exceed regular hourly compensation.

Right to Freedom of Association & Collective Bargaining

We recognize and respect the right of all employees' to freedom of association and the right to join unions or other work related associations as well as the right to bargain collectively as permitted by, and within the limits of, local laws. All employees should be able to assert their right of freedom of association and their right to remain independent without fear of retaliation or termination.

Healthy & Safe Workplace

The health and safety of our employees is of utmost importance. We strive to provide and maintain a safe work environment for our employees and partners, by complying with all federal, state and local laws regarding safety in the workplace as well as all Company based safety procedures in our facilities. We address and remediate any identified risks of accidents, injury and health impacts and believe that safety is “everyone’s responsibility” and therefore, an important part of every employee’s job at Steve Madden.

Water Resources

At Steve Madden, we recognize all employees’ rights to clean drinking water and sanitation.

Employee Responsibilities

We believe all employees are responsible for supporting human rights in the work place. All Steve Madden employees should periodically review this Global Human Rights Policy, always treat each other with respect and dignity, continuously foster an environment for all employees to openly communicate and promptly report any suspected behaviors or workplace situations that may violate the Company’s values around the principles and commitment to human rights.

COMPLIANCE & REPORTING FOR EMPLOYEES

At Steve Madden, we take violations to the Global Human Rights Policy very seriously. The Company’s General Counsel has primary authority and responsibility for the enforcement of Steve Madden’s Global Human Rights Policy subject to supervision by the Company’s Board of Directors. Employees should immediately report any conduct suspected of, engaged in or endured by a Steve Madden employee, or any other individual conducting business on behalf of Steve Madden, that they believe is a potential violation of the Global Human Rights Policy or may in any way compromise the Company’s values around the principles of human rights.

To report a violation, employees may use any option listed in the Company’s Code of Conduct including contacting Human Resources, the Legal Department at generalcounsel@stevemadden.com, calling the Company’s 24/7 Ethics & Compliance Employee Hotline at **1-877-446-4612 ext. 10777** or filling out a complaint form available in the public folders or on the ADP dashboard at <http://my.adp.com>.

The Company reserves the right to amend this policy at any time. Nothing in this policy says or implies that a contract exists between the Company and its employees or that participation in this program is a guarantee of continued employment with Steven Madden, Ltd.