

STEVE MADDEN

STEVEN MADDEN, LTD. CONFLICT MINERALS POLICY

Steven Madden, Ltd. (“Steve Madden,” “we,” “us” and “our”) is committed to conducting our business in a socially and environmentally responsible manner. We aim to source materials in a lawful and ethical way, ensuring that our products do not finance or benefit armed groups in conflict-affected regions. Accordingly, we have adopted this Conflict Minerals Policy (the “Policy”).

Steve Madden is committed to ensuring full compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and the regulations of the United States Securities and Exchange Commission (the “Commission”) issued thereunder, related to trade in conflict minerals (the “Conflict Minerals Rules”). We expect all participants in our supply chain, whether direct or indirect (“Suppliers”), to share this commitment. Under the Conflict Minerals Rules, Steve Madden is required to make certain disclosures to the Commission regarding its use of tin (derived from cassiterite), tantalum (derived from columbite-tantalite), tungsten (derived from wolframite) and gold or their derivatives (“Conflict Minerals”). Steve Madden must also disclose whether any Conflict Minerals used in our products originate from a Covered Country, which currently includes the Democratic Republic of the Congo or an adjoining country, and, if so, whether those minerals directly or indirectly financed or benefited armed groups in these countries.

Steve Madden annually assesses its supply chain to determine where Conflict Minerals exist and works with its Suppliers to determine the use and origin. To the extent applicable, Steve Madden follows the processes and procedures set forth in the Organization for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”). Steve Madden requires all Suppliers to cooperate with our efforts to determine the source of any Conflict Minerals in our products and expects our Suppliers to make every effort to source these minerals from areas outside of the Covered Countries.

Steve Madden and its Suppliers purchase raw materials and component parts from a variety of sources. Steve Madden is several levels removed from the actual mining of any Conflict Minerals, and Steve Madden does not make purchases of Conflict Minerals directly from mines, smelters or refiners. We therefore require the cooperation of our Suppliers in the implementation of this Policy and in enabling us to meet our compliance obligations. In furtherance of this Policy, our Suppliers are expected to:

- Determine which products incorporate Conflict Minerals, regardless of country of origin;
- Define and maintain adequate procedures for the traceability of Conflict Minerals and, where applicable, derivatives of Conflict Minerals;
- Maintain adequate, reviewable business records substantiating the source of Conflict Minerals;

- Render all necessary assistance to Steve Madden or its designee for the Conflict Minerals due diligence process including, but limited to, providing, as requested, written certifications and other information concerning the origin of Conflict Minerals included in products and/or components supplied to us;
- Implement necessary policies and procedures regarding Conflict Minerals that are consistent with this Policy and the OECD Guidance, including, but not limited to, the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel, direct suppliers, indirect suppliers, and other affiliates; and
- Obligate all Suppliers, whether direct or indirect, to adopt policies and procedures that are consistent with this Policy.

Suppliers may reach out to their Steve Madden business contacts with any questions, comments or concerns regarding this Policy. Any concerns regarding this Policy or potential violations may be reported at generalcounsel@stevenmadden.com.

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