

STEVE MADDEN

Responsible Recruitment Policy

1. Purpose

At Steven Madden, Ltd. (“Steve Madden” or “Company”) we are committed to conducting our business responsibly and expect our Suppliers to conduct themselves in accordance with our [Supplier Code of Conduct](#). The purpose of this Responsible Recruitment Policy (this “Policy”) is to protect the rights and well-being of all Workers, including migrant workers, throughout the Recruitment process. We believe that all Workers should have access to responsible recruitment channels and that no Worker should pay for a job. This Policy is informed by the [Employer Pays Principle](#) and the ILO’s [General Principles and Operational Guidelines for Fair Recruitment and Definition of Recruitment Fees and Related Costs](#).

2. Scope

This Policy applies to all Company Suppliers, authorized subcontractors, recruitment agencies, and any other third-party service providers to the Company involved in the Recruitment of Workers within our supply chain.

By acceptance of any purchase order from Steve Madden, the supply chain partner acknowledges its acceptance of this Policy and intention to comply with the requirements.

3. Definitions

- 3.1. **Due Diligence:** Reasonable steps adopted by an entity to identify, prevent, mitigate, and account for how it addresses its adverse human rights impacts.
- 3.2. **Employer:** An individual or entity that hires or employs Workers and engages with the Company, either directly or indirectly, as part of the Company’s supply chain.
- 3.3. **Labor Recruiter:** Any third party involved in the Recruitment, selection, hiring, and management of Workers.
- 3.4. **Recruitment:** The process and action of actively seeking out, finding, and hiring Workers for open positions of the Company.
- 3.5. **Recruitment Fees:** Any fees or costs incurred in the Recruitment process for Workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.
- 3.6. **Supplier:** Any manufacturer, supplier, distributor, vendor, or agent that the Company engages with and is expected to conduct itself in accordance with the [Supplier Code of Conduct](#).
- 3.7. **Worker:** Any person placed on-site of a manufacturer engaged in business with the Company. A Worker may either be recruited directly by the factory or through a labor recruiter.

4. Requirements/Guidelines

- 4.1. **Respecting Human Rights:** Recruitment must be carried out in a manner that upholds internationally recognized human rights and alignment with international labor standards, including elimination and prevention of forced labor, child labor, and discrimination in employment and occupation.

- 4.2. **Due Diligence:** All recruitment agencies and labor brokers engaged by Suppliers must undergo a rigorous Due Diligence process to ensure they adhere to the principles outlined in this Policy. Suppliers are responsible for monitoring and enforcing compliance by recruitment agencies.
- 4.3. **No Fees for Workers:** Certain Recruitment Fees should not be borne by the Worker, including but not limited to, medical examinations or visa processing fees, as all such costs shall be borne by the Employer.
- 4.4. **Transparency in Recruitment:** All terms and conditions of employment, including wages, benefits, working hours, and job responsibilities, must be communicated clearly to Workers in their native language before employment begins. To the extent Workers are supplied with a written contract, it should be in a language they understand.
- 4.5. **Freedom of Movement:** Workers must retain control of their personal documents, such as passports and work permits. Employers and recruiters are prohibited from confiscating or withholding these documents under any circumstances.
- 4.6. **Voluntary Employment:** Employment must be freely chosen, and Workers must not be subjected to forced labor, including bonded labor, debt bondage, or involuntary prison labor. Workers should not be required to lodge deposits or any other form of security to gain employment.
- 4.7. **Agency Accountability:** Suppliers must ensure that recruitment agencies do not charge Workers any fees and that they comply with all applicable labor laws and regulations. Any breach of this Policy by a recruitment agency must result in immediate corrective action and may lead to termination of the business relationship with the Company.
- 4.8. **Grievance Mechanism:** A fair, confidential, and accessible grievance mechanism must be established by Employers for Workers to report recruitment abuses or violations of their rights without fear of retaliation. All grievances must be addressed promptly and thoroughly.
- 4.9. **Corrective Action:** Employers must immediately respond to any non-compliance whether identified through due diligence reviews, social compliance audits, grievance mechanism or otherwise. Once a violation is identified, remediation should occur immediately, and no later than 30 days after discovery, prioritizing re-payment of any Worker fees or wage discrepancies.

5. Compliance and Verification

- 5.1. **Audits and Inspections:** To assess compliance with this Policy, Steve Madden reserves the right to access and review Suppliers' and their labor providers management systems and processes, standards, and records through self-assessments, interviews, and audits performed directly by Steve Madden, independent third-party audits and/or other methods.
- 5.2. **Non-compliance:** Supply chain partners found to be non-compliant with this Policy must develop and address corrective actions. Repeated or severe non-compliances may result in termination of contracts by the Company.