

# STEVE MADDEN

## California Transparency in Supply Chains Act of 2010 Statement

Steve Madden, Ltd. (“Steve Madden” or “the Company”) is committed to conducting its business according to the highest ethical and legal standards. Steve Madden does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any vendor that uses involuntary labor of any kind, including prison labor, indentured labor, bonded labor, or labor obtained through human trafficking or slavery. Steve Madden requires all of its vendors and suppliers to comply with all applicable laws and regulations of the United States, as well as those of the country of manufacture and exportation. Steve Madden also prohibits its vendors and suppliers from using slave, forced, prison or child labor, and expects them to prevent practices that could in any way contribute to human trafficking.

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires retailers and manufacturers doing business in California to provide consumers with information regarding their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale. The purpose of the Act is to increase the amount of information available to consumers about the efforts manufacturers and retailers are undertaking to prevent and eradicate human trafficking and slavery in their product supply chains, both in the United States and in international markets. The Act requires company disclosures in five (5) areas – verification, audit, certification, internal accountability and training.

### **Verification**

Steve Madden uses various tools to verify that the factories that manufacture its products operate fairly and safely, and address the risks of human trafficking and slavery. Steve Madden includes in all of its Manufacturing Agreements a Vendor Code of Conduct which requires all vendors, suppliers, and subcontractors (“Vendors”) to take reasonable measures to ensure that labor standards are met and comply with all applicable laws. Vendors accept these standards when they enter into Manufacturing Agreements with Steve Madden. Steve Madden does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any Vendor that uses involuntary labor of any kind. Vendors are expected to take reasonable measures to ensure that subcontractors are made aware of, and comply with these standards.

Vendors must certify that they do not employ workers younger than the minimum working age established by applicable law in the country of manufacture or age 14, whichever is higher, unless labor is in connection with a legitimate apprenticeship program that is strictly in accordance with local laws and all appropriate registration requirements of the appropriate authorities. Steve Madden does this by requiring all Vendors to certify compliance with the Company’s *Global Human Rights Policy* and

*Factory Profile Questionnaire* which is a requirement of starting business with Steve Madden.

### **Audits**

Pursuant the Vendor Code of Conduct, Steve Madden has the right to audit all of its vendors and suppliers, as well as to conduct on-site inspections of vendor facilities, to engage in announced and unannounced monitoring activities including confidential employee interviews, and to contract with third party auditors to ensure compliance. Steve Madden determines which suppliers and vendors to audit based on specific risk assessments as well as the results of previous audits and other information obtained by the Company.

### **Certifications**

Steve Madden requires all Vendors in its supply chain to certify receipt, understanding, and acceptance of the Vendor Code of Conduct, which details the Company's own standards and policies as well as fair labor practices in general including laws concerning the use of child, prison, or forced labor, and against human trafficking and slavery. To evaluate compliance with these policies in the Company's supply chain, the Company periodically reviews the Vendor Code of Conduct and Compliance Manual as a whole and distributes revised versions to Vendors and further requires acknowledgement, agreement, and certification of receipt in writing. The Company is always reviewing and monitoring its Vendor relationships, and any found in violation of Company policies and standards may be terminated.

### **Internal Accountability**

Steve Madden seeks to do business with Vendors that share the Company's commitment and dedication to ethical and responsible business practices, and we encourage Vendors to promote best practices and to work towards continual improvement through their production operations and supply chains. The Vendors that share our commitment and dedication to this policy become and remain the Company's Vendors. And again, the Company reviews and monitors its Vendor relationships and may terminate a relationship with any Vendor found to be in violation of the Company's standards.

The Company has a zero tolerance policy for any factory or factory employee found to violate child labor, forced labor, slavery, or human trafficking standards or laws. Such a violation may result in immediate suspension or deactivation of the factory. This zero tolerance policy is communicated to all Vendors.

Steve Madden is continuously working to implement an enhanced compliance program to ensure all employees and supply chains comply with all respective laws and the Company's standards regarding human trafficking, slavery and child labor in supply chains.

## **Training**

Steve Madden is working to craft a comprehensive training program for all employees, management, and key contacts at supply chains detailing the applicable laws and the Company's standards regarding human trafficking, slavery, and child labor in supply chains. The training program will ultimately include a combination of in-person training sessions and online training tools to reiterate the importance of compliance with the applicable laws and Company-specific policies and procedures regarding human trafficking, slavery, and child labor in supply chains.

Steve Madden's Vendor Code of Conduct can be found on its corporate website using the following link <https://stevemadden.gcs-web.com/corporate-governance/highlights>.