VENDOR SECURITY POLICY STATEMENT

Security Requirements

The following summarizes **Genesco**'s security requirements as they relate to vendors.

Statement of Principles

- **Genesco** is committed to adopting appropriate and sensible security measures in all of our operations.
- **Genesco** chooses vendors who share the commitment.
- In its purchase contracts, **Genesco** requires that vendors adopt security measures recommended by the United States Customs Service and which are consistent with the Best Practices of the Footwear Distributors and Retailers Association.
- If it is determined that a vendor has failed to adopt or maintain appropriate security measures, Genesco will take action, which may include requiring the vendor to adopt specific security measures, canceling the affected contract(s), terminating its relationship with the vendor or requiring a third party review and verification of security practices.

Vendor Approval Process

The most important part of **Genesco**'s compliance program is the identification of those vendors that share in **Genesco**'s commitment to security before business is transacted. Therefore it is **Genesco**'s policy that all suppliers and their manufacturing facilities must undergo a formal evaluation and approval process prior to the placement of orders. Vendors must agree to authorize, in advance, unrestricted access to their facilities-including the ability to conduct unannounced inspections.

Monitoring

Assuring vendor compliance with security measures includes the following key components and formal documentation of these activities:

- Regular inspection of all facilities.
- All purchase orders issued with clearly stated compliance requirements.
- Unannounced facility visits for the express purpose of identifying security failures.
- Regular re-certification of all facilities by **Genesco** personnel or agents.

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• Annual notification to all active vendors of security requirements.

Violations

Genesco personnel or agents look for violations of security guidelines. All documented violations must be reported to the local office or agency responsible for production and quality issues and a copy to corporate headquarters ATTN: Vice President –Administration for action.

Guidelines

Genesco has adopted the Manufacturer Security Recommendations of the United States Customs Service Trade Partnership Against Terrorism and the Best Practices of the Footwear Distributors and Retailers Association.