

# **Supplier Manual – Responsible Sourcing**

## **Johnston & Murphy**

January 2021

**TABLE OF CONTENTS**

---

INTRODUCTION ..... 3

SUPPLIER CODE OF CONDUCT AND IMPLEMENTATION REQUIREMENTS ..... 4

    Johnston & Murphy Code of Conduct for Suppliers, Vendors, and Agents.....4

Audit Standard ..... 10

POLICY & GOALS ..... 12

    Corporate Social Responsibility Policy ..... 12

GOVERNANCE & TRAINING ..... 13

    Overview ..... 13

    Roles & Responsibilities ..... 13

    Training..... 14

    Internal Accountability ..... 14

SUPPLIER SELECTION & REQUIREMENTS ..... 15

    Overview ..... 15

    Supplier Risk Assessment..... 15

    Supplier Requirements ..... 15

    Critical Findings..... 16,16

ENVIRONMENTAL POLICY ..... 17

## INTRODUCTION

---

Johnston & Murphy (J&M) is committed to socially responsible management practices—in both its own operations, and in its supply chain.

This manual describes J&M's Responsible Sourcing Program and assessment methodology, including requirements for suppliers, vendors and agents. To promote our values and ethical standards throughout our supply chain, J&M has adopted a Global Supplier Code of Conduct that applies to all suppliers, vendors and agents who conduct business with J&M. This Code of Conduct is a general guide to standards of business practice and regulatory compliance that applies to all suppliers of J&M.

This manual is designed as a practical tool for the implementation of Johnston & Murphy's Responsible Sourcing Program.

We recognize the role our suppliers, vendors and agents play in the J&M Responsible Sourcing Program. J&M expects that all suppliers share our commitment to ensuring workers' rights and safety and engaging in ethical business practices.

We look forward to partnering with our suppliers, vendors and agents to ensure our products are produced in factories that offer safe, healthy and fair working conditions.

## **SUPPLIER CODE OF CONDUCT AND IMPLEMENTATION REQUIREMENTS**

---

This section includes J&M's Code of Conduct language and Implementation Requirements for specific paragraphs of the Code of Conduct that will aid the supplier in complying with the Code of Conduct requirements and going beyond these minimum principles.

### **Johnston & Murphy Code of Conduct for Suppliers, Vendors, and Agents**

#### **Introduction**

The Code of Conduct is a vital pillar of Johnston & Murphy's human rights and workplace accountability program. These guiding principles are driven by the belief that good corporate citizenship is essential to our long-term business success and must be reflected in our relationships and actions in our workplaces and the workplaces of those who supply our business. As a Supplier, Vendor or Agent to Johnston & Murphy, you and your company play an integral part in our success. Therefore, we expect your support in Johnston & Murphy's ongoing efforts to conduct business in accordance with our ethical standards and the law.

Recognizing that there are differences in laws, customs, and economic conditions that affect business practices around the world, we believe that shared values must serve as the foundation for relationships between Johnston & Murphy and its suppliers, starting with the commitment to respect all human rights, in particular as expressed by the United Nations Declaration on Human Rights and industry standards around social responsibility. The Code of Conduct communicates our values and expectations and emphasizes the importance of responsible workplace policies and practices that comply, at a minimum, with applicable environmental laws and with local labor laws and regulations. The principles outlined below reflect the values we uphold, and we expect our suppliers to follow the spirit and intent of these guiding principles. Please be aware that Johnston & Murphy requires you, as a Supplier, Vendor or Agent to abide by all applicable laws that govern your company, your products/services, and our business relationship. You are also required to abide by the ethical standards set forth by Johnston & Murphy as described in this Code of Conduct.

In some cases, our Code of Conduct may set requirements that go beyond local legislation and reference internationally accepted best practice or conventions. Wherever there is a conflict between two competing standards, Suppliers, Vendors and Agents shall abide by the stricter standard.

#### **Hiring and Termination**

Johnston & Murphy requires Suppliers, Vendors and Agents to provide all employees a written statement outlining the terms of employment in an official language and the language understood by the employee. Each employee shall fully understand his or her employment terms prior to commencing work and shall not be required to sign an incomplete contract. Suppliers, Vendors and Agents shall ensure that all employees are in a legal employment relationship.

Prior to hiring, Suppliers, Vendors and Agents must verify an employee's age documentation, and where legally permitted, maintain a copy of such legal documentation. Suppliers, Vendors and Agents may not terminate employees illegally and must maintain termination records for at least 12 months.

Suppliers, Vendors and Agents must respect employees' privacy and comply with all legal requirements regarding privacy; employee records shall be kept private in full compliance with applicable legal standards.

## **Remuneration and Benefits**

Johnston & Murphy's Suppliers, Vendors and Agents must maintain accurate payroll records and employees shall receive at least the minimum legal wage rate for hours worked, including overtime, and be paid in accordance with the law. In addition, Suppliers, Vendors and Agents shall pay employees all legally required benefits, including but not limited to: social security, parental leave, annual leave and statutory holidays, as applicable. Johnston & Murphy encourages Suppliers, Vendors and Agents to provide wages and benefits at a level not less than the prevailing local industry standard. All employees' wages shall be paid directly into an employee-controlled account, and employees shall receive wages at least once per month, on time, with a pay slip. Employees should understand their pay slips and there should be no illegal deductions or any deductions that are not legally regulated.

## **Working Hours**

Suppliers, Vendors and Agents shall maintain accurate time records and not allow off-clock work or work to be taken home (unless official homework practices are in place). Working hours, both regular and overtime, shall comply with legal requirements on regular and overtime working hours. In any case, regular weekly working hours, including overtime, should never exceed 60 hours. Wherever overtime work is required, Suppliers, Vendors and Agents shall inform employees of the overtime obligations and allow them to reject any such request without punishment or retaliation.

All employees shall be given legally required rest breaks and daily rest.

## **Forced, Bonded, Indentured, Slave, and Prison Labor and Human Trafficking**

Johnston & Murphy prohibits its Suppliers, Vendors and Agents from engaging in any form of forced, bonded, indentured, slave or prison labor or human trafficking in their operations. Overtime may never be mandatory unless legally permitted and employers have obtained any required written consent from employees.

Johnston & Murphy's Suppliers, Vendors and Agents shall ensure that employees are not subject to any deception during recruitment and hiring and that employees are not charged any fees, travel expenses, administrative costs or other payments for the purpose of recruitment or employment or as a condition of employment.

Employees shall not be in debt due to recruitment or employment and may not be subject to any deposits. Suppliers, Vendors and Agents must ensure that employees are in possession or have direct control at all times of their personal identity documents, and they must guarantee all employees their freedom of movement. Employees may not be restricted from terminating employment with due regard to legal notice periods; Suppliers, Vendors and Agents may not threaten migrant workers with termination or repatriation as a means of exercising control.

## **Child Labor, Young Workers, Apprentices, and Trainees**

Johnston & Murphy does not permit Suppliers, Vendors and Agents to employ individuals under the age of 14 or under the legal working age, whichever is stricter. Where employees are under the age of 18, Suppliers, Vendors and Agents must ensure their working conditions comply with legal requirements and do not jeopardize their health, safety and morals. During hiring, Suppliers, Vendors and Agents must ensure this is done in full compliance with the law, including medical testing, applicable documentation maintenance, such as licenses and permits, and terms of employment, such as hours and pay.

## **Abuse, Coercion, Harassment, and Disciplinary Action**

All employees shall be treated with dignity and respect and not be subject to verbal, physical, or mental abuse, coercion, pressure or threats, corporal punishment, or any form of harassment during employment or recruitment. Where security is in place at a Supplier, Vendor or Agent's site of operations, these may never include opposite sex frisking or removal of clothing.

## **Discrimination**

Suppliers, Vendors and Agents shall not engage in any kind of discrimination in hiring and employment, including but not limited to discrimination on the basis of race, Color, religion, gender, sex, national origin, age, pregnancy, childbirth, or related medical condition, physical or mental disability, medical condition, genetic information, sexual orientation, marital or registered domestic/civil union partner status, gender identity, or any other prohibited factor. Suppliers, Vendors and Agents shall maintain procedures on anti-discrimination. All employment decisions must be based on qualifications, skills, performance, and experience and employers should accommodate employees' beliefs as far as practicable.

Johnston & Murphy does not permit Suppliers, Vendors and Agents to subject employees to any illegal recruitment or hiring tests, any pregnancy or HIV testing, or birth control requirements, as a condition of employment.

## **Freedom of Association and Collective Bargaining**

Suppliers, Vendors and Agents must respect the legal rights of all employees to associate, organize, and bargain collectively and not interfere with them exercising their rights, penalizing or retaliating against them. Where laws curtail these rights, Suppliers, Vendors and Agents should encourage alternative means to facilitate worker representation.

## **Grievance Mechanisms**

Suppliers, Vendors and Agents shall implement a grievance procedure by which employees can confidentially raise issues of concern to management without fear of reprisal or negative repercussions. Suppliers, Vendors and Agents should record and track grievances raised and inform employees about how grievances are addressed and resolved.

## **Health and Safety**

Johnston & Murphy requires that its Suppliers, Vendors and Agents proactively manage occupational health and safety risks and ensure that employees' workspaces are safe and secure and prevent injuries and illnesses. At minimum, Suppliers, Vendors and Agents must comply with all laws concerning occupational health and safety, including but not limited to: emergency preparedness, fire safety, first aid, personal protective equipment, chemicals and hazardous material management, equipment and electrical safety, noise, lighting, ventilation, sanitation, access to potable water, and employee training. Suppliers, Vendors and Agents must hold all licenses and permits that are required for operations and equipment used on site. All legally required health and safety notices must be posted and visible to employees and understood by them.

Johnston & Murphy encourages all Suppliers, Vendors and Agents to implement management systems to identify, assess and address any relevant health and safety risk. Implementation of health and safety programs should be overseen by designated personnel with oversight by senior management. Where there are no legal requirements, Johnston & Murphy requires Suppliers, Vendors and Agents to comply with the following:

## **Emergency Precautions**

Suppliers, Vendors and Agents shall maintain fire extinguishers as required by law, and unless the law states otherwise, maintain and mount fire extinguishers in areas of flammable or combustible materials storage and along emergency exit pathways. Extinguishers must always remain accessible, be indicated, and have operating instructions and monthly inspection tags.

Suppliers, Vendors and Agents must maintain emergency alarms as required by law, and at least maintain manual or automatic emergency alarms in production and distribution areas. Alarms shall be indicated, accessible, and audible or visible in high-noise areas.

Secondary emergency exits must be present on each floor and located at opposite ends. Emergency exits, including doors and windows, shall be accessible, indicated, unlocked, and signed, single release operable, side-hinged, self-closing, and open in the direction of travel. Emergency exits must have a landing on the exit side. Emergency exit pathways must be accessible at all times, indicated with directional signs and path markings, lead to a public way or assembly point and shall be continuously lit. Emergency lighting shall be provided along all emergency exit paths. The emergency assembly point shall be accessible by the emergency exit pathway, unobstructed, and separated from hazardous, combustible or flammable materials or objects.

The emergency evacuation plan shall be posted as required by law, and at minimum in high-concentration areas and along emergency exit pathways. Emergency evacuation plans shall be accessible, shall reflect the facility's plot plan accurately in a language understood by the majority of employees, and shall contain the accurate location of the assembly point as well as a "You Are Here" mark.

Suppliers, Vendors and Agents shall implement evacuation drills as legally required, and at minimum every 12 months for all shifts and floors of the facility.

## **Accidents and First Aid**

Johnston & Murphy requires Suppliers, Vendors and Agents to keep all accident records and to investigate and report each employee and facility accident.

Suppliers, Vendors and Agents must maintain fully equipped first aid kits that are always accessible to all employees. First aid kits must be clearly marked and never locked. Where operations so require, Suppliers, Vendors and Agents shall provide functional and appropriately located eye wash stations and/or chemical shower facilities. Trained first aid employees and medical staff and clinics must be present where legally required and at minimum one employee who is responsible for first aid should be present during each shift.

Any legally required occupational health exams shall be provided to employees at required frequencies.

## **Personal Protective Equipment**

Suppliers, Vendors and Agents should implement a management system that includes a fully completed health and safety risk assessment for the identification, use, maintenance and employee training for appropriate personal protective equipment.

## **Chemicals and Hazardous Materials**

Johnston & Murphy encourages its Suppliers, Vendors and Agents to establish a policy governing chemicals and hazardous materials identification, use, maintenance and training. The policy should be

communicated to all employees and full training on specific requirements for employees must be provided. Suppliers, Vendors and Agents must ensure safe handling, storage and disposal of chemicals and hazardous materials and ensure such materials are clearly labeled; complete and accurate inventories of chemicals and hazardous materials must be kept, as well as all applicable safety data sheets.

### **Equipment Safety**

Suppliers, Vendors and Agents shall include equipment safety in their health and safety policy and implement procedures to ensure all equipment used on site is properly maintained in safe working order. Suppliers, Vendors and Agents must include equipment safety in the employee health and safety training.

### **Workspace Safety**

Suppliers, Vendors and Agents must maintain all electrical equipment and installations including electrical panels, wiring and outlets in good working order and prevent damaged or exposed wiring, possible trip hazards and overloading through use of adapters, extension cords and/or surge protectors.

Suppliers, Vendors and Agents must monitor noise levels in the workplace and provide personal protective equipment as needed. Workplaces must be sufficiently lit, ventilated and temperature controlled and be regularly cleaned to avoid accumulation of dust, lint, waste and scraps.

### **Potable Water and Sanitation**

Employees shall have unlimited and free access to potable water and toilet facilities. There shall be a sufficient number of toilets for employees that are well lit and ventilated, separated by gender, and contain privacy stalls, running water and toilet supplies.

### **Food Preparation and Canteen**

Where Suppliers, Vendors and Agents provide facilities for food preparation and canteen areas these must be kept clean and in compliance with all legal requirements for such spaces. Applicable licenses, permits and certifications must be kept for any food preparation and canteen areas.

### **Child Care**

Where legally required, Johnston & Murphy requires Suppliers, Vendors and Agents to provide childcare facilities. Facilities must be kept separate from production areas, maintained in sanitary condition and comply with all health and safety requirements, including placement on the ground floor, emergency alarms, secondary emergency exits, fire extinguishers and first aid kits.

Individuals under the age of 18 who are not working at the facility should not have access to production areas.

### **Dormitory**

Where Suppliers, Vendors and Agents make dormitories available to employees, they must do so in compliance with all legal requirements and hold all required permits and certificates. Dormitories for employees must be separate from the Supplier, Vendor or Agent's production and distribution areas and employees must have access to sanitary sleeping and eating quarters, potable water, hot water, and toilets and sleeping quarters segregated by gender.



Emergency precautions and electrical safety guidelines at the facility shall equally apply at the dormitory.

Employees must not be subject to curfews or abuse by security personnel and shall be free to choose between facility-provided housing and other accommodation alternatives.

### **Environmental Protection**

Suppliers, Vendors and Agents doing business with Johnston & Murphy must act in an environmentally responsible manner and comply with all applicable environmental laws, rules, codes, and regulations for where they conduct business as well as the nature of their operations, including holding all required permits and licenses for the use and disposal of natural resources.

Johnston & Murphy encourages Suppliers, Vendors and Agents to develop an Environmental Protection policy and communicate this to all stakeholders. Based on their policy, we encourage Suppliers, Vendors and Agents to complete an environmental risk assessment to identify risks to employees and the community and to address identified risks.

### **Business Operations, Homework and Subcontracting, and Supply Chain Management**

Suppliers, Vendors and Agents must maintain a valid business license in compliance with the law for its operation and sites. Where Suppliers, Vendors and Agents use homeworking arrangements, they must comply with all legal requirements, hold all legally required permits and monitor and document homeworking conditions. All requirements set out in this Code equally apply to homeworkers.

Johnston & Murphy requires Suppliers, Vendors and Agents to inform them formally and in writing about all homework and subcontracting activities, regardless of whether these activities relate directly or indirectly to the production or service for Johnston & Murphy.

Johnston & Murphy encourages Suppliers, Vendors and Agents to conduct their own supply chain human rights due diligence and supply chain monitoring of their full supply chains (including suppliers, subcontractors and contractors, customers and partners). Any standards our Suppliers, Vendors and Agents are bound by, including this Code, should be communicated to their suppliers, subcontractors, contractors, customers and partners.

Where such human rights due diligence exists, Johnston & Murphy requires that Suppliers, Vendors and Agents share the findings of these assessments with Johnston & Murphy.

### **Bribery and Facilitation Payments**

Johnston & Murphy is committed to full compliance with the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. We do not and will not engage in any form of corruption, bribery, facilitation payment or any hidden or undocumented side payment to any person in connection with any business related to Johnston & Murphy or for personal gain. Johnston & Murphy prohibits its Suppliers, Vendors and Agents from engaging in any such form of corruption or bribery or from falsifying records and unduly influencing employees.

Suppliers, Vendors and Agents must establish a policy prohibiting bribery and facilitation payments and communicate this to all employees, customers and business partners. Employees must feel free to refuse to participate in any form of bribery or facilitation payment supported by the facility and shall be

aware that they will not suffer demotion, penalty or other adverse consequences for voicing a concern, or for refusing to pay a bribe or facilitation payment even if this action may result in the facility losing business. A system must be implemented for employees to anonymously report any suspicious payments without fear of reprisal.

**Assessment Execution**

Johnston & Murphy and/or its agents, representatives or independent contractors may from time to time and at any time during regular business hours, request and be granted full and complete assistance and access to the Supplier, Vendor or Agent’s operations and facility-provided housing, including related documentation, except to the extent that such access would violate employees’ privacy rights under applicable law, and be granted permission to conduct confidential employee interviews. The Supplier, Vendor or Agent shall cooperate fully with Johnston & Murphy to ensure the quality and thoroughness of the inspection and audit process.

Suppliers, Vendors and Agents shall maintain on site all documentation that may be needed to verify compliance with this Code of Conduct. Depending on a Supplier, Vendor or Agent’s operational environment, confidential employee interviews may also be conducted with employees indirectly involved in facility operations, such as canteen, security and cleaning personnel. In addition, interviews with management shall foster understanding of the Supplier, Vendor or Agent’s management systems.

**Corrective Action**

Suppliers, Vendors and Agents are encouraged to engage in corrective action during the assessment or immediately thereafter and report such corrective action to their customers. Long-term corrective action involves identification of root causes and implementation of management systems to ensure non-compliance is prevented from occurring in the future.

**Violations**

Violations of this Code of Conduct may result in cancellation of existing orders and termination of the business relationship with the Supplier, Vendor, or Agent in Johnston & Murphy’s sole discretion. Compliance by the Supplier, Vendor, or Agent with this Code of Conduct is a material term of any contract of purchase between Johnston & Murphy and the Supplier, Vendor, or Agent.

**ACKNOWLEDGE AND AGREED:**

Please acknowledge this Code of Conduct by sending a signed copy to [ResponsibleSourcing@genesco.com](mailto:ResponsibleSourcing@genesco.com). Please call +1-615-367-7674 for any other questions.

Print Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Signed: \_\_\_\_\_  
Date: \_\_\_\_\_

**Audit Protocol**

---

All suppliers are required to undergo annual social compliance audits to verify compliance with J&M’s Supplier Code of Conduct. The audit program is managed by Sumerra-a third-party audit management provider. Sumerra will contact you around 8 to 10 weeks prior to the audit date for scheduling and all requirements.

All compliance audits will be conducted against Sumerra's social compliance audit standard, which can be accessed [here](#). Factories should use the compliance requirements outlined in the Standard as a reference for management best practices and to prepare for upcoming audits.

## **POLICY & GOALS**

---

### **Corporate Social Responsibility Policy**

As a timeless American icon, Johnston & Murphy builds long-lasting relationships with our consumers and business partners by creating contemporary interpretations of classics that are uncompromising in quality and value, with personal service and integrity in everything we do. Consistent with this philosophy, we are committed to ethical business practices, workers' rights and safety, and environmental protection in all our business operations. We strive to operate with integrity and expect the same commitment from all our vendors, suppliers, and agents.

Our Global Supplier Code of Conduct ("Code of Conduct") is the foundation of our Responsible Sourcing Program and will serve as a guide to achieving social and environmental compliance both within our company and in our supply chain. While we recognize that laws and standards may differ between countries and regions, our Code of Conduct outlines a set of fundamental principles for good corporate citizenship that our suppliers, vendors and agents are expected to share and implement.

The Responsible Sourcing Program will also direct suppliers, vendors and agents toward compliance with local and international legal requirements and help them maintain good standing for continued business with J&M. Suppliers, vendors and agents who do not meet our standards or complete corrective actions will not be considered business partners of choice and J&M may choose at its own discretion to discontinue business with them.

### **Responsible Sourcing Goals**

- Protect workers' rights
- Ensure workers' health and safety
- Reduce environmental impact
- Institutionalize ethical behavior, good governance, and regulatory compliance

## GOVERNANCE & TRAINING

---

### Overview

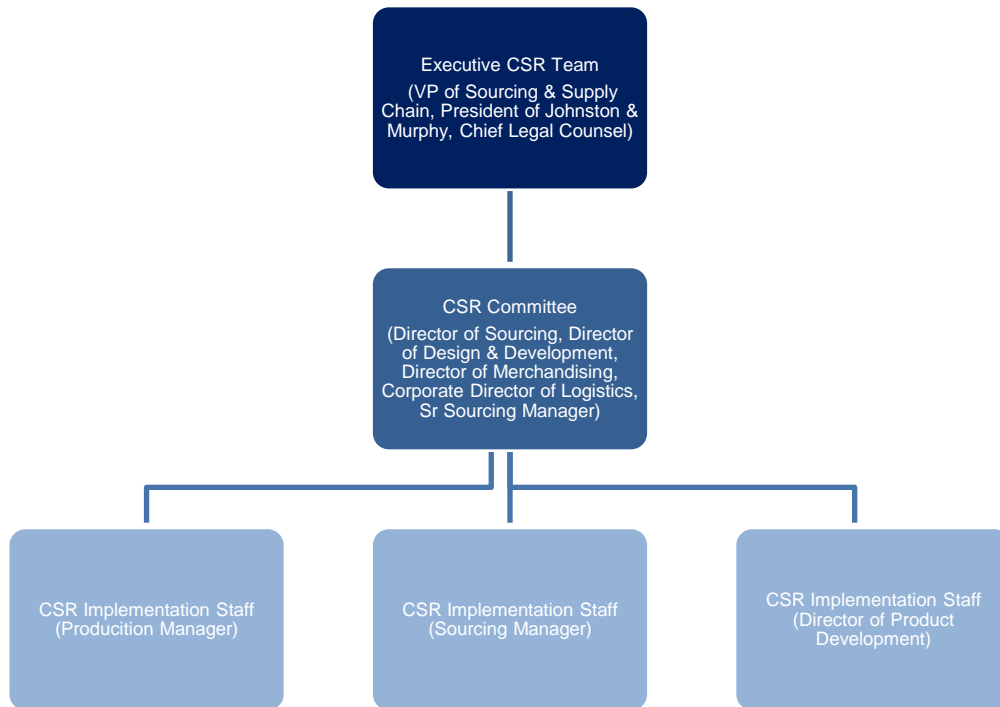
The success of a Responsible Sourcing Program relies on effective management and oversight. While each employee has a role in helping implement J&M's Code of Conduct for Suppliers, Vendors and Agents at every level of the business, the Vice President of Supply Chain, the President of Johnston & Murphy and the Chief Legal Counsel have the ultimate responsibility of developing and coordinating the company's overall corporate responsibility efforts.

### Roles & Responsibilities

The Vice President of Sourcing & Supply Chain, the President of Johnston & Murphy and the Chief Legal Counsel shall convene the J&M CSR Committee made up of the Director of Sourcing, the Director of Footwear Product Development, the Director of Merchandising, the Corporate Director of Logistics, and the Sourcing Manager, at least once per year to discuss the strategy and goals of the Responsible Sourcing Program.

The Vice President of Sourcing & Supply Chain is the main point contact for social compliance related issues for both internal and external stakeholders.

The Sourcing Manager Sourcing, the Production Manager and the Director of Footwear Product Development are responsible for implementation of the Responsible Sourcing Program.



## **Training**

### ***Training for Suppliers***

Johnston & Murphy will continue to monitor factory audit results and provide targeted training to suppliers, vendors and agents to inform them of the Responsible Sourcing Program, including adherence to the Code of Conduct, general social compliance audits, and required corrective and preventative actions where and if required.

Select suppliers, vendors and agents will receive structured and targeted training should J&M determine a need.

### **Internal Accountability**

All J&M employees will be held accountable to their respective roles, procedures, and processes to ensure correct and timely execution of Responsible Sourcing Program.

## **SUPPLIER SELECTION & REQUIREMENTS**

---

### **Overview**

J&M's procurement practices reflect the standards set forth in our Supplier Code of Conduct. We expect our suppliers, vendors and agents to operate in an ethical manner and comply with the social and environmental guidelines delineated in this manual.

Suppliers, vendors and agents are selected on a series of criteria, with responsible sourcing being one of them. Each supplier will be individually evaluated to determine viability as a business partner.

Monitoring social compliance of suppliers, vendors and agents is an integral part of our Responsible Sourcing Program. We regularly monitor our supply chain to ensure that our suppliers, vendors and agents are in compliance with relevant local laws and regulations as well as our best practice standards included in the Supplier Code of Conduct. We have adopted a continuous improvement approach, whereby we provide ongoing support to our suppliers and help them improve their performance over time.

J&M's Responsible Sourcing Program is divided into a two-stage approach: supplier risk assessment and onsite social compliance audits.

### **Supplier Risk Assessment**

J&M assesses the risk of each supplier, vendor and agent to determine who is required to undergo social compliance audits as 100% of J&M's suppliers, vendors and agents must comply with the Code of Conduct. All new suppliers will be subject to the Supplier Code of Conduct and social compliance audits. Audit scheduling will be prioritized based risk levels and will then become part of the Sumerra annual auditing program to ensure on-going compliance.

### **Supplier Requirements**

J&M's Supplier Code of Conduct applies to all suppliers, both domestic and international.

The following are specific requirements expected from all J&M suppliers:

- Suppliers, vendors and agents warrant that they will comply with all applicable laws and regulations and require their suppliers to do the same.
- Suppliers, vendors and agents warrant that they will read and understand the Supplier Code of Conduct requirements and display the Code in an area accessible to all employees in the language(s) understandable to each employee.
- Suppliers, vendors and agents are also required to cooperate with the third-party monitoring company chosen by J&M and allow access to the facility in order that the assessment team may conduct a full assessment.

- Suppliers, vendors and agents will be responsible for identifying any areas of its operation that do not conform to J&M's Supplier Code of Conduct, and for implementing and monitoring corrective action plans designed to achieve compliance with the Code.

In instances where suppliers have already undergone social compliance assessments, J&M will determine on a case-by-case basis whether such assessments fulfill J&M's requirements. At minimum, these assessments should be conducted by a qualified third-party social auditing body and be similar in scope and standards.

**Critical Findings**

Should J&M become aware of a supplier's legal violations, J&M will evaluate the supplier relationship and choose a course of action, which may include:

- Working with the supplier to remediate the violation(s) through developing preventative measures;
- Canceling the purchase contract(s); and/or
- Terminating the supplier relationship.

If any zero-tolerance issues are identified in the annual audit, J&M will require immediate remediation of the issue.

If a supplier relationship has been terminated, J&M may consider resuming business with a supplier only after an audit satisfactory to J&M has been completed. Increased audit frequency at the expense of the supplier, vendor or agent to ensure sustainable improvement may be required.

<b>Zero-Tolerance Issues</b>
<ul style="list-style-type: none"> <li>● Denied access to the facility Including restricting access to the facility during walkthrough, restricting access to workers for interviews, and document review</li> <li>● Lack of valid business license</li> <li>● Bribery</li> <li>● Unauthorized Subcontracting or sub-supplying or failure to disclose subcontractor or sub-supplier used</li> <li>● Use of forced labor, prison labor or human trafficking (e.g. withholding workers identification documents)</li> <li>● Harassment or abuse of workers (verbal, sexual, physical)</li> <li>● Discrimination</li> <li>● Use of Homeworkers (unless permitted by law)</li> <li>● Workers below the minimum required age (e.g. Child Labor)</li> <li>● Interference in union activities or restricting freedom of association and/or collective bargaining</li> <li>● Retaliation against whistle blowers</li> <li>● Serious risks related to worker health and safety</li> <li>● Burning or onsite disposal of hazardous waste</li> </ul>



## **ENVIRONMENTAL POLICY**

---

All Suppliers must comply with the Environmental Policy laid out by Genesco below:

All applicable environmental laws must be adhered to at all times. The supplier must be able to demonstrate its commitment to the proper handling, storage, use, shipment and disposal of all materials that are regulated under any applicable environmental law, and all employees are required to abide by such requirements.

The supplier is required to maintain all necessary environmental permits and approvals. Certain employees need to be charged with ensuring that the Company remains in material compliance with the terms and conditions of any such permits and approvals as well as with the filing of any reports and notifications required under any applicable environmental laws. Such employees will ensure that all permit applications, reports and notifications are timely filed. If such employees discover any omission or lack of timely action, they will promptly report this to their immediate supervisor and take appropriate action to correct such omission.

Certain employees are charged with maintaining, in accordance with Genesco's document retention policy, all documents required to be maintained under applicable environmental laws. Such persons will verify that all manifests, other shipping documents, Material Safety Data Sheets ("MSDSs"), chemical inventory forms and monitoring and sampling data reports are properly completed and maintained.

If any employee becomes aware that a spill, release or discharge of any material regulated pursuant to an applicable environmental law has occurred or that any violation of an applicable environmental law has taken place, such employee will immediately report such event to his or her immediate supervisor so that necessary action may be taken. Necessary action may include evacuating employees, reporting such event to a governmental authority if required pursuant to any environmental law, and containing and cleaning up any such spill, release or discharge. Employees should also report any violations of this policy that they observe.