

# NINE WEST HOLDINGS, INC.

## STANDARDS FOR CONTRACTORS AND SUPPLIERS

Nine West Holdings, Inc. (“Nine West”) is committed to legal compliance and ethical business practices in all of our operations worldwide. We choose contractors and suppliers who we believe share that commitment. We require our contractors and suppliers to comply with all applicable laws and regulations of the country, or countries, in which they are conducting business. Our standards are summarized as follows. As used in these Standards, the term “contractors and suppliers” includes, but is not limited to, factories, agents, vendors and suppliers of component parts.

### **LABOR**

#### **A. CHILD LABOR**

Contractors and suppliers shall not use child labor, defined as workers under the age of 14, or if older than 14, the age of compulsory education if the country of manufacture requires compulsory education beyond 14 years of age.

#### **B. FORCED LABOR**

Our contractors and suppliers shall not use any form of forced, coerced, trafficked, compulsory, bonded, indentured or prison labor, and shall not purchase materials from suppliers using any such labor.

#### **C. MIGRANT LABOR**

Contractors and suppliers that recruit or employ foreign contract workers shall ensure that these workers are treated fairly and on an equal basis with the local workforce. Workers shall not be charged any fees, costs or deposits for recruitment, travel or processing official documents and work visas, and if such fees are paid by the workers, the contractor or supplier shall reimburse them promptly.

Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those less favorable to the worker) are strictly prohibited. Contractors and suppliers shall ensure that all original travel and identification documents remain with the workers, and that workers have secure individual storage to safely maintain those documents during the time of their employment.

### **WAGES/BENEFITS**

Employees shall be compensated for all hours worked, at rates that meet the national minimum standards or local industry standards, whichever is higher. Overtime shall be compensated at legally mandated rates, or if there is no applicable legally mandated rate, at a rate at least equal to the regular hourly wage. Employees shall be provided all legally mandated benefits.

### **HOURS OF WORK**

On a regular basis, employees shall not be required to work more than the lesser of 60 hours per week, including overtime, or the number of hours specified by the applicable labor code. Workers shall have at least one day of rest in every seven.

### **DISCIPLINARY PRACTICES**

Nine West will not utilize contractors or suppliers who use corporal punishment or any form of mental or physical coercion or harassment.

**DISCRIMINATION**

Contractors and suppliers shall not discriminate against employees or potential employees in employment practices, including hiring, wages, benefits, advancement, disciplinary procedures, termination or retirement, on the basis of gender, race, religion, age, disability, nationality, political opinion, sexual orientation, ethnic origin, maternity or marital status.

**FREEDOM OF ASSOCIATION**

Employees shall be free to join organizations of their own choice. Employees shall not be subject to intimidation or harassment in the exercise of their right to join (or to refrain from joining) any organization. Where the right to freedom of association and collective bargaining is restricted under law, the employer should take steps to create an open means of communication for employees to discuss issues and express concerns in a positive environment.

**HEALTH & SAFETY**

Contractors and suppliers shall comply with all applicable laws and regulations regarding working conditions and shall provide workers with a safe and healthy environment. All required health and safety permits shall be obtained and their operational and reporting requirements followed.

Contractors and suppliers shall identify and assess potential emergency situations in the workplace and in any other company-provided facilities, and shall minimize their potential impact by implementing emergency plans and response procedures. Contractors and suppliers shall provide workers with access to first aid, health and safety information and hazard information to educate, inform, train and protect workers from workplace hazards. Contractors and suppliers shall protect workers from overexposure to chemical, biological, physical hazards including noise and stress, and physically demanding tasks in the workplace.

**DORMITORY**

Where provided by contractors or suppliers, worker housing must provide a clean, safe and healthy residence environment. Dormitory facilities must comply with all applicable legally- mandated standards for public domiciles in the country in which they are located.

**ENVIRONMENT**

Suppliers and contractors shall comply with applicable laws and regulations regarding the protection and preservation of the environment and take appropriate actions to reduce adverse impacts on human health and the environment. All required environmental permits shall be obtained and their operational and reporting requirements followed.

Contractors and suppliers shall have policies and procedures in place to manage and minimize environmental impacts with respect to energy, air, emissions, water, waste, hazardous materials and other significant environmental risks. Contractors and suppliers shall have programs in place for the safe storage and handling of chemicals, as well as to prevent or mitigate catastrophic releases of chemicals.

**SUBCONTRACTING**

Contractors and suppliers shall not subcontract any operation in the manufacturing process without prior written consent from Nine West. All approved subcontractors shall implement and adhere to Nine West's Standards.

**PRODUCT SAFETY**

Contractors and suppliers shall comply with consumer product safety standards and requirements under laws and regulations administered by the U.S. Consumer Product Safety Commission and with Nine West's Restricted Substances Policy (attached as Appendix A). In addition, contractors and suppliers are expected to eliminate unnecessary hazardous substances in the production process.

**CUSTOMS AND SECURITY**

Contractors and suppliers shall comply with all applicable laws and regulations regarding the importation and trans-shipment of merchandise into the United States. This includes U.S. Customs and Border Protection (USCBP)'s C-TPAT (Customs-Trade Partnership Against Terrorism) supply chain security program and where applicable, USCBP's Importer Security Filing requirement.

**ETHICAL BUSINESS PRACTICES**

Contractors and suppliers shall not offer bribes, gifts, discounts or other unlawful or unethical payments or compensation in dealings with public officials or individuals in the private sector to influence any act or decision or otherwise to secure a business advantage.

**MANAGEMENT SYSTEMS**

Contractors and suppliers should adopt a management system that provides processes, procedures and appropriate resources to ensure that the production facility consistently complies with the specific requirements and spirit of Nine West's Standards and local law. Contractors and suppliers should take all necessary corrective actions to remediate deficiencies identified by internal or external assessments, inspections and reviews.

**DOCUMENTATION AND INSPECTION**

Contractors and suppliers shall maintain on file all documentation needed to demonstrate compliance with these Standards and applicable laws and shall make these documents available for Nine West or its designated representatives at any time, whether or not notice is provided in advance.