

Global Compliance Program Requirements

Lands' End is committed to conducting business with a high standard of business ethics, a regard for human rights and in compliance with all applicable laws. Moreover, Lands' End expects its vendors to maintain similar standards in its entire supply chain, including but not limited to raw materials, fabric & trim suppliers, employee recruitment services as well as any secondary processing facilities whether owned, leased or contracted. While Lands' End recognizes that different cultural, legal and ethical systems exist in the countries where merchandise for Lands' End is manufactured, the Global Compliance Program Requirements and the related processes, policies and procedures further define and set forth certain basic and fundamental requirements that all domestic and international vendors must satisfy as a condition of doing business with Lands' End. The requirements are developed based on local and national laws, International Labour Organization (ILO) conventions and benchmarked against industry protocols.

Transparency & Participation. Lands' End expects vendors and their supply chain to be cooperative, open, honest and transparent.

<u>Compliance with the Law.</u> Lands' End will only produce merchandise in facilities that we consider reputable and whose business and labor practices conform to the requirements of applicable law and our Compliance Requirements. Where our Program sets a higher standard, it will prevail. Lands' End will not do business with companies that violate the law and will terminate factories that do.

<u>Health and Safety.</u> Conditions in all production and residential facilities must be safe, clean, structurally sound and consistent with all applicable laws and regulations and the Compliance Requirements.

<u>Fire Safety Risk.</u> All production and residential facilities must take all possible precautions to reduce the risk of fire and have adequate plans to protect the lives of the workers in the event of a fire. Facilities must adhere to all applicable fire safety laws and regulations in the countries where they operate.

<u>Child Labor</u>. No worker shall be employed under the age of 15, or under the age of completion of compulsory education or under the minimum age for employment in the country of manufacture, whichever is greater.

<u>Forced/Slave Labor, Human Trafficking.</u> We will not allow forced labor or human trafficking whether in the form of prison labor, indentured labor, bonded labor or forced labor by governments. Overtime hours must be voluntary and not excessive.

<u>Migrant Workers</u>. Shall not pay for any recruitment and should be provided with contracts prior to leaving country of origin in their local language, treatment, and wages that equal those of local workers. Dormitories (if applicable) shall be safe, clean and allow for freedom of movement.

<u>Harassment or Abuse.</u> No worker shall be subject to any physical, sexual, psychological or verbal harassment or abuse. Workers must be treated with dignity and respect.

<u>Discrimination.</u> Discrimination in employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination or retirement on the basis of gender, race, ethnicity, social origin, religion, age, disability, sexual orientation, national origin, or political opinion is prohibited.

<u>Working Hours.</u> Workers shall not be required to work (inclusive of overtime) more than the legally prescribed limits or 60 hours, whichever is less. One day off in every seven-day period shall be provided. Overtime hours will be voluntary and managed to reasonable levels. Production facilities shall comply with applicable laws that entitle workers to vacation time, leave periods and holidays.

<u>Wages and Benefits.</u> Wages are essential for meeting the basic needs of workers. Workers will be compensated by wages, including overtime pay and benefits which satisfy all applicable laws and regulations.

<u>Freedom of Association.</u> All workers must have the right to establish and join a legal organization of their own choosing, without being penalized for the non-violent exercise of these rights.

<u>Environmental Compliance.</u> Adherence to all local laws protecting the environment is required. Factories must conduct business to minimize the impact on the environment, including energy & greenhouse gases, air & water pollution including management of wastewater and consumption and responsible chemical usage..

<u>Notice and Record Keeping.</u> The Global Compliance Program Requirements must be posted in a location accessible to the workers in the appropriate local language. Factories must also maintain and make available sufficiently detailed records that enable Lands' End to determine their compliance with the Program.

<u>Factory Security.</u> **Vendors and their supply chain** must implement minimum security criteria and best practices to help secure our supply chain from terrorist activity. The criteria are based on a set of recommendations developed as a result of the Customs-Trade Partnership Against Terrorism (CTPAT) initiative with US importers.

<u>Violations.</u> To anonymously report suspected violations of the <u>Global Compliance Program Requirements</u>, please contact the Lands' End Global Compliance Department by e-mailing <u>compliance@landsend.com</u>.

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