



Compliance Program Guidebook

Section A1

Social, Labor and Security

Standard Operating Procedure

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1 INTRODUCTION TO THE LANDS' END COMPLIANCE PROGRAM

1.1 Compliance Commitment

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 as outlined in the Lands' End Vendor Code of Conduct. 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 facilities 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.

1.2 Transparency

1.2.1 Continuous Improvement

- Lands' End operates under a continuous improvement philosophy. Our goal is always to ensure human rights are respected in our supply chain, although we realize that challenges might be identified during the audit. As a result, our expectation is that facilities producing for Lands' End will openly and honestly discuss any deficiencies and concerns with designated audit service providers. In return, Lands' End believes that facilities need support and an opportunity to improve. Lands' End's goal is to empower and support suppliers and supplier facilities in reaching their full potential.

1.2.2 Transparency

- Lands' End expects facilities to be open, honest, and transparent with all records related to working hours and wages and will not tolerate facilities that are unwilling to be honest about real practices and engage in record falsification or bribery as a means of passing audits.
- Lands' End will NOT terminate business relationships with facilities that are honest and transparent about their actual practices, regardless of records-related issues identified unless the issue leads to a Critical finding (see Section 4.1 for more details). However, all facilities must be willing to make gradual improvements over a reasonable time-frame.

1.3 Contact Information

The Lands' End Compliance Team is the primary contact for all compliance program-related questions or comments. To contact the Compliance Team, please contact Compliance Manager Steven Peterson at steven.j.peterson@landsend.com or compliance@landsend.com

2 SCOPE AND REGISTRATION

2.1 Scope

All production processes and materials are included in scope, and all sites and subcontractors must be registered with Lands' End (see Section 2.3). All subcontractors must therefore comply fully with the Lands' End Compliance Program and will be subject to the audit process based on the type and extent of processing conducted. Failure to register or use of an unauthorized factory or subcontractor is subject to a monetary penalty up to \$10,000.

Any entity within an unapproved country (see Section 2.2) is not in scope and not eligible for the Lands' End supply chain.

Any factory located within one building which holds multiple businesses or tenants (e.g., each floor in the building is a different business license, and the factory producing for Lands' End is on Floor 3) is not eligible for the Lands' End supply chain without preapproval by compliance department.

2.2 Unapproved Countries and Regions

Lands' End does not allow production to take place in any countries which have been sanctioned or embargoed by the Office of Foreign Assets Control (OFAC). Vendors may not procure goods or engage in transactions of any kind with select people or entities that have been sanctioned by OFAC.

For a full list of currently sanctioned and embargoed countries, individuals, or entities, please refer to the [US Department of Treasury website](#) and [US Department of Homeland Security](#).

In addition, Lands' End reserves the right to restrict specific types of production from certain countries or regions based on risks associated with these locations.

2.3 Registration

All vendors and factories producing Lands' End product must be registered with the Lands' End Sourcing Team. Registration is required as soon as a factory is identified for production and before production begins. To register an additional factory or processing site, contact your Lands' End Sourcing Manager or Director to obtain forms for set up.

All registrations must disclose physical site addresses for any and all Lands' End production processes. If at any point an address changes, the registration must be updated.

Lands' End will consider registration exemption on a case-by-case basis for production that is not specifically made for the Lands' End brand.

3 PROGRAM GOVERNANCE & AUDITS

All factories producing Lands' End product are required to comply with the Lands' End Compliance Program Requirements, this SOP and the Supply Chain Partner Code of Conduct. Factories will be audited periodically (as defined below) to verify compliance.

3.1 Types of Audits

There are three main types of audits, with various audit scopes plus a certification equivalency audit. The main types of audits are:

- **Initial:** An initial audit takes place after new registration of a factory based on a risk assessment including projected volume and is the first Lands' End audit on site. Initial audits are full-scope, and usually cover both social and CTPAT security compliance.
- **Annual:** After the initial audit, regular full-scope audits will take place periodically to confirm compliance. These audits may happen annually, or at other intervals up to 36 months. This will be determined by Lands' End based on risk.
- **Follow-up:** Follow-up audits have a limited scope to specific issues or areas of concern (e.g., Corrective Action Plan from most recent audit) and generally take place in response to the results of a previous full scope audit. See section 4 for more details on follow-up schedules and triggers.
- **Desktop Equivalency:** Generally used after strong outcome on previous initial/annual audit or to review certification audit results for low risk or low volume factory. Lands' End will accept an audit report provided by the factory if it meets the following requirements:
 - (1) Accepted Industry Standards ERSA, BSCI, Better Work, SMETA, SA8000, SLCP, WRAP
 - (2) Conducted in last 12 months
 - (3) full report + CAP,
 - (4) completed by acceptable audit firm
- **Migrant Worker Module:** Factories with foreign or domestic migrant workers will be subject to additional audit protocols for human trafficking and forced labor.

At the time of the audit coordination (see Section 3.3), the scope will be clearly indicated. Most audits will, cover both social and security compliance.

3.2 Audit Process

The onsite social audit follows a consistent process:

- Opening Meeting - Introduction to the audit process and plan, interview management about the company background, sign pre-audit documents (e.g. Code of Ethics).
- Site Tour - Visual observation of entire site.
- Worker Interviews - Workers will be randomly selected in group and/or individual interviews. Interviews are confidential and auditors require a private space to speak with workers.
- Worker Surveys – Some audits will have an electronic survey that is distributed among the workers to fill out on a phone using a QR Code via a link or Facebook messenger. When worker surveys are used, worker interview samples are cut by 50%.
- Document and Record Review - Audit team reviews requested documents based the document list provided when the assessment is confirmed.
- Data Analysis and Cross Checking - Audit team reviews all provided

- information across all sources of evidence to form findings as well as best practices as applicable. See Transparency expectations in Section 1.2.2.
- Closing Meeting - Audit team reviews findings and best practices with management, as well as discuss next steps. Management is asked to sign the draft Corrective Action Plan to confirm understanding of the issues identified.

Note that piece rate workers must be paid for the time they participate in surveys and interviews.

3.3 Audit Cadence

With some exceptions (see Section 3), each facility producing for Lands' End must undergo at least one Elevate onsite audit every 12 to 36 months based on risk assessment including most recent results. Facilities must also satisfactorily complete their resulting Corrective Action Plan process within approved timelines (See Section 5).

Where necessary, some facilities may also be selected for a follow-up audit. This is determined on a case-by-case basis.

3.4 Audit Notifications

Audit notifications are sent via email by the audit firm to the primary factory and vendor contacts. Pre-Payment of audit fees is a requirement for scheduling all audits.

Audit notifications include facility profile information requests, a Code of Ethics letter, Non-Retaliation Policy Requirements, Assessment Frequently Asked Questions (FAQs), and the applicable Compliance Standard. The letters must be signed in acknowledgement before the audit begins, and the facility profile information must be provided and/or confirmed during audit coordination.

Audit notifications will also include the audit scope and a 14-day audit window, which must be confirmed during audit coordination.

If the factory does not respond to the audit notification after a reminder has been sent, Lands' End will proceed with the audit within the audit window provided.

3.5 Unannounced Audits

Some audits may be fully unannounced. In this case, the vendor and factory will not receive an audit notification. In these cases, the factory is still required to comply fully with the Compliance Program, including granting audit access to the audit team on the selected day(s).

3.6 Audit Delays and Denials

Vendors are responsible for ensuring that facilities are prepared for the audit, aware of the requirements, and otherwise comply fully with the Compliance Program.

Audit delays may be requested for valid reasons (e.g. national holiday), however delay requests are subject to approval by the Lands' End Compliance Team. If there is a valid reason why the audit cannot be conducted during the given timeframe, it is the responsibility of the vendor to contact the audit firm at least 7 days before the start of the audit window.

If the auditor is not granted full access to the facility, workforce, and all necessary documents, it will be considered an access-denied audit, and the vendor will be charged for the denied audit as well as the re-scheduled audit.

3.7 Audit Firms

All Lands' End compliance audits will be conducted by the approved audit firm ELEVATE. Audit coordination, execution, and part of the Corrective Action Plan process will be managed by ELEVATE

on behalf of Lands' End. For Desk Top Equivalency Audits of certification, Lands' End will accept certification audit by additional approved audit firms. Please request audit firm approval.

3.8 Audit Costs

Audit costs are based on a variety of factors, including factory location, number of workers, and travel expenses and include CAP management. The cost agreement is pre-determined by Lands' End and the audit firm and is non-negotiable. **Audit costs will be billed to the vendor prior to the audit.** The vendor is expected to promptly pay the invoice upon receipt, to avoid scheduling delays.

There are associated costs for cancellation or rescheduling, express booking, holiday or weekend work or travel, etc. For cancellation or rescheduling less than 5 business days prior to the audit window, 100% of the audit cost will be applied. For cancellation or rescheduling less than 7 business days prior to the audit window, 50% of the audit cost will be applied.

Lands' End reserves the right to deduct any outstanding audit fees from future payments due to the vendor.

3.9 Risk Assessment & Audit Exemptions

Lands' End will conduct a risk assessment and may exempt a factory up to three years, under certain conditions. Lands' End reserves the right to approve or deny any audit exemption requests. To request an audit exemption, ensure that one or more of the following three conditions is applicable to your facility, and contact the Lands' End Compliance Team for review and approval:

- Low Risk/History of Compliance: Factories with at least two scores over 80 for compliance audits with the Lands' End program, and is therefore considered low risk, a factory may be exempt from an audit for up to 36 months.
- Certifications: Certain certifications may exempt a factory from an audit, if the factory received an acceptable rating during their most recent audit, and the audit took place less than 12 months prior to the request.
- Production Volume or Location: In some cases, a factory may be allowed an exemption based on low production volume or location.
- **NOTE**: Factories with production for various large uniform clients or other special selling channels like wholesale or the university collection may not be allowed exemptions per additional client requirements.

4 AUDIT RESULTS & PRODUCTION

Audit results will be provided to the vendor and the factory via email. The results will include, at minimum, an audit score (see below) and a list of any identified non-compliances (see Section 5).

4.1 Social Results

4.1.1 Non-Compliance

- Each non-compliance is assigned one of five severities based on the audit findings: Zero Tolerance, Critical, Major, Moderate, or Minor.
- Zero Tolerance: A breach of a non-negotiable standard or local law. For more details on ZT issues, see Section 8.
- Critical: A severe breach of the standard or local law which represents imminent or critical threats to worker’s safety, life or which constitutes a critical breach of worker’s human rights or ethical business standards. For more details on Critical criteria, see Section 8.
- Major: An absence or total breakdown of social compliance system; a systematic or material breach of the standard or local law which poses an imminent and immediate, but not life-threatening, threat to workers’ safety or human rights.
- Moderate: A breach of the standard or local law which represents a danger to workers or infringes on workers’ human rights; The impact is less than those imposed by ‘major’ issue.
- Minor: An isolated failure or oversights which represents low risk to workers. A minor issue is not a systematic failure which can be reversed immediately.

4.1.2 Scoring

- Each audit will have a final score and associated grade range. The final score is calculated from the non-compliances identified during the audit.

Grade Range	Score	Audit Impact	Production Impact
Green	96-100	No follow-up required. Next annual between 18-36 months.	No impact.
	91-95	No follow-up required. Next annual between 12-30 months.	No impact.
Yellow	81-90	No follow-up required. Next annual between 12-24 months.	No impact.
Yellow	71-80	Follow-up may be required within 6 months. Next annual around 12-18 months.	No impact.
Orange	51-70	Follow-up will be required. Next annual around 6-12-months.	Production may be affected.
Red	26-50	Follow-up will be required.	Production may be affected.
	0-25	Follow-up will be required.	Production affected. Termination recommended.

4.2 Security Results

4.2.1 Scoring

- Each audit will have an overall score as well as individual section scores, and the resulting associated grade range. The overall score and the individual section scores are a percentage, calculated from the number of issues identified on-site.

Grade Range	Overall Score	Lowest Individual Section Score	Audit Impact	Production Impact
Green (A)	90%+	85%+	No impact.	No impact.
Yellow (B)	70%-89%	60%+	Follow-up may be required.	Production may be affected.
Red (C)	0%-69%	<60%	Follow-up will be required.	Production may be affected.

5 CORRECTIVE ACTION PLANS

When issues of noncompliance are identified during an audit, the Vendor will be required to complete a Corrective Action Plan and work with facilities to ensure the plan is executed. After each audit, the vendor and factory will receive an email from the audit firm with instructions for how to submit the completed CAP and supporting evidence.

The supplier is required to submit evidence of corrective actions for each violation within the specified timeline, ranging from 30-90 days. Lands' End expects factories to respond promptly to the audit firm to maximize the benefit of the service. If corrective actions require additional time, the supplier must provide a detailed plan and date for completion. Once the plan has been approved by the audit firm, vendors are then responsible for ensuring evidence of the plan progress and/or completion is submitted for review.

As a reminder, Lands' End supports continuous improvement. Lands' End recognizes that in some cases, such as working hours and social insurance improvement, a longer-term and gradual plan for improvement is necessary. It is therefore most important that the timelines in the plan are accurate and achievable, so that the plan can be followed once approved.

6 FACTORY TERMINATION

6.1 Process

If a factory is terminated for bribery attempt or any Zero Tolerance or critical non-compliance Lands' End may at its discretion cancel all orders not yet shipped.

If a factory is terminated for any other reason(s), the vendor and factory must:

- Complete and ship any orders currently in production within agreed-upon timelines
- Cancel or move to another approved factory any orders that have not yet begun production

In all termination cases, any posted Lands' End documents (e.g. Compliance Manual, the Global Compliance requirements, etc.) must be removed.

Before factory termination, vendors will receive an email from the Lands' End Compliance Team warning of the possible termination. This email will explain termination reason(s), any associated corrective actions before termination decision, and related timelines.

6.2 Reinstatement

Terminated factories may request reinstatement approval for production no sooner than 12 months after the termination date. Lands' End reserves the right to refuse or accept at any time for any reason.

If approved, before production may begin, the factory must:

- Complete an audit and receive a score of 90 or higher (Green)
- Complete the resulting CAP process

7 FILING A COMPLAINT

If any factory or vendor does not agree with an audit result, audit process, or any other aspect of the Lands' End compliance program, they may submit their complaint to the Lands' End Compliance Team at any time via email. The issue(s) will be investigated, and a response can be expected within 30 days.

8 GLOBAL COMPLIANCE REQUIREMENTS

This section outlines the Global Compliance Requirements by topic, and lists examples of the relevant Critical compliance criteria under each topic. See section 4 for more details on how Critical criteria may affect audit results, scoring, and more. The full social audit will cover each topic and include over 300 criteria.

8.1 Transparency & Business Integrity

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

Below are the relevant Critical and Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- The facility allows assessor(s) full access to its facility premises, workers, and records. (ZT)
- The facility had a business license for legal operation. (ZT)
- The facility does not attempt to bribe assessor(s) including offering any form of monetary compensation, gifts or favors. (ZT)
- Workers are not punished through monetary, physical, or other means, for participating in worker interviews. (ZT)
- The facility provides accurate and true payroll documents and time attendance records for review.

8.2 Compliance with the Law

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.

8.3 Child Labor

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.

Below are the relevant Critical and Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- There is no employee employed by the facility currently below the age of fifteen (15) or in breach of local minimum age for work or mandatory schooling (ZT).
- There is no employee employed by the facility historically below the age of fifteen (15) or in breach of local minimum age for work or mandatory schooling at time of employment.
- The facility has a system for identifying workstations and operations that are inappropriate for young workers according to applicable laws. The facility ensures juvenile workers do not perform work that jeopardizes their health, safety or morals (as defined by law/ILO Conventions 138 and 182).

8.4 Forced Labor and Migrant Workers

We will not allow forced labor or human trafficking whether in the form of prison labor, indentured labor, or bonded labor. Overtime hours must be voluntary. Migrant workers should be provided with contracts in local language before leaving country of origin and with wages and treatment equal to those of local workers.

Below are the relevant Critical criteria. This is not an exhaustive list of all criteria.

- The facility does not use any type of involuntary labor who are trafficked, prisoned (not in compliance with ILO Convention 29), bonded, or indentured, either at the facility itself, or a broker (ZT)
- The employees have the right to terminate their employment freely without being penalized financially, being threatened of physical or mental coercion or facing unlawful notice periods. For foreign migrant workers, if required by law, the facility pays for all travel costs for returning to their home.
- Workers should maintain possession or control over original government issued identification and personal documentation, such as passports, identity papers, travel documents, and other personal legal documents (ZT).
- The facility ensures that any amendments to contracts after workers' arrival meet local law, provide equal or better terms of employment. All amendments are written in a language that worker understands, have been explained to workers and are signed with their consent.
- All costs and fees associated with the recruitment and processing of workers either directly, or through a third-party agents / labor agency, are paid by the the employer and not charged back from workers. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker within 90 days after joining the facility / of discovery.
- The facility ensures that workers have full control of withdrawals from their bank accounts.
- There is no portion of worker's wages withheld for payment upon the end of the contract period. No mandatory saving program applicable or required for workers.
- All overtime shall be voluntary. The facility ensures that all employees have the right to refuse to work overtime hours without being retaliated. Grievance records do not show any allegation that overtime is not voluntary.
- There are no unreasonable restrictions on the movement of workers and their access to basic liberties at workplace and if applicable in employer-controlled dormitory / housing.
- Employees are free to leave the facility premises at end of their working shifts.
- Employees shall not be forcibly required to live in employer-owned or controlled housing. The freedom of movement of employees who live in employer-controlled housing shall not be unreasonably restricted.

8.5 Health and Safety

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.

Below are the relevant Critical and Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- There are no indications of possible structural collapse on the interior or exterior of buildings, such as large visible cracks or sagging in walls and floors.
- There are sufficient numbers of emergency exits at the facility (production floors, office areas, warehouse, etc.).
- Emergency exits are unlocked during working hours (including overtime).
- There are sufficient numbers of emergency exits on each dormitory floor as

- legally required.
- Dormitories are separated from production buildings and warehouses as legally required.
- There are sufficient numbers of emergency exits on each dormitory floor as legally required.
- Emergency exits in dormitory are unlocked.

8.6 Fire Safety Risk

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.

8.7 Harassment or Abuse

No worker shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

Below are the relevant Critical and Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- The facility does not tolerate and has committed to a workplace free of sexual harassment (ZT).
- The facility does not use any form of – or threat of – physical violence, including slaps, pushes or other forms of physical contact as a means to maintain labor discipline (ZT).
- The facility does not use any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language, as a means to maintain labor discipline.
- The facility does not use any form – or threat – of psychological abuse, such as forcing workers to sign letters of self-criticism or posting / publishing the names of workers subject to disciplinary measures as a means to maintain labor discipline.

8.8 Discrimination

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.

Below are the relevant Critical criteria. This is not an exhaustive list of all criteria.

- The facility does not, based on a woman's pregnancy, make decisions that result in dismissal, threat to dismiss, loss of seniority, or deduction of wages.
- The facility ensures that pregnant women are not engaged in work that creates substantial risk to the health of the pregnant woman or their reproductive health. Women that might previously have been in such roles should be offered alternative work at the facility.

8.9 Working Hours

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 must be voluntary. Production facilities shall comply with applicable laws that entitle workers to vacation time, leave periods and holidays.

Below are the relevant Critical criteria. This is not an exhaustive list of all criteria.

- The facility shall have an attendance tracking mechanism to record workers' attendance and hours of work (e.g. time cards, fingerprint and face recognition and manual).

8.10 Wages and Benefits

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.

Below are the relevant Critical criteria. This is not an exhaustive list of all criteria.

- The facility ensures that wages paid for regular worked hours are at least legal minimum wage or industry wage agreed within a collective bargaining agreement (CBA) whichever is higher.

8.11 Freedom of Association

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.

Below are the relevant Critical criteria. This is not an exhaustive list of all criteria.

- The facility respects the right of employees to freedom of association and collective bargaining. No employee shall be subject to harassment, intimidation, or retaliation in their efforts to freely associate or bargain collectively.

8.12 Environmental Compliance

Adherence to all local laws protecting the environment is required. Factories must conduct business to minimize the impact on the environment, including reducing waste and maximizing recycling initiatives.

Below are the relevant Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- The facility does not have severe environmental pollution, which is to be understood as pollution that is likely to spread widely from the site and where the effects will be very difficult or expensive to correct, including but not limited to: untreated industrial waste-water discharged, illegal landfilling and incarceration of waste on-site (ZT).

8.13 Notice and Record Keeping

The Global Compliance Program Requirements (Supplier website Section A Compliance Form AF 100) must be posted in a public location accessible to all workers at each and every factory where LE products are manufactured. The factories are responsible for the accurate translation and printing the requirements in all appropriate languages and local dialect when/ if applicable. Poster/s printed with a minimum poster size of ISO 216 A series paper, A2 (420mm X 594mm).

Factories must also maintain and make available sufficiently detailed wage, working hour, production records etc. that enable Lands' End to determine compliance with the Program. All outsourced factories involved in the secondary processes included but not limited to embroidery, embossing, silk screening, stamping, dyeing, washing, tufting, binding, latexing, storage of finished or packed goods, diecasting, molding, welding, weaving, polishing/grinding, etc. must also be registered and shall maintain the same requirements noted under this agreement.

Below are the relevant Zero Tolerance criteria. This is not an exhaustive list of all criteria.

- The facility does not use unauthorized subcontracting (ZT).

8.14 Factory Security

Factories 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.

For examples of relevant criteria, please refer to the most recent US Customs & Border Protection's Minimum Security Criteria.

Below are some examples of what will be checked on-site. This is not an exhaustive list.

- Does the facility maintain a log of all visitors entering the facility?
- Does the facility have a written security policy and security plan?

