

Lands' End

Supply Chain Partner Code of Conduct

Purpose:

Lands' End is committed to operating in an ethical and socially responsible manner while providing quality products to our customers. We view our contracted Partners and our overall supply chain partners (“Partners”) as an integral part of our business success and to establish relationships with them that are based on high standards for ethical behavior, integrity, trust and legal compliance. This Supply Chain Partner Code of Conduct outlines Lands' End’s expectations for all Partners in our supply chain who conduct business with our company. Each Partner is required to adhere to and comply with this Supply Chain Partner Code of Conduct (“Code”), and to educate itself, its employees, and its agents and representatives about this Code’s provisions. Partners should make sure their employee code of conducts align and share this same intent.

This Code may be amended by Lands' End from time to time. Its enforcement and its interpretation rests solely with Lands' End and does not confer or create any rights in favor of any party other than Lands' End.

Ethical Business Practices:

Lands' End commits itself to the values expressed in its Code of Conduct which sets forth the standards by which all Lands’ End employees promote a culture of integrity and legal compliance, including guidance and interactions with its Partners. Partners shall familiarize themselves with and support [Lands' End Employee Code of Conduct](#) , and the obligations and responsibilities of Lands' End employees under it. Partners shall not take any action, or refrain from taking any action, that would cause or reasonably be expected to cause, an employee to violate The Code of Conduct. Partners who conduct business with Lands' End must share its values and ethical commitments. Lands' End deals openly and ethically with our Partners. In return, Lands' End expects its Partners to:

- Comply with all national, provincial, local and other applicable labor and employment, health and safety, and environmental laws and regulations of the country where any and all goods described in any Lands' End purchase order is produced.
- Comply with all national, provincial, local and other applicable laws and regulations related to countering bribery and corruption, including, but not limited to, the Foreign Corrupt Practices Act (“FCPA”).

- Comply with all Customs requirements and regulations related to the process of exporting, transporting and importing products to be sold by Lands' End or any of its subsidiaries globally including Uyghur Forced Labor Prevention Act
- Partners may not produce merchandise, procure goods or engage in transactions with its supply chain for Lands' End with countries, entities and individuals which have been sanctioned by the Office of Foreign Assets Control ("OFAC")
- Maintain independence and impartiality in all business relationships.
- Never offer a Lands' End employee money or anything of value.
- Never engage in bribery or corruption or offer anyone an improper payment or gift for the purpose of obtaining or retaining business or securing an improper advantage with or for Lands' End.
- Ensure the confidentiality and security of Lands' End's confidential information.
- Cooperate with legitimate governmental investigations.
- Keep financial books and records in accordance with all applicable legal, regulatory, and fiscal requirements and with accepted accounting practices for the industry where Vendor operates.
- Support compliance with this Code by establishing appropriate management monitoring and compliance processes and cooperating with reasonable assessment processes as requested by Lands' End.

Working Conditions:

Lands' End is committed to having a diverse and inclusive workforce where everyone is treated with respect and dignity. Lands' End recognizes its responsibility to follow the employment and human rights laws of every country where it conducts business. We require Partners to adopt similar practices in their business operations and follow the Lands' End Global Compliance Requirements & Guidebook to:

- Encourage a diverse employee workforce and provide an employee workplace free from illegal discrimination or any other form of employment abuse.
- Maintain a safe and humane work environment and comply with all applicable laws regarding working conditions, including accident prevention, health and safety, fire safety, and electrical, mechanical and structural safety.
- Implement management systems and controls that identify hazards and assess control risks.
- Never use unlawful labor or forced labor, including use of prison, indentured, bonded, slave or compulsory labor and human trafficking in the supply of materials, products or services.
- Responsible recruitment of migrant employees:
 - No Partners' employees pay for their jobs and Partners will timely pay or reimburse any and all recruitment fees and expenses.

- All Employees will be informed of the basic terms of their employment prior to leaving home.
- Employees will retain control of all travel documents and have full freedom of movement.
- Partners must respect the right of workers to associate freely as permitted by and in accordance with all applicable laws and regulations.
- Ensure employees, contractors and service providers are not subject to physical, sexual, psychological or verbal abuse, coercion or intimidation.
- Treat employees fairly and honestly, including with respect to wages, working hours and benefits in accordance with all applicable laws and regulations.
- All employees shall be at least of legal age established by local law. If local law does not set a minimum age, employees must be at least fifteen (15) years of age. Official and verifiable documentation of each employee’s date of birth or a legally recognizable means of confirming each employee’s age shall be maintained by Vendor.
- 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 United States Customs-Trade Partnership Against Terrorism (“C-TPAT”)
- Develop processes and procedures for ensuring that material, component and service providers also conduct their business operations in a socially responsible manner.

Safe, Quality Products:

Lands' End requires that its merchandise meets the highest quality and safety standards in the industry and is committed to its products meeting or exceeding product safety requirements. To fulfill this requirement, Lands' End relies on its Partners to:

- Maintain accurate books and records related to compliance with product safety.
- Comply with applicable Lands' End standards, including the restricted substance list “RSL” and Lands’ End quality and standard operating procedures. Comply with all applicable federal and state product safety laws and regulations.
- Implement and maintain processes and procedures to monitor and test the safety and quality compliance of raw materials, packaging components and final products sold to Lands' End.

Environmental Impact:

Lands' End always seeks to use good judgment regarding the environmental impact of its business operations and to seek to develop programs, policies and procedures for minimizing or eliminating significant threats to the environment. Lands' End expects Partners to work with it to develop and continuously strive to improve the sustainability of its products, packaging and procedures. Lands' End expects Partners to:

- Understand and be aware of significant environmental impacts, both positive and negative, of business operations.
- Seek to reduce negative environmental impacts including energy and carbon emissions, waste generation, water usage and any discharges to the environment.
- Comply with all applicable environmental laws and regulations.
- Demonstrate sensitivity to environmental issues that may impact local communities.
- Develop processes and procedures for the proper and safe handling, storage, transportation and disposal of hazardous waste in full compliance with all laws and regulations.
- Provide environmental data as requested for industry goals like the HIGG Factory Environmental Module “FEM”

Socially Responsible Supply Chain:

Lands' End is committed to preventing the sale of products produced at the expense of communities, workers or the environment. Lands' End works with Partners who share our commitment to a socially responsible supply chain and expect our Partners to:

- Comply with all applicable laws and regulations, including state requirements, and Lands' End's standards and sourcing policies, including certification requirements.
- Develop processes and procedures for ensuring that material, component and service providers also conduct their business operations in a socially responsible manner including the Global Compliance Program Requirements
- Comply with Conflict Minerals regulations as outlined in the Lands' End Conflicts Minerals Policy.
- Participate in supply chain mapping and traceability efforts by Lands' End
- Maintain mapping and traceability information including material certifications and transaction documentation with your suppliers and your suppliers' suppliers up to the raw materials for review upon request.
- Cooperate with all verification audits of mapping and traceability reviews.

Audit Ethics:

Lands' End expects the highest standards of integrity in all aspects of the audit process. Lands' End expects full transparency from the Vendor during the audit process, including full and accurate disclosure of all labor, employment, health safety and environmental documentation. Any and all forms of bribery and corruption, deception and falsification of records is strictly prohibited. Any such finding may result in the termination of the business relationship.

Lands' End employees and independent auditors acting on behalf of Lands' End are prohibited from accepting gratuities from Partners with whom it presently does business, has done business or any entity that may be considered for future business. Gratuities includes gifts, money, trips,

meals, lodging or special favors. Failure to comply may result in the termination of the business relationship.

It is the Vendor’s responsibility to maintain the documentation to verify compliance with Lands' End’s Supply Chain Partner Code of Conduct and with all applicable laws and regulations and to make such documentation available upon request of Lands' End or its third-party auditor. Documentation includes, but is not limited to, licenses, permits, certifications, policies, procedures and employee and facility records.

Retaliation or penalty against any person who in good faith reports unlawful or inappropriate activity related to this Supply Chain Partner Code of Conduct and/or the audit process may result in termination of the business relationship.

Reporting of Questionable Behavior or Possible Violations:

It is the Vendor’s responsibility and obligation to ensure its employees, agents and representatives understand and comply with this Code. Additionally, the Vendor is required to inform Lands' End when the Vendor is aware of a violation of this Code.

Partners should report questionable behavior or a possible violation of this Code by e-mail to an officer of the company or compliance@landsend.com

In addition to the above, Partners can report questionable behavior or a possible violation of this code using our confidential ethics hotline website that is maintained by an independent service provider at www.landsend.ethicspoint.com

Conclusion:

Lands' End is committed to working with Partners to encourage legal and ethical compliance and sound business practices. The relationship between Lands' End and Partners is based on open dialogue and joint efforts. This Code is an integral part of Lands' End’s Vendor selection and retention process and Lands' End expects full and voluntary compliance with it.

Agreed and Acknowledged:

(signature)_____

Name of Supply Chain Partner:

(print) _____

Name and Title of Authorized Representative:

(print)_____

Date:
