

Madewell

CONFLICT MINERALS PROGRAM

As of July 30, 2019

POLICY

At Madewell, we believe that we have a responsibility to source our products in a legal, ethical and responsible manner consistent with the highest standards. The Responsible Sourcing program at Madewell is in place to clearly communicate our expectations to our suppliers and to monitor and improve working conditions at the facilities that manufacture products for Madewell.

Conflict minerals are certain minerals mined in conditions that support armed conflict and human rights abuses, particularly in regions in and surrounding the Democratic Republic of the Congo (DRC). The minerals include tantalum, tin, tungsten and gold (3TG). In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502 of the act requires that companies disclose whether minerals necessary to the functionality or production of their products originated from the conflict regions in and around the DRC. The purpose of this law is to raise public awareness about conflict minerals and promote the use of due diligence in conflict mineral supply chains in order to cut off funding to armed groups in conflict regions.

Madewell does not source or buy minerals directly. Nevertheless, we are concerned about the reported link between mining and armed conflict and human rights abuse in conflict regions. Madewell supports the goals and objectives of Section 1502.

As a company affected by the regulation, we have established a Conflict Minerals Program that uses a reasonable due diligence process as suggested by the Organization for Economic Cooperation and Development (OECD) guidelines and we are working closely with our suppliers to determine the presence of 3TG in our supply chain. We are committed to identifying the source of minerals that are required for the functionality or production of Madewell and Madewell branded products and to eliminating those minerals that may have originated at conflict mines.

Madewell expects its suppliers to fully cooperate with its requirements to ensure compliance with the Dodd-Frank requirements. Suppliers are expected to purchase materials from legitimate sources that can trace and verify that the materials provided are not involved in funding conflict. Failure to comply with Madewell requirements will result in reevaluation of our business relationship with the supplier.

DODD-FRANK REQUIREMENTS

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The conflict minerals reporting requirement in Dodd-Frank applies to any products that the company **contracts to manufacture** and where the minerals are **necessary to the functionality** of the product. A company is considered to be **contracting to manufacture** the product if it has some influence over the manufacturing of the product (including control over design or materials used in the product). The minerals must be **necessary to the functionality** or production of the product.

SUPPLIER REQUIREMENTS

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We have engaged with Source Intelligence® to assist in our conflict minerals compliance program. Source Intelligence will facilitate the data collection process on behalf of Madewell. Information provided will be collected, analyzed and stored within their secure system.

All suppliers are required to cooperate fully with Madewell requirements relating to conflict minerals compliance. Madewell and Source Intelligence send periodic reminders and follow up via phone and/or email with suppliers that fail to provide necessary information.

As needed, Madewell requests assistance from related agent and/or vendor contacts to assist in collection of necessary information. Failure by a supplier to provide the necessary information may result in a temporary block of purchase orders or termination of the relationship with that supplier. If a sub-supplier fails to provide necessary information, Madewell may require that the supplier cease working with that sub-supplier for Madewell merchandise.