

KATE SPADE & COMPANY

STANDARDS OF ENGAGEMENT

Kate Spade & Company upholds the highest standard of business ethics and regard for human rights. We follow the letter and spirit of all applicable laws, and require our business partners and suppliers to do the same. Suppliers must observe all applicable laws of their country, including laws relating to employment, discrimination, the environment and safety for the manufacturing of apparel, fashion accessories and other products sold by Kate Spade & Company. Suppliers must be transparent in all record keeping and embrace a fundamental effort toward operational efficiencies and continuous improvement. Suppliers must comply with all applicable United States and international laws relating to the import and export of products, including country of origin labeling, product labeling and fabric and product safety and testing. If local or industry practices exceed local legal requirements, the higher standard applies.

Forced Labor: There shall be no use of forced labor, including prison labor, indentured labor, bonded labor or other forms of involuntary labor.

Child Labor: No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.

Harassment or Abuse: Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological or verbal harassment or abuse.

Nondiscrimination: No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

Health and Safety: Employers shall provide a safe and healthy workplace and if applicable, safe and healthy living quarter conditions. Employers shall take necessary steps to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities.

Environment: Employers must comply with all laws and regulations relating to environmental protection in the countries where they operate. Employers should implement policies and procedures to ensure environmental impacts are minimized with respect to water; energy; air emission; waste, hazardous materials and other significant environmental risks.

Freedom of Association and Collective Bargaining: Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

Wages and Benefits: Employers recognize that wages are essential to meeting employees' basic needs. Employers shall pay employees, as a floor, at least the minimum wage required by local law or the prevailing industry wage, whichever is higher, and shall provide legally mandated benefits.

Hours of Work: Except in extraordinary business circumstances, employees shall not be required to work more than the lesser of 60 hours per week or the limits on regular and overtime hours allowed by the law of the country of manufacture. Employees shall be entitled to at least one day off in every seven-day period.

Overtime Compensation: In addition to their compensation for regular hours of work, employees shall be compensated for overtime hours at such premium rate as is legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate at least equal to their regular hourly compensation rate.

If you believe that these Standards of Engagement are not being upheld or if you have any questions regarding these Standards of Engagement, below is the contact information. Your identity will be kept in confidence.

By mail: 5901 West Side Avenue, North Bergen NJ 07047, USA, Att: Social Compliance Dept.

By email: Business_Ethics@katespade.com