

SANCTIONS / OFAC – Office of Foreign Assets Control

The [Office of Foreign Assets Control](#) (OFAC) of the U.S. Department of the Treasury administers and enforces laws imposing economic and trade sanctions based on US foreign policy and national security goals against targeted foreign entities deemed to be a threat to U.S. national security, foreign policy, or the economy.

Kate Spade is subject to US sanctions law, which generally prohibits Kate Spade from doing business with US sanctioned countries or persons, or from sourcing products from US sanctioned countries or persons, directly or indirectly. Violating US sanctions law is punishable by substantial criminal and civil penalties. In supplying products to Kate Spade, you agree that (i) no transaction will involve a US sanctioned country or person, (ii) no product will be sourced, or was sourced, from any US sanctioned country or person, and (iii) no product will contain any input that will be sourced, or was sourced, from any US sanctioned country or person.

For these purposes,

“US sanctioned country” means any country or territory that is the target of comprehensive sanctions imposed by the United States. As of the date of this Agreement, these countries/territories are **Iran, Sudan, Syria, Cuba, North Korea, and Crimea.**

“US sanctioned person” means any entity or individual that appears on, or any entity that is owned or controlled by an entity or individual that appears on, any sanctioned party list issued by the US Treasury Department’s Office of Foreign Assets Control (“OFAC”). The primary sanctioned party list is OFAC’s List of Specially Designated Nationals and Blocked Persons (“SDN List”). Entities and individuals are placed on the SDN List for a variety of reasons, including links to US sanctioned countries, terrorism, narco-trafficking, organized crime, proliferation, human rights violations, corruption, and regional instability. OFAC’s sanctioned party lists can be found on the OFAC web site at <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/consolidated.aspx>.

If you have any questions concerning these supplier restrictions or their application to a specific transaction or relationship, please contact Kate Spade’s *Legal Department* at 212 626 3155 or tmichno@katespade.com.