CALIFORNIA TRANSPARENCY IN SUPPLY CHAIN ACT

The act seeks to eliminate modern slavery, forced labor and human trafficking from product supply chains. Lands' End, Inc. has a Supply Chain Partner Code of Conduct that strictly prohibits the use of forced or compulsory labor of any kind, including prison labor, bonded labor, indentured labor, and human trafficking. **As a retail seller doing business in the state of California, to comply with our legal and ethical obligations we are supplying you with details of our efforts to address the issue of modern slavery, forced labor and human trafficking in our supply chain.**

Lands' End, Inc. has a Global Compliance Program to ensure that suppliers for Lands' End and all its subsidiaries comply with applicable regulations, standards and laws as well as Lands' End own internal standards related to child labor, wages and benefits, working hours, harassment/abuse, discrimination, health and safety, factory security, freedom of association, environmental compliance, forced labor and human trafficking.

A summary of specific efforts from the Lands' End Global Compliance Program includes:

- **Global Supplier Requirements.** All direct merchandise suppliers agree to the Lands' End Terms and Conditions for Purchase Orders which requires compliance with all Lands' End, Inc.'s standards and policies including the Global Compliance Requirements ("Requirements") when accepting an order from Lands' End.
- **Global Supplier Audits and Verification.** Tier 1 factories that produce Lands' End merchandise are assessed regularly by an approved third-party firm on our behalf. Specifically, the auditors are trained to review and assess high risk areas associated with modern slavery, forced labor and human trafficking, including but not limited to: 1) the presence of foreign or domestic migrant workers, 2) the availability of a formal grievance mechanism in the factory for workers to raise human rights issues, 3) the number of intermediaries between the factory and the migrant worker, 4) the use of labor recruiters and the process, 5) the recruitment costs passed on to migrant workers, 6) loans held by workers, 7) the terms and conditions of employment prior to leaving home country in the workers home country language, and 8) the handling of visas and passports. The inspections are conducted on site, and involve interviews with workers and management, a review of pertinent factory records, and a physical inspection of the factory and dormitory facilities.
- **Global Supplier Certification.** In addition to all merchandise manufacturers, our key fabric and component suppliers are required to certify and acknowledge the Lands' End Supply Chain Partner Code of Conduct, which extends this commitment to our supply chain and the suppliers of our suppliers. Based on current challenges confronting our industry relating to forced labor and in conjunction with sourcing more sustainable raw materials, Lands' End is also actively conducting further due diligence on the most at-risk areas of the raw materials in our supply chain.
- **Global Supplier Accountability.** Depending on the outcome of the audit, a detailed corrective action plan may be required and implemented. Regular follow-up visits are also conducted to ensure efforts are made to correct any violations. If a supplier is found to be actively engaged in violation of this policy, further disciplinary actions may be taken, including reimbursement of recruitment fees and as a last resort termination and reporting to law enforcement.
- **Global Supplier Training.** During the vendor onboarding process suppliers are advised of the Lands' End Global Compliance Program Requirements, Supply Chain Partner Code of Conduct , and additional resources available including the Compliance Program Guidebook. All auditors are trained to provide guidance during the inspection process as issues arise. For more challenging issues, vendor and factory leaders can access specific compliance resources located in certain countries to consult on process improvement methods.
- **Internal Training.** Training on all Requirements is provided by our lead audit firm to all 3rd party auditors who conduct social compliance audits on our behalf. In addition, Lands' End employees who visit factories as part of their job responsibilities are made aware of the indicators of modern slavery, forced labor and human trafficking, and are required to report any potential issues for further investigation.

For more information regarding Lands' End's efforts to address the issue of modern slavery forced labor and human trafficking in our supply chain, you may email compliance@landsend.com