

Madewell

**CALIFORNIA
TRANSPARENCY
IN SUPPLY
CHAINS ACT**

As of February 7, 2022

At J.Crew, 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 J.Crew 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 J.Crew.

We are proud of our efforts to monitor and improve working conditions around the world. We are pleased to provide more information about these efforts so that you, our customer, can be confident in your decision to purchase J.Crew.

As a company affected by the California Transparency in Supply Chains Act of 2010 (SB 657), we are providing the following information about our program and our efforts to source our products responsibly. The purpose of the law is to provide customers with the information they need to make responsible and informed purchasing decisions. Specifically, the information we have provided explains how we are working to evaluate and address any risks of slavery and human trafficking in our supply chain.

Our efforts to align with both the letter and the spirit of the law are as follows:

1. Engage in verification of the product supply chains to evaluate and address risks of human trafficking and slavery.

We have a robust Responsible Sourcing Program in place to evaluate and address risks in our supply chain, including the risk of slavery and human trafficking. We have three full-time associates dedicated to social responsibility, and we partner with leading independent organizations to implement various aspects of our program, including conducting factory inspections, trainings and remediation in the facilities that produce our goods.

The primary focus of our Responsible Sourcing Program is our direct suppliers—those vendors and factories that manufacture J.Crew products on our behalf. We assess factory risk and determine our inspection strategy based on location, previous inspection reports and volume of production placed. We conduct regular inspections at the suppliers that manufacture J.Crew products to monitor compliance to our Code of Vendor Conduct and related laws and regulations. All new factories are subject to inspection before any purchase orders are placed. Existing factories are typically inspected every 12 to 24 months unless follow-up is required, in which case we will inspect more frequently.

Similar to other retailers, our supply chain is complex and we have less visibility to the indirect suppliers that provide fabric, trim and other components to our direct suppliers and even less visibility to the origin of the raw materials of these components. Nevertheless, we recognize that we have a responsibility to identify risks and work to improve working conditions throughout our supply chain.

2. Conduct audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains.

We conduct regular inspections at the suppliers that manufacture J.Crew products to monitor compliance to our Code of Vendor Conduct and related laws and regulations. We carefully select and rely on independent external firms to conduct both announced and unannounced inspections of manufacturing facilities and to help guide our program. In partnership with these firms, we've developed inspection procedures that address all the provisions covered by our Code of Vendor Conduct, including the risk of human trafficking.

A typical inspection consists of document review, private worker interviews and a walk-through of the facility. When appropriate, we will also conduct surveillance and off-site interviews. When issues of noncompliance are identified, it is our practice to work with a supplier to become compliant with our Code of Vendor Conduct. We aim to provide suppliers with the tools they need to improve working conditions, including training and in-factory consultations, and we conduct reinspections when necessary to verify improvement.

We terminate a business relationship only as a last resort, if a critical issue of noncompliance is identified or when a supplier is unwilling to comply with our requirements despite our efforts to help them become compliant.

3. Require direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

We seek to work with suppliers that share our commitment to responsible business practices. The Code of Vendor Conduct is the basis for the Responsible Sourcing Program at J.Crew and sets forth the guiding principles that are expected of our suppliers. Our code prohibits the use of forced labor of any kind, including slavery and human trafficking.

Our vendors are contractually required to comply with our Responsible Sourcing Supplier Guidelines, which include our Code of Vendor Conduct, program policies and procedures and the requirement that our vendors do a reasonable inquiry to ensure that their own suppliers operate legally. We have communicated similar Responsible Sourcing expectations to the key mills that supply fabric for our products.

4. Maintain accountability standards for contractors failing to meet company standards regarding slavery and human trafficking.

We seek to work with suppliers that share our commitment to responsible business practices. Vendors are contractually required to comply with our Responsible Sourcing Supplier Guidelines, which include our Code of Vendor Conduct. Any failure to comply with our Responsible Sourcing Guidelines could lead to corrective action, up to and including termination.

5. Provide company employees and management who have direct responsibility for the supply chain with management training on human trafficking and slavery,

particularly with respect to mitigating risks within the supply chain of products.

The J.Crew production department is responsible for managing the relationship with our suppliers. Production and Responsible Sourcing work hand in hand to monitor supplier conditions and achieve program goals. All members of the Production team are required to participate in the University of Delaware's Risks of Human Trafficking and Slavery shortcourse webinar, designed specifically to provide relevant information to sourcing professionals. In addition, we regularly conduct training seminars for our Production team on our Responsible Sourcing requirements and how to consistently manage suppliers to achieve our Responsible Sourcing goals.

In addition to internal trainings, we regularly conduct Responsible Sourcing training seminars for suppliers. These seminars focus on our Code of Vendor Conduct, program requirements and other relevant topics, including working hours and overtime, health and safety and management systems.

UK Modern Slavery Act 2015

1. BUSINESS OVERVIEW

J.Crew Group, Inc. (J.Crew) is an internationally recognized multibrand apparel and accessories retailer that differentiates itself through high standards of quality, style, design and fabrics. We are a vertically integrated omnichannel specialty retailer that operates stores and websites both domestically and internationally. We source our merchandise by purchasing merchandise directly from trading companies and manufacturers and through the use of buying agents. Our sourcing base currently consists of over 200 vendors who operate 339 factories in 26 countries. Our top 10 vendors supply 34 percent of our merchandise. Each of our top 10 vendors uses multiple factories to produce its merchandise, which we believe gives us a high degree of flexibility in placing production of our merchandise. All agents, factories and suppliers are subject to the compliance policies set forth in this statement.

2. ANTI-SLAVERY & ANTI-HUMAN TRAFFICKING POLICIES

At J.Crew, we believe that we have a responsibility to source our products in a legal, ethical and responsible manner consistent with the highest standards. This includes our commitment to ensure that no forced labor, whether in the form of human trafficking or indentured labor is taking place in any parts of our business or in our supply chain.

To this end, all of our associates are expected to act professionally and ethically and comply with all applicable laws where we do business and must certify the Code of Ethics and Business Practices. If an associate believes that they are witnessing or suspecting unethical conduct, which they are unable to address with management or HR, they can call "The Open Talk Line" resource that allows associates to report concerns 24/7.

In our supply chain, all of our suppliers, factories and contractors are required to adhere to our Code of Vendor Conduct, which prohibits the use of forced labor of any kind, including slavery and human trafficking. Our vendors are contractually required to comply with our Responsible Sourcing Supplier Guidelines, which outlines our requirement that our vendors need to verify that their own suppliers operate according to our Vendor Code of Conduct principles.

3. RISK ASSESSMENT, DUE DILIGENCE & ENFORCEMENT

We have a comprehensive Responsible Sourcing program in place to evaluate and address risks in our supply chain, including the risk of human trafficking and slavery. Our inspectors are trained in identifying any potential risks of forced labor or human trafficking. We determine our inspection strategy based on country and industry risk as well as previous inspection reports.

We conduct both announced and unannounced inspections of manufacturing facilities. A typical inspection covers code elements ranging from health and safety, wages, working

hours to forced labor and consists of document reviews, private worker interviews and a walk-through of the facility. When appropriate, we will also conduct surveillance and off-site interviews. In cases where there is a higher risk of potential forced labor, we will conduct targeted inspections.

Should issues of noncompliance be identified during our inspections, it is our practice to work with suppliers to address these issues. We aim to provide suppliers with the tools they need to improve working conditions, including training and in-factory consultations, and we will conduct reinspections when necessary to verify improvement. However, we will terminate a business relationship if identified issues are not resolved to our satisfaction, if a critical issue of noncompliance is repeatedly identified or if a supplier does not share our commitment to the principles laid forth in the Vendor Code of Conduct.

4. TRAINING & CAPACITY BUILDING

All J.Crew associates are trained in the Code of Ethics and Business Practices and must complete a refresher online training once a year. Among other expectations, associates are expected to act professionally and ethically and comply with all applicable laws where we do business. Any failure to comply with the Code of Ethics and Business Practices could lead to corrective action, up to and including termination. Associates and management, who have responsibility in managing and monitoring our suppliers, have been trained on the risks of human trafficking and slavery.

In addition to internal trainings, we conduct Responsible Sourcing training seminars for suppliers. These seminars focus on our Code of Vendor Conduct program requirements and other relevant topics, including working hours and overtime, health and safety and management systems. In some cases, we have conducted specialized supplier training focusing on risks associated with migrant labor and additional requirements to ensure fair treatment.

5. EFFECTIVENESS

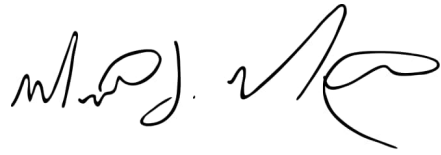
The principles laid out in our Code of Ethics as well as in our Vendor Code of Conduct aim to clearly communicate our zero-tolerance stance toward unethical conduct and any form of forced labor in our business or supply chain.

Our internal grievance mechanisms, as well as our continuous monitoring efforts at our factories, help us to identify risks and to assess whether our guidelines are being followed by our associates and supply chain partners.

Modern slavery and human trafficking are serious issues. Based on data from the International Labour Organization, there are currently as many as 21 million affected victims. We acknowledge the risks of forced labor in our global supply chain and understand the importance of the requirements of Section 54 of the UK Modern Slavery Act.

At J.Crew, we are committed to strengthening our internal processes, working with our suppliers as well as industry groups, governments and other stakeholders to develop strategies to address modern

slavery and human trafficking in our supply chain. This statement covers the reporting period for the fiscal year ending February 2, 2019, and has been approved by the Board of Directors of J.Crew.

A handwritten signature in black ink, appearing to read "M. Nicolson". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Michael Nicolson, Chief Operating Officer