

# STEVE MADDEN

## Modern Slavery Statement

This statement addresses the period from January 1, 2023, to December 31, 2023, in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act.

Steven Madden, Ltd. (“Steve Madden” or “the Company”) is committed to conducting its business according to the highest ethical and human rights standards in line with International Bill of Rights and the Conventions of the International Labour Organization (ILO). This statement outlines the steps taken by Steve Madden to detect and prevent modern slavery and human trafficking throughout our business and supply chains.

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires retailers and manufacturers doing business in California to provide consumers with information regarding their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale. The purpose of the Act is to increase the amount of information available to consumers about the efforts manufacturers and retailers are undertaking to prevent and eradicate human trafficking and slavery in their product supply chains, both in the United States and in international markets. The Act requires company disclosures in five (5) areas – verification, audit, certification, internal accountability, and training.

Similarly, the UK Modern Slavery Act of 2015 (the “MSA”) and the Australian Modern Slavery Act of 2018 (AMSA) require organisations who conduct business and supply goods and services in these respective countries to produce a statement describing their steps to ensure that they identify and mitigate modern slavery in their operations and supply chains.

Latest estimates show that forced labor and forced marriage have increased significantly in the last five years. The International Labour Organization, Walk Free Foundation and the International Organization for Migration Global Estimates indicate that 50 million people were living in modern slavery in 2021 according to the latest [Global Estimates of Modern Slavery](#) and 10 million more people were in modern slavery compared to 2016 global estimates.

Modern slavery is a human rights violation and a crime, yet it is still a global issue. Steve Madden adopts a zero-tolerance approach to modern slavery and is fully committed to preventing slavery and human trafficking in our operation and supply chain.

Steve Madden does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any supplier that uses involuntary labor of any kind, including prison labor, indentured labor, bonded labor, or labor obtained through human trafficking or slavery. Steve Madden requires all its suppliers and factories to comply with all applicable laws and regulations. Steve Madden also prohibits its suppliers and factories from using slave, forced, or prison labor, and expects them to prevent practices that could in any way contribute to human trafficking.

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## **OUR BUSINESS AND SUPPLY CHAIN**

Steven Madden, Ltd. and its subsidiaries design, source and market fashion-forward branded and private label footwear, accessories and apparel for women, men and children. We distribute our products through department stores, mass merchants, off-price retailers, shoe chains, online retailers, national chains, specialty retailers and independent stores throughout the United States, Canada, Mexico, Europe and certain other international markets. In addition, our products are distributed through our retail stores within the United States, Canada, Mexico and Europe and our joint ventures in Israel, South Africa, Taiwan and China, and under special distribution arrangements in certain European countries, the Middle East, South and Central America, and various countries in Asia, in addition to our e-commerce sites.

Steve Madden and its wholly owned subsidiaries are committed to conducting our business responsibly and transparently. Steven Madden is committed to working with manufacturers, Suppliers, and agents (hereafter “Suppliers”) that share the Company’s goal of maintaining socially responsible and sustainable business practices. Suppliers are required to comply with all (local) laws, rules, and regulations relevant to their business.

## **MANAGING RISK**

Within our business, we consider the risk of exposure to modern slavery to be the greatest in our product supply chain. Countries with a high risk of modern slavery in fashion supply chains include Brazil, China, India, Vietnam and Bangladesh.

In this past year, Steve Madden has continued to take actions to map our tier-one supply chain factories. Steve Madden products are predominantly manufactured in China, Cambodia, Mexico, Brazil, Vietnam, India, Portugal, Italy and Tunisia. We require our partners within our supply chain to comply with our Supplier Code of Conduct. Supplier relationships are critical to achieving our goals. We have established a compulsory requirement for all our suppliers to disclose their production factories and comply with our Supplier Code of Conduct, which incorporates international human rights principles.

## **CONTRACTUAL COMMITMENT TO ETHICAL STANDARDS & VERIFICATION**

Steve Madden includes in all its Manufacturing Agreements a Supplier Code of Conduct which requires all suppliers, factories and subcontractors (“Suppliers”) to take reasonable measures to ensure that labor standards are met and comply with all applicable laws. Suppliers accept these standards when they enter into Manufacturing Agreements with Steve Madden. Steve Madden does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any factory that uses involuntary labor of any kind. Suppliers are expected to take reasonable measures to ensure that subcontractors are made aware of and comply with these standards. We expect all suppliers to not only commit to the Supplier Code of Conduct but to permit ongoing monitoring to maintain compliance with our standards.

In 2022, Steve Madden released and distributed an updated Supplier Code of Conduct to include specific references to the MSA. In the Supplier Code of Conduct,

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Steve Madden requires all Suppliers to attest that:

- they don't use any form of forced compulsory or slave labor;
- their employees work voluntarily and are entitled to leave work;
- they provide each employee with an employment contract that contains a reasonable notice period for terminating their employment;
- they don't require employees to post a deposit/bond and don't withhold their salaries for any reason; and
- they don't require employees to surrender their passports or work permits as a condition of employment.

All factories must complete Steve Madden's Factory Profile Questionnaire as a requirement of doing business with Steve Madden. This questionnaire includes questions on forced labor and serves as a first indication and commitment from our suppliers.

The Company's General Counsel has the primary authority and responsibility for the enforcement of the Code of Business Conduct, subject to the supervision of the Nominating/Corporate Governance Committee and the Audit Committee of the Board of Directors. The Company will not tolerate any kind of retaliation for reports or complaints regarding misconduct that were made in good faith.

Steve Madden offers different channels for employees to report any suspicion of violations to a Hotline, operated by an external or independent third-party Company. We will work to enhance the tool to capture comments and feedback to measure worker wellbeing in our supply chain.

## **SUPPLIER DUE DILIGENCE & AUDITS**

Steve Madden uses various tools to verify that the factories that manufacture its products operate fairly and safely and address the risks of human trafficking and slavery. We value strong supplier partnerships and are investing in our associates in Asia to work with strategic footwear factories in implementing and elevating compliance to the Steve Madden Social Compliance Standard. Due diligence is conducted through the Steve Madden Supply Chain Visibility Process. Steps include collecting production factory information, requesting recent third-party audit reports, visiting factories, conducting second-party audits, following up on corrective action implementations, and providing training to supplier and factory compliance managers. We also require each strategic supplier to have at least one dedicated employee to manage social responsibility, including enforcement of fair labor practices, in their supply chains.

Steve Madden conducts on site audits in all production facilities, engages in announced and unannounced monitoring activities including confidential employee interviews, and contracts with third-party auditors to occasionally verify supplier compliance. Steve Madden determines which factories to audit based on specific risk assessments as well as the results of previous audits and other information obtained by the Company.

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## **CERTIFICATION**

Steve Madden requires all suppliers and factories in its supply chain to certify receipt, understanding, and acceptance of the Supplier Code of Conduct, which details the Company's own standards and policies as well as fair labor practices in general including laws concerning the use of child, prison, or forced labor, and against human trafficking and slavery. In 2022, Steve Madden overhauled our Supplier Code of Conduct strengthening our ethical standards and partner policies. The Supplier Code of Conduct, when revised, is distributed to Suppliers and requires each Supplier's acknowledgement, agreement, and certification of receipt in writing.

## **INTERNAL ACCOUNTABILITY**

Steve Madden seeks to do business with suppliers that share the Company's commitment and dedication to ethical and responsible business practices, and we encourage suppliers and factories to promote best practices and to work toward continuous improvement in their production operations and supply chains. The suppliers that share our commitment and dedication to this policy become and remain the Company's suppliers. The Company reviews and monitors its supplier relationships and may terminate a relationship with any supplier found to be in violation of the Company's standards.

The Company has a zero-tolerance policy for any factory or factory employee found to violate child labor, forced labor, slavery, or human trafficking standards or laws. Such a violation will result in immediate suspension or deactivation of the factory. This zero-tolerance policy is communicated to all suppliers.

Steve Madden is continuously working to implement an enhanced compliance program to ensure all employees and supply chains comply with all respective laws and the Company's standards regarding human trafficking, slavery and child labor in supply chains.

## **AWARENESS/TRAINING**

Steve Madden provides comprehensive training to all employees with direct responsibility for supply chain management and key contacts within our supply chains detailing the applicable laws and the Company's standards regarding human trafficking, slavery, and child labor in supply chains, particularly with respect to mitigating labor-related risks within our supply chains. The training program utilizes online training tools to reiterate the importance of compliance with the applicable laws and Company-specific policies and procedures regarding human trafficking, slavery, and child labor in supply chains.

## **MEASURING PERFORMANCE**

Steve Madden has defined a set of key performance indicators and controls to combat modern slavery and human trafficking in our organization and supply chain, which provide a basis for measuring supplier social responsibility performance and aid the factories in implementing sustainable improvements to become trusted suppliers and production facilities.

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## **CONTINUOUS IMPROVEMENT**

Steve Madden is committed to continually improving our processes and policies to identify and minimize the risk of modern slavery and human trafficking throughout our supply chain. We encourage collaborative, ongoing discussion of compliance challenges and encourage transparency and continuous improvement.

This statement has been approved by the Board of Directors  
and signed on (Date), by

Gregg Meyer  
Chief Sustainability Officer