

**Steven Madden, Ltd. Statement Pursuant to the
California Transparency in Supply Chains Act of 2010**

Steven Madden, Ltd. (“Steve Madden” or the “Company”) is committed to conducting its business according to the highest ethical and legal standards. Steve Madden requires all of our suppliers to comply with the applicable laws and regulations of the United States, and those of the country of manufacture or exportation.

Steve Madden supports the California Transparency in Supply Chains Act of 2010 (SB 657). The Act requires that retailers and manufacturers doing business in California disclose what efforts (if any) it takes to eradicate slavery and human trafficking from its direct supply chain 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 root out human trafficking and slavery in their product supply chains, both in the United States and abroad.

Steve Madden requires all of its vendors and suppliers to prohibit the hiring of slave labor, forced or prison labor, child labor, and further prevent practices that could contribute to human trafficking.

Specifically, to eradicate slavery and human trafficking from our supply chain, Steve Madden undertakes the following actions:

Verification

Steve Madden verifies its product supply chains to evaluate and address the risks of human trafficking and slavery through its Vendor Compliance Manual and the Customs Trade Partnership Against Terrorism Agreement (C-TPAT) process.

The Company does not knowingly employ any type of involuntary labor and will not knowingly conduct business with any vendor that uses involuntary labor of any kind including prison labor, indentured labor, bonded labor or labor obtained through human trafficking, slavery. Vendors are expected to take reasonable measures to ensure that suppliers and subcontractors are made aware of, and comply with, these standards. Vendors must not employ workers younger than the minimum working age established by applicable law in the country of manufacture or age 14, whichever is higher, unless such labor is in connection with a legitimate apprenticeship program that is strictly in accordance with local laws and all appropriate registration requirements of appropriate authorities. Vendors are responsible for complying with all local legal restrictions, including those laws that apply to work performed by workers under age 18 and those laws that limit younger workers’ ability to work due to compulsory schooling requirements. Vendors are expected to take reasonable measures to ensure that suppliers and subcontractors are made aware of, and comply with, these standards. Vendor compliance with these standards is verified through third party audits on behalf of customers, as well as Steve Madden’s own internal audits.

Steve Madden, and all of its divisions are certified members of C-TPAT since September 2004. Steve Madden has enacted robust C-TPAT procedures that require container security and integrity at all points of the shipping process, including a 7-point container inspection process to verify the physical integrity of the container structure prior to stuffing. C-TPAT verifications are conducted by third party audit companies, as well as by Steve Madden's own internal audit team.

Audits

Under the terms of the Vendor Compliance Manual, Steve Madden has the right to audit all of its vendors, conduct on-site inspections of vendor facilities and engage in announced and unannounced monitoring activities, including confidential employee interviews, to ensure compliance. Steve Madden audits its vendors based on a vendor's risk assessment as well as the results of previous audits and corrective action plans. Generally, audits are conducted on at least an annual basis, except in cases of known violations where audits are done more frequently. Audits of high risk vendors are usually conducted on a weekly basis. Audits of medium risk vendors are usually conducted monthly, and low risk vendors are usually audited on a quarterly basis.

Certifications

Steve Madden requires all vendors in its supply chains to certify receipt, understanding, and acceptance of its Vendor Compliance Manual. The Vendor Compliance Manual details the Company's required standards and policies that all vendors must comply with; failure to comply may lead to termination of the vendor relationship. The Vendor Compliance Manual provides Company policies and procedures regarding legal requirements, safety procedures, and integrity processes, including the C-TPAT process. The Vendor Compliance Manual also requires vendors to comply with all applicable laws, including fair labor practices, laws concerning the use of child, prison or forced labor, and human trafficking.

To evaluate compliance with our policies in the supply chain, including, without limitation, compliance with the Company's standards regarding human trafficking and slavery in supply chains, we periodically review our Vendor Compliance Manual and distribute revised versions to our vendors asking that they review, acknowledge and agree to the updated terms contained in the revised manual. The Company will review and monitor its vendor relationships and may terminate a relationship with any vendor found to be in violation of the Company's standards.

Internal Accountability

Steve Madden seeks to do business with vendors that share our commitment and dedication to ethical and responsible business practices and we encourage our vendors to promote best practices and work towards continual improvement throughout their production operations and supply chains. As such, it is those vendors who share our commitment and dedication to this policy that become and remain the Company's vendors. The Company will review and monitor its vendor relationships and may terminate a relationship with any vendor 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 vendors.

The Company's Code of Business Conduct and Ethics explicitly requires all employees to respect the laws of the cities, states, and countries in which we operate and prohibits any employee from committing an illegal or unethical act, or instructing another to do so. Indeed, compliance with our policies is continuously monitored and subject to review by the Company. Each manager of the Company is responsible for ensuring that the principles set out in our policies are communicated to, and are understood and observed by, all employees and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of our policies are directed to report it to their supervisor or senior management. We recognize that employees may be reluctant to report concerns for fear of retaliation and we will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith.

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

Training

Steve Madden is working to craft a comprehensive training program for all employees, management, and key contacts at supply chains detailing the applicable laws and the Company's standards regarding human trafficking, slavery, and child labor in supply chains. The training program will ultimately include a combination of in-person training sessions and 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.