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## Global Compliance

### Global Compliance Program for Merchandise Vendors and Factories

The Sears and Kmart Global Compliance Program for merchandise vendors and factories is designed to help ensure that Transformco's production facilities operate according to the Program requirements and all applicable local laws governing such issues as child labor, wages, benefits, working hours, harassment, health and safety and factory security.

One of the benefits of the Global Compliance Program is fewer or less frequent audits for factories with high compliance performance levels and effective internal systems to manage labor and social issues. Additionally, the Program places a strong emphasis on ways that we can support remediation and continuous improvement within the Sears and Kmart supply chain.

The Program was established to protect the integrity of Transformco's brands, and to hold all factories accountable to a set of generally accepted employment standards and workplace practices that we refer to as the [Global Compliance Program Requirements](#). This document provides a description of each requirement and must be posted in every factory producing merchandise for Sears and Kmart.

The [Global Compliance GUIDEBOOK to Program Requirements](#) was developed to help production facilities understand the details of our Global Compliance Program and what is necessary to improve compliance levels. The manual provides indicators of compliance and non-compliance for each requirement, and outlines good management practices for factories.

While we expect adherence to the Sears and Kmart Global Compliance Program requirements as outlined in the [GUIDEBOOK](#), we understand that full compliance can be challenging for some factories. Therefore, our goal is to work with factories that are honest and transparent, and committed to making continuous improvements. However, factories that fail to be honest and transparent or show limited response to outstanding compliance issues will be terminated.

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