

CA Transparency

Nine West, LLC.

Statement for the California Transparency in Supply Chains Act (SB 657)

Nine West, LLC. (the “Company” or “we”) is committed to legal compliance and ethical business practices in all of our operations worldwide. We choose suppliers and contractors who we believe share that commitment.

We take the risks of slavery and human trafficking in our supply chain very seriously. Like many companies manufacturing or selling products in California, we are required to comply with the California Transparency in Supply Chains Act of 2010 (California Senate Bill 657) beginning in 2012. That law was designed to increase the amount of information available to consumers about the efforts of manufacturers and retailers to eliminate the risk of modern day slavery, forced labor, human trafficking and similar human rights violations (“slavery and human trafficking”) from their supply chain. Accordingly, below are some examples of how we are working to eliminate that risk from our supply chain.

1. **RISK ASSESSMENT.** The Company internally assesses the risk of slavery and human trafficking with respect to the supply chain for all of its products. To judge which of its sourcing countries presents the highest risk levels, the Company utilizes several resources, including the U.S. State Department’s annual Trafficking in Persons Report’s country rankings, the United Nations Office on Drugs and Crime’s Global Report on Trafficking in Persons, the Director General of the International Labour Organization’s reports on forced labor, and the U.S. Department of Labor’s List of Goods Produced by Child Labor or Forced Labor. The Company continuously assesses its risk as these resources are updated and as new, credible resources become available.

2. **AUDITS.** The Company conducts audits of its direct suppliers to evaluate compliance with the Company’s Standards for Contractors and Suppliers, which include standards for slavery and human trafficking in the supply chain. To determine factory selection and timing for audits we look at several criteria, including factory location (country), size, workforce composition and past compliance performance, if available, to determine facility risk and audit priority. In addition to our internal staff, we retain a number of recognized, unaffiliated third party workplace compliance audit firms to conduct both announced and unannounced factory audits on our behalf. The Company utilizes a scorecard system to assign risk levels to suppliers objectively based on audit results. The scorecard concept is a data-driven process, with the underlying premises that not all violations should be treated equally and that some findings are more serious and not as easily corrected as others. By comparing audit results, the scorecard system allows the Company to evaluate and determine where monitoring is needed most. Over time, audit scores reflect the compliance status of a factory, making it a useful tool for internal production divisions to benchmark their factories, vendors and agents when making sourcing decisions. The Company also supports ongoing supplier improvements through training and technical assistance.

3. **SUPPLIER CERTIFICATION.** The Company requires that all of its suppliers comply with applicable laws within their country of business regarding slavery and human trafficking. Since 1996, the Company has required all of its contractors and suppliers to adhere to its Standards for Contractors and Suppliers, which, among other things, prohibits child labor and any form of forced, compulsory, bonded, indentured or prison labor and requires compliance with applicable laws and regulations regarding health and safety in working conditions. In addition, as part of the Company’s purchase order and commercial invoice processes, factories are required to certify compliance with the Company’s Standards concerning elimination of the risk of slavery and human trafficking practices in their supply chains.

4. **ACCOUNTABILITY STANDARDS AND PROCEDURES.** All Company employees and agents with production, sourcing or quality control responsibilities, as well as internal buying offices and trading companies doing business with the Company, are provided with copies of the Company’s compliance program policies and procedures related to the enforcement of its Standards for Contractors and Suppliers. These policies and procedures, which are outlined in our Corporate Compliance Operations Manual, include issuance of zero tolerance notifications for violations of the Company’s prohibition on use of child or forced labor and implementation of corrective action plans. In the case of non-compliance, the Company examines the specific situation and develops an appropriate strategy for resolution.

5. **TRAINING.** The Company conducts internal training of its managers and employees with direct responsibility for supply chain management that specifically raises awareness of slavery and human trafficking and focuses on mitigating the risks within our supply chain. In addition, the Company’s internal corporate compliance employees, as well as third party monitors contracted to audit facilities in the Company’s supply chain, have participated in training jointly developed and delivered by the United Nations Global Initiative to Fight Human Trafficking (“UN.GIFT”) and the International Labor Organization (“ILO”). That training helps internal and external monitors to

thoroughly monitor the risk of forced labor in the Company's supply chain and to develop and deliver training programs for agents, vendors and other supply chain partners on the issue, including how to identify and mitigate forced labor and trafficking risks in their recruitment processes.

The Company also conducts training programs targeted to suppliers on topics that support awareness of the Company's Standards for Contractors and Suppliers to ensure the appropriate participants in supply chain management are knowledgeable concerning the Company's requirements for suppliers. The Company encourages its agents, vendors and suppliers to participate in seminars and training programs on social compliance issues (including the issues of slavery and human trafficking) to further raise awareness of the issues and mitigate the risks within the Company's supply chain.

GET 15% OFF WHEN YOU SUBSCRIBE!

CUSTOMER CARE ORDER ASSISTANCE

Enter Your Email Address*

SIGN UP

TRACK YOUR ORDER

Privacy Policy

CA Transparency

Shipping & Returns Policy

Size & Measurements

RETURN AN ITEM

ACCESSIBILITY

Turn On Accessibility Assistant

Enable Accessibility

© 2020 Nine West.
LLC.

