



## TAPESTRY, INC. SUPPLIER CODE OF CONDUCT

Tapestry, Inc. and its subsidiaries and affiliates (the “Company” or “Tapestry”), operates a global business. The Company is committed to conducting its business, and procuring products and services around the world in a manner which is conducive to good global citizenship as well as enhancement of the Company’s reputation, image and commercial success.

The Company expects the companies with whom it procures products and services to comply with all applicable laws and regulations, to treat their employees fairly and with dignity and respect, to be socially responsible citizens in the countries and communities in which they operate, and to embrace the Company’s high standards of ethical behavior.

Accordingly, the Company has enacted the following **Supplier Code of Conduct**. Tapestry expects all companies from whom it procures products and services to be bound by this Supplier Code of Conduct. Please note that this code supersedes the Coach, Inc. supplier selection guidelines.

“Suppliers” include contractors, joint venture partners and suppliers of goods and services, including raw material suppliers.

### 1. Ethical Standards

The Company will only do business with those suppliers who embrace high standards of ethical business behavior and who demonstrate commitment to those standards through rigorous practices.

### 2. Legal Requirements

The Company is committed to full compliance with all laws and regulations in the locations where the Company operates and conducts business, and will not knowingly operate or use suppliers who operate in violation of any such law or regulation.

### 3. Anti-Corruption:

The Company is committed to working with suppliers who do business in an honest and transparent way. In accordance with the US Foreign Corrupt Practices Act of 1977, and other applicable international laws, suppliers may not pay bribes or otherwise make

improper payments. This means that Tapestry suppliers must not, directly or indirectly, offer, pay, promise to pay, authorize the payment of, any financial or other advantage, or anything else of value, to any person for the purpose of securing an improper advantage for the supplier or the Company. This includes any attempt to impact the objectivity of third party representatives appointed by Tapestry to carry out inspections or compliance audits. The Company’s Anti-Corruption Policy can be found at <http://www.coach.com/governance-document.html>

### 4. Environmental Requirements & Sustainability

The Company believes in doing business with those suppliers who share the corporation’s commitment to the environment, and who pursue practices which conform to applicable environmental standards. The

Company expects suppliers to promptly develop and implement plans and programs to correct any non-compliant environmental practices. This includes, but is not limited to, complying with all applicable local environmental laws and regulations. As regulations change in the future, the Company expects its suppliers to comply with any new environmental regulations.

Sustainability has long been a part of how the Company does business. The Company publishes an annual sustainability report that describes its strategy and commitment to the environment and social responsibility. You can find the report at: <http://www.coach.com/sustainability-report.html>

#### **5. Conflict Minerals:**

As a publicly traded US Company, the Company is required to disclose the use of “Conflict Minerals” required for the functionality of its products. Conflict Minerals come from the Democratic Republic of Congo and surrounding countries and include Tin, Tungsten, Tantalum and Gold (3TGs).

Any 3TGs used in the production of Company products, and the applicable smelters, must be disclosed to the Company. during its annual Conflict Minerals survey. The Company also encourages its suppliers to look for conflict-free certified sources when sourcing 3TGs. For additional information, please refer to Tapestry’s Conflict Mineral policy at <http://www.coach.com/conflict-minerals-policy.html>

#### **6. Slavery & Human Trafficking:**

In compliance with the *California Transparency in Supply Chains Act (SB 657)* and the *UK Modern Slavery Act of 2015*, Tapestry will not knowingly use suppliers who employ slave labor or support human trafficking. You can find the Company’s policies at: <http://www.coach.com/governance-document.html>

#### **7. Animal Welfare:**

The Company has adopted an animal welfare policy in order to ensure the humane and ethical treatment of the animals used in the production of Company product. You can find the Company’s policy at: [www.coach.com/governance-document.html](http://www.coach.com/governance-document.html)

#### **8. Employment Practices**

**Working Hours:** The Company will not knowingly use suppliers who fail to comply with the legal maximum working hours as specified by each country’s standards and laws.

**Child Labor:** While the legal definition of “children” may vary from country to country, the Company will not knowingly do business with suppliers who employ individuals who are under 15 years of age.

**Forced Labor:** The Company will not knowingly use suppliers of either raw materials or finished product that have been produced by involuntary or forced labor, whether indentured, bonded, prison or labor obtained through slavery, human trafficking or otherwise, nor will the Company use services provided by such labor.

**Discrimination:** The Company believes that people should be employed on the basis of the ability to do the job, rather than on the basis of personal characteristics or beliefs. Suppliers must not discriminate against their employees on the basis of personal characteristics or beliefs, such as age, race, color, creed, ethnicity, nationality, alienage, citizenship, social origin, gender, religion, marital status, sexual orientation, gender, identity, genetic characteristics, maternity status, military status, disability or political beliefs, or any other legally-recognized protected basis prohibited by applicable law, at any stage of the employment relationship.

#### **Harassment & Disciplinary Practices:**

Tapestry suppliers must treat all workers with respect and dignity. No worker will be

subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.

**Health & Safety:** The Company believes in doing business with those suppliers who have demonstrated concern for and commitment to the health and safety of their employees.

**Wages & Benefits:** Suppliers must meet all legal requirements to ensure that minimum wages are adhered to, any and all overtime is paid for, and any benefits due to the employees are satisfied.

This section is inclusive of all types of labor such as full or part-time, shift, migrant and/or seasonal, contractors, consultants, and anyone else employed by any means of compensation.

Additionally, Tapestry will favor those suppliers who are proactive in contributing to the continued education and betterment of its employees.

## **9. Privacy & Security**

The Company requires its suppliers to comply with applicable privacy and data protection laws, and to maintain privacy and security policies and controls that meet or exceed all applicable legal and regulatory requirements.

## **10. Confidential, Proprietary and Personal Information**

One of the Company's most valuable assets is information. Suppliers must safeguard the Company's confidential and proprietary information,, by keeping it secure, limiting access to those who have a need to know to perform their jobs and avoiding discussion of confidential information in public areas. The obligation to preserve the Company's confidential information, and that of its employees, business partners and customers, is ongoing, even if the relationship between the Company and the supplier is terminated.

The supplier must take all necessary precautions to make sure that the information is not stolen, wrongly disclosed or illegally used.

## **11. Accuracy of Business Records**

Honest and accurate recording and reporting of information is essential. Every business transaction must be recorded correctly and in a timely manner. The Company therefore expects suppliers to be candid and accurate when providing or entering such information. Suppliers should not make false or misleading entries into their financial reporting systems. Internal controls should be established to ensure accurate business records are maintained.

## **12. Conflicts of Interest**

The Company and its employees have an obligation to act in the best interests of the Company. Actions must be based on sound business judgment, not motivated by personal interest or gain. Any situation that creates or appears to create a conflict of interest between personal interests and the interests of the Company must be avoided.

Any situation, including any relationship or transaction between the Company and any of its or its suppliers' employees or family members of employees, that creates or appears to create a conflict of interest between personal interests and the interests of the Company must be avoided.

The best way to avoid conflict of interest situations is to immediately disclose any situation that has the potential to be misunderstood by others, including other employees, customers, suppliers and the public. Both Tapestry employees and suppliers with whom Tapestry does business must disclose to the Company any actual or potential conflict of interest.

## **13. Compliance**

To ensure that the Company's suppliers are fulfilling their obligation, the Company reserves the right to conduct audits and can

use internal or external parties to conduct those audits. An audit may consist of a factory/company walk-through to evaluate the physical working conditions, as well as health and safety practices; confidential interviews with workers to provide freedom to speak on potential misconduct; and a review of all relevant documentation (e.g. payroll, time records, employee age verification, licensures, certificates, waivers, etc.).

If a factory visit reveals an issue that requires improvement the Company expects that all suppliers will take necessary corrective action to promptly remediate any non-compliance.

#### **14. Communication:**

Tapestry suppliers must communicate these principles and guidelines to their workers and supervisors.

#### **15. Known Violations**

You are required to report any known violations of this Supplier Code of Conduct, including the policies referenced herein. If you have questions, need to make disclosures, or are concerned about conduct that you believe violates the Company's standards or the law, contact the Law Department at 212-615-2436. You may also report a matter (anonymously, if desired) by contacting the Coach Ethics and Compliance Reporting System online at <http://www.coachinc.ethicspoint.com>, or call a representative, at 1-800-396-1807 (for matters in the United States) or the international phone numbers available at <http://www.coach.com/contact-board.html>.

**Doing business with Tapestry means that you acknowledge the Company's Supplier Code of Conduct and commit to doing business with the Company according to these terms. The Company reserves the right to terminate its business relationship with any supplier who is unwilling to comply with this Supplier Code of Conduct.**