Corporate Intormation



In January of 2012, the state of California passed the Transparency in Supply Chains Act (the "Statute"). This Statute requires companies that conduct business in California to disclose their efforts to eradicate slavery and human trafficking from direct supply chains. More specifically, this Statute requires that companies disclose to what extent, if any, they address each of the five points

DO YOU ENGAGE IN VERIFICATION OF PRODUCT SUPPLY CHAINS TO EVALUATE AND ADDRESS RISKS OF HUMAN TRAFFICKING AND SLAVERY?

Vera Bradley's Supplier Code of Conduct prohibits the use of forced, involuntary, or child labor of any kind in our supply chain Suppliers may not participate in, or benefit from, any form of forced labor (including prison labor, indentured labor, bonded/debt labor, sale labor, etc.). Before we engage with a potential supplier, a Vera Bradley Auditor or third-party audit provider conducts an on-site audit to evaluate each potential supplier's ability to comply with our Supplier Code of Conduct.

DO YOU CONDUCT AUDITS OF SUPPLIERS TO EVALUATE SUPPLIER COMPLIANCE WITH COMPANY STANDARDS FOR TRAFFICKING AND

Each facility of any supplier conducting business with Vera Bradley is subject to an audit to ensure that they are in compliance with our Supplier Code of Conduct. The audits are performed by either a trained Vera Bradley Auditor or a third-party audit provider who employs experts in local laws and who speak the local languages. The frequency of audits for each facility is based on factors such as prior risk assessment and previous audit results. Our goal is to audit each facility once per year. Currently our audits are scheduled with the suppliers due to the amount of time and resources required on-site to complete all audit requirements.

DO YOU REQUIRE DIRECT SUPPLIERS TO CERTIFY THAT MATERIALS INCORPORATED INTO THE PRODUCT COMPLY WITH THE LAWS REGARDING SLAVERY AND HUMAN TRAFFICKING OF THE COUNTRY OR COUNTRIES IN WHICH THEY ARE DOING BUSINESS?

Vera Bradley requires all finished goods suppliers, as well as any direct-sourced component suppliers, to be in compliance with our Supplier Code of Conduct in addition to any applicable laws within the country of origin regarding slavery and human trafficking. We ask all suppliers to certify that the production of any additional materials incorporated into the product comply with the applicable laws regarding slavery and human trafficking of the countries with whom they are doing business

DO YOU MAINTAIN INTERNAL ACCOUNTABILITY STANDARDS AND PROCEDURES FOR EMPLOYEES OR CONTRACTORS FAILING TO MEET COMPANY STANDARDS REGARDING SLAVERY AND TRAFFICKING?

Our Supplier Code of Conduct states that any discovery of forced labor or human trafficking shall be treated as a zero-tolerance violation, which requires immediate corrective action by the supplier. In the event of a zero tolerance violation, Vera Bradley reserves the right to refuse to begin, or to terminate, a business relationship, regardless of any corrective action taken.

DO YOU PROVIDE COMPANY EMPLOYEES AND MANAGEMENT, WHO HAVE DIRECT RESPONSIBILITY FOR SUPPLY CHAIN MANAGEMENT, TRAINING ON HUMAN TRAFFICKING AND SLAVERY, PARTICULARLY WITH RESPECT TO MITIGATING RISKS WITHIN THE SUPPLY CHAIN OF

Vera Bradley is currently working towards training all employees, management, and third-party audit providers who work with our supply chain with regards to the risks of human trafficking and slavery as well as what actions can be taken to mitigate these risks.

Vera Bradley, Inc. believes that its commitment to integrity, human rights, and social responsibility extends to its global supply base We support ending the violence and human rights violations in the mining of certain minerals from a location described as the "Conflict Region", which is situated in the eastern portion of the Democratic Republic of the Congo (DRC) and surrounding countries. The U.S. Securities and Exchange Commission adopted final rules to implement, as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. The rules require public companies to disclose basis whether the products they manufacture or contract to manufacture contain "conflict minerals" that are "necessary to the functionality or production" of those products and report to the SEC on an annual basis

The definition of "conflict minerals" refers to gold, as well as tin, tantalum, and tungsten, which are the derivatives of cassiterite, columbite-tantalite, and wolframite, regardless of where they are sourced, processed or sold. The U.S. Secretary of State may designate other materials to this list in the future. We support these requirements to further the humanitarian goal of ending violent conflict in the DRC and surrounding countries, which has been partially financed by the exploitation and trade of "conflict minerals"

- Support the aims and objectives of the U.S. legislation on the supply of "conflict minerals".
- Do not knowingly procure specified metals that originate from facilities in the "Conflict Region" that are not certified as "conflict free"
- Ensure compliance with these requirements, and ask our suppliers to undertake reasonable due diligence with their supply chains to assure that specified metals are being sourced only from:

 • Mines and smelters outside the "Conflict Region" or

 - Mines and smelters that have been certified by an independent third party as "conflict free" if located within the "Conflict Region"

This due diligence includes having our suppliers provide written evidence documenting that raw materials used to produce gold, tin, tantalum and tungsten, used in the materials to manufacture components and products supplied to Vera Bradley, Inc., originate from outside the "Conflict Region" or if they originate from within the "Conflict Region", that the mines or smelters be certified as "conflict free" by an independent third party. The aim is to ensure that only "conflict free" materials and components are used in products that

If we discover the use of these minerals produced in facilities that are considered to be "non-conflict free", in any material, finished good, or component we procure, we will take appropriate actions to transition that product to become "conflict free"

