



## Transparency in Supply Chains Act Disclosure

This disclosure is provided pursuant to the California Transparency in Supply Chains Act of 2010, Section 1714.43 of the California Civil Code, which requires retailers and manufacturers above a certain size and doing business in California to disclose what efforts, if any, they have taken to monitor human trafficking and the use of slave labor in their supply chains.

Throughout its history, Red Wing Shoe Company, Inc. ("RWSC") has been firmly committed to ensuring its supply chain reflects RWSC's values and respect for human rights.

**Verification.** RWSC engages in verification of its footwear and garment manufacturers and all potential new manufactures to evaluate and address the risk of human trafficking and slavery through social compliance and code of conduct inspections. These inspections are performed by RWSC directly and through independent third parties. All third party contract manufacturers agree to abide by RWSC's Standards of Business Practices Code.

**Auditing.** RWSC requires all footwear and/or garment manufacturing facilities to be verified through a social compliance and code of conduct inspection prior to commencement of the first production and periodically thereafter for compliance with its code. RWSC has engaged a reputable independent third party to conduct audits of its manufacturers to monitor the manufacturers' ongoing compliance with RWSC's policies. These audits may be unannounced or pre-arranged. RWSC reserves the right to internally conduct these workplace inspections at any given time. At this time, all formal inspections are announced.

**Certification.** RWSC does not currently require all of its direct suppliers to certify that materials incorporated into the product sold to RWSC comply with the laws regarding slavery and human trafficking in the country or countries in which they are doing business.

**Accountability.** RWSC maintains internal accountability standards and procedures regarding employee compliance with applicable U.S. laws. Through its Standards of Business Practices Code, RWSC maintains accountability standards and procedures regarding business partner compliance with applicable laws, human rights, forced labor and child labor. A garment or footwear manufacturer's failure of a company code/social compliance inspection can result in RWSC working with the manufacturer to remedy the violation, disciplinary action or termination of orders and/or the manufacturer's relationship with RWSC, as appropriate under the particular circumstances. Corrections of the identified issues are validated during a follow up inspection performed internally by RWSC or through an independent third party.

**Training.** RWSC is currently in the process of incorporating its company code and social compliance policies and procedures into its corporate on-line training modules for training RWSC employees and management on slavery and human trafficking, particularly with respect to mitigating risks within the supply chain of products.