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## Equal Employment Opportunity Policy

Genesco is committed to providing an environment free from all forms of harassment and discrimination.

“Sexual Harassment” is defined to include, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal, graphic or physical conduct or behavior of a sexual nature when:

1. Submission to such conduct is made explicitly or implicitly a term or condition of an individual’s employment.
2. Submission to or rejection of such conduct by an individual is used as the basis for personnel decisions affecting that individual.
3. Such conduct has the purpose or effect of unreasonably interfering with an individual’s work or creates an intimidating, hostile or offensive working environment.

Genesco also deems any type of employment-related “harassment” unacceptable and includes, but is not limited to, slurs, jokes, teasing, gestures, deliberate touching, display of offensive material, and other unwelcome and offensive verbal, graphic, or physical conduct or behavior relating to an individual’s race, color, gender, sex, religion, creed, national origin, ancestry, age, veteran status, pregnancy, childbirth, or related medical condition, physical or mental disability, medical condition, genetic information, sexual orientation, citizenship, marital or registered domestic/civil union partner status, gender identity, and/or expression, military or veteran status or other characteristic protected by federal, state, or local laws. This policy applies to all communications, including, but not limited to, weblogs (blogs), social networking websites, forums, emails, instant messaging, text messages, graphics and pictures, chat rooms and virtual worlds.

A consensual romantic and/or sexual relationship between an employee with supervisory authority and any subordinate, including one not reporting directly to the supervisor, will compromise the Company’s ability to enforce its policy against sexual harassment. Consequently, if such relationships arise, they will be considered carefully by the Company, and appropriate action will be taken. Such action may include a change in the responsibilities of the individuals involved in such relationships or transfer of location within the Company to diminish or eliminate the supervisory relationship and workplace contact that may exist. Any supervisory employee involved in such a relationship is required to report the relationship to his or her supervisor and to Human Resources.

Genesco will not tolerate illegal harassment in any form. It is a form of discrimination, a violation of federal and state law, and a serious violation of the Company’s policy. Such conduct may result in disciplinary action up to and including termination.

Genesco requires individuals to report incidents of illegal harassment or discrimination and provides avenues by which individuals can report complaints of illegal harassment or discrimination. Genesco strongly encourages reporting of all perceived incidents of illegal harassment or discrimination, regardless of who the alleged offender may be. An individual who believes he or she is the victim of illegal harassment or discrimination or who witnesses illegal harassment or discrimination of others should immediately discuss his or her concerns with his

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or her supervisor. If the employee does not feel comfortable discussing the situation with his or her supervisor or is not satisfied with the action taken by the supervisor, the employee should contact the Human Resources Department, Suite 264, Post Office Box 731, Nashville, Tennessee 37202-0731, by telephone at (615) 367-7598 or (800) 404-5370 or via email at [respect@genesco.com](mailto:respect@genesco.com). An individual is not required to discuss the concern with the alleged harasser. An individual is not required to discuss the concern with his or her immediate supervisor.

Genesco will promptly investigate and respond to all complaints of illegal harassment or discrimination. Employees are expected to cooperate with the Company's investigation to the fullest extent. False information provided in the course of an investigation is grounds for discipline, including termination. When unlawful sexual harassment, discrimination or conduct in violation of this policy is found to have occurred, appropriate remedial action will be taken. All reports of harassment or discrimination will be treated in a confidential manner, subject to the Company's legal obligation to investigate and respond appropriately to such complaints. Further, appropriate steps will be taken to investigate and respond to any complaints of illegal harassment or discrimination involving a non-employee's conduct or behavior or an employee's conduct or behavior against a non-employee under this policy, whether the non-employee is a vendor, customer or other.

To ensure that employees understand this policy and their obligations under it, the Company periodically will conduct training relating to the policy and its implementation.

Genesco's policy prohibits offensive or inappropriate conduct that may not rise to the level of unlawful harassment.

Genesco prohibits retaliation against anyone involved in reporting an incident of harassment or discrimination. Conversely, the Company considers filing intentionally false reports of harassment or discrimination a violation of this policy, which is also subject to disciplinary action.