

## POLITICAL CONTRIBUTIONS RELATIONSHIP WITH PUBLIC OFFICIALS

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United States law prohibits corporations from making any expenditures or contributions of money or anything of value in support of political candidates for elective federal offices. The laws of many states and foreign countries similarly prohibit the use of corporate funds or contributions for political purposes.

No contributions of Company funds, property or services for political purposes shall be made directly or indirectly by or on behalf of the Company, unless, prior thereto, such contributions have been determined to be lawful and have been approved in writing by the Company's General Counsel. A "contribution" includes the rendering of services on behalf of the Company and the sale or use of Company assets for less than normal charges as well as purchases of tickets to political dinners or other fund-raising events.

This policy statement relates only to contributions by or on behalf of the Company and is not intended to discourage employees from making contributions of their own resources or own time to the candidates or political parties of their choice. However, the Company will not reimburse any employee directly or indirectly for any political contribution made by the employee. No employee shall apply any pressure to any other employee that infringes upon any individual's right to decide whether, to whom and in what amount, a personal political contribution is to be made.

Federal, many state laws and the laws of many foreign countries strictly prohibit the payment of compensation or giving of gifts or anything of value to anyone connected with the government as an inducement for contract awards, including subcontracts with a government contractor. Seeking or accepting any compensation in connection with such contracts is similarly prohibited.

All relations with government or political officials should be conducted in a manner that will not adversely reflect on the Company's or the public official's integrity and with the expectation that all such actions will become a matter of public knowledge.

Note that interactions with public officials are also governed by Genesco's Anti-Corruption Policy.