

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT DISCLOSURE

Genesco and its subsidiaries (collectively, "Genesco" or "Company") sell consumer goods through both wholesale and retail channels. Its retail operations sell both merchandise manufactured to the Company's order by unrelated contract manufacturers and bearing the Company's owned or licensed brands, and merchandise manufactured for and purchased from unrelated wholesale distributors and bearing their brands.

Ethical Sourcing Policy

Genesco is committed to principles of ethical business practice and recognition of the dignity of others, including responsible labor practices. The same policies relating to slavery and forced labor apply across all of Genesco's operations. We therefore discuss in this Statement our efforts to eradicate slavery and forced labor from our supply chains for goods offered for sale on an enterprise-wide basis. However, some of Genesco's subsidiaries are not subject to the California Transparency in Supply Chains Act.

Genesco's approach is to focus on its direct suppliers, since this is the level of the supply chain where Genesco believes that it has the most influence and can therefore be the most effective.

Supplier Terms and Conditions

In furtherance of the foregoing commitment, Genesco requires its vendors to warrant and represent that merchandise has been manufactured in compliance with the applicable laws of the United States and of the jurisdiction of manufacture, and without the use of slave or forced labor. Genesco's contracts of purchase require vendors to certify compliance with these standards and with terms of purchase which give the Company the right to audit compliance with its standards through its own employees or third parties.

In its terms of purchase, Genesco reserves the right to terminate orders for merchandise from vendors found to violate its manufacturing standards, including those prohibiting slavery or forced labor, and the right to terminate the relationship with suppliers in violation of such standards.

Site Visits and Audits

Personnel from each of the Company's branded operations visit their respective operation's tier-one manufacturing facilities to observe the manufacturing process in an effort to ensure compliance with manufacturing and quality standards, including labor standards. Additionally, some of the Company's wholesale operations are parties to agreements under which independent third-party inspectors conduct compliance audits to ensure compliance with manufacturing standards, including prohibitions on slave and forced labor. During the audit, the independent third-party inspector will visit and inspect the tier-one manufacturing site, conduct interviews with supervisors, managers and employees of the facility, and review relevant books and records of the third party manufacturer.

In most instances, if a deficiency is identified, corrective action will be required on a specified timeline, followed by validation by the Company or its auditor that such deficiency has been remedied, including, if necessary through a re-audit of the manufacturer. In the case of a serious violation of the Company's standards, termination of the Company's relationship with the manufacturer may occur, particularly where corrective action is either not possible or determined to be an insufficient remedy.

Because of the number of and frequent changes in unrelated vendors of manufactured goods and the competitive sensitivity of many of the vendors' manufacturing arrangements, the Company's retail operations that sell merchandise primarily marketed under unrelated vendors' trademarks generally rely upon the vendors' representations and warranties regarding labor standards.

Internal Accountability and Training

Applicable internal personnel receive annual ethics training covering topics including the manufacturing standards discussed above and prohibitions on knowingly doing business with vendors that violate the standards.

The Company's policies on legal compliance and ethical business practices provide for penalties up to and including termination for employees who violate the policies, including those involving labor practices.

Employees are encouraged to raise any concerns and have multiple channels to do so, including through anonymous reporting mechanisms.