

GENESCO INC. CORPORATE MEDIA AND COMMUNICATIONS POLICY

The guidelines below are not intended to bar or unduly restrict responses to inquiries by trade publications concerning product developments, fashion trends, general industry issues and similar matters which relate directly to your business. Individual operating divisions may develop their own policies for dealing with trade media on matters involving their business exclusively. However, the Director of Corporate Relations should be advised whenever a division representative receives or answers such inquiries. Also, before anyone in an operating company takes steps to pitch a story or otherwise seek coverage in the media, he should contact the Corporate Relations Department. There should be no announcements over the business wires (PR Newswire or Business Wire) without prior approval from the Corporate Relations Department as to both content and timing of the release. The timing and content of a message may cause serious legal and corporate public relations problems which the spokesman for the division would not necessarily be in a position to anticipate. Copies of news releases and press kits should also be sent to the Corporate Relations Department as part of your normal distribution.

In dealing with the media, either in response to an unsolicited media inquiry or as a part of a division publicity project, with securities analysts, institutional investors and others, the spokesman should never comment on Genesco's financial performance and other Company-wide issues. Questions regarding the Company's operating results, financial condition or other corporate matters should be referred to the Chief Financial Officer, as the Company's primary spokesman to the financial and investment community. Other general corporate issues should be referred to the Director of Corporate Relations.

Of course, divisional spokesmen should not under any circumstances disclose financial or confidential marketing information concerning their operating companies. Market share, sales, earnings, growth rates, customers and marketing strategies and other detailed information about an operating company can obviously provide the competition with useful data, and we should take steps to safeguard all such information.

Because of the risk of personal liability to the person posting a message and the potential for corporate liability if the person is held to be speaking for the Company, Genesco employees must refrain from discussing Genesco's performance or prospects in Internet chat rooms (such as the Yahoo message board), in weblogs ("blogs"), or any other similar medium. No employee is authorized to post comments about Genesco on Internet message boards.

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Social media is a powerful communication tool that can have a significant impact on the Company, its employees and its customers. Social media provides an informal platform for individuals to exchange ideas and information. The Company recognizes the importance of social media to the organization and its employees and has established the following guidelines to assist employees who use social media for personal and/or Company use.

What is Social Media?

Social media refers to any form of communication posted to and/or sent via a server or Internet/Intranet website. Examples include blogs, social networking websites (i.e., Twitter, Facebook, MySpace, LinkedIn, etc.), forums (YouTube), message boards, broadcast e-mails, instant messaging, text messages, chat rooms and virtual worlds. This policy applies to all forms of social media.

Using Social Media During Work Time – No Right to Privacy

While the Company acknowledges that its employees may engage in the use of social media in their personal lives, employees should limit such use while working. Accessing and using social media sites while at work is a distraction and can negatively impact our employees' productivity.

The Company has the right to monitor an employee's use of the Company's resources (i.e., computers, smart phones, servers, etc.). Any employee who uses the Company's resources to engage in social media communications or activity must understand that they have no right to privacy with respect to those communications or activity, even if the employee is accessing personal accounts and sites. The Company's resources should be used primarily for business purposes so each employee's social media usage will be monitored at the Company's discretion.

General Use of Social Media

Employees should use social media responsibly, keeping in mind that their communications and activities are a reflection of that employee and the Company. Please also remember that social media postings can be copied, re-disseminated by others, and are virtually impossible to "erase" or "undo."

Engaging in Social Media on Behalf of the Company

No employee may speak on behalf of the Company using social media unless specifically authorized by the Company to do so; this includes tweeting from corporate events. In addition, employees are not permitted to create any social media accounts on behalf of the company unless authorized by the Company.

For purposes of blogs or social media officially maintained by the Company or its divisions, only employees specifically assigned to do so may communicate on behalf of the Company. Any blog or social media officially maintained by the Company is considered Company property.

Good Judgment when using Social Media and/or Commenting on the Company

Employees may obviously engage in social media communications or activity in their personal time using their personal resources. However, any such communications or activity should not be harassing, defamatory, threatening, and should not infringe on intellectual property rights, invade the privacy of anyone or contain illegal content.

Employees must clearly and conspicuously note that they are employees of the Company if they post or mention the Company or its products or services on any blogs, social networking sites (including Company sponsored sites), chat rooms, etc. This will help you and the Company stay in compliance with requirements imposed by the Federal Trade Commission.

If you use social media to comment about the Company or its products or services, and are not doing so as an authorized spokesperson for the Company, you must include a prominent disclaimer in the communication that states, "The opinions, perceptions, beliefs and positions expressed here are my own and not those of Genesco."

Specific Examples of Prohibited Conduct

This section contains examples of conduct that is strictly prohibited by this policy, regardless of whether an employee engages in this conduct during personal time or work time, using personal resources or Company resources.

- Employees may not use social media to discriminate against or harass employees, customers or vendors of the Company. For example, posting a sexually explicit joke regarding a co-worker is prohibited. Similarly, comments, images, or other communications regarding a co-worker's race, religion, nationality, or other protected class which is vulgar, intimidating or hostile is also prohibited.
- Employees may not use social media to threaten or intimidate employees, customers or vendors of the Company. Posting any sort of physical threat is strictly prohibited.
- Employees may not respond to comments (customer, media, etc.) pertaining to the Company or its divisions in social media.
- Employees may not use social media to publish or disclose the Company's confidential and proprietary information, including, but not limited to, the Company's trademark and logos, customer information, private employee health information, private identifying information of employees (such as SSNs, contact information, etc.), business plans and prospects, financial information, etc. This includes statements about quarterly or annual results that have not been generally announced to the public or information about business transactions.
- Employees must comply with all Company policies related to conduct and ethics when engaging in the use of social media, whether on personal time or Company time. If something that you post on social media violates a Company rule, you may be subject to disciplinary action, up to and including termination of employment.

Violations of this Policy

Any violation of this policy may result in disciplinary action, up to and including termination of employment. If you believe that you have inadvertently violated this policy, or if you believe that another employee of the Company has violated or is violating this policy, please notify Human Resources immediately.

Similarly, if you are uncertain about the appropriateness of a social media posting or have a question about this policy in general, please contact your Human Resources Representative.

Protected, Concerted Activity

Nothing in this policy is intended to abridge or restrict any employee's right to engage in protected, concerted activity under the National Labor Relations Act. Of course, the Company hopes that if you have any concern regarding your terms and conditions of employment, you will inform the Company and provide us with an opportunity to address the concern internally before you use social media to publicize your concern.