TAPESTRY, INC. SUPPLIER CODE OF CONDUCT

Tapestry, Inc., including all of its brands, subsidiaries and affiliates (the “Company” or “Tapestry”), operates a global business. The Company acknowledges its responsibility to respect human rights and is committed to conducting its business, and procuring products and services around the world, in a manner which is conducive to good global citizenship. The Company expects the companies from whom it procures products and services to comply with all applicable laws and regulations, to treat their employees fairly and with dignity and respect, to be socially responsible citizens in the countries and communities in which they operate, and to embrace the Company’s high standards of ethical behavior.

Accordingly, the Company has enacted the following Supplier Code of Conduct. Tapestry is committed to the standards set forth above and expects all companies from whom it procures products and services to be bound by this Supplier Code of Conduct. Please note that this code supersedes the Coach, Inc. supplier selection guidelines.

“Suppliers” include contractors, joint venture partners and suppliers of goods and services, including raw material suppliers and any contractor or agent utilized by the supplier in work for the Company.

1. Ethical Standards

The Company will only do business with those suppliers who embrace high standards of ethical business behavior and who demonstrate commitment to those standards through rigorous practices.

2. Legal Requirements

The Company is committed to full compliance with all laws and regulations in the locations where the Company operates and conducts business, and will not knowingly operate or use suppliers who operate in violation of any such law or regulation.

3. Anti-Corruption

The Company is committed to working with suppliers who do business in an honest and transparent way. In accordance with the US Foreign Corrupt Practices Act of 1977, and other applicable international laws, suppliers may not pay bribes or otherwise make improper payments. This means that Tapestry suppliers must not, directly or indirectly, offer, pay, promise to pay, authorize the payment of, any financial or other advantage, or anything else of value, to any person for the purpose of securing an improper advantage for the supplier or the Company. This includes any attempt to impact the objectivity of third party representatives appointed by Tapestry to carry out inspections or compliance audits. The Company’s Anti-Corruption Policy can be found at www.tapestry.com/investors/ under the Global Business Integrity Program section.

3. OFAC Compliance

The Company expects that no supplier will act, or provide any materials or services, directly or indirectly, for or on the behalf of any country, person or entity that appears on the Specially Designated Nationals and Blocked Persons List, as maintained by the Office of Foreign Assets Control (OFAC) of the U.S. Department of the Treasury or is otherwise subject to OFAC sanctions.

4. North Korea
The North Korea Sanctions and Policy Enhancement Act of 2016 includes a provision that any goods, wares, merchandise and articles made by North Korean citizens or nationals anywhere in the world are presumed to be forced-labor goods under Section 307 of the Tariff Act of 1930. Any shipment of goods believed by US Customs and Border Patrol to be made with forced and/or prison labor may be banned from all US ports of entry.

Suppliers must ensure that no North Korean nationals or citizens are employed the manufacture of the Company’s raw materials or finished goods. The Company will utilize its existing verification processes and procedures to ensure compliance.

For practices related to the Company’s policies on slavery and human trafficking, including information on how we vet our supply chain, please refer to section 7.

5. Environmental Requirements & Sustainability

The Company believes in doing business with those suppliers who share the corporation’s commitment to the environment, and who pursue practices which conform to applicable environmental standards. The Company expects suppliers to promptly develop and implement plans and programs to correct any non-compliant environmental practices. This includes, but is not limited to, complying with all applicable local environmental laws and regulations. As regulations change in the future, the Company expects its suppliers to comply with any new environmental regulations.

Sustainability has long been a part of how the Company does business. The Company publishes an annual sustainability report that describes its strategy and commitment to the environment and social responsibility. You can find the report at: www.tapestry.com/investors/ under the Sustainability Report section.

6. Conflict Minerals

As a publicly traded US Company, the Company is required to disclose the use of “Conflict Minerals” required for the functionality of its products. Conflict Minerals come from the Democratic Republic of Congo and surrounding countries and include Tin, Tungsten, Tantalum and Gold (3TGs).

Any 3TGs used in the production of Company products, and the applicable smelters, must be disclosed to the Company during its annual Conflict Minerals survey. The Company also encourages its suppliers to look for conflict-free certified sources when sourcing 3TGs. For additional information, please refer to Tapestry’s Conflict Mineral policy at www.tapestry.com/investors/ under the Conflict Minerals Policy section.

7. Slavery & Human Trafficking


8. Subcontracting Requirements

Suppliers are prohibited from outsourcing any production process to a subcontractor if they have the capability in house. If a production process is outsourced, the supplier must provide certain information on the subcontractor to the Company upon request, such as name, address, contact person and specialty. All subcontractors are required to comply with this Code of Conduct.
9. Animal Welfare

The Company has adopted an animal welfare policy in order to ensure the humane and ethical treatment of the animals used in the production of Company product. You can find the Company’s policy at: www.tapestry.com/investors/ under the Global Business Integrity Program section.

10. Employment Practices

Working Hours: The Company will not knowingly use suppliers who fail to comply with the legal maximum working hours as specified by each country’s standards and laws.

Child Labor: While the legal definition of “children” may vary from country to country, the Company will not knowingly do business with suppliers who employ individuals who are under 15 years of age.

Forced Labor: The Company will not knowingly use suppliers of either raw materials or finished product that have been produced by involuntary or forced labor, whether indentured, bonded, prison or labor obtained through slavery, human trafficking or otherwise, nor will the Company use services provided by such labor.

Disclosure of Country of Origin: The Company expects that suppliers will provide any and all identification documentation, upon request, of all workers. This documentation must include country of origin.

Discrimination: The Company believes that people should be employed on the basis of the ability to do the job, rather than on the basis of personal characteristics or beliefs. Suppliers must not discriminate against their employees on the basis of personal characteristics or beliefs, such as age, race, color, creed, ethnicity, nationality, alienage, citizenship, social origin, gender, religion, marital status, sexual orientation, gender identity, genetic characteristics, maternity status, military status, disability or political beliefs, or any other legally-recognized protected basis prohibited by applicable law, at any stage of the employment relationship.

Harassment & Disciplinary Practices: Tapestry suppliers must treat all workers with respect and dignity. No worker will be subject to corporal punishment, physical, sexual, psychological or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.

Health & Safety: The Company believes in doing business with those suppliers who have demonstrated concern for and commitment to the health and safety of their employees.

Wages & Benefits: Suppliers must meet all legal requirements to ensure that minimum wages are adhered to, any and all overtime is paid for, and any benefits due to the employees are satisfied.

Freedom of Association & Collective Bargaining: Suppliers must respect the legal rights of employees to freely and without harassment participate in worker organizations of their choice, and to refrain from joining organizations if that is their wish. Suppliers must not threaten or penalize employees for their efforts to organize or bargain collectively where permitted by the laws of the country of manufacture, nor may they discriminate against workers as a result of any such organization affiliation.

This section is inclusive of all types of labor such as full or part-time, shift, migrant and/or seasonal, contractors, consultants, and anyone else employed by any means of compensation.

Additionally, Tapestry will favor those suppliers who are proactive in contributing to the continued education and betterment of its employees.

11. Privacy & Security
For the purpose of this section, the notion of "Data Protection Laws" means (a) national laws implementing the Data Protection Directive (95/46/EC) and the Directive on Privacy and Electronic Communications (2002/58/EC); (b) the General Data Protection Regulation (2016/679) (the “GDPR”) and any national law issued under the GDPR, and (c) any other data protection laws, regulations, or regulatory requirements, guidance and codes of practice applicable to the Processing of Personal Data (as amended and/or replaced from time to time).

The Company requires its suppliers to comply with applicable privacy and Data Protection Laws, and to maintain privacy and security policies and controls that meet or exceed all applicable legal and regulatory requirements.

In order to comply with its legal obligations the Company must ensure that any third party which processes or shares personal data (as defined under Data Protection Laws) in the context of the provision of services takes sufficient steps to comply with the requirements of relevant Data Protection Laws. The Company therefore retains the right to carry out prior due diligence on its suppliers in relation to data protection, privacy and security. As part of such due diligence process, suppliers must complete Company’s due diligence questionnaire.

In accordance with section 15 of this Code of Conduct, Company also retains the right to carry out ongoing monitoring of its suppliers in relation to compliance with applicable data protection laws.

In the event that suppliers use any sub-contractors, suppliers obligations in relation to data protection and security, including the requirement to participate in prior due diligence and ongoing monitoring, shall be passed down to such subcontractors.

12. Confidential, Proprietary and Personal Information

One of the Company’s most valuable assets is information. Suppliers must safeguard the Company’s confidential and proprietary information, by keeping it secure, limiting access to those who have a need to know to perform their jobs and avoiding discussion of confidential information in public areas. The obligation to preserve the Company's confidential information, and that of its employees, business partners and customers, is ongoing, even if the relationship between the Company and the supplier is terminated. The supplier must take all necessary precautions to make sure that the information is not stolen, wrongly disclosed or illegally used.

13. Accuracy of Business Records

Honest and accurate recording and reporting of information is essential. Every business transaction must be recorded correctly and in a timely manner. The Company therefore expects suppliers to be candid and accurate when providing or entering such information. Suppliers should not make false or misleading entries into their financial reporting systems. Internal controls should be established to ensure accurate business records are maintained.

14. Conflicts of Interest

The Company and its employees have an obligation to act in the best interests of the Company. Actions must be based on sound business judgment, not motivated by personal interest or gain.

Any situation, including any relationship or transaction between the Company and any employees or family members of employees of either the Company or its suppliers, that creates or appears to create a conflict of interest between personal interests and the interests of the Company must be avoided.

The best way to avoid conflict of interest situations is to immediately disclose any situation that has the potential to be misunderstood by others, including other employees, customers, suppliers and the public.
Both Tapestry employees and suppliers with whom Tapestry does business must disclose to the Company any actual or potential conflict of interest.

15. Compliance

To ensure that the Company’s suppliers are fulfilling their obligation, the Company reserves the right to conduct audits and can use internal or external parties to conduct those audits. An audit may consist of a factory/company walk-through to evaluate the physical working conditions, as well as health and safety practices; confidential interviews with workers to provide freedom to speak on potential misconduct; and a review of all relevant documentation (e.g. payroll, time records, employee age and country of origin verification, licensures, certificates, waivers, etc.).

If a factory visit reveals an issue that requires improvement the Company expects that all suppliers will take necessary corrective action to promptly remediate any non-compliance.

16. Tax Evasion

Under no circumstances may suppliers engage in tax evasion or facilitate tax evasion on behalf of others. Suppliers and other third parties must ensure that they comply with all applicable tax laws and regulations in the countries where they operate, and should have appropriate controls in place to minimize the risk of tax evasion or its facilitation. Suppliers shall be open and transparent with the tax authorities.

17. Communication

Tapestry suppliers must communicate these principles and guidelines to their workers and supervisors.

18. Known Violations

You are required to report any known violations of this Supplier Code of Conduct, including the policies referenced herein. If you have questions, need to make disclosures, or are concerned about conduct that you believe violates the Company’s standards or the law, contact the Law Department at 212-615-2436. You may also report a matter (anonymously, if desired) by contacting the Tapestry Ethics and Compliance Reporting System online at http://www.tapestry.ethicspoint.com, or call a representative, at 1-800-396-1807 (for matters in the United States) or the international phone numbers available at www.tapestry.com/investors/ under the Contacting the Board section.

Doing business with Tapestry means that you acknowledge the Company’s Supplier Code of Conduct and commit to doing business with the Company according to these terms. The Company reserves the right to terminate its business relationship with any supplier who is unwilling to comply with this Supplier Code of Conduct.