

Human Rights Statement

July 10, 2023

OUR COMMITMENT to HUMAN RIGHTS

At J.Crew Group, we build iconic American brands that allow customers to look and feel their best. We strive to be a leading and prosperous portfolio of beloved brands with great design legacies, and our mission is to set a standard that inspires us and the retail industry to do better. Improving the lives of the people we touch is of supreme importance to us, and so we have committed to fundamental, universal and inalienable human rights that apply to our own associates, customers and communities, as well as our operations, suppliers and business partners. We respect and support global principles aimed at protecting human rights, and seek to operate in compliance with all applicable laws that impact human rights wherever we do business.

HUMAN RIGHTS AND OUR ASSOCIATES

How Our Associates Conduct Business The J.Crew Group [Code of Ethics and Business Conduct](#) requires our associates, wherever they are located, to conduct business and perform their job responsibilities with the highest standards of ethics and respect for others. The *Code* applies not only to all our associates, but to our service providers, independent contractor and our Board of Directors. It requires all to foster respect in the workplace and to show professionalism in working with other associates, customers, business partners and the general public.

Valuing Our Associates Our approach to human rights in our company begins with our own associates. We engage in business activities across the globe with more than 10,000 full and part-time associates from a variety of backgrounds and life experiences. We foster safe, inclusive and respectful workplaces in every location throughout the world. We are steadfastly committed to a workplace where equal treatment, dignity and respect is provided regardless of race, color, ancestry, national origin, religion, sex, marital status, age, sexual orientation, gender identity or expression, legally protected physical or mental disabilities or any other basis protected under the law.

Supporting Diverse Candidates and Associates We are continually expanding our candidate pools by partnering with organizations and educational institutions that promote racial, socio-economic diversity. As part of our efforts to build inclusion, we offer regular DEIB training, open forums and the opportunity to form and participate in associate-led groups that gather based on common interests or identities. These groups are open to all members of our team. We are also proud to celebrate key dates throughout the year that honor the diversity of our associates including Black History Month, Hispanic Heritage Month, Women's History month, AAPI Heritage Month, Pride Month and many more.

Equitable Pay We believe in competitive and equitable pay for our associates. J.Crew Group routinely conducts compensation studies to ensure that all associates, regardless of gender or race, are paid fairly based on objective factors including experience, skills, position and performance.

Employee Benefits J.Crew Group provides an array of inclusive benefits that support our diverse population. We provide access to benefits that encourage wellness and recognize the need for a healthy balance between work and personal life. We are committed to providing life-enhancing benefits that go beyond typical health insurance such as adoption, surrogacy, parental leave and mental health services. Our associates are able to select from a variety of options that can be tailored to their individual needs and supported by self-service technology.

Health & Safety We are committed to providing a safe and healthy environment for our associates and customers through dedicated safety programs to reduce or eliminate workplace hazards in our stores, our distribution centers and our offices.

OUR CUSTOMERS

Our customers are the reason we are in business. We strive to meet and exceed customer expectations by providing safe, accessible and sustainable goods and services. Through our marketing practices we strive to embrace inclusivity and celebrate the collective and individual identity. As a company, we actively welcome all customers regardless of race, ethnicity, religion, gender, age, ability, size and shape, or sexual orientation. We partner with Open to All and signed their *Mitigate Racial Bias in Retail Charter* that honors our commitment to the customer experience and supports our goal of mitigating racial bias and fostering an inclusive shopping experience for all. We are committed to ensuring that store associates treat all customers with respect and according to our policies and related laws, including those pertaining to equal access for customers with disabilities.

We also respect our customers' privacy as outlined in the J.Crew Group [Privacy Policy](#) that prohibits the collection of personal information from children and responsibly maintains and uses private customer information in order to enhance our customers' shopping experiences in accordance with applicable laws. Our policy encourages customers to choose how their information is used by providing opt-out options as well as the ability to delete specific personal information or a customer account.

OUR COMMUNITIES

We are growing our associate volunteer program, connecting customers with nonprofits we admire, and creating opportunities to give back in the communities where we live and work. We are achieving these efforts through philanthropy and giving, volunteerism and corporate matching. Throughout the year, we team up with organizations across the country that are aligned with our values and connect our customers to their philanthropic mission. And we support their work through donations as a portion of a product purchase, or by collecting physical items like coats and clothing.

Locally, our stores sponsor events where a portion of the proceeds are donated to local charities, and in 2022, our J.Crew Group teams collectively volunteered over 2,600 hours to organizations that foster basic human rights of those living in their communities. We also believe that having enough food is a basic human right. We therefore partner with *No Kid Hungry*, which has a mission to end childhood hunger in America. Finally, since March of 2020 we supported the American Civil Liberties Union with donations totaling over \$1.0 million to protect and advance civil liberties for all. We team up with other organizations all over the country that tackle important issues like inclusivity, female empowerment and support for children.

HUMAN RIGHTS IN OUR SUPPLY CHAIN

Our Business Partners and their Facilities We do not own or operate any production facilities, so it is important for us to develop trusted relationships with our vendors to ensure that human rights are respected

in our entire supply chain. Therefore, we seek long-term relationships with suppliers that share our commitment to abide by our [Supplier Code of Conduct](#) (“Code”) and respect the human rights of the more than 100,000 workers who contribute to the production of our merchandise.

Supplier Code of Conduct Our *Code* clearly outlines our expectations for the treatment of all workers within our supply chain. It prohibits physical, psychological, verbal, or sexual harassment, threats, or abuse or corporal punishment. All workers must be treated with dignity and respect. The *Code* also forbids the use of any form of forced or child labor, involuntary or trafficked labor, including prison, bonded and indentured, and any form of human trafficking. And it outlines our expectations and applicable laws pertaining to working conditions, including legal working hours, safe working environments, health benefits, legal wages and the right to freely associate and participate in a formal grievance process. We are particularly committed to protecting the human and labor rights of at-risk groups including women, young workers, domestic migrant workers and foreign contract workers; groups that are known to be more at risk for human rights abuses.

Risk Assessments Prior to approval, each new vendor and factory goes through a thorough due diligence screening process as well as pre-approval audits to assess the level of compliance with our J.Crew Group *Supplier Code of Conduct*. J.Crew social compliance audits are conducted by reputable 3rd party audit firms on our behalf. Over the lifecycle of our relationship with our vendors, we conduct frequent announced and unannounced facility audits to evaluate compliance, and we will not do business with any company that does not protect human rights or is deemed to be a risk to our business.

Remediation and Improvement If serious human rights noncompliances are identified during an audit, we will investigate to assess the allegation and understand the root cause. Depending on the findings, we will assess possible remediations with a factory while always trying to focus our efforts to improve outcomes for workers. We expect all suppliers to improve their level of compliance with our *Code* from audit to audit. If a supplier is unable to respond to our continuous improvement model after three social compliance audits, we will consider an end to the business relationship.

Transparency We will continue to implement processes and procedures to drive transparency, assess our supply chain, trace fabric and raw material origins and prohibit forced labor of any type in the manufacture of J.Crew Group product.

Partnerships We align with several organizations that support our efforts to ensure that human rights are respected in our supply chain. Through our partnership with [Fair Trade USA](#), we empower workers and ensure fair conditions and equal economic opportunities for everyone who manufactures our products. [Better Work](#) supports the human rights of workers in our supply chain by providing compliance assessments, training, advocacy and research. [The Mekong Club](#) works to bring about sustainable practices towards the fight against modern slavery. They enhance our human rights efforts by providing modern slavery training for J.Crew Group associates and providing ongoing research and advocacy in support of our efforts to ensure that modern slavery is not found in our supply chain.

CORPORATE GOVERNANCE OF HUMAN RIGHTS

We hold ourselves accountable through our corporate governance structure beginning with our associates who have a shared responsibility for respecting human rights in our organization, our stores and in our supply chain. Our associates also have a responsibility to raise any observed or suspected violation of our human rights policies. Our Open Door policy provides the forum for our associates to raise human rights issues and concerns to their manager or through our [Open Talk Line](#), which supports anonymous and confidential reporting.

Our Board of Directors, comprised of 50% women and 50% who identify as members of underrepresented racial and ethnic groups, routinely review and provide oversight over our human rights initiatives, sustainability efforts and our overall Environmental, Social and Governance (ESG) strategy. Our Audit Committee regularly reviews our human rights compliance and ethics programs throughout our business. Finally, our Diversity, Equity, Inclusion and Belonging Council (DEIB), led by our CEO and Chief People Officer, and senior leaders provides oversight, business alignment and championing of our DEIB strategies and programs.

LOOKING FORWARD

We will continue to conduct the ongoing due diligence necessary to continually strengthen our understanding of human rights issues in our operations and supply chain. We will focus our efforts on infusing innovation in our training, our policies and our business collaborations in support of our core values and our commitment to fundamental, universal and inalienable human rights.