



# ASCENA RETAIL GROUP, INC. STATEMENT ON SUPPLY CHAIN TRANSPARENCY

On January 1, 2012, California enacted a new law requiring companies of a certain size to publicly disclose the steps they are taking to identify and eradicate forced labor in their supply chains. Ascena Retail Group, Inc., through its collective of brands, including dressbarn, maurices, Lane Bryant, Catherines, Justice, Ann Taylor, LOFT, and Lou & Grey (collectively hereafter, “ascena”), aligns with the intent of the legislation, and we are pleased to share our continuous work towards sourcing products free of slavery and human trafficking.

At ascena, we understand that both our Associates at ascena, and our Customers, genuinely care about the conditions under which our products are manufactured. It is important to us, and to *Her*, that materials used in our products are obtained through ethical labor conditions. ascena’s Code of Conduct for Merchandise Suppliers (“Code of Conduct”) provides suppliers with our expectations for responsible manufacturing standards. We only align ourselves with suppliers who share this commitment. Our Code of Conduct clearly states that our Suppliers must not use involuntary or forced labor, whether indentured, bonded, prison, or labor obtained through slavery and human trafficking.

We are taking the following actions to mitigate the risks of human trafficking and slavery in our direct product supply chain:

1. **VERIFICATION OF PRODUCT SUPPLY CHAINS:** ascena has a robust on-going internal risk assessment program conducted by our ascena Responsibility department. Our team reviews the U.S. Department of State’s annual report on Trafficking in Persons, as well as the recommendations put forward by the Department of Labor’s List of Goods Produced by Child Labor and Forced Labor, in addition to other sources. When considering new sourcing countries, we follow a strict approval process involving multiple departments and based on various criteria, including social compliance risks. Additionally, all new private label factories must be reviewed by the ascena Responsibility department for social compliance before production may begin. Ascena Retail Group, Inc. is proud to be a buyer partner of the Better Work Program, a collaborative factory monitoring initiative led by the International Labour Organization (ILO). We utilize audits conducted by the Better Work inspectors to assess factory compliance in key manufacturing countries where the program is active.

2. **AUDITING:** We regularly conduct independent, unannounced and semi-unannounced audits using third party service providers against ascena’s Code of Conduct for responsible sourcing. We survey our suppliers to assess their use of migrant and foreign contract workers. Our service providers follow procedures to identify non-compliance issues found specifically within these classes of workers, such as hiring process issues and access to grievance systems. An important aspect of the auditing process is worker interviews, conducted both on-site and off-site. Whenever serious issues are found, suppliers are expected to engage in remediation and training which includes a corrective action plan and a series of e-learning modules specifically designed to address the risk in their supply chain. In addition, we apply our rating system, ascena Scale, which impacts business volumes, and provides guidance to Sourcing, assisting them in placing business with suppliers that achieve favorable compliance scores, and reducing business for poor performers. We have and will terminate factories with significant issues when there is insufficient evidence of improvement.



**3. SUPPLIER CERTIFICATION:** All Vendors are bound by contract, and do represent and warrant in our agreement, to abide by all applicable employment and human rights laws, as well as our Code of Conduct, which, among other things, prohibits the use of child labor and forced or involuntary labor, forced overtime, discrimination, or bonded or prison labor. The Code of Conduct emphasizes the importance of well-treated, fairly compensated workers. Our ascena Responsibility program seeks to promote the maintenance of these standards in our manufacturing facilities and assesses compliance with our Code of Conduct.

**4. MAINTENANCE OF INTERNAL ACCOUNTABILITY STANDARDS AND PROCEDURES:** The Ascena Code of Business Conduct, distinct from the Code of Conduct of Merchandise Suppliers, is a guideline for ethical business conduct and how we do business. This code, also available on our corporate website, is a summary of basic principles for working in a way that reflects our Company's commitment to ethics and integrity. Associates are trained and required to report any suspected violations of the Code of Business Conduct, and such reports may be submitted in writing or made to the Corporate Governance Hotline that is available to all associates.

**5. STAFF TRAINING ON IDENTIFYING AND PREVENTING SLAVERY AND HUMAN TRAFFICKING:** Relevant trainings are conducted for associates that engage regularly with vendors. These trainings include webinars and eLearning which address risks of forced labor and human trafficking. Vendors participate in training through our on-boarding process, and are trained more frequently when related risks are identified.