

TALBOTS

The Talbots, Inc. Merchandise Supply Chain Code of Conduct

The Talbots, Inc. is committed to conducting its business in accordance with the highest ethical standards and in compliance with the laws of every country in which it does business. Talbots seeks to do business with vendors and factories whose practices conform to the standards set forth in this Merchandise Supply Chain Code of Conduct.

Talbots expects the vendors and factories it works with to make a sincere effort toward continuous improvement of working conditions and reserves the right to suspend, discontinue or terminate its relationship with any vendor or factory which violates this Merchandise Supply Chain Code of Conduct or any applicable law.

Talbots also reserves the right to make periodic updates to this Merchandise Supply Chain Code of Conduct and will notify its vendors and factories of any such changes.

In the event that local law and this Merchandise Supply Chain Code of Conduct are in conflict, the stricter standard shall prevail.

I. Monitoring Program

Talbots expects vendors and factories to seek adherence to the Merchandise Supply Chain Code of Conduct. While vendors and factories must take responsibility for working conditions, Talbots will utilize, where appropriate, internal as well as third-party (unaffiliated) monitors to conduct on-site evaluations and inspections of its vendors' and factories' facilities to audit for compliance to the standards set forth in this Merchandise Supply Chain Code of Conduct through a monitoring program.

II. Forced Labor

Talbots expects employment to be freely chosen by workers, and without threat or penalty of any sort (including physical harm, financial indebtedness and non-physical coercion). Talbots expects vendors and factories to be familiar with the ways in which their workers are recruited (whether foreign contract workers or nationals), and to ensure that none of their workers are victims of deception, coercion or fraud in the recruitment process.

III. Child Labor

Talbots expects its vendors and factories to only employ workers whose minimum age is the greater of 15 or the age for completing compulsory education in the country of manufacture.

IV. Wages, Hours and Overtime

Vendors and factories must pay wages and offer benefits and working conditions that comply with the wage and hour laws, rules and regulations, including overtime premium rates, of the country of manufacture.

V. Working Conditions

Factories are expected to treat all workers with respect and dignity and provide them with a safe and healthy environment. Workers must not be subjected to corporal punishment or any other form of physical, psychological, sexual or verbal harassment. Factories shall provide a safe and sanitary working environment in order to avoid preventable work-related accidents and injuries.

VI. Freedom of Association

Talbots supports workers' rights to lawfully associate and expects workers to be free to choose whether or not to lawfully organize and join associations.

VII. Discrimination

Workers should be employed on the basis of their ability to carry out the duties of a particular job without regard to race, caste, color, gender, national origin, religion, age, disability, marital status, maternity, sexual orientation, union membership, political opinion or other personal characteristics or beliefs. No person shall be subjected to discrimination in any aspect of employment.

VIII. Environment

Factories must comply with all applicable environmental laws and regulations in the country of operation.

IX. Foreign Contract Workers

When foreign contract workers are employed, Talbots expects vendors and factories to protect these workers' fundamental rights of liberty and movement.

Vendors that employ foreign contract workers, defined as workers who sign an employment contract to work at a factory outside their home country, must comply with the provisions outlined in The Talbots, Inc. Merchandise Supply Chain Code of Conduct Appendix: Detailed Standards and Expectations except to the extent that any term is expressly prohibited by law.