



Political Activities and Contributions Policy

GENERAL POLICY ON POLITICAL ACTIVITIES AND CONTRIBUTIONS APPLICABLE TO ALL COACH, INC. EMPLOYEES

We do not make political contributions. No funds or assets of the Company may be used for contributions to any ballot initiative, referendum or other question, political action committee (PAC), political party or candidate, whether federal, state or local, in the United States or abroad. This policy is subject to specific foreign country exclusions. Any such exclusion must be preapproved in advance with the Law Department. A political contribution includes both direct (i.e., money) and in-kind contributions. In-kind contributions include the purchase of fundraising tickets, contribution of products, volunteer work by Coach employees within normal business hours and the use of Coach facilities for fundraising or political purposes. If you have a question regarding an in-kind contribution, please contact the Law Department.

The Company is prohibited from compensating or reimbursing any Coach employee or individual associated with the Company, directly or indirectly, in any form, for political contributions that the person intends to make or has made. The engagement of, or payment to, any outside lobbyist must be preapproved by the Law Department. It should be noted that certain jurisdictions, including the United Kingdom, have broadly defined political contributions. If you have a question regarding whether something is considered a political contribution, please contact the Law Department.

Individual Coach employees remain free to make personal contributions to candidates or parties of their choice. A personal contribution is the responsibility and burden of the individual person. Such personal political activities or contributions must not involve or even appear to involve use of Coach's funds or resources. Coach's funds or resources include, but are not limited to, Company time, facilities, office supplies, letterhead, phones, and fax machines. Coach will accept no responsibility for or obligation with respect to a personal contribution. Further, a personal contribution shall not be made with the intention of assisting Coach or one of its operating companies in obtaining or retaining business.

Any questions concerning this policy should be directed to Todd Kahn, Global Corporate Affairs Officer, Secretary and General Counsel at (212) 594-1850.