



Coach, Inc. Supplier Code of Conduct

Coach, Inc. and its subsidiaries and affiliates, including the Coach and Stuart Weitzman brands (the “Company” or “Coach, Inc.”), operates a global business. Coach, Inc. is committed to conducting its business, and procuring products and services around the world in a manner which is conducive to good global citizenship as well as enhancement of the Company’s reputation, image and commercial success.

Coach, Inc. expects the companies with 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 Coach, Inc.’s high standards of ethical behavior.

Accordingly, Coach, Inc. has enacted the following **Supplier Code of Conduct**. Coach, Inc. 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 Company’s supplier selection guidelines.

“Suppliers” include contractors, joint venture partners and suppliers of goods and services, including raw material suppliers.

1. Ethical Standards

Coach, Inc. 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

Coach, Inc. 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:

Coach, Inc. 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 Coach, Inc. 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 Coach, Inc. This includes any attempt to impact the objectivity of third party representatives appointed by Coach, Inc. to carry out inspections or compliance audits. The Company’s Anti-Corruption

Policy can be found at

<http://www.coach.com/governance-document.html>

4. Environmental Requirements & Sustainability

Coach, Inc. 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. Coach, Inc. 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:

<http://www.coach.com/sustainability-report.html>

5. Conflict Minerals:

As a publicly traded US Company, Coach, Inc. 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 Coach, Inc. products, and the applicable smelters, must be disclosed to Coach, Inc. 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 Coach, Inc.'s Conflict Mineral policy at <http://www.coach.com/conflict-minerals-policy.html>

6. Slavery & Human Trafficking:

In compliance with the *California Transparency in Supply Chains Act (SB 657)* and the *UK Modern Slavery Act of 2015*, Coach, Inc. will not knowingly use suppliers who employ slave labor or support human trafficking. You can find the Company's policies at: <http://www.coach.com/governance-document.html>

7. Animal Welfare:

Coach has adopted an animal welfare policy in order to ensure the humane and ethical treatment of the animals used in the production of Coach product. You can find the Company's policy at: www.coach.com/governance-document.html

8. Employment Practices

Working Hours: Coach, Inc. 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, Coach, Inc. will not knowingly do business with suppliers who employ individuals who are under 15 years of age.

Forced Labor: Coach, Inc. 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 Coach, Inc. use services provided by such labor.

Discrimination: Coach, Inc. 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: Coach, Inc. 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: Coach, Inc. 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.

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

9. Privacy & Security

Coach, Inc. 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.



10. 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 Coach, Inc. 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.

11. 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. Coach, Inc. 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.

12. Conflicts of Interest

Coach, Inc. 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 that creates or appears to create a conflict of interest between personal interests and the interests of Coach must be avoided.

Any situation, including any relationship or transaction between the Company and any of its or its suppliers' employees or family members of employees, that creates or appears to create a conflict of interest between personal interests and the interests of Coach, Inc. 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 Coach, Inc. employees and suppliers with whom

Coach, Inc. does business must disclose to Coach, Inc. any actual or potential conflict of interest.

13. 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 verification, licensures, certificates, waivers, etc.).

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

14. Communication:

Coach, Inc. suppliers must communicate these principles and guidelines to their workers and supervisors.

15. Known Violations

You are required to report any known violations of this Coach, Inc. 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 Coach Inc.'s standards or the law, contact the Coach, Inc. Law Department at 212-615-2436. You may also report a matter (anonymously, if desired) by contacting the Coach Ethics and Compliance Reporting System online at <http://www.coachinc.ethicspoint.com>, or call a representative, at 1-800-396-1807 (for matters in the United States) or the international phone numbers available at <http://www.coach.com/contact-board.html>.

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