

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

FORCED LABOR AND HUMAN TRAFFICKING POLICY

On January 1, 2012, the California Transparency in Supply Chains Act of 2010 (Cal. Civ. Code § 1714.43) went into effect. This law, passed by the California state legislature, will increase the amount of information made available by retailers and manufacturers concerning their efforts to eradicate slavery and human trafficking from their supply chains. As a result, consumers can make better and more informed choices about which products they use and companies they patronize.

Forced labor and human trafficking can take many forms, including child labor, and TUMI Stores has a zero-tolerance policy for any such forced labor, human trafficking or child labor used in the manufacture of its products. TUMI Stores, Inc. and its parent, TUMI, Inc. (collectively, “TUMI”) have together established a comprehensive program that takes multiple actions to verify the absence of forced labor, human trafficking or child labor in TUMI’s supply chain. These actions include:

Verifying product supply chains, for evaluating and addressing risks of human trafficking and slavery.

Conducting audits of suppliers to evaluate supplier compliance with company standards.

Requiring direct suppliers to certify that materials incorporated into TUMI products comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.

Maintaining internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.

Providing company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery.

TUMI’s specific programs and initiatives are described below.

TUMI's Position. TUMI strictly prohibits the use of “forced labor” and “human trafficking” in all company operations and in TUMI’s global supply chain. The International Labour Organization (“ILO”) defines forced labor as “all work or service which is exacted from any person under the menace of a penalty and for which the said person has not offered himself voluntarily”. The “Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children” which supplemented the “United Nations Convention against Transnational Organized Crime (2000)” and the “Council of Europe Convention on Action Against Trafficking in Human Beings (2005)”, defines human trafficking as “the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use by force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability, or of the giving and receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”

Standards of Engagement. TUMI has established a code of conduct, known as the “Standards of Engagement”, which is modeled on international human rights law and international labor rights conventions. TUMI’s Standards of Engagement prohibit TUMI’s manufacturers and suppliers from making TUMI products using forced labor or illegal child labor. A copy of TUMI’s Standards of Engagement is available [here](#). All of TUMI’s manufacturers and suppliers are required to sign a Manufacturing or Supplier Agreement which includes TUMI’s Standards of Engagement.

Ensuring Compliance with TUMI’s Standards of Engagement. TUMI routinely verifies manufacturer and supplier compliance by using independent third parties to assess adherence to TUMI’s Standards of Engagement and to inspect factory conditions. TUMI reserves the right to conduct audits, both announced and unannounced, of TUMI’s manufacturer and supplier factories. TUMI commits to discontinue TUMI’s business relationship with any manufacturer or supplier that consistently or deliberately fails to meet compliance standards or breaches TUMI’s Standards of Engagement. In all of TUMI’s Purchase Orders or other engagement agreements with suppliers, suppliers certify that all products supplied are in compliance with all applicable country laws and regulations, including those regarding forced labor, including human trafficking.

Implementation. TUMI trains TUMI’s employees and management personnel with direct responsibility for supply chain management to mitigate risks within the supply chain. Each year, TUMI actively engages in various corporate responsibility and sustainability initiatives. TUMI works together with TUMI’s supply chain personnel to raise awareness and implement programs to improve understanding of these initiatives as well as ensure compliance with them. TUMI hosts sustainability workshops with TUMI’s department heads and decision makers at TUMI’s corporate headquarters in New Jersey and with key manufacturers and suppliers in both China and Thailand. Health, safety and environmental recommendations are provided to manufacturers and suppliers based upon these workshops and TUMI’s supply chain factory visits. To view TUMI’s Corporate Responsibility Statement, please [click here](#).

Effective as of January 1, 2012

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

TUMI STORES, INC.

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> TUMI’s Position.

> Standards of Engagement.

> Ensuring Compliance with TUMI’s Standards of Engagement.

> Implementation.

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