

## ***Stein Mart Conflict Minerals Compliance Policy***

In accordance with the Dodd-Frank Wall Street Reform and Consumer Protection Act, the United States Securities and Exchange Commission (SEC) requires publicly traded companies to report on the origin of these conflict minerals. This legislation is intended to diminish the proceeds from the mining of certain minerals in the Democratic Republic of Congo (DRC) and adjoining countries which have been linked to human rights violations through the funding of illegal armed groups. This policy is consistent with Stein Mart's Vendor Code of Conduct which clearly states the company's strong commitment to ethical business practices especially as they relate to human rights issues.

### **DEFINITIONS**

**Conflict Minerals:** refers to columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives; or any other mineral or its derivatives determined by the Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country. Tantalum, tin, tungsten and gold (3TGs) are the widely accepted derivative metals to be of interest at present and are the current focus of the EICC-GeSI (Electronic Industry Citizenship Coalition – Global eSustainability Initiative) conflict free smelter certification program.

**DRC Adjoining Country:** is a country that shares an internationally recognized border with the Democratic Republic of the Congo. The following countries are currently recognized as "adjoining countries": Angola, Burundi, Central African Republic, Congo Republic (a different nation than DRC), Rwanda, South Sudan, Uganda and Zambia.

**DRC Conflict Free:** As defined in Section 1502 of the Dodd-Frank Act, "a product may be labeled as 'DRC conflict free' if the product does not contain conflict minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or an adjoining country."

**Conflict minerals obtained from recycled or scrap sources:** Conflict minerals obtained from recycled metals. These recycled metals may be reclaimed end-user/ postconsumer products or scrap processed metals created during product manufacturing. Recycled metals include excess, obsolete, defective, and scrap metal materials containing refined or processed metals that are appropriate to recycle in the production of tin, tungsten, tantalum or gold. Minerals partially processed, unprocessed or a bi-product from another ore are not included in this definition.

### **POLICY**

Stein Mart fully supports the humanitarian goals of the Dodd Frank Act and is committed to conducting its business operations in a manner that complies with all applicable laws and regulations regarding conflict minerals. We are committed to working with our supply chain to increase transparency regarding the origin and traceability of minerals contained in our products. Stein Mart will follow the current Organization for Economic Cooperation and Development (OECD) framework to incorporate proper due diligence measures into our supply chain regarding trade in conflict minerals.

To comply with these requirements Stein Mart will:

- Inform our vendors of this Conflict Minerals Policy and its relationship to Stein Mart's Vendor Code of Conduct.
- Take measures to increase the likelihood that we are able to source products from our vendors which are DRC Conflict-Free. These measures will include adopting, disseminating and incorporating this policy in related purchase orders, contracts and other appropriate agreements with vendors.
- Encourage our vendors to track and improve their performance in sourcing minerals from their vendors which are validated as being DRC Conflict-Free in accordance with a national or internationally recognized due diligence framework.
- Annually make training materials available to our buying group focused on education and awareness of DRC Conflict-Free initiatives.

Communications supporting the above initiatives detail the following requirements which will apply to all Stein Mart vendors:

- Assist Stein Mart by responding to all inquiries regarding compliance with SEC regulations related to conflict minerals and provide all necessary declarations.
- Undertake reasonable due diligence, consistent with the Organization for Economic Cooperation and Development (OECD) current guidelines, within their supply chain seek to determine the chain of custody and origin of the conflict minerals. Due diligence includes developing policies and management systems to use DRC Conflict-Free minerals, including making these requirements apply to their direct vendors and sub-tier vendors and requiring them to do the same with lower tiers of vendors.
- Make commercially reasonable efforts to comply with information requests on the source and origin of conflict minerals in the parts, components or materials provided to Stein Mart. This includes completion of the EICC-GeSI (Electronic Industry Citizenship Coalition – Global E-Sustainability Initiative) conflict minerals reporting template.
- Maintain chain of custody data for five years and provide the same to Stein Mart upon request.

#### **NON-COMPLIANCE**

Stein Mart has focused our efforts on surveying and educating our vendors regarding the initiatives detailed above. Should a violation to the above policy be identified, remedies may include:

- Issuance of Business Recovery Charge due to a vendor's failure to respond to inquiries or provide necessary documentation.
- Notification of Stein Mart Conflict Minerals Policy violation and our intent to terminate the business relationship within 90 days if not corrected.
- Suspension of business activity until Stein Mart is assured the vendor or its contractor has corrected the issue and taken all necessary action to prevent future violations.
- Termination of the business relationship including the cancelation of all existing contracts and/or purchase orders.
- Report illegal activity to the appropriate authorities.

#### **Additional Information**

Questions regarding Stein Mart's Conflict Minerals Policy and compliance program can be addressed to [conflictminerals@steinmart.com](mailto:conflictminerals@steinmart.com).

For additional information about our commitment to responsible sourcing and other human rights, see Stein Mart's Vendor Code of Conduct:

<https://vendors.steinmart.com/sites/SupplyChain/Documents/Vendor%20Code%20of%20Conduct.pdf>

Dated: May 31<sup>st</sup>, 2017