



Supply Chain Disclosure Statement

Hayneedle, Inc. (“Hayneedle”) is committed to conducting business in a lawful and ethical manner. We expect our suppliers to do the same. This disclosure sets forth Hayneedle’s current efforts to eliminate slavery and human trafficking from our supply chain.

Verification of Supply Chains

Hayneedle expects its suppliers to address the concerns of human trafficking and slavery. Specifically, our vendor terms and conditions require our direct suppliers to comply with applicable laws regarding slavery and human trafficking. Our internal (non-third party) verification is performed with direct suppliers through their acceptance of our Vendor Guidelines and Standard Code of Conduct.

Auditing of Supply Chains

Hayneedle’s Vendor Standard Code of Conduct explicitly permits Hayneedle to conduct audits or investigations at any time in response to a possible violation by our direct suppliers of company standards for trafficking and slavery in supply chains. At this time, Hayneedle has not determined a need for additional verification or independent audits of its direct suppliers.

Certification of Direct Suppliers

By signing or accepting our Vendor Terms and Conditions, Hayneedle’s direct suppliers represent and warrant that it conducts business pursuant to all applicable local and national laws, including those governing slavery and human trafficking and its failure to do so is considered a breach of the agreement.

Accountability Standards and Procedures

We require each new employee to abide by Hayneedle’s Code of Business Conduct. All new employees receive the Code of Business Conduct in their new hire information and sign an acknowledgement stating they have read it. Failure of employees to abide by Hayneedle’s Code of Business Conduct is taken seriously, and can result in corrective action up to and including termination of employment.

Training

Hayneedle offers training for associates and management who work with our supply chains on the issues of slavery and human trafficking.