

GLOBAL SOURCING GUIDELINES

Foot Locker, Inc. is concerned about the safety and fair treatment of the workers who manufacture the goods the Company sells, wherever the workers are located. To this end, the Company has developed the following Global Sourcing Guidelines, which shall apply worldwide to the Company's suppliers. Foot Locker, Inc.'s Global Sourcing Guidelines require all of the Company's suppliers to respect certain employment standards that the Company believes should be universal notwithstanding more relaxed standards (if any) which may be imposed by applicable local laws.

In the selection of its suppliers, Foot Locker works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with those of the Company. At the very minimum, Foot Locker expects its suppliers to comply, and to ensure that their subcontractors comply, with all legal requirements applicable to the conduct of their business.

Each of the Company's suppliers agrees that, by accepting orders from the Company or any of its subsidiaries, it will abide by and implement the terms of these Global Sourcing Guidelines and require the same from each of its subcontractors. Each of the Company's suppliers acknowledges that its failure to honor this agreement will compel Foot Locker to reevaluate, and possibly terminate, its business relationship with such supplier.

Employment Standards:

Foot Locker will only do business with suppliers whose workers are, in all cases, present voluntarily, compensated fairly and allowed the right of free association and who are neither put at risk of physical harm, discriminated against, nor exploited in any way.

In particular, it is Foot Locker's policy that:

Child Labor. Child labor is not permissible. Workers may not be younger than 15 years of age (or 14 where local law permits) or the age for completing compulsory education, if higher.

Forced Labor. Forced labor, whether in the form of prison labor, slave labor, indentured labor, bonded labor or otherwise is not permissible. Employment must always be on a voluntary basis.

Wages and Benefits. Foot Locker will only deal with suppliers who compensate their employees fairly by providing wages, overtime premiums and benefits that, at very least, comply with legally mandated minimum standards.

Working Hours. Foot Locker will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards or any maximum prescribed by applicable laws.

Health and Safety. Foot Locker will only deal with suppliers who provide their employees with a safe and healthy work environment, designed to prevent accidents and injury to health arising out of or occurring in the course of work. At the very least, the Company requires that its suppliers comply with all applicable, legally mandated minimum standards for workplace health and safety.

Nondiscrimination. Foot Locker believes that employment should be based on ability and not on belief or any other personal characteristics. Thus, Foot Locker will only deal with suppliers who do not practice discrimination in employment, including in hiring, salary, benefits, advancement, discipline, termination, retirement, or in other aspects of employment on the basis of race, color, nationality, ethnic origin, gender, religion, age, sexual orientation, disability, or similar factors.

Harassment and Abuse. Foot Locker expects all employees to be treated with respect and dignity. Thus, Foot Locker will not deal with suppliers whose employees are subjected to physical, sexual, psychological or verbal harassment or abuse.

Freedom of Association. Foot Locker expects all of its suppliers to grant their employees the right to choose to affiliate with legally sanctioned organizations or associations without interference.

Environment:

Foot Locker expects that each supplier facility will comply with all laws and regulations relating to environmental protection in the country in which it operates.

Subcontracting:

Supplier will not utilize subcontractors in the manufacturing of products for Foot Locker without Foot Locker's prior written approval and only after subcontractor has agreed to comply with these Global Sourcing Guidelines.

Cargo Security:

Each supplier is responsible to assure the security of the merchandise to the point of delivery to Foot Locker. Supplier will take the necessary steps to assure all shipments of merchandise to Foot Locker are secure and do not contain illegal materials or substances, illegal drugs, contraband or weaponry.

These Global Sourcing Guidelines are distributed annually by the Company to each of its suppliers. In order to assure that the Guidelines' contents are available to the workers whose well-being is their object, the Company also requires its suppliers to post these Global Sourcing Guidelines prominently on the premises where goods for the Company are manufactured.

These Global Sourcing Guidelines are integral parts of our purchase agreement with our suppliers. **To assure its suppliers' conformity with these Global Sourcing Guidelines, Foot Locker reserves the right to make periodic, unannounced inspections of its suppliers' facilities.** Moreover, each shipment of goods to the Company must be accompanied by a certificate from the supplier confirming, in respect of the goods included in the shipment, that the supplier and each of its subcontractors have complied with the terms of these Global Sourcing Guidelines and that, in particular, neither forced labor nor child labor was employed in the manufacture of such goods. Suppliers agree to maintain and provide upon request all documentation necessary to demonstrate and to assure compliance with the Global Sourcing Guidelines.

Foot Locker, Inc. welcomes questions and comments regarding these Global Sourcing Guidelines, all of which should be sent to the Company's Secretary at Foot Locker, Inc., 330 West 34th Street, New York, New York 10001.