

Wolverine World Wide, Inc. Conflict Minerals Policy

Wolverine World Wide, Inc. and its subsidiaries (collectively, “Wolverine,” “we,” “us” and “our”) are committed to the respect of human rights as well as conducting our business in a socially and environmentally responsible manner.

Wolverine takes its obligations as provided for in Rule 13p-1 under of the Securities Exchange Act of 1934 (the “Conflict Minerals Rule”) seriously and has accordingly adopted this Conflict Minerals Policy (the “Policy”). We are committed to complying with our obligations under the Conflict Minerals Rule and expect all participants in our supply chain, including suppliers, to share this commitment. Further, where cassiterite, columbite-tantalite, gold, wolframite or their derivatives are used in our products, we strive to ensure these minerals or their derivatives do not directly or indirectly finance or benefit armed groups in the Covered Countries.

The Conflict Minerals Rule is intended to reduce funding for armed groups committing human rights abuses in the “Covered Countries” which currently include the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia. Under the Conflict Minerals Rule, Wolverine is required to make certain disclosures to the U.S. Securities and Exchange Commission regarding its use of the Conflict Minerals - cassiterite (tin), columbite-tantalite (tantalum), gold and wolframite (tungsten) – that may be necessary for the functionality or production of products that Wolverine manufactures or contracts to manufacture. Wolverine must disclose whether the aforementioned Conflict Minerals originate from a Covered Country and, if so, whether those minerals financed or benefited armed groups in the Covered Countries.

Wolverine annually assesses its supply chain to determine where Conflict Minerals exist and works with its suppliers to determine the use and origin. To the extent applicable, Wolverine follows the processes and procedures set forth in the Organisation for Economic Co-operation and Development's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”).

Wolverine and its third-party suppliers purchase raw materials and component parts from a variety of sources. Wolverine is several levels removed from the actual mining of any Conflict Minerals, and Wolverine does not make purchases of Conflict Minerals directly from mines, smelters or refiners. We therefore require the cooperation of our suppliers in the implementation of this Policy and in enabling us to meet our compliance obligations. In furtherance of this Policy, our suppliers are expected to:

- Determine which products incorporate Conflict Minerals, regardless of country of origin;
- Define and maintain adequate procedures for the traceability of Conflict Minerals and, where applicable, derivatives of Conflict Minerals;
- Maintain adequate, reviewable business records substantiating the source of Conflict Minerals;

- Render all necessary assistance to Wolverine or its designee for the Conflict Minerals due diligence process including but limited to providing, as requested, written certifications and other information concerning the origin of Conflict Minerals included in products and/or components supplied to us;
- Implement necessary policies and procedures regarding Conflict Minerals that are consistent with this Policy and the OECD Guidance, including but not limited to the adoption of a risk mitigation strategy to respond to identified risks in the supply chain, and communicate such policies and procedures to their personnel, direct suppliers, indirect suppliers, and other affiliates; and
- Obligate all suppliers, whether direct and indirect, to adopt policies and procedures that are consistent with this Policy.

Suppliers may reach out to their Wolverine business contacts with any questions regarding this Policy. Any concerns regarding this Policy or potential violations may be reported as outlined below:

By email via: compliance@wwwinc.com

By mail to the following address:

Wolverine World Wide, Inc.
9341 Courtland Drive, NE
Rockford, MI 49351
Attention: Chief Compliance Officer