

MODERN SLAVERY STATEMENT

2026

INTRODUCTION

This Modern Slavery Statement (**Statement**) is made by Foot Locker Australia Holdings, LLC (ARBN: 669 762 387) (**Foot Locker AU**) pursuant to sections 13 and 16 of the *Modern Slavery Act 2018* (Cth) (**Act**) for the reporting period from 2 February 2025 to 31 January 2026 (**Reporting Period**).

The Statement has been approved by the board of Foot Locker AU, as required by section 13(2)(c) of the Act.

STRUCTURE

Foot Locker AU is a Virginia, USA based corporation, operating in Australia as a foreign registered company.

Its Head Office in Australia is located at Level 1, 16 Terrace Place, Murarrie, Queensland.

Foot Locker AU is a wholly owned subsidiary of Foot Locker, Inc. (**Foot Locker**), New York, NY, USA.

Foot Locker AU does not have any subsidiaries.

Foot Locker AU's operations and supply chain for the products that it sells through its retail and online stores (i.e. sporting footwear, apparel and accessories) are largely the same as, and governed by, Foot Locker. Accordingly, for the purpose of this Statement, references are made to Foot Locker, as applicable to Foot Locker AU.

Foot Locker AU employs approximately 1,987 staff across the business as follows:

- 101 in head office; and
- 1,886 in retail stores.

OPERATIONS AND WHO WE ARE

- Global: Foot Locker is a leading footwear and apparel retailer. With a global presence across North America, Europe, Australia and New Zealand, and a licensed store presence in Europe, the Middle East and Asia, Foot Locker has a strong history of sneaker authority that sparks discovery and ignites the power of sneaker culture.
- Internet Channels: Foot Locker offers athletic footwear, apparel, and equipment through the Internet channels for each brand, such as footlocker.com or footlocker.eu.
- Private Label: The vast majority of products sold by Foot Locker come from our name brand suppliers. Only a very small percentage of our products are sourced directly by Foot Locker. We have in place a system of factory inspections and monitoring to ensure compliance with our guidelines and applicable laws.
- Australia: In Australia, Foot Locker AU operates approximately 81 retail stores and through a mobile and international channel footlocker.com.au.

Foot Locker AU's operations include:

- the procurement of sporting footwear, apparel and accessories from Foot Locker's suppliers;
- the sale and delivery of sporting footwear and apparel through retail stores and online;

- direct employment of workers to manage and maintain retail stores;
- direct employment of workers to manage and maintain office premises and undertake activities relevant to the sales and distribution of its goods, including logistics, marketing, corporate functions and other administration; and
- the engagement of contractors to undertake logistics, cleaning and security.

SUPPLY CHAINS

As mentioned above, Foot Locker AU's supply chain is primarily Foot Locker's supply chain. Foot Locker AU does not manufacture or source the merchandise that it sells in its stores, as that is procured by Foot Locker. Foot Locker AU's supply chain is limited to goods and services that it needs to source locally.

Foot Locker AU's main local supply chain consists of:

- the employment of retail and office staff;
- suppliers who fit out and maintain the retail stores and offices (including the provision of IT and telecommunications equipment); and
- contractors or external service providers who undertake logistics, cleaning and security;

Products in Foot Locker AU's supply chain include:

Category	Details
Shoes/Sneakers	Men's, women's and children's footwear, including lifestyle/casual sneakers, performance running shoes, basketball shoes and trail/outdoor shoes.
Clothing	Apparel for men, women and children, including t-shirts, hoodies, tracksuits, shorts and jackets.
Accessories	Bags, hats, socks, sneaker care and other accessories

The vast majority of these products come from Foot Locker's branded suppliers. These include major and reputable global brands. A small percentage of Foot Locker's products are sourced directly by Foot Locker under its private label.

A large proportion of Foot Locker's proprietary brand merchandise, apparel and accessories are sourced from suppliers located across China, Pakistan, Vietnam, Thailand, Portugal and the United States.

RISKS OF MODERN SLAVERY PRACTICES

The footwear and apparel industries can carry a high risk of modern slavery practices in operations and supply chains, particularly in regions where raw materials, labour and final products are sourced.

Foot Locker has identified a risk that it may contribute to modern slavery practices in its supply chain through the merchandise it buys and sells. These risks primarily involve human rights abuses such as:

- forced and child labour;
- unfair wages and benefits; and
- poor working conditions and health and safety risks (such as high temperatures in factories, extreme noise levels and potential impacts from cleaning agents).

Foot Locker assesses that these risks are higher in jurisdictions such as China, Pakistan, Vietnam and Thailand, where workplace rights protections and enforcement mechanisms are comparatively weaker than in Australia, Europe and the United States.

Foot Locker's efforts to address the risks of modern slavery in its operations and supply chain focus on suppliers in locations that lack robust workplace protections for workers.

Tier 1 suppliers are required to share Foot Locker's policies with Tier 2 suppliers who are also required to comply with relevant policies.

Foot Locker assesses that the risk of contributing to modern slavery practices in its operations and supply chains in locations such as Australia, Europe and the United States is low, having regard to:

- its operations and supply chains in those locations, which are primarily of a retail and administrative nature and the sourcing of goods and services to support the same; and
- the respective legislative regimes to protect worker rights and the environment.

ASSESSING AND ADDRESSING MODERN SLAVERY RISKS

Guidelines

Foot Locker's Guidelines require all vendors and suppliers globally to respect certain stated standards. Foot Locker's Guidelines:

- are distributed to both our branded vendors and private label suppliers;
- reflect Foot Locker's abiding commitment to the safety and fair treatment of the workers who manufacture the products we sell. Foot Locker is paying attention to the working conditions and employment standards of manufacturing employees worldwide;
- are designed to make clear that we expect the product that we sell in our stores to be manufactured in compliance with local laws, under working conditions that meet certain standards, and without the use of child labour, prison labour, or any form of slave labour;
- make it clear that Foot Locker is committed to sourcing components and materials from companies that share our values regarding human rights and environmental responsibility; and
- are incorporated into our Vendor Standards Manual.

Foot Locker's suppliers adhere to our Global Sourcing Guidelines (**GSG**) and agree that, by accepting orders from us or any of our subsidiaries, they will abide by and implement the following requirements and require the same from each of their subcontractors:

Anti-Bribery and Anti-Corruption: We will only deal with suppliers who comply with applicable anti-bribery and anti-corruption laws.

Child Labor: Child labour 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, Slavery, and Human Trafficking: Forced labour, whether in the form of prison labour, involuntary, or slave labour (including human trafficking), indentured labour, bonded labour, or otherwise, is not permissible. Employment must be voluntary.

Wages and Benefits: We will only deal with suppliers who compensate their workers fairly and timely by providing wages, overtime premiums, and benefits that comply with legally-mandated minimum standards or the appropriate prevailing wage to meet a worker's basic needs. We expect all suppliers and subcontractors to maintain accurate books and business records in accordance with all applicable laws and other requirements.

Health and Safety: We will only deal with suppliers who provide their workers 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. Our suppliers must comply with all applicable, legally-mandated minimum standards for workplace health and safety.

Harassment and Abuse: All workers must be treated with respect and dignity. We will not deal with suppliers whose workers are subjected to corporal punishment or mental or physical coercion and/or physical, sexual, psychological, or verbal harassment or abuse.

Working Hours: We will only deal with suppliers who maintain reasonable work hours, not exceeding prevailing local standards or any maximum prescribed by applicable laws. Overtime work shall be consensual, and other than in extraordinary circumstances, workers must be allowed to have at least one weekly rest day, and the sum of weekly working hours, including overtime, shall not exceed 60 hours. Suppliers shall comply with applicable laws that entitle workers to paid annual leave, casual leave, and holidays.

Non-discrimination: Employment should be based on ability and not on belief or any other personal characteristics. We will only deal with suppliers who do not practice discrimination in employment, including in hiring, salary, benefits, advancement, discipline, termination, retirement, or any other aspects of employment on the basis of race, colour, nationality, ethnic origin, gender, religion, age, sexual orientation, marital status, disability, or similar factors.

Freedom of Association and Collective Bargaining: Suppliers must respect the right to free association and grant their workers the right to bargain collectively without unlawful interference.

Environment and Sustainability: We expect our suppliers to prioritize sustainability, reduce waste, and work to reduce carbon emissions and comply with applicable environmental laws and regulations. Each supplier facility must comply with all laws and regulations relating to environmental protection in the country in which it operates. We expect suppliers to implement reasonable measures to mitigate negative impacts generated from their operations on the environment.

Conflict Minerals and Restricted Chemicals: All raw materials and substances used to produce our products must comply with all applicable rules, laws, and regulations, including conflict minerals regulations and chemical content and exposure laws.

Subcontracting: Suppliers will not utilize subcontractors in the manufacturing of products for us without prior written approval and only after the applicable subcontractor has agreed to comply with Foot Locker's guidelines. Further, our suppliers must maintain a socially responsible supply chain and source components and materials from companies that share our values regarding human rights, ethics, and environmental responsibility.

Cargo Security: Each supplier is responsible for safeguarding the security of the merchandise to the point of delivery to us. Suppliers will take the necessary steps to ensure all shipments of merchandise to us are secure and do not contain illegal materials or substances, illegal drugs, contraband, or weaponry.

Each of our suppliers acknowledges that its failure to honour these guidelines will compel us to re-evaluate, and possibly terminate, its business relationship with such supplier.

These guidelines are distributed annually by Foot Locker to each of its suppliers. In order to assure that these guidelines are available to the workers for whom they are meant to protect, we also require suppliers to provide training for workers and post these guidelines prominently on the premises where our products are manufactured. These guidelines are an integral part of our purchase agreements with our suppliers. To assure suppliers' compliance with these guidelines, we reserve the right to make periodic, unannounced inspections of its suppliers' facilities. Suppliers agree to maintain and provide upon request all documentation necessary to demonstrate compliance with these guidelines.

Private Label Factory Audits

Foot Locker is concerned with the safety and fair treatment of all workers involved in our supply chain, wherever the workers are located globally. It is Foot Locker's policy to choose reputable business partners who are committed to ethical standards and business practices. Foot Locker will only do business with

suppliers whose workers are present voluntarily, compensated fairly, allowed the right of free association and who are neither put at risk of physical harm, discriminated against, nor exploited in any way.

What do we do?

- Foot Locker conducts regular social compliance audits for direct suppliers of private label product. During the social compliance audit, a verified third party evaluates the factory on compliance in forced labour, child labour, wages and working hours, harassment and discipline, health and safety, freedom of association, discrimination, sub-contracting, basic environmental standards. Auditors evaluate compliance with these standards through document review, worker and management interviews and factory tours. Auditors are trained in identifying potential risks of forced labour or human trafficking.
- Foot Locker reserves the right to make periodic, unannounced inspections of our private label suppliers' facilities to verify compliance with our Guidelines and other requirements. Such on-site inspections are conducted by our internal team or by a third-party company.
- Suppliers agree to maintain and provide, upon request, all documentation necessary to demonstrate and to assure compliance.
- In recent years, we have taken steps to consolidate our supplier base so that we are working more closely with fewer suppliers to deepen our partnerships to forge a more collaborative approach grounded in continuous engagement and improvement.
- Because our proprietary brand supply chain extends through various tiers beyond Tier 1 - from primary manufacturing supplier partners (and their owned or contracted factories) to raw material sourcing - we have continued our commitment to mapping our supply chain, for Tier 1 and Tier 2 suppliers, in an effort to ensure that they produce the products sold in our stores in a socially-responsible way. This information is screened against several risk exposure databases and further researched for additional risk and supply chain exposure using external subject-matter experts in the area of supply chain and human rights risks. In instances where supply chain mapping suggested that the risk was elevated, we may conduct additional chain of custody and traceability documentation reviews.

Foot Locker Social Compliance Due Diligence

Foot Locker's efforts include setting policies and operating guidelines for suppliers, identifying risks to workers health and safety through social compliance audits, and by participating in industry groups that collaborate to set policies and approaches to social and environmental risks within the supply chain, such as Retail Industry Leaders Association (RILA) in the US.

Foot Locker Security Compliance Due Diligence

Each supplier is responsible for the security of the merchandise, and we expect each supplier to take the necessary steps to assure all shipments of merchandise to Foot Locker are secure and do not contain contraband or other illegal materials.

Foot Locker continues its partnership with Dutch Customs and U.S. Customs & Border Protection in the area of border security and international trade control. Foot Locker is a validated member of ("C-TPAT") in the United States and Authorized Economic Operator ("AEO") in Europe.

Foot Locker Global Human Rights Policy

Our Global Human Rights Policy ("GHPR") outlines our human rights procedures and practices as they support our business and govern our relationships with our vertical brand manufacturing partners ("partners") and teammates. Through adherence to the GHPR, we prioritize human rights in our daily work, follow the law, and live our values.

The GHPR is applicable in any country in which we operate. Where local law and the requirements of the GHPR differ, we will follow the higher standard. Where they are in conflict, we will follow national law while doing our best to respect human rights.

Purpose of the GHPR

We are committed to basic human rights as a core component of the way we conduct business. This supports teammates in creating and maintaining a work culture that prohibits unhealthy or unsafe work conditions, forced labour or child labour, and supports the provision of equal human rights for everyone. These include, but are not limited to, the protection of minority groups, the protection of women's rights, the protection from discrimination based on gender (including gender identity), sexual preference, race or ethnicity, colour, religion, regionality or nationality, age, disability, sexual orientation, political beliefs or affiliations, or marital or maternity or parental status, the right to clean fresh water and sanitation, and protections against child or involuntary or forced labour, or corporal punishment.

The GHPR provides direction and guidance to teammates to ensure that all practices and processes support the fundamental principles of basic human rights and are developed and implemented in a manner that complies with our values around human rights and respects the inherent value of everyone. The GHPR also helps ensure that teammates engaged in company business understand their responsibility for upholding human rights and equality in the workplace.

The GHPR applies to all teammates. We also expect all parties who do business on our behalf to also conduct their business in ways that uphold the principles of the GHPR.

GHPR Policy Details

We are committed to maintaining a work environment that respects and supports the provision of basic human rights of all teammates around the world, especially members of at-risk groups including women, young workers, and foreign contract workers, regardless of the country in which they work, to the full extent permitted by law. To this end, we:

- commit to protecting team members from workplace hazards and to providing a safe working environment;
- strictly prohibit forced or compulsory labour, child labour, and human trafficking in any form;
- promote, protect, and help ensure the full and equal enjoyment of human rights for everyone; and
- commit to maintaining a workplace that is free from violence, harassment, intimidation, or other unsafe or disruptive conditions due to internal and external threats and will provide security safeguards for teammates as needed while respecting teammate privacy and dignity.

Foot Locker Global Sourcing Guidelines

Our Global Sourcing Guidelines (the “**Guidelines**”) applies to all suppliers and set forth our diligence efforts in connection with the GHPR. In accordance with the Guidelines, we will carry out appropriate human rights due diligence based on the UN Guiding Principles on Business and Human Rights (“**UNGPs**”) to identify, prevent, mitigate and account for how we address any adverse human rights impacts. This process will include:

- taking action to assess actual and potential adverse human rights impacts,
- integrating and acting upon the findings and tracking responses, and
- communicating how adverse human rights impacts are addressed.

We will concentrate our due diligence efforts where we consider the risk to the rights holder to be greatest (referred to as ‘salient human rights’ in the UNGPs), and where we are most able to make a positive difference (referred to ‘leverage’ in the UNGPs). We recognize that human rights due diligence is an ongoing process as human rights risks may change over time as our business operations evolve.

We will not tolerate any behaviour or actions that violate the GHPR.

SPECIFIC REQUIREMENTS/RESPONSIBILITIES

Supplier Responsibilities

We care about the safety and fair treatment of the workers who manufacture the goods we sell, wherever the workers are located. The Guidelines and our Conflict Minerals Policy each require our suppliers to respect certain standards.

We audit our private label suppliers' factories, both from a social and a security standpoint, particularly in developing countries or places with known human rights risks. We also engage with our suppliers on a regular basis to understand their policies and procedures regarding human rights.

Responsible Recruitment

We expect all our vertical brand manufacturing partners and vendors to practice responsible recruitment in accordance with local laws and international standards. Specifically for apparel and footwear, we are committed to the AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment.

Adherence to our policies requires that:

- no worker must pay for their job;
- workers must retain control of their travel documents and have full freedom of movement;
- all workers must be informed of the basic terms of their employment before leaving home.

Training

To ensure the effectiveness of this Statement, we will continue to build the knowledge and understanding of teammates on modern slavery and human rights issues.

Reporting Concerns

Our Code of Business Conduct includes policies preventing harassment and discrimination. We also provide ongoing training to promote a respectful workplace.

If a teammate, vendor, or partner becomes aware of a possible violation of our policies, they have a duty to "speak up" and report their observations in good faith. We prohibit retaliation against anyone reporting a possible violation in good faith.

The Code of Business Conduct includes an Ethics Hotline for reporting concerns as follows:

Online: footlocker.ethicspoint.com (international telephone numbers are available on this site).

The Ethics Hotline is managed via NAVEX and is available 24 hours per day, 7 days per week, in multiple languages.

Wherever local laws permit, concerns directed to the Ethics Hotline can be made anonymously. We will take the appropriate steps to investigate allegations, interview witnesses, resolve inquiries/issues, and identify the records/documents that need to be retained (for legal or operational reasons) and applicable retention period.

ASSESSMENT OF EFFECTIVENESS OF ACTIONS

Non-Compliance

Foot Locker understands that improving working conditions within factories is an ongoing responsibility. It is committed to encouraging positive change at its directly sourced supplier factories, with the goal that each audit will demonstrate measurable improvements by the supplier, where required.

The policies and processes described above are critical to Foot Locker's assessment of the effectiveness of its actions.

The audit process creates transparency with audit findings, assisting to identify suppliers who are non-compliant, so that appropriate actions can be taken to assist the supplier to remediate any non-compliances or alternatively, to terminate the relationship.

When non-compliance is identified during an audit, Foot Locker partners with the supplier to develop and implement an improvement plan for the facility. The outlined corrective actions must be taken by the supplier to remediate the issue. Foot Locker works with factory management to ensure the supplier properly addresses issues which present a risk to the supply chain.

In some cases, Foot Locker will require a follow-up audit to re-evaluate records after corrective actions have been taken.

Foot Locker reserves the right to terminate the relationship with any supplier who fails to comply with our Guidelines.

Foot Locker has an obligation to conduct business in an honest and ethical manner every day, and that doing so is the only way to succeed. We are committed to respecting internationally recognized human rights standards and avoiding adverse impacts on human rights resulting from our business activities. This commitment is based on our values and the principles set forth in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the UNGPs, the OECD Guidelines for Multinational Enterprises and the UN Universal Declaration of Human Rights.

Foot Locker has mapped its supply chains for Tier 1 and Tier 2 and assessed this information against several risk exposure databases and it engaged external subject matter experts in the area of supply chain and human rights risks to research any additional risks and supply chain exposure.

During the Reporting Period, Foot Locker its Tier 1 proprietary brand suppliers. No zero-tolerance labour violations were identified.

Foot Locker's proactive measures as described in this Statement are effective in raising awareness among its suppliers about the importance of respecting fundamental human rights and ensuring decent and fair working conditions throughout supply chains and operations.

APPROVAL

This Statement was approved on 31 July 2026 by Foot Locker Australia, Inc. as the principal governing body for Foot Locker Australia Holdings, LLC.

Signed for and on behalf of Foot Locker Australia Holdings, LLC:

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Giovanna Cipriano
Director, Foot Locker Australia Holdings, LLC