

A collection of men's accessories is displayed on a wooden surface. There are three ties: one with a dark blue and white geometric pattern, one with a blue and white polka dot pattern, and one with a solid blue color. A pair of square cufflinks with a blue and white geometric pattern is also visible. A white pocket square with a blue and white checkered pattern is folded and placed next to the ties. The items are arranged on a wooden surface with a light-colored wooden board running diagonally across the frame.

PERRY ELLIS INTERNATIONAL

Modern Slavery Joint Disclosure Statement - UK & Australia - **FY25**

In alignment with the Modern Slavery Act 2015 (section 54) and the Commonwealth Modern Slavery Act 2018 (Cth), this joint Statement details our ongoing due diligence efforts for the reporting period of February 4, 2024, to February 1, 2025 (FY'25). It was developed through consultation with all entities owned or controlled by Perry Ellis International, Inc. and was subsequently approved by all officers within the Board of Directors on July 18, 2025.

Jorge Narino

[Jorge Narino \(Jul 24, 2025 14:40:17 EDT\)](#)

JORGE NARINO

Chief Financial Officer
Perry Ellis International, Inc.





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OUR BUSINESS

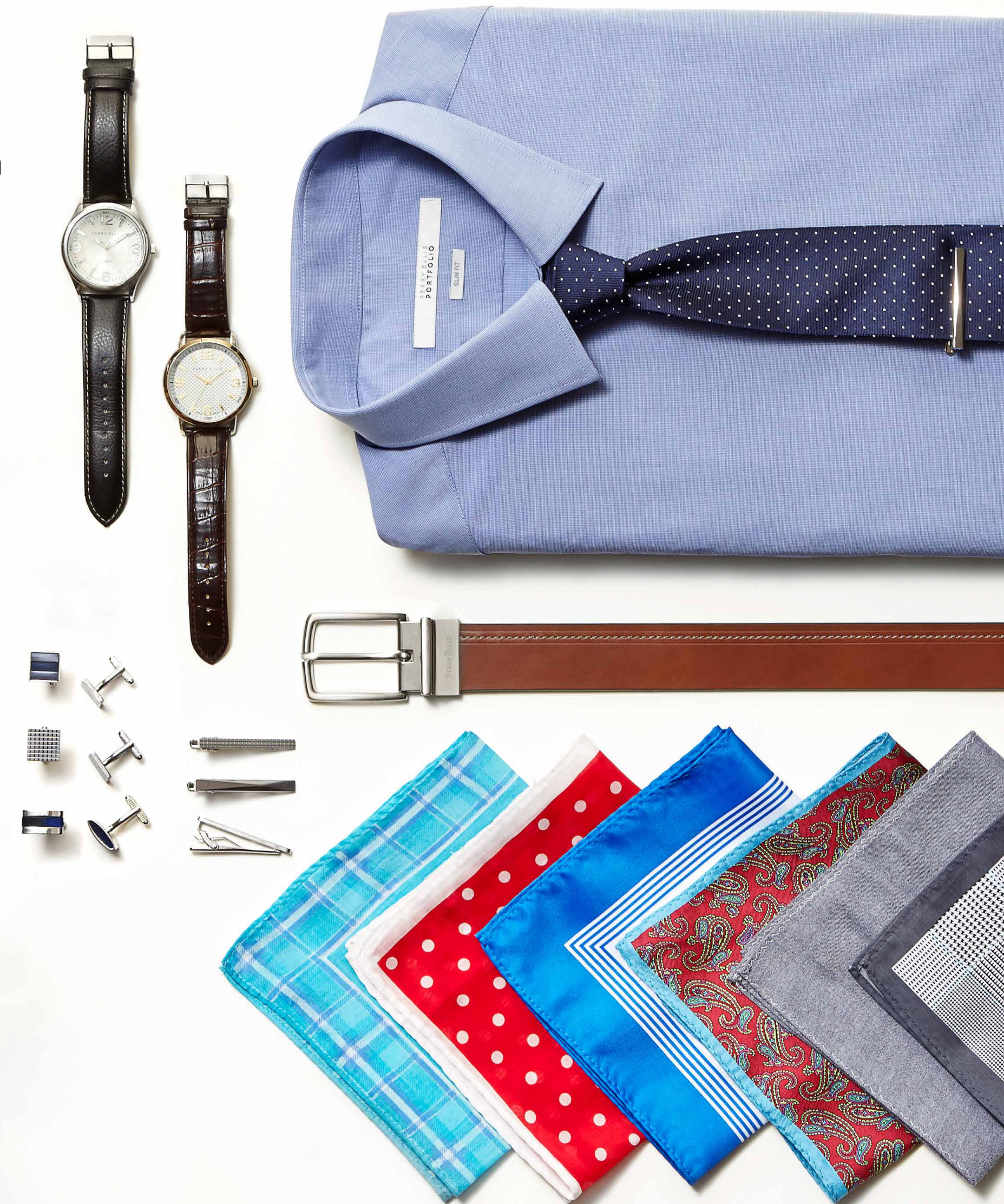
Our products are distributed globally through a wide network of retailers, including department stores, chain stores, mass merchants, specialty stores, and corporate wear distributors. We also sell directly to consumers via our retail stores and e-commerce platforms, and expand our market presence through strategic brand licensing. Headquartered in Miami, Florida, USA, we have a global footprint that includes 5 U.S. offices, 5 distribution centers, 244 direct-to-consumer stores, and 13 international offices, supported by 1,816 associates.

Perry Ellis International, Inc. (PEI), a privately-held company and its wholly-owned subsidiaries, Perry Ellis Europe Limited (PEEL) and Perry Ellis International Europe Limited (PEIEL) is a leading designer, distributor, and licensor of men's and women's apparel, accessories, and fragrances. PEI's diverse portfolio includes dress and casual shirts,

golf sportswear, sweaters, pants, denim, activewear, dresses, and swimwear, sold through all major retail channels. PEI, through its wholly owned subsidiaries, owns a collection of well-known national and international brands.

We further extend our brand reach by licensing our proprietary brands to third parties for manufacturing and marketing in product categories or geographic areas where we have no direct operations.

In Australia, our business consists of licenced royalties and sales generated from wholesale and Ecommerce. PEI has direct licence and distribution agreements with companies registered and established in Australia. We do not manufacture, own or control any entities in Australia nor do we operate or employ any associates in Australia.



BRAND PORTFOLIO

MEN'S FASHION		WOMEN'S FASHION	ACTIVE & SPORT
PERRY ELLIS	PERRY ELLIS AMERICA	LAUNDRY BY SHELLI SEGAL LOS ANGELES	
F FARAH®	CUBAVERA®	RAFAELLA	 GRANDSLAM
JOHN HENRY®	SAVANE®	ELLA RAFAELLA	
 MANHATTAN®			
Havanera Co. BY CUBAVERA®			

PEI enhances its roster of brands by licensing trademarks from third parties, including: Nike® for swimwear, Southern Proper® and Callaway®, PGA TOUR®, and Jack Nicklaus® for golf apparel.



APPAREL



PGA TOUR

OFFICIAL LICENSED APPAREL





OUR STRUCTURE

Reporting directly to the Chief Financial Officer, PEI's Social Compliance & Sustainability team is instrumental in the proactive management and mitigation of supply chain risks. Their responsibilities include ensuring supplier adherence to PEI's Vendor Code of Conduct, policies, and procedures, alongside continuous risk assessment, management, and overarching supply chain oversight. Extensive efforts led by this team are detailed further in the Due Diligence section. This team cultivates strong collaborative relationships across various cross-functional departments, including Sourcing, Legal, Quality, Imports, Purchasing, and Licensing, and strategically engages external industry experts for guidance and support as needed.



SUPPLY CHAIN

Our brand portfolio's production is facilitated by a global network of independent, contracted manufacturing partners. Our commitment to the highest ethical standards—encompassing human rights, fair labour, and worker safety—is foundational to our supply chain operations. Our compliance program sets clear expectations for sustainable performance, and we selectively engage with suppliers who demonstrate a verifiable commitment to these principles. Notably, our long-standing relationships with key suppliers, some exceeding 15 years and representing 65% of our production volume, underscore our commitment to enduring partnerships built on shared values. Our dedicated overseas sourcing teams are essential in providing on-the-ground support, fostering effective communication, ensuring compliance, and strengthening our global supply chain network, which in FY25 included approximately 267 Tier 1¹ & 2² suppliers across 28 countries for our directly produced goods and an additional 191 suppliers in 14 countries for our licensed merchandise.



¹ Manufacturing facilities
² Embroidery, printing, laundry facilities

DUE DILIGENCE

We prioritise the protection of our commitment to ethical and quality standards and brand integrity by implementing a strict due diligence process for all direct suppliers. This mandatory vetting process, conducted before production authorisation or purchase order approval, involves a multi-layered evaluation of potential partners.

MANDATORY CERTIFICATION

- Prior to registration, all manufacturers are required to sign our Master Supply Agreement contractually obligating them to comply with PEI's ethical, social, and environmental standards, as well as all relevant laws and regulations, including:

PEI Terms of Engagement

Customs requirements

Conflict Minerals policy

Manufacturing facility disclosure

PEI policies



SUPPLIER AUDITS



- To ensure the consistent application of our stringent supplier standards, **PEI** mandates that all direct suppliers, regardless of brand affiliation, undergo onsite audits, typically every 12 to 24 months. Several factors, including audit performance, or risk dictate audit frequency. These audits, conducted by either accredited third-party audit firms or PEI's own internal auditors, serve as a critical mechanism for verifying adherence to our ethical, environmental, and labour practice requirements. These requirements also apply to our licensee factories.
- **The audits**, which may be unannounced or semi-announced, are conducted to provide an accurate view of standard operational conditions, and involve a detailed review of supplier internal processes, safety practices, policies, records and relevant documentation.
- Suppliers are responsible for proactively initiating their audit renewal process at least two months prior to the expiration of their existing audit certifications. This lead time is essential to facilitate scheduling and audit completion, to maintain continuous compliance and transparency. Failure to initiate and complete audit renewals within the stipulated timeframe may result in delays in production approval, potentially impacting order fulfillment and business continuity.
- **Recognising the value and rigor of existing industry audit programs, PEI** actively collaborates with its suppliers

by accepting audit reports from recognised and reputable organisations such as SMETA, BSCI, SLCP, and WRAP. This approach not only reduces audit duplication and costs, minimising the burden on suppliers, but also streamlines the compliance process, allowing for more efficient resource allocation and a stronger focus on continuous improvement.

- **Based on risk assessments and performance data**, PEI may conduct unannounced visits and/or desktop reviews to ensure ongoing supplier accountability and prompt issue resolution. PEI prohibits unauthorised subcontracting. All subcontractors must be vetted and pre-approved prior to entering into any subcontracting arrangements and will be required to comply with PEI's Vendor Code of Conduct.





CORRECTIVE ACTION & REVIEW

- All audit reports, from third-party auditors, internal audits or industry bodies, undergo a detailed review by PEI's Compliance team to verify compliance with our standards.
- PEI's Compliance Program promotes joint partnerships, transparent communication, and a commitment to ongoing improvement. In the event of non-conformances, we work closely with suppliers to deploy Corrective Action Plans (CAPs) designed to identify and rectify root causes, leading to effective remediation and improvement. Re-audits are performed for onsite verification when necessary. Ultimately, we maintain the integrity of our program by discontinuing partnerships with suppliers who are unwilling to properly remediate findings.



FOREIGN MIGRANT WORKERS

- Vendors bear a specific responsibility to foreign migrant workers, acknowledging their increased susceptibility to forced labour stemming from their distinct legal, social, economic, and cultural situations. Compliance with PEI's Migrant Policy, which vendors are required to sign, is therefore essential.
- Beyond legal compliance, vendors must proactively safeguard the equitable treatment of migrant

workers by: providing clear, written employment terms in their local language before they leave their home country; ensuring they incur no employment-related fees; promptly refunding any such fees already paid; and guaranteeing their full freedom of movement and control over their personal documents.

- PEI's commitment to addressing this issue is demonstrated through our participation in the AAFA/FLA's (Fair Labor Association) Commitment to Responsible Recruitment³, a proactive industry initiative targeting forced labour risks faced by migrant workers in global supply chains.

³ https://www.aafaglobal.org/AAFA/Solutions_Pages/Commitment_to_Responsible_Recruitment

SUPPLY CHAIN TRANSPARENCY

- Acknowledging the inherent complexity of our global supply chain and the ongoing challenges in achieving complete visibility, our commitment to transparency extends beyond our direct Tier 1 suppliers. We are actively working to enhance our understanding and oversight of our broader supply network.

TIER 2

- We require the disclosure of all Tier 2 suppliers during the onboarding process. This information allows PEI to assess and manage risks associated with lower-tier suppliers. Tier 2 suppliers must provide a current industry audit report demonstrating compliance

with our Vendor Code of Conduct (VCOC). Tier 2 suppliers who have not undergone a third party audit must complete our comprehensive Self-Assessment Questionnaire (SAQ) and furnish supporting documentation. SAQ's are reviewed by our Compliance team to ensure they meet our requirements prior to registration and approval. An updated SAQ is required on an annual basis.

TIER 3

- To enhance the traceability of our materials, fabric mills must be disclosed and registered within our Product Lifecycle Management (PLM) system and are required to be linked on all purchase orders.





METAL TRIM SUPPLIERS

- As part of our Conflict Minerals Compliance Program (CMCP), metal trim suppliers must also be disclosed during the onboarding process. To ensure the responsible sourcing of materials, we partner with a third party provider to conduct a comprehensive Reasonable Country of Origin Inquiry (RCOI) for each in-scope metal trim supplier to determine the origin of the materials in accordance with the Responsible Sourcing of Minerals Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"). This process is executed utilising the Organisation for Economic Co-operation and Development OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and

High-Risk Areas (OECD Guidance). Information is gathered regarding the presence and sourcing of tantalum, tin, tungsten and gold (3TG) used in products and components supplied to PEI by completing a Conflict Minerals Reporting Template (CMRT).

- Suppliers are required to provide information regarding the sourcing of their materials with the ultimate goal of identifying the 3TG smelters or refiners ("SORs") and associated mine countries of origin. Suppliers that meet our standards are registered in our PLM system for the reporting year and must undergo our due diligence process on an annual basis.

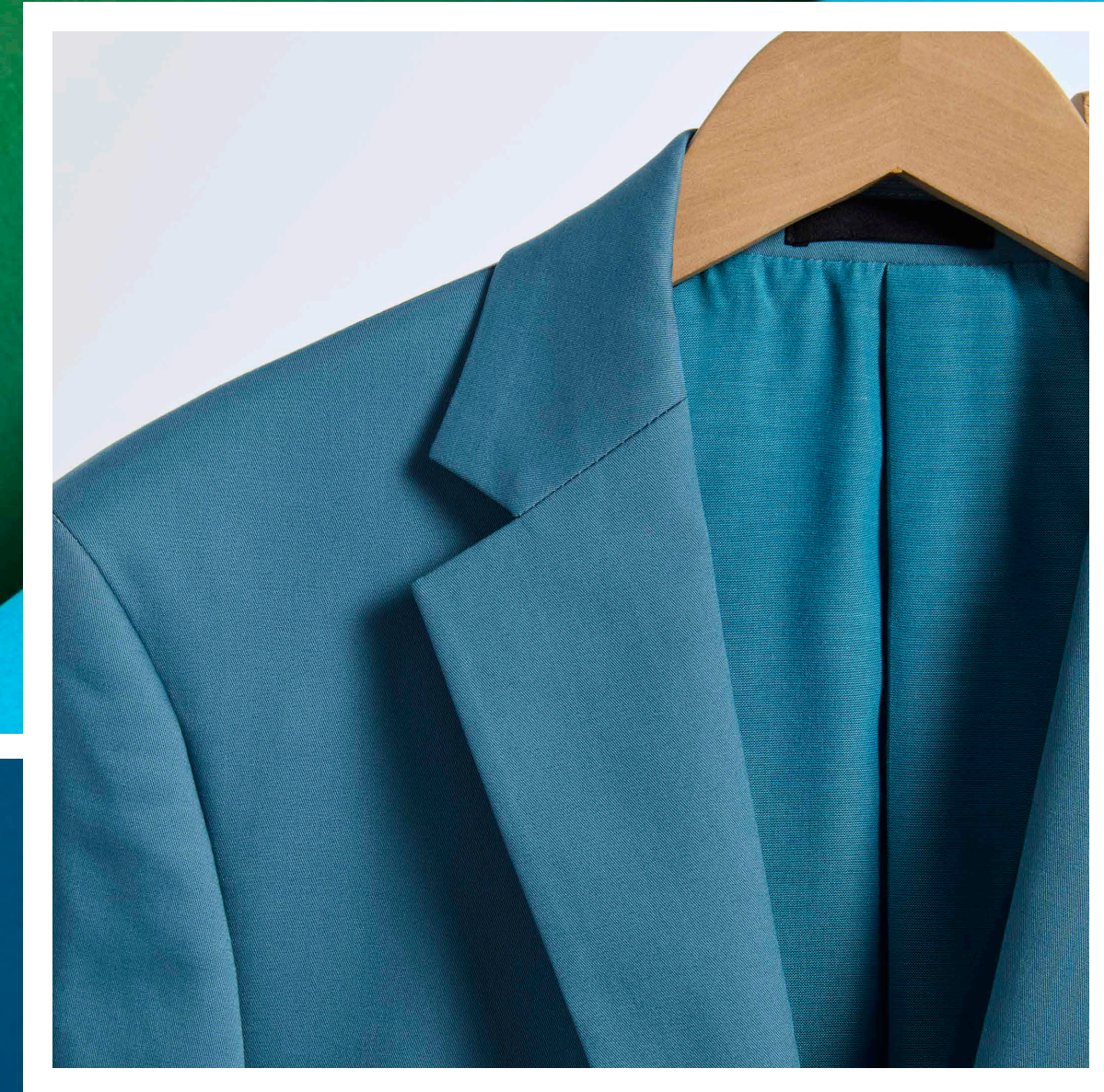
OPERATIONAL CONTROLS

- Our PLM system incorporates robust safeguards to ensure that purchase orders are exclusively generated for registered and approved suppliers, thereby maintaining compliance with our standards. This comprehensive control extends to specific materials, such as metal trims, where only pre-approved suppliers can be selected in purchase orders. Furthermore, all new suppliers are subject to a mandatory pre-approval process before they can be utilised in our products.



INTEGRATED OVERSIGHT

Recognising the critical need for supply chain risk reduction, we foster close collaboration between our field QC auditors, sourcing teams, and overseas merchandisers to ensure on-the-ground support and visibility. Our field teams conduct regular supplier visits to monitor quality and production, providing an additional layer of risk mitigation. To prevent unauthorised subcontracting, the Compliance team provides field teams with regular updates on supply chain changes.





MEMBERSHIPS & PARTNERSHIPS

Achieving long-term sustainability in the global fashion industry demands systemic change that no single company can accomplish alone. PEI strives to address critical industry challenges through multi-stakeholder partnerships. We believe that working with industry

experts to support our work on pressing issues related to human rights, ethical sourcing, industry trends, and evolving regulations is essential. Our membership in the following organisations directly aids our ongoing initiatives.



Sedex (Supplier Ethical Data Exchange) plays a crucial role in helping companies navigate the complexities of ethical and sustainable supply chain management. Sedex provides a platform that facilitates the sharing of audit and assessment data between brands and suppliers, enabling collaboration and driving continuous improvement.



NATIONAL RETAIL FEDERATION (NRF) is the world's largest retail trade association and provides its members the opportunity to advocate on important policy issues and gain insights from industry leaders and visionaries.

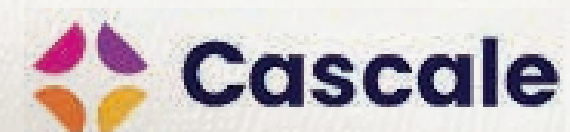


AMERICAN APPAREL & FOOTWEAR ASSOCIATION

(AAFA) stands at the forefront as a leader of positive change for the apparel and footwear industry. With integrity and purpose, AAFA delivers a unified voice on key legislative and regulatory issues. AAFA enables a collaborative forum to promote best practices and innovation. AAFA's comprehensive work ensures the continued success and growth of the apparel and footwear industry, its suppliers, and its customers.



CIRCULAR MATERIALS is a national not-for-profit producer responsibility organization that develops, implements and supports effective and efficient recycling programs across Canada.



CASCALE is a global nonprofit alliance of 300 leading consumer goods brands, retailers, manufacturers, sourcing agents, service providers, trade associations, NGOs, and academic institutions catalyzing collective action toward equitable and restorative business practices in the consumer goods industry.

ukft champions positive change throughout the UK's entire fashion and textile supply chain. It equips members with current information on crucial topics like regulations, industry trends, and best practices. UKFT also fosters collaboration through events, webinars, and roundtables, and advocates for the industry's strategic and economic value to government and policymakers, directly influencing legislation.



The Higg FEM tool helps companies build sustainability strategies based on credible data, pinpoint hotspots, and make breakthrough improvements on a global scale. The Higg FEM is used to assess the environmental impact of product manufacturing at facilities. Every stage of the production process is captured through this tool: from water and waste management to chemical and energy use.



The Farah brand is a signatory of the UK Textiles Pact run by WRAP. The UK Textiles Pact (formerly Textiles 2030) is the leading voluntary agreement for the UK's fashion and textiles sector, convened by WRAP and backed by government. The Pact supports companies to reduce their climate impact by adopting more sustainable and circular practices to achieve science-based targets.

POLICIES & GOVERNANCE



We address modern slavery and human rights risks through a comprehensive Social Compliance Program and clear policies. As a condition of working with PEI, suppliers must adhere to our Vendor Code of Conduct, related policies, and all local labour laws. These policies provide guidance for suppliers in implementing the principles of our Code. Suppliers are expected to establish management systems to achieve and maintain compliance with these requirements. We are committed to conduct regular reviews of our policies to ensure they remain effective, relevant, and aligned with industry standards.

PEI Vendor Code of Conduct (VCOC)
Child Labour & Young Worker
Forced Labour
Cotton Sourcing
Migrant Worker
Freedom of Association

Suppliers must establish and maintain formal written policies and procedures for identifying and prohibiting forced labour and child labour. These policies must be effectively communicated to all subcontractors, and regular training on these policies must be provided to ensure adherence.

PEI CODE OF ETHICS AND CONDUCT

Our Code of Ethics and Conduct sets the ethical foundation for our organisation, fostering responsible citizenship at all levels. This code outlines the highest standards of conduct, ensuring our operations are conducted with integrity and transparency, and reflecting the core values that have driven our success

<https://www.pery.com/Company/EthicsAndConduct>

for over fifty years. All associates are expected to adhere to this Code upon joining, and annual virtual training is mandatory to maintain accountability.

CONFIDENTIAL REPORTING HOTLINE

PEI provides a secure, third-party hotline for employees to anonymously report a wide range of concerns impacting the organisation or its employees. These incidents include the following categories: Financial Impropriety, Regulatory Compliance and Ethical Conduct, and Human Capital Management. The hotline ensures reports are investigated, and appropriate action is taken without fear of retribution.

TRAINING

PEI strives to continually raise awareness among its associates and suppliers through targeted training programs.

INTERNAL STAKEHOLDERS

Building a knowledgeable and empowered workforce is central to our proactive strategy for mitigating modern slavery. To achieve this, all associates in supply chain facing roles completed compulsory third-party e-learning focused on the identification and prevention of exploitative practices, including human trafficking, slavery, and child and forced labour. The training incorporated interactive elements to assess understanding. These essential training and capacity-building initiatives ensure our teams are equipped to recognise and address the multifaceted challenges and risks associated with modern slavery. Recognising the dynamic nature of this field, our Social Compliance team also prioritises continuous learning through external training and webinars to ensure we remain aligned with industry best practices and current regulations.

AWARENESS

In recognition of UK Anti-Slavery Week (October 14-20), we launched an internal newsletter, 'Shining a Light on Modern Slavery - A Call to Action'. This

initiative was aimed at educating our associates on the realities of modern slavery, covering global facts, common misconceptions, and tangible signs to look for. The newsletter also featured an interactive quiz and a list of resources to encourage further learning and action.

SUPPLIERS

Suppliers are integral partners in our supply chain, and we prioritise training as a key element in building robust relationships and facilitating open dialogue. In FY '25, we delivered in-person and virtual training in Bangladesh and Vietnam, notably extending this knowledge-sharing to Tier 2 suppliers in Bangladesh. The curriculum focused on building capacity in critical areas such as preventing forced and child labour, understanding our Vendor Code of Conduct and expectations, navigating local labour laws, managing supply chain traceability and chain of custody documentation, developing effective corrective action plans, and exchanging best practices. A total of 140 supplier representatives participated in the training sessions.





PE employs a strategic and proactive approach to combat forced and child labour risks throughout our complex supply chain. This includes a detailed evaluation that considers geographical location, industry sector, and specific supplier practices to pinpoint areas of heightened vulnerability, enabling targeted resource allocation. We utilised industry and government resources including the U.S. Department of State Trafficking in Victims Report, U.S. Department of Homeland Security's UFLPA Entity List and U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor to assist us to identify and prioritise modern slavery risks, encompassing forced labour, child labour, and broader human rights concerns.

RISK ASSESSMENT AND EFFECTIVENESS

In FY'25, our risk assessment strategically focused on the following key areas recognising their potential for forced labor vulnerabilities.

Direct Suppliers (Tier 1)

Risks include systemic labour violations in manufacturing facilities leading to forced/unpaid overtime, restricted worker mobility, lack of legal awareness, absence of formal contracts, and insufficient pre-employment screening, all of which can result in failures to uphold ethical labour standards and regulatory requirements.

Upstream Suppliers (Tier 2 and beyond)

The use of upstream suppliers presents inherent challenges in establishing comprehensive visibility and effective oversight. Upstream supply chains often involve numerous layers of suppliers making it difficult to access information from deeper tiers.

Migrant Workers

This group is particularly vulnerable to exploitation, including passport/document

retention, withheld wages, recruitment fees, threats of penalties, and excessive working hours.

MEASURING EFFECTIVENESS

Alongside our due diligence efforts, we took the subsequent steps to manage these corresponding risks:

Audits

Conducted thorough onsite assessments of 100% of our direct suppliers.

- **293 direct supplier audits**

- 94% were industry-recognised programs

- 92% were conducted by APSCA⁴ auditors

- **192 licensee factory audits**

- 90% were industry-recognised programs

- **In FY25, foreign migrant workers represented 3% of our Tier 1 and T2 supply chain.**

Our audits included a targeted focus on identifying and preventing migrant worker exploitation

Our FY'25 audits found no evidence of forced labour nor other zero tolerance findings.

⁴ <https://www.theapsca.org/about-us/>

Upstream Supplier Visibility

- Partnered with a risk intelligence provider to significantly enhance visibility into our multi-tiered supply chain, extending beyond Tier 1.
- This increased insight allowed us to more effectively identify, assess, and proactively address potential ethical sourcing risks further upstream.
- Additionally, 40 Tier 2 supplier audits and Self-Assessment Questionnaires (SAQs) were conducted, 50% of which were industry-recognised audits, to evaluate and ensure compliance standards were met.

Through this integrated approach, we actively link identified risks with targeted actions to foster a more ethical and transparent supply chain.



BROADER RISK MITIGATION ACTIONS

- Recognising growing global supply chain complexities, we strengthened our supplier onboarding process with enhanced risk assessment measures to screen potential suppliers and select partners who align with our standards.
- Revised our Purchase Order Terms and Conditions to mandate thorough due diligence and ensure no prohibited labour is used in our products, emphasising comprehensive supply chain traceability and chain of custody documentation requirements.
- Updated and made accessible key policies (Cotton Sourcing, Freedom of Association, Anti-Bribery & Corruption) via our Vendor Portal to clearly communicate our requirements and expectations to all suppliers.