

Modern Slavery Statement  
AUSTRALIA MSA  
Annual Report (FY2024)

**1. Identification of Reporting Entity**

RALPH LAUREN AUSTRALIA PTY LTD

**2. Description of Reporting Entity Structure, Operations and Supply Chain**

RALPH LAUREN AUSTRALIA PTY LTD (hereinafter referred to as the “Company” or “RLA”) is an Australian Proprietary Company, with its principal registered office and place of business located at Ground Floor, 16-18 Grosvenor Street, The Rocks NSW 2000.

RLA is a wholly owned subsidiary of Ralph Lauren Corporation (“RLC”), a company incorporated in the United States of America, which designs, develops and contracts with third party suppliers to manufacture Ralph Lauren-branded products.

The Company imports Ralph Lauren-branded fashion apparel and accessories, and its principal activities are the distribution and sale of Ralph Lauren-branded fashion apparel and accessories (“RL-product”) in Australia. The Company currently has approximately 470 employees.

**3. Description of Risks of Modern Slavery Practices in the Operations and Supply Chains of the reporting entity, and any entities that the reporting entity owns or controls**

RLC works with a global network of suppliers, vendors, and factories, where it contracts with vendors who source materials from materials suppliers, such as textile from mills and dye plants. RLC does not directly manufacture products but rather it contracts for the manufacture of its products with third party vendors. In FY 2024, RLC worked with 378 active Tier 1 factories across 31 countries, covering 94% of our business across all categories, to manufacture our products. For more information on our supply chain, please see our [2024 Global Citizenship and Sustainability Report](#).

All RLC suppliers are independent entities subject to various legal jurisdictions with varying legal and regulatory frameworks in place to support efforts to eradicate modern slavery. To manage this variation, we developed the RLC [Operating Standards](#) which forms the basis of our relationship with our suppliers and sets forth our standards and expectations with respect to legal and ethical matters, human and labor rights (including modern slavery), animal welfare, and environmental compliance. The RLC Operating Standards set a benchmark of minimum acceptable conduct for all RL-suppliers. The RLC Operating Standards are supplemented by our [Foreign Migrant Worker Standards](#) to ensure fair employment terms for foreign migrant workers who are particularly vulnerable to some forms of modern slavery (such as, debt bondage or forced overtime) in the apparel and footwear supply chain. RL's suppliers are expected to communicate and disseminate RLC's Operating Standards, Human Rights Policy, Foreign Migrant Worker Standards, and other relevant policies throughout their supply chain.

Through a [Human Rights Disclosure](#), RLC outlines the salient risks in its supply chain which are

identified through its internal risk assessment process. Our identified salient risks in the supply chain are as follows: Child Labor and Young Workers, Discrimination, Harassment, and Gender-Based Violence, Forced Labor, Freedom of Association and Collective Bargaining, Occupational Health and Safety, Wages and Benefits, and Working Hours.

These issues are the focus of RLC's human rights due diligence ("HRDD") efforts. RLC takes a risk-based approach and concentrates its efforts on high-risk geographies and activities where we can influence mitigation or remediation efforts when issues occur. RLC recognizes that there are human rights issues beyond the most salient risks. As we make progress on these critical issues, we plan to address additional risks. We work with our supply chain partners to share the responsibility to mitigate and address potential and actual human rights issues through ongoing assessments, remediation, capability building, and training. RLC regularly monitors, evaluates, and tracks the effectiveness of its actions to respond to human rights risks and impacts.

- 4. Description of actions taken by entity, and any entity that reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes**
  - a. for example, development of policies and processes to address modern slavery risks, and providing training for staff about modern slavery**

*Policies:* RLC's core compliance policies include its Code of Business Conduct and Ethics "(Code of Conduct") which requires all employees to comply with laws and regulations addressing, among other things: fair dealing, gifts and entertainment, conflicts of interest, protection of Company systems and assets, fair and truthful disclosures to the public, maintenance of accurate books and records, treatment of others with respect and dignity, and promotion of a safe and healthy working environment. The Code of Conduct specifically states that each individual should have the ability to work in an environment that prohibits discriminatory practices and sets forth RLC's expectations that the workplace is free of bias, harassment, and violence.

Additionally, pursuant to the Code of Conduct, RLC requires reporting of, among other things, potential or actual violations of the Code of Conduct, our policies, or the law by our employees, business partners, or customers. It also sets forth the escalation process and provides a confidential reporting portal accessible on [www.ralphlauren.ethicspoint.com](http://www.ralphlauren.ethicspoint.com), as well as RLC's global toll-free hotline numbers for reporting potential or actual misconduct. Employees are encouraged to report any alleged violations or concerns to their supervisor, manager, or appropriate personnel. All RLC employees are required to undergo mandatory Code of Business Conduct and Ethics training and are required to submit annual certifications of completion.

RLC, its affiliates and subsidiaries, including RLA, are committed to conducting its global operations ethically and with respect for the dignity of all people who make RL-products. Our commitment to respect internationally recognized human rights is outlined in our [Human Rights Policy](#). To implement this commitment, we assess our supply chain for modern slavery risks, including forced labor, human trafficking, deceptive recruiting, and child labor. Our supplier contractual agreements oblige suppliers to adhere to the RLC Operating Standards. To ensure these standards are understood and upheld, we have a dedicated monitoring team within RLC's Global Citizenship and Worker Well-Being Department ("RLC Global Citizenship team").

For a comprehensive list of additional policies relating to modern slavery, see

<https://corporate.ralphlauren.com/reports-and-policies>.

***Internal Team:*** The RLC Global Citizenship team is responsible for administering the social compliance program, including HRDD across the supply chain for all RL-divisions, including RLA. Preventing modern slavery is a core pillar of our social compliance program. RLC strictly prohibits all forms of modern slavery including, but not limited to, forced labor, human trafficking, deceptive recruitment and child labor. The social compliance program includes supply chain due diligence, risk assessments, monitoring activities, including auditing and supplier engagement, training, and capability building.

The RLC Global Citizenship team oversees social compliance auditing and monitoring of factories that manufacture RL-product by utilizing third party auditors, including the ILO-Better Work program, where available, and the approved verification bodies of the Social & Labor Convergence Program (“SLCP”). In addition, the team also conducts select site visits to follow-up and monitor conditions.

Our auditors are compelled to be vigilant and pay specific attention to red flags alerting us to potential modern slavery findings as we consider a modern slavery finding as a zero-tolerance violation. Audit results are reviewed by the RLC Global Citizenship team and, where applicable, a Corrective Action Plan (“CAP”) is developed with the factory. The team monitors, confirms, and records the completion of CAPs.

We conduct social audits to assess the working conditions of supplier locations and, post-audit, continue to engage with our suppliers to ensure implementation of corrective actions and appropriate remediation, where applicable. Where we find a supplier in violation of our standards, the supplier is expected to remediate the issue promptly and adequately. Where applicable, our social auditing protocol also includes foreign migrant worker interviews to verify compliance with our Foreign Migrant Worker Standards. If we identify and validate an instance of noncompliance with our requirements related to eradicating slavery or human trafficking, we will work with that supplier to make immediate changes; otherwise, we will cease business relations.

***Training and Engagement:*** When we enter new or renew existing contractual arrangements, suppliers are assessed for their business, quality, cargo security, and social standards and capabilities. During the on-boarding process, all suppliers enter into written contractual agreements which include obligations to adhere to the RLC Operating Standards, pre-production and in-line production audits and approvals, and ongoing monitoring and remediation.

We recognize that engagement is a continuous process. Accordingly, we conduct ongoing monitoring of suppliers to ensure that they comply with our program of auditing, remediation, monitoring, supplier engagement, and capability building. As part of this process, our RLC Global Citizenship team conducts individualized supplier engagements, including site visits and calls, allowing for more touch points with suppliers and an iterative process to better assess human rights risks, understand supplier and worker needs, and tailor capacity building.

The RLC Global Citizenship team continually works with our internal cross-functional teams and suppliers, to educate and train them about the definition of forced labor and modern slavery, areas of risk, red flags, and escalation processes. For example, RLC periodically organizes vendor summits wherein we further engage with our suppliers by reiterating our expectations, share learnings and best practices, and foster regular interaction and communication, as we work together to overcome our

mutual challenges.

The RL Grievance Mechanism Program for supply chain workers complements the primary operational-level grievance mechanisms run by the factories themselves and enables workers to escalate concerns directly to RLC using the RL Hotline email address, accessible through a QR code or through NAVEX, via internet or telephone. The RL Hotline is accessible to factory workers except where not permitted due to data privacy considerations. The RL Grievance Mechanism Program information is made available to workers on posters throughout factories in the workers' local languages. Our posters are currently available in 27 languages.

We are committed to ensuring that workers have access to effective grievance mechanisms. To that end, we educate managers and workers on the importance of grievance mechanisms, alongside evaluating and improving the effectiveness of our program.

*Due Diligence and Risk Assessments:* RLC conducts risk assessments to assess its operations and the likelihood and extent of human rights impacts of our business. We base our human rights due diligence measures, in all material respects, on the framework set forth in the *OECD Due Diligence Guidance for Responsible Supply Chains in the Garment & Footwear Sector*. We may utilize or consult various resources, including public indicators on country risk levels and salient risks in the industry to help assess social and human rights risks, such as: U.S. State Department Trafficking in Persons Report; U.S. Department of Labor List of countries producing goods using Child Labor/Forced Labor; ITUC Global Rights Index; Corruption Perceptions Index; and the UNDP Human Development Report. In addition, we review the Verisk Maplecroft risk indices on human rights, including the forced labor and trafficking in persons indices. We constantly assess our supply chain for actual and potential risks and take a proactive approach to mitigate potential impacts.

Combined with the collaboration, resources, and tools provided by our membership in various industry associations, as further discussed below, we rely on intelligence and expert analysis from on-the-ground stakeholders in the social compliance industry such as third-party auditing firms and the ILO-Better Work program. The results of our risk assessments are incorporated into our mitigation strategies and utilized to keep our Board of Directors updated on any issues raised.

*Industry Engagement:* RLC is engaged with the industry to advocate for and develop successful, sustainable solutions to eradicate forced labor and other human rights violations from global supply chains. We leverage our membership in various industry associations such as the American Apparel and Footwear Association ("AAFA"), US Fashion Industry Association ("USFIA"), and Businesses for Social Responsibility ("BSR") to inform us of risks. Notably, we belong to the Joint AAFA/NRF/RILA/USFIA Forced Labor Working Group ("FLWG"). Additionally, RLC is a signatory to the AAFA and Fair Labor Association's Commitment to Responsible Recruitment, a proactive industry effort which seeks to address potential forced labor risks for migrant workers in the global supply chain.

## **5. Assessment of the effectiveness of such actions**

RLC maintains records and tracks the results of our social audits. We work with suppliers to ensure our actions are addressing forced labor and other social compliance risks. We continue to evaluate all new factories and audit existing factories on a regular basis. In all cases, when a factory has an issue or is not making visible remediation progress or improvements, RLC's escalation process includes to

the Global Sourcing and Purchasing teams, and discussions that will drive business decisions. If a factory still does not respond, RLC will discontinue business with that factory.

The RLC Global Citizenship team provides regular reports on supplier social compliance ratings and human rights risk assessments to the Global Sourcing and Purchasing teams. The Supplier Engagement Scorecard, a program used to review supplier performance has social and environmental performance indicators that enable us to communicate our sustainability expectations, evaluate and monitor the progress of our suppliers and strengthen collaboration. In FY24, we diversified our social key performance indicators (KPIs) within the scorecard to align with key areas: career advancement for workers, wage management and effective grievance mechanisms.

Additionally, RLC's Supplier Engagement Strategy ("SES") is centered on the maintenance of long-standing relationships with key and strategic suppliers, enabling us to partner closely and transparently for the benefit of the people who make RL-product. This strategy focuses on strengthening performance in three key areas: business execution & partnership, citizenship & sustainability and quality.

**6. Description of the process of consultation with any entities that the reporting entity owns or controls**

As discussed above, the RLC Global Citizenship team oversees the HRDD, auditing and monitoring of all factories for all RL-divisions. We apply the same process, standards, and programs for all areas of the business

**7. Any other information that the reporting entity considers relevant**

N/A

Pursuant to the requirements of the *Commonwealth Modern Slavery Act 2018*, the Ralph Lauren Modern Slavery Act Statement, approved by its parent entity Ralph Lauren Corporation, is hereby approved by the Board of Directors of the Ralph Lauren Australia PTY (the "Registrant"), and signed on its behalf by the duly authorized undersigned.

**RALPH LAUREN AUSTRALIA PTY LTD**  
**ABN 61118 847 359**

By:

Date:

Name:

Title: Director

A handwritten signature in black ink, appearing to read "Jay Kimpton", is written over the signature line. The signature is fluid and cursive.

September 19, 2024