

Reformation

LYMI Inc. dba Reformation (“Reformation” or “we”) – Consolidated Modern Slavery & Supply Chain Transparency Statement

Reporting period: FY2025

This consolidated statement is being furnished pursuant to the UK Modern Slavery Act 2015 (s.54); California Transparency in Supply Chains Act (CTSCA, SB 657); Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (S-211); Australia Modern Slavery Act 2018 (Cth).

This statement discusses Reformation’s global business practices to address forced labor and child labor. It encompasses our domestic operations as well as our global supply chain. This statement is provided only by the entity specifically covered by the respective acts. As used in this statement, forced labor includes modern slavery, prison labor, indentured labor, bonded labor, human trafficking, or other similar conduct.

1. Introduction & Commitment

Reformation strictly prohibits all forms of forced labor, child labor, and human trafficking. As a Participating Company of the Fair Labor Association (FLA) working toward full accreditation, we align our practices with the principles enshrined in the Universal Declaration of Human Rights, affirming the inherent dignity and equality of every individual. These commitments are embedded in our operations and supply chain through concrete actions and oversight.

We fully support global efforts to eliminate forced and child labor, protect human rights, and uphold ethical labor standards. Transparency, supply chain traceability, and accountability are the foundations of how we conduct business. Reformation regards child labor, modern slavery, and human trafficking as egregious violations of human rights, and we are committed to rigorous due diligence to identify, prevent, and remediate such risks within our supply chain.

2. Organizational Structure, Activities & Supply Chains

Reformation is headquartered in Los Angeles and operates a local manufacturing site, a global e-commerce business, and retail operations serving the United States, Canada, the United Kingdom, the European Union, and Australia.

As [published](#) biannually and in line with our commitment to the [Transparency Pledge](#) Reformation’s supply chain consists of 80+ direct cut, sew, and finish manufacturing partners and subcontractors (AKA Tier 1) across the globe. We also participate in the [Open Supply Hub \(OS Hub\)](#) to expand on public disclosures. In addition, Reformation maintains direct relationships with a global network of materials suppliers, such as mills, dyers, printers, weavers, and knitters (AKA Tier 2).

3. Policies

Reformation’s [Supplier Code of Conduct](#) (“Code”) and Compliance Benchmarks are based on the International Labor Organization (ILO) core conventions, the Universal Declaration of Human Rights, and internationally accepted labor standards. The intention of our Code is to ensure the respect of fundamental human and labor rights, including the prohibition of child and forced labor, within our own operations and our supply chain. Our Code applies equally to workers considered permanent, temporary, agency workers, piece-rate, salaried, hourly, part-time, homeworkers, young, and migrant.

Policy on Forced Labor and Responsible Recruitment

In 2019, Reformation endorsed the [AAFA/FLA Commitment to Responsible Recruitment](#), joining other industry leaders in pledging to protect workers from recruitment-related exploitation. Conditions for Signing the Commitment to Responsible Recruitment include:

1. Incorporating the Commitment to Responsible Recruitment into our company's social compliance standards, such as our Code of Conduct within one year from the date of signing;
2. Periodically reporting on our actions to embed elements of the Commitment to Responsible Recruitment in our policies and processes, such as through our sustainability reporting and/or modern slavery legal disclosures.

In line with this commitment, all suppliers must adopt and maintain employment practices in accordance with Reformation's [Policy on Forced Labor and Responsible Recruitment](#). This policy addresses the key "enabling factors" that contribute to human trafficking and forced labor by requiring that:

- No workers pay for their job;
- Workers receive a timely refund of fees and costs paid to obtain or maintain their job;
- Workers retain control of their travel documents and have full freedom of movement; and
- All workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin.

Through these requirements, Reformation works to ensure that recruitment and employment practices safeguard workers' rights and dignity across our supply chain.

Certification

Reformation requires all Tier 1 suppliers to comply with our Code of Conduct and to extend these requirements to any sub-suppliers involved in the production of goods or services for Reformation. By executing the Acknowledgment of Receipt and Acceptance of Terms (AOR), suppliers certify that raw materials and finished goods manufactured and delivered to Reformation are produced in full compliance with our Code of Conduct and the additional policies set forth in the Sustainable Partners Guidebook.

4. Governance

Sustainability at Ref is led by our Chief Sustainability Officer (CSO), who reports directly to the CEO, underscoring top management's commitment to fair labor and responsible business practices. The Sustainability team works across the business to embed practical measures that support these commitments in day-to-day operations and decision-making. Our CSO also presents sustainability strategy and impact performance updates to the Board through quarterly Sustainability Committee meetings, helping ensure regular senior-level oversight and accountability. In addition, team members at the Manager level and above are evaluated on progress toward sustainability-related goals, which is formally considered in remuneration reviews and eligibility decisions. The Board of Directors, through its quarterly Sustainability Committee meetings, provides oversight of our sustainability strategy and fair labor commitments, and is responsible for reviewing and formally approving this annual modern slavery disclosure.

5. Due Diligence

Reformation defines due diligence as an ongoing, risk-based process to identify, prevent, mitigate, and account for potential or actual adverse human rights impacts in our operations and supply chains. This definition is consistent with the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector and the UN Guiding Principles on Business and Human Rights (UNGPs).

Reformation's due diligence system spans the entire supplier relationship lifecycle, including:

- Risk Mapping & Assessment

- Supplier Onboarding & Authorization
- Monitoring
- Integration with Business Decisions

Fair Labor Association (FLA)

Reformation is advancing our policies on supply chain labor and human rights in alignment with the [Principles of Fair Labor and Responsible Production](#), a cornerstone of the FLA accreditation requirements. As a Participating Company, we benefit from the FLA's independent, multi-stakeholder oversight, which adds rigor and accountability to our due diligence system. We believe this independent validation affirms that Reformation's goal of building a program that is robust, transparent, aligned with international regulatory expectations, and built to earn trust - going beyond self-policing.

6. Training & Awareness

Reformation believes that training is critical to the success of our program and undertakes the following training to ensure awareness, comprehension, and alignment internally and across our supply chain.

- Annual Internal training for all employees covering global risks, the content of our Code and Social Responsibility Program.
- Annual Supplier training covering our code of conduct with special attention giving to critical risks such as child and forced labor. Training also covers important Social Responsibility program requirements such as third-party assessment and remediation.
- Assessment Service Provider training to ensure they are following the appropriate process and protocol when evaluating labor conditions and interacting with workers.

7. Risk Assessment

Reformation evaluates salient risks to workers using a combination of country indices, worker sentiment surveys, assessment findings, and publicly available data. We integrate assessment findings and pre-sourcing documentation into our risk management model. New suppliers are screened using a facility pre-sourcing profile to identify regional and forced labor risks. For authorized facilities, the severity and recurrence of audit non-compliances, particularly Critical or Zero Tolerance findings (e.g., high-risk migrant worker issues or tax non-compliance), automatically influence the facility's risk rating and trigger escalation for executive review and determination of next steps (e.g., specialized onsite remediation, dialogue, additional assessments or termination of the business relationship).

Risks to workers and the business are assessed across four categories: country, sector, transaction, and business partner profile. Based on this assessment, Reformation has determined that the highest exposure for forced and child labor exists within its product supply chain. Priority risk areas identified and addressed include:

- State-sponsored forced labor
- Exploitation of foreign migrant workers, including recruitment fee debt
- Child labor in raw material production, particularly in agriculture

Our risk assessment process directly informs the onsite supplier assessment methodology, frequency, and remediation requirements.

Our traceability efforts also help us ensure that we uphold our commitment to the [Call to Action by the Coalition to End Forced Labor in the Uyghur region](#) and ensure our cotton is not sourced from China.

We're part of the AAFA/NRF/RILA/USFIA Forced Labor Working Group, collaborating with industry leaders to combat forced labor and promote transparency and accountability across global supply chains

8. Onsite Supplier Assessments & Verification

To vet new suppliers and ensure ongoing compliance with our Code, all Tier 1 suppliers—and their subcontractors—undergo semi-announced (typically a 2-week window) independent third-party assessments at least once a year. Additionally, our domestic supply chain in California is also assessed bi-annually using unannounced independent third-party assessments. These assessments require suppliers to provide accurate and up-to-date documentation, full access to facilities, employee records, and workers for confidential interviews. Each assessment covers all provisions of our Supplier Code of Conduct and Compliance Benchmarks, including prohibitions on child and forced labor, and often incorporates mobile phone surveys that give workers a safe, confidential channel to raise concerns. The goal of each assessment is not only to verify compliance but also to drive continuous improvement that delivers meaningful benefits for workers.

Where suppliers employ foreign migrant workers, we conduct focused assessments that dedicate additional time to evaluating recruitment and employment practices, including potential risks related to fees, contracts, and fair treatment.

Finally, we supplement our own monitoring with independent initiatives such as the Fair Labor Association's Sustainable Compliance Initiative (SCI), the ILO Better Work Program, and other accepted/qualified, mutually recognized assessments, adding further transparency and rigor to our oversight.

9. Remediation & Corrective Action

Reformation requires all suppliers to comply with our Code of Conduct and to uphold our core principles of transparency, accountability, and continuous improvement. In the event of Assessment findings, Reformation mandates the development of a Corrective Action Plan (CAP) that identifies both the immediate measures necessary to mitigate identified risks and the longer-term management systems required to prevent recurrence. All CAPs are subject to Reformation's review, approval, and ongoing monitoring to ensure timely and effective resolution of noncompliance.

Where findings involve complex or critical issues - including but not limited to child labor or forced labor - Reformation requires the engagement of qualified third-party experts to assist in the remediation process. In such cases, suppliers must fully cooperate to ensure that corrective actions result in a sustainable resolution and a verifiable remedy. Failure to comply with CAP requirements or to remediate violations within realistic timeframes may result in escalation measures up to and including termination of the business relationship.

Child labor remediation

When cases of child labor are identified in the supply chain, best practice requires an approach that prioritizes the best interests of the child while ensuring long-term prevention. Suppliers must immediately remove the child from hazardous or inappropriate work and, in coordination with the buyer and qualified third-party experts, develop a remediation plan that prioritizes the best interests of the child, avoids financial or social harm, and includes measures to remediate the loss of income for vulnerable families.

10. Grievance Mechanisms & Worker Voice

Grievance Mechanism

Providing workers with a safe and effective way to raise concerns is central to empowering employees and ensuring they can speak up without fear of retaliation or prejudice. Grievance mechanisms establish a clear, transparent process for handling workplace issues and are an essential safeguard for fair labor practices.

Reformation requires all supplier facilities to implement effective grievance channels—such as suggestion boxes, hotlines, or worker surveys—which are verified as part of our Assessment process. In addition, Reformation maintains a direct grievance channel via email (coc@thereformation.us), prominently printed on our Supplier Code of Conduct. Each supplier must post and communicate the Code and grievance procedures in a visible location, in the local language(s) understood by employees, supervisors, and managers.

As an FLA participating company, makers and their advocates can also raise complaints via [FLA's Complaint Channel](#). In these cases, FLA will work with us to investigate, remediate, and resolve complaints.

Worker Voices

We administer Worker Sentiment Surveys during some of our annual Assessments via a smartphone app that allows us to reach hundreds of workers. These are anonymous surveys that provide us with insights needed to better understand risks to workers and drive continuous improvements. The survey covers questions related to happiness at work, relationships with supervisors, recruitment, trust in grievance mechanisms, working hours, and wages.

11. Effectiveness & KPIs

Reformation's social responsibility program, which covers our efforts to identify and remediate any instances of child or forced labour, is evaluated by the FLA each year. The FLA validation process includes verification of a self-assessment that includes recommendations for continual improvement. In addition to the foregoing, the FLA also conducts spot visits to select vendor factories by an FLA direct assessment firm, provides approval for each remedial action plan, and posts such plans on its publicly available website.

Auditing & Remediation Metrics

Reformation uses a color-coded system (Green, Yellow, Orange, Red) to indicate a facility's compliance status, with the goal of maintaining 95% of suppliers in Green or Yellow ratings.

Other key metrics tracked:

- Percentage of Tier 1 supplier facilities and supplier facilities beyond Tier 1 audited to a labor code of conduct.
- Percentage of total audits conducted by a third-party auditor.
- Priority non-conformance rate and associated corrective action rate for suppliers' labor code of conduct audits.
- Percentage supplier rating (Green, Yellow, Orange, Red) of Tier 1 facilities.
- Percentage of suppliers with Orange/Red audit ratings actively engaged with us in corrective actions in the last 12 months.
- Percentage of suppliers with Orange/Red audit ratings improved over the course of 12 months.
- Percentage by facility count & Percentage by volume Tier 1 audited in the annual year.

- Percentage by facility count & Percentage by volume Tier 2 audited in the annual year.
- Findings - Breakdown by Category and Severity and Findings - Breakdown by Subcategory and Severity.

Traceability Metrics:

- Percentage Tier 1 Traceability - Finished goods assemblers & subcontractors traceability
- Percentage Tier 2 Traceability- Dyers & printers; finishers, weavers, knitters
- Percentage Tier 3 Traceability- Fibers, spinners, recycled material collectors/processors
- Percentage Tier 4 Traceability- Raw material (farm, forest, recycler)

Environmental Metrics

- Percentage of Tier 1 supplier facilities and supplier facilities beyond Tier 1 that have completed the Sustainable Apparel Coalition's Higg Facility Environmental Module (Higg FEM) assessment or an equivalent environmental data assessment.

12. Consultation & Collaboration

Reformation consults and collaborates with a wide variety of organizations such as the Fair Labor Association (FLA), Canopy, Casmile, Worldly, Apparel Impact Institute, Reverse Resources, Fashion for Good, Textile Exchange, Policy Hub, and other brands in efforts to improve our industry, reduce audit fatigue, and enhance factory remediation efforts.

As Reformation (LYMI Inc.) is the sole reporting entity and does not own or control any other entities, no consultation process with subsidiaries was required for the preparation of this statement, in line with the Australia Modern Slavery Act reporting criteria.

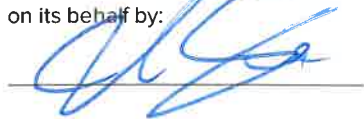
Working with a wide range of organizations and experts, Reformation regularly evaluates our approach to understanding working conditions in our supply chain and working with our suppliers to enhance their capabilities.

13. Approval & Publication

Upon Board of Directors approval, this statement will be published on Reformation's website and submitted to the required government portals.

Signature

This statement was approved by the Board of Directors of Reformation on April 7th, 2026, and is signed on its behalf by:



Full Name: John Coyle

Title: Director

Company Name: LYMI Inc. dba Reformation

Date: April 7th, 2026