


# Human Trafficking and Modern Slavery Disclosure Statement

In compliance with the regulations of the *California Transparency in Supply Chains Act* (SB 657) ("CTSCA"), the *UK Modern Slavery Act of 2015* ("UKMSA"), and the *Australian Modern Slavery Act of 2019* ("AMSA"), the following "Statement" discloses and updates the policies and actions of Fruit of the Loom and affiliated companies, including Fruit of the Loom, Inc.; Union Underwear Company, Inc. d/b/a Fruit of the Loom; Fruit of the Loom, Ltd.; Russell Corporation Australia Pty. Ltd.; Vanity Fair Brands, LP; and Russell Brands, LLC (collectively, "Fruit of the Loom" or "Company") relating to human trafficking and modern slavery in our global supply chain during 2021.

Fruit of the Loom defines human trafficking as an act of recruiting, transporting, transferring, harboring, or receiving a person through the use of force, coercion, or other means, for the purpose of exploitation. Fruit of the Loom defines modern slavery broadly to include any form of servitude, forced or compulsory labor and human trafficking.

We are committed to continuously monitor and improve the effectiveness of our prevention efforts, and will incorporate key learnings into the enhancement of our policies and practices to eliminate any form of human trafficking or modern slavery in the factories producing our family of brands.

  
Melissa Burgess Taylor  
Chairman and Chief Executive Officer  
June 2022

## Progress

Modern Slavery and human trafficking are complex issues that require diligence and collaboration at all levels of our supply chain. Our 2021 accomplishments included the following:

- We continue to advance the mapping of our supply chain.
  - We transitioned our "Beyond Tier 1 Transparency and Factory Profile Questionnaire" to a cloud-based platform to enhance our mapping efforts.
  - We invited 86 new final assembly Tier 1 suppliers to the platform. These suppliers consisted of our owned and operated facilities, third-party sourcing locations, and several licensing partners' supply chains.
  - We completed the mapping of the selected 86 new final assembly apparel and hardgoods locations.
  - We additionally invited participation through all tiers, including raw material suppliers.
  - 39 raw material suppliers engaged out of the 86 final assembly suppliers (45%).
- Following up on efforts from the prior year (2020), we continued to review our cotton apparel supply chain to minimize the risk of our utilization of cotton, yarns, and fabrics from the Xinjiang Uighur Autonomous Region in China ("XUAR"). We required our

suppliers and our licensees to confirm the absence of forced labor in their supply chains (in particular, from the XUAR, and any relationships with the “Xinjiang Production and Construction Corps” (“XPCC”)). We received confirmation from all suppliers and licensees that they do not conduct business with any XPCC entities.

## Accountability

Fruit of the Loom has a zero-tolerance policy for employees or suppliers who fail to meet Fruit of the Loom’s standards for the prevention of human trafficking and modern slavery in our supply chain. If evidence of human trafficking or modern slavery is identified in our supply chain and is not immediately remedied or otherwise appropriately addressed to our satisfaction, we will terminate the business relationship with the offending party.

Out of 300+ factory assessments in 2021, there was 1 identified finding in the area of forced labor, involving recruitment fees having been charged in the workers’ home country prior to employment at one of our suppliers in Taiwan. Our forced labor criteria include the following

- No prisoners, indentured, slave, or bonded labor are permitted.
- Workers must not be in debt to a third party or the employer due to recruitment or placement.
- Workers must not pay any fees, taxes, deposits, or bonds for employment-related costs during recruitment, placement, or for continued employment. The foregoing does not include income tax deductions, social insurance, or other similar withholdings legally required by government authorities.
- The actual terms and conditions of employment must be in compliance with the contracts signed at the time of recruitment.
- Workers’ personal identification documents and money must not be controlled or held by the facility or employment agency, even with written consent from workers.
- Workers must not be restricted from leaving the factory after work and/or during unpaid breaks.

The finding was addressed with the factory through a corrective action plan involving reimbursements of the fees paid. We continue to monitor for compliance.

## Training

Fruit of the Loom conducts internal training on our Code of Conduct to ensure the necessary participants in supply chain management understand our commitments and requirements, including those related to human trafficking and modern slavery, with a particular focus on mitigating risks. All suppliers are provided with our Code of Conduct in all languages understood by the workforce (based on an annual profile), are required to post the Code(s) of Conduct in a conspicuous location and must train employees annually on the contents. In 2021, our Corporate Social Responsibility team participated in approximately 132 hours of webinar training and committee participation, and conducted multiple virtual workshops totaling 195 hours of training to employees and key partners covering our human trafficking and modern slavery policies.

## Factory Assessments



Our [Social Compliance Assessment Program](#) is designed to evaluate factories' compliance with our Code of Conduct. Factories that we own and operate, as well as finished goods contractors – including subcontractors directly sourced by our Company or a licensee – are typically assessed by an accredited third-party or Fruit of the Loom staff on an annual basis. Assessments are typically scheduled with factories, but we reserve the right to perform unannounced assessments at our discretion.

We incorporate efforts to detect forced labor, including modern slavery and/or human trafficking, into our factory assessments. By acceptance of our Supplier or Manufacturing Agreement, including our Code of Conduct, our suppliers and licensees certify that the products supplied to us effectively comply with applicable laws regarding slavery and human trafficking of the country or countries in which they are doing business. Our Supplier Guidelines, accessible here: <http://www.fotlinc.com/pages/suppliers-resources.html#.XPA4ZYhKjcs>, include specific benchmarks to assist our suppliers and licensees in their efforts to prohibit forced labor in their, and our, supply chains. We also provide a means for workers to report suspected violations of the Code of Conduct by phone or by email, and we strictly prohibit any retaliation against persons who report violations.

## Policies

Our Company's Core Values, as well as our [Code of Conduct](#), govern our approach to human trafficking and modern slavery. Respect for People is a critical element of these governing documents that define the culture of our employees and contractors in offices, distribution centers and factories alike. Our Code of Conduct includes the following provision regarding human trafficking and modern slavery:

*“Suppliers will not use forced labor, including, but not limited to, prison labor, indentured or slave labor, or bonded labor. Suppliers will adopt measures to ensure that facilities are not utilized in human trafficking and will monitor their supply chain for such practices.”*

Additional examples of our efforts against forced labor include our longstanding prohibition of the use of cotton from Uzbekistan and Turkmenistan, and our more recent position statements and monitoring involving allegations of forced labor of North Koreans in China's Shandong Province and of Muslim Uighurs in the XUAR.

## Our Business

Fruit of the Loom is a private corporation doing business around the world, and, in particular, in California and the United Kingdom. Fruit of the Loom manufactures goods in the apparel and sporting goods industries, and our applicable businesses exceed the financial thresholds which require compliance with the CTSCA, the UKMSA, and the AMSA.

[Our supply chain](#) is composed of factories that we own and operate, in addition to factories directly sourced by our Company or licensees that produce our family of brands.