

# FRUIT OF THE LOOM

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## Licensed Partner Social Compliance Manual



FRUIT OF THE LOOM.

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Updated September 2025

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## DEFINITIONS

1. **Assessment firm:** The company that evaluates a manufacturing site based on a social auditing standard.
2. **Compliance Owner:** Primary contact at Fruit of the Loom that manages social compliance requirements and support for licensees.
3. **Corrective Action Plan (CAP):** The plan of action that details methods to remedy any findings in a social compliance or security assessment report. The CAP lists each finding, the root cause of the finding, the action that must be taken to correct the finding, the responsible party, the deadline date, and status for completing the action item.
4. **Manufacturing Site (factory):** Manufacturing facility that will produce the final product.
5. **Licensee-owned Compliance Program (LOC):** Social compliance program by which licensee is responsible for majority or all of supply chain social compliance monitoring.
6. **Social Compliance Assessment:** The evaluation process conducted by an assessor to verify the compliance of a manufacturing site's working conditions with codes of conduct or benchmarks based on local and international labor standards.
7. **Subcontractor:** Any business other than the final product manufacturer to which the licensee has issued a purchase order that performs a process directly related to the production of the product for licensee by the manufacturer. Examples of subcontracted processes could be cutting, sewing, or any operation thereafter (e.g., embroidery, printing, or laundering of a branded finished product).
8. **Tier 1 Supplier:** Final product manufacturer that ships finished goods, including Subcontractors.

## General Compliance Program Requirements and Restrictions

All licensees will be required to complete a Corporate Social Responsibility Onboarding Questionnaire prior to the signing of the licensing agreement. Any questions about the Corporate Social Responsibility Onboarding Questionnaire should be directed to the appropriate Compliance Owner.

Fruit of the Loom Supplier Code of Conduct: Licensees are responsible for ensuring that the Fruit of the Loom Supplier Code of Conduct is posted in all Tier 1 Suppliers and Subcontractors and that the employees are trained on its contents at onboarding and at least annually thereafter.

Supply Chain Mapping: Licensees are responsible for identifying the sources of raw materials within the entire supply chain from final assembly manufacturers to raw materials, including trims, such as sewing threads and elastics for apparel goods and nuts, bolts, plastic, rubber and leather for hardgoods. The name and address of each source of Fruit of the Loom products must be provided to Fruit of the Loom upon request.

Regional Forced Labor Risks: Licensees may not produce, manufacture, or source goods or materials (including, without limitation, cotton and cotton inputs), in or from Uzbekistan, Turkmenistan or Xinjiang Uyghur Autonomous Region ("XUAR") in China, or otherwise support, directly or indirectly, the activities of any CMIC on the NS-CMIC List, any entity on the BIS Entity List, or any of its or their subsidiaries. Documentation of the foregoing, satisfactory to Fruit of the Loom in its sole discretion, shall be provided upon request. Licensees that do business with and in China must review new developments on a regular basis and make sure that their policies and procedures align with current economic, sanction, export, and import requirements.

Restricted Countries: Licensees may not produce, manufacture, or source goods from Ethiopia or Myanmar.

Compliance and Ethical Standards: In all business operations and dealings with Fruit of the Loom, whether directly or indirectly, you are required to comply—and to instruct your employees to comply—with the following compliance and ethical standards:

### **Bribes and Improper Payments**

Specifically, but without limitation, compliance with the U.S. law known as the *Foreign Corrupt Practices Act* ("FCPA").

### **Transactions with Restricted/Sanctioned Countries, Entities, and Persons**

Specifically, but without limitation, compliance with laws and sanctions administered and enforced by the *Office of Foreign Assets Control* ("OFAC").

# Licensee-Owned Compliance (LOC) Program

## New Manufacturing Site Onboarding

**Must be completed prior to placing orders with the manufacturing site.** Please refer to the Onspring User Guide for detailed instructions.

### Manufacturing Site Information

Once a prospective manufacturer is identified, check Fruit of the Loom's manufacturing site list in the licensee portal or on the Fruit of the Loom website ([Supply Chain - Fruit of the Loom, Inc.](#)) to confirm whether the manufacturing site is already registered for Fruit of the Loom production.

- *If the site is listed:* Notify your Compliance Owner of your intent to onboard the manufacturing site and the expected date of the initial purchase orders. The Compliance Owner will share any current or recent concerns (e.g., ongoing remediation or incidents).
- *If the site is not listed:* Initiate the onboarding process through the licensee portal. The manufacturing site must complete and submit the following via the Fruit of the Loom system. **Allow 10 business days for processing.**

**Required Submission:** *to be completed by the manufacturing site*

Manufacturing Site Profile (including third-party manufacturing acknowledgment)

Additional Requirements for Manufacturing Sites in Bangladesh:

1. Confirmation of Accord (RSC)/Nirapon membership or willingness to join
2. Remediation completion percentages for structural, fire, and electrical assessments
3. Projected remediation completion date
4. Estimated remediation cost
5. Financial responsibility plan (if any)
6. Lead brand
7. Most recent CAPs for structural, fire, and electrical assessments

### Supplier Code of Conduct

Instruct the manufacturer to review Fruit of the Loom's Supplier Code of Conduct Benchmarks and Supplier Guidelines.

### Social Compliance Assessment Review

Collect and review a valid third-party social compliance assessment. Identify any compliance risks, such as:

- Factories over five floors
- Multiple tenants in the same building
- Retail stores on the ground floor

If there are any high or **severe** rated findings (see Appendix A), the licensee must work with the manufacturer to remediate all issues before placing orders.

### Onsite Visit

An onsite visit is recommended to verify working conditions and is required for manufacturing sites located in countries where Fruit of the Loom or its licensees have no current production presence. Fruit of the Loom's manufacturing footprint can be found here: [Supply Chain - Fruit of the Loom, Inc.](#)

### Onboarding Confirmation

You will receive an email notification from Onspring confirming the completion of the onboarding process and requesting the production start date.

### Posting Requirements

Download the Fruit of the Loom Supplier Code of Conduct and Human Trafficking poster from the [Resources for Suppliers - Fruit of the Loom, Inc.](#) Instruct the manufacturing site to post these in all employee-understood languages and in a prominent location visible to all employees.

### Ongoing Monitoring

#### Monthly Site Confirmation

By the 10th of each month, licensees must confirm their list of active manufacturing sites in the licensee portal.

Please confirm the following:

- All active manufacturing sites (with or without current orders)
- Manufacturing sites to deactivate

### Annual Profile Update

Each active manufacturing site must complete a Manufacturing Site Profile annually. This will be automatically sent to the site contact. Licensees must ensure contact information is up to date. Contact information can be verified through the licensee portal.

### Annual Social Compliance Assessment Update

Each licensee must complete a Social Compliance Assessment Report annually. A template along with instructions and due date will be sent via email by your FOTL Compliance Owner.

## Factories Without Orders

### Manufacturing Site Status

Manufacturing sites with no current orders may remain active in the Fruit of the Loom system for up to six (6) months from the date of the last shipment, provided they have a valid assessment.

### Deactivation Process

Initiate deactivation through the licensee portal and confirm the required information. Refer to the Onspring User Guide for instructions.

### Removal of Trademarked Materials

Once all orders have shipped, the licensee must ensure all trademarked materials are removed or destroyed, including but not limited to:

- Supplier Code of Conduct and Human Trafficking posters
- Garments, trims, packaging, etc.

### Deactivation Certificate

After confirming the above, complete the deactivation certificate using the link provided in the notification email.

### Reactivation

To reactivate a manufacturing site, notify your Compliance Owner. If a Manufacturing Site Profile has not been completed within the current calendar year, the manufacturing site will need to complete the onboarding process to be reactivated.

## Additional Information

### Courtesy Visits

The Fruit of the Loom's Sustainability team may conduct courtesy visits to verify the effectiveness of the licensee's compliance program and offer training or support. These are not audits, but specific areas may be reviewed for compliance. A representative from the licensee is encouraged—but not required—to accompany Fruit of the Loom during the visit.

### Program Participation

Continued participation in the LOC Program depends on timely reporting and adherence to guidelines. If a licensee fails to meet program requirements, Fruit of the Loom may impose additional reporting obligations to ensure proper supply chain monitoring.

## Appendix A

- **Imminently hazardous working conditions**
  - Emergency exit(s) locked during work hours
  - Missing or malfunctioning legally required fire alarms or fire extinguishers
  - Children present on the work floor (not working)
  - Site does not have legal approval for the construction of industrial or residential buildings
- **Observed child labor**
  - Evidence found of child labor in the last 12 months
  - Noncompliance with juvenile restrictions
  - **Prison, indentured, slave or bonded labor utilized, including employment of any North Korean nationals or ethnic Uyghurs, as well as members of other Muslim minority groups from the Xinjiang Uyghur Autonomous Region**
- **Facility has possession of workers' personal identification documents**
  - Workers have paid fees, taxes, deposits or bonds for the purpose of recruitment or employment, including illegal pay deductions
  - Actual terms and conditions of employment are not in compliance with contracts signed during recruitment
  - Workers are unable to leave premises after work and/or during unpaid breaks
  - Overtime is mandatory
  - Indication of harassment
  - Indication of abuse
  - Intrusive or gender inappropriate security practices
- **Illegal or unauthorized use of home workers**
  - Working hour records incomplete, unavailable, or not maintained for at least 12 months, or from beginning of operations if in operation for less than 12 months
  - Falsified working hour records or lack of accurate information about number of hours worked
  - Payroll records incomplete, unavailable, or not maintained for at least 12 months, or from beginning of operations if in operation for less than 12 months
  - Payroll records are missing information such as hours worked, pay rate, itemized deductions or other legally required components
  - Falsified payroll records or lack of accurate information to confirm proper wage payment for hours worked
  - Failure to pay at least legal minimum wage, including workers in training or on probation
  - Failure to pay legal overtime, rest day or holiday premium rates
  - Late payment of wages
- **Denied or restricted freedom of association or collective bargaining rights**
  - **Management has threatened to shift/discontinue production to disrupt workers' associations**
  - Interference of management in workers' representative or union elections
  - Discrimination, harassment or abuse of current or aspiring workers' or union representatives
  - Management favoritism of one workers' association over another
  - Environmental Sustainability
  - Failure to treat solid, liquid or air pollutants prior to disposal
- **Denial of access to facility for assessment team**
  - **Bribery, corruption, extortion, embezzlement or other unethical practices**
  - Assessment team unable to independently select interviewees
  - Interviewees coached or intimidated by management
  - Unauthorized use of a subcontractor

**FRUIT OF THE LOOM**  
**Social Compliance Manual Acknowledgement Form**

Licensee Company Name: \_\_\_\_\_

**By signing below, I acknowledge that I have read and understand the steps outlined in this manual and my company's social compliance obligations for Fruit of the Loom.**

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Licensee Representative (signature)

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Licensee Representative (print)

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Title

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Date