


Human Trafficking and Modern Slavery Disclosure Statement

In compliance with the regulations of the *California Transparency in Supply Chains Act* (SB 657) ("CTSCA") and the *UK Modern Slavery Act of 2015* ("MSA"), 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 2019.

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
December, 2020

Progress

Modern Slavery and human trafficking are complex issues that require diligence and collaboration at all levels of our supply chain. In 2019, we accomplished the following:

- We enhanced our Code of Conduct Benchmarks with the additional requirement that "migrants must be informed of the basic terms of employment before leaving home." This was added as part of our implementation of the Commitment to Responsible Recruitment.
- We updated our posting requirements for our Code of Conduct, Factory Safety Policy, and Human Trafficking poster to mandate that these be provided in the languages spoken by every employee in the factory. The previous requirement was for languages spoken by 10% of the workers in the factory.
- We enhanced our annual Factory Profile to gather data regarding foreign migrant employees.
- We conducted a gap analysis between the results of assessments conducted by industry-recognized auditors and our own Code of Conduct Benchmarks. Gaps in forced labor standards were identified and compliance will be verified on-site during factory visits.

Additionally, in April, 2019, we issued our Position Statement on the allegations of forced labor of Muslim Uighurs and other ethnic minority groups in the Xinjiang Province of China. We required our suppliers to confirm and acknowledge the absence of forced labor in their supply chains, thereby reaffirming our Company policy of zero tolerance on the matter.

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 400+ factory assessments in 2019, 27 findings in the area of forced labor were identified, including:

- Lack of or insufficient written policy on forced labor or procedure to ensure forced labor is not utilized in the supply chain;
- Forced labor policy and procedure not reviewed annually;
- Lack of training for workers on forced labor policy and procedure;
- Payment of fees by foreign migrant workers for the purposes of recruitment or employment;
- Holding of foreign migrant workers' personal identification documents by the factory

All of the findings were addressed with the factories through corrective action plans or on-site visits, and we continue to monitor the corrective action plans for compliance.

Additionally, in August, 2019, we received the report from our outside consultant of the remediation program conducted to address the forced labor allegations at one of our supplier factories in Malaysia (disclosed in a previous Statement). The report revealed that the supplier:

- Completed reimbursement of recruitment fees to 99% of workers in scope, including those overseas.
- Committed to zero-fee recruitment.
- Strengthened recruitment practices.
- Improved its overall working environment as confirmed by all workers.

The report also revealed areas for continued improvement, as follows:

- Recruitment due diligence, in particular regarding sub-agents.
- Improved safety in accommodation and transportation.
- Better worker-employer dialogue.
- Training for workers in their own language to ensure understanding of all key policies.

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. During factory visits in 2019, we continued to raise awareness of human trafficking and modern slavery with factory management teams. 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. Additionally, in 2019, our Corporate Social Responsibility team provided more than 499 hours of in-person training, and 12 hours of webinar 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 have incorporated 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.

Specific assessment activities for 2019 included the following:

- We conducted a review of tier 1 facilities reporting migrant workers and determined that we have migration channels in Malaysia, Taiwan, Jordan, Egypt, and Thailand.
- We created a brief for each country that included our footprint and the local laws and common practices related to migrant labor laws.
- We created an interview template and standard operating procedure to use during factory visits to interview migrant workers and factory management.
- We visited all locations in Taiwan and Jordan. All migrant workers were interviewed in Taiwan, and a sampling of workers was interviewed in Jordan.
- Interview questions addressed working hours, dormitory rules, recruitment fees, passport management, and the payment process. Tours of the factories and dormitories were also conducted.

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 China's Xinjiang Province.

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 and MSA.

[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.