

# Foot Locker Inc.

**TICKER**  
NYSE:FL

**MARKET CAPITALIZATION**  
US\$6 billion

**HEADQUARTERS**  
United States

**COMPLIANCE**

UK Modern Slavery Act: [None available](#)

California Transparency in Supply Chains Act: [Disclosure available, but not compliant](#)

**COMMITMENTS**

[None](#)

**OVERALL RANKING**

**33 out of 43**

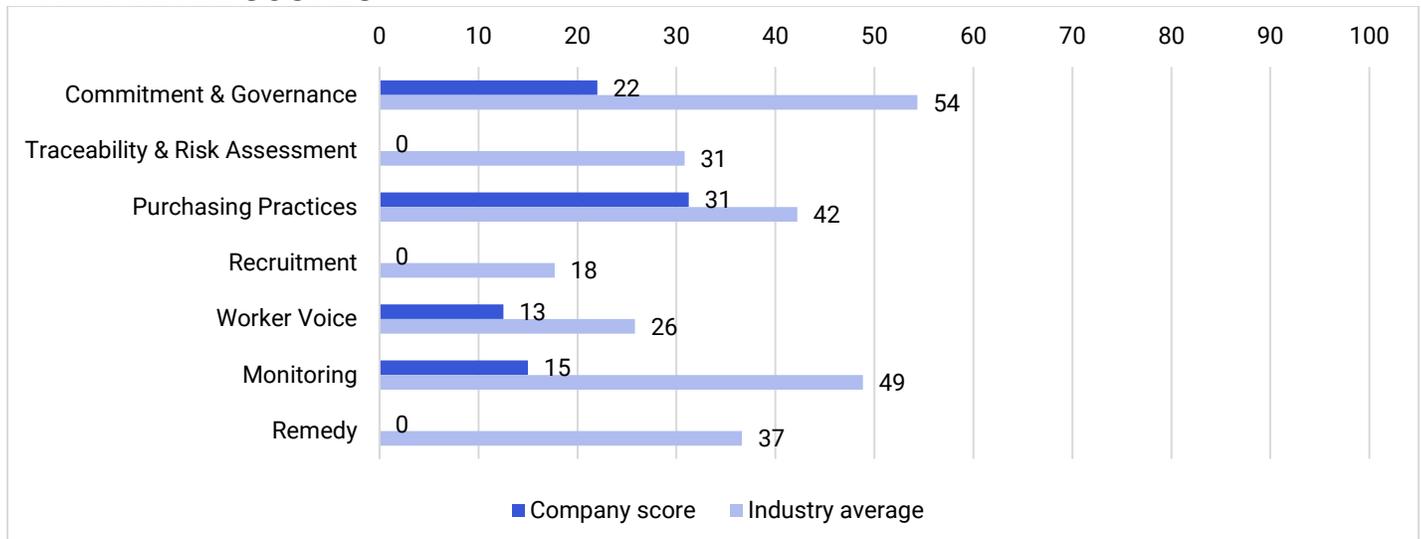
**OVERALL SCORE**

**12 out of 100**

**SUMMARY**

Foot Locker Inc. (Foot Locker), a US-based footwear and apparel retailer, ranks 33rd out of 43 companies and discloses significantly less information on its forced labor policies and practices than its peers. Its score is based on some disclosure on the themes of Commitment & Governance, Purchasing Practices, Worker Voice, and Monitoring. The company is encouraged to improve its performance and disclosure on the themes of Commitment & Governance, Traceability & Risk Assessment, and Recruitment.

**THEME-LEVEL SCORES**



Research conducted through June 2018, or through August 2018 where companies provided additional disclosure or links. For more information, see the full dataset [here](#).

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## LEADING PRACTICES

None.

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## NOTABLE FINDINGS

**Commitment & Governance:** Foot Locker discloses a supplier code of conduct which includes standards addressing forced labor. It reports that the code is distributed annually to its suppliers and that each shipment of goods from its suppliers must be accompanied by a certification of compliance with the code.

**Purchasing Practices:** Foot Locker has a policy prohibiting unauthorized subcontracting by its suppliers and states that any subcontractors must comply with its supplier code of conduct.

**Monitoring:** Foot Locker discloses that internal teams or third parties audit its suppliers in order to verify compliance with its supplier code of conduct. It reports that audits include reviews of relevant documentation and site visits. The company states that it reserves the right to undertake unannounced audits.

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## OPPORTUNITIES FOR IMPROVEMENT

**Commitment & Governance:** The company is encouraged to establish and disclose a managerial structure with clear responsibilities and accountability for the implementation of its supply chain policies and programs relevant to human trafficking and forced labor, both within the company and at the board level. The company may further consider establishing training programs to ensure that relevant decision-makers within the company and its supply chains are aware of the risks related to human trafficking and forced labor and are effectively implementing the company's policies and standards.

**Traceability & Risk Assessment:** To demonstrate a strong understanding of its supply chains, the company may consider disclosing the names and addresses of its first-tier suppliers, the countries of its below-first-tier suppliers, the sourcing countries of raw materials at high risk of forced labor, and information on its suppliers' workforce. The company is further encouraged to assess forced labor risks across its supply chains and disclose the risks identified.

**Recruitment:** To address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company may consider requiring recruitment agencies used by its suppliers to uphold workers' rights and ensuring that workers in its supply chains are not charged fees during any recruitment-related process. The company is also encouraged to confirm that recruitment agencies used by its suppliers are audited and to work with suppliers to ensure that migrant workers' rights are respected (e.g., to confirm workers' passports or other personal documents are not retained).

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## COMPANY PROVIDED ADDITIONAL DISCLOSURE

[No.](#)