

## KnowTheChain Apparel & Footwear Benchmark - Additional Disclosure 2020/2021

Company Name: Pou Chen Corporation

Date: 2021 FEB.

Guidance:

- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website. Please see the 'comment text' and 'source' cells in the Excel document for the information we have already reviewed.
- Note KnowTheChain has already undertaken a review of your website. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to (extensive additional disclosure documents that include a comprehensive list of links already reviewed will not be considered).

### THEME 1: COMMITMENT AND GOVERNANCE

#### 1.1 Commitment

The company:

- (1) publicly demonstrates its commitment to addressing forced labor and human trafficking.

In adhere to the spirits of human rights as advocated by international organization and meet the purpose of effectively terminating forced labor, Pou Chen has signed "Responsible Recruitment" jointly promulgated by Fair Labor Association (FLA) and American Apparel & Footwear Association (AAFA) in November 2019.

Source: Pou Chen, "CSR 2019 Report, p.33" <https://www.pouchen.com/index.php/en/csr/csr-reports> , <https://www.pouchen.com/download/corp-governance/2019%20PCC%20CSR%20Report-EN.pdf>

#### 1.2 Supplier Code of Conduct

The company's supplier code of conduct:

- (1) requires suppliers to respect the ILO core labor standards, which include the elimination of forced labor;
- (2) is easily accessible from the company's website;
- (3) is updated regularly, following internal review and input from external stakeholders;
- (4) is communicated to the company's suppliers; and
- (5) requires its first-tier suppliers to take steps to ensure that their own suppliers implement standards that are in-line with the company's supply chain policies addressing forced labor and human trafficking.

Pou Chen's FLA aligned Code of Conduct explicitly covers the 4 ILO core labor standards (freedom of association and the right to collective bargaining, forced labor, child labor, nondiscrimination) as well as the health and safety of workers and working hours. Pou Chen also expects suppliers to respect each of the above standards. We believe that all workers have the right to work in a safe and fair environment, including all workers in the supply chain. The Code of Conduct has been regularly announced and

notified as a publicity project to suppliers, required to follow the COC and comply with local laws and regulations. In 2020, Pou Chen has established [Guidelines on employment standards to suppliers of Pou Chen Group] according to the Group's COC, zero tolerance policy and FLA benchmark together with international labour standards. Suppliers are required to follow the guideline to respect relevant labor standards, eliminate human trafficking and ensure the supply chain policy are communicated to workers in supply chain. To advance respect for human rights throughout our business operations, including our extended supply chain, supplier audits and non-schedule visits will be conducted according to the requirement of the guidelines.

Source: Pou Chen, "Website," <https://www.pouchen.com/index.php/en/supply-chain-management>  
<https://www.pouchen.com/index.php/en/corporate-governance/quarterly-results-9>

### 1.3 Management and Accountability

The company:

- (1) has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labor and human trafficking; and
- (2) has tasked a board member or board committee with oversight of its supply chain policies that address forced labor and human trafficking.

Pou Chen pays attention to labor and human rights issues in supply chain and has established a dedicated team (Global Supplier Management Sustainable Development, GSCM SD Team) that is responsible for implementing sustainable development management to suppliers. Pou Chen's supplier sustainable development management is based on local law, brand customer requirements, international human rights standards and Group code of conduct. All suppliers are required to undertaken assessment including prohibition of child labor, addressing forced labor, working hours, wages and etc.

Source: Pou Chen, "Website," <https://www.pouchen.com/index.php/en/supply-chain-management>  
<https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf>

### 1.4 Training

The company:

- (1) trains all relevant decision-makers within the company on risks and policies that address forced labor and human trafficking;
- (2) trains its first-tier suppliers on risks and policies that address forced labor and human trafficking and discloses the percentage of first-tier suppliers trained; and
- (3) engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labor and human trafficking to their own supply chains and/or trains suppliers below the first tier on such policies.

Pou Chen has held a human rights compliance advocacy meeting, providing training to suppliers and relevant decision-makers on risk and policies that address forced labour and human trafficking. With a total of 25 high-risk suppliers and 34 managements of suppliers are participated. Also, 23 supervisors

and colleagues from the Groups procurement department and human rights management team have been joined in the training.

Source: Pou Chen, "Website, 2020 Implementation of Supplier Development"  
<https://www.pouchen.com/index.php/en/supply-chain-management>

## 1.5 Stakeholder Engagement

To fully understand and address working conditions in sourcing countries, companies need to engage with potentially affected groups and local stakeholders such as trade unions, worker organizations, or local NGOs—in addition to suppliers. Furthermore, as forced labor risks tend to be systemic in nature, collaboration with other companies, for example, to engage policy makers to strengthen labor legislation, is needed to address forced labor in supply chains.

In the last three years, the company has engaged relevant stakeholders by:

- (1) providing at least two examples of engagements on forced labor and human trafficking with stakeholders such as policy makers, worker rights organizations, or local NGOs in countries in which its first-tier suppliers and suppliers below the first tier operate; and
- (2) actively participating in one or more multi-stakeholder or industry initiatives focused on eradicating forced labor and human trafficking across the industry.

Pou Chen communicates with stakeholders, including shareholders/investors, customers, competent authorities, employees, suppliers, the media, communities and NGOs, about their concerned topics through both regular and impromptu meetings, as well as transparent and solid interaction between the stakeholders and the relevant staff. The channels of communication include but are not limited to questionnaires, emails, meetings and conference calls for collecting stakeholder feedback and suggestions. And the feedback received from stakeholders will be discussed during internal meetings and be reported to the Board of Directors at least once a year. Pou Chen has signed [the Commitment to "Responsible Recruitment"](#) jointly promulgated by Fair Labor Association (FLA) and American Apparel & Footwear Association in November 2019. We incorporate Responsible Recruitment practices in its business operations, and ensure that there is no forced labor issue through the internal audit mechanism.

Source: Pou Chen, "CSR 2019 Report, p. 84-87 " <https://www.pouchen.com/download/corp-governance/2019%20PCC%20CSR%20Report-EN.pdf> & "Website"  
<https://www.pouchen.com/index.php/en/csr/health-safety-management>

## THEME 2: TRACEABILITY AND RISK ASSESSMENT

### 2.1 Traceability and Supply Chain Transparency

The company discloses:

- (1) the names and addresses of its first-tier suppliers;
- (2) the countries of its below-first-tier suppliers (this does not include raw material suppliers);
- (3) the sourcing countries of at least three raw materials at high risk of forced labor and human trafficking; and
- (4) the number of workers per supplier, and one additional data point on its suppliers' workforce (e.g., the gender ratio, migrant worker ratio, or level of unionization per supplier).

Pou Chen Group has factories and suppliers all over the world in China, Indonesia, Vietnam, Cambodia, Bangladesh and Myanmar. In order to effectively share information with the public, the group recently disclosed the owned shoe factories information on an open and public supply chain transparency platform called Open Apparel Registry (OAR). We not only share the factory name, factory located country, factory address and the number of workers employed by the factory, but also we cooperate with suppliers to disclose the supplier information.

Source: Open Apparel Registry, <https://openapparel.org/> and Pou Chen, "Website, Factory and Supplier List of Pou Chen Group" [https://www.pouchen.com/index.php/en/csr/csr\\_news/58-csr\\_2021?selectedItem=58](https://www.pouchen.com/index.php/en/csr/csr_news/58-csr_2021?selectedItem=58)

[https://www.pouchen.com/index.php/en/csr/csr\\_news/58-csr\\_2021/817-pcc-csr-news-210219-en](https://www.pouchen.com/index.php/en/csr/csr_news/58-csr_2021/817-pcc-csr-news-210219-en)

## 2.2 Risk Assessment

Risk assessment involves evaluating the potential that a company has (by virtue of who its suppliers are and where they are located) of being linked to forced labor and human trafficking. Risk assessment is a process that is carried out in addition to and outside of auditing. It helps identify potential forced labor risks as well as actual impacts that may be hard to detect through audits. This process may involve engaging local stakeholders, labor rights experts, independent sources, and assessing risks associated with specific raw materials, regions, or groups of workers such as migrant workers.

The company discloses:

- (1) details on how it conducts human rights supply chain risk or impact assessments that include forced labor risks or assessments that focus specifically on forced labor risks; and
- (2) details on forced labor risks identified in different tiers of its supply chains.

Pou Chen's human rights compliance evaluation is based on local law, brand customer requirements, international human rights standards and Group code of conduct, including prohibition of child labor, addressing forced labor, working hours, wages and etc. By working together with third party or NGO, Pou Chen Sustainable Development Department and dedicated team implement internal audit to factories and suppliers to maintain compliance standards in human rights and labors.

Source: Pou Chen, "Website, 2020 Implementation of Supplier Sustainability Management" <https://www.pouchen.com/index.php/en/supply-chain-management>

<https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf>

## THEME 3: PURCHASING PRACTICES

### 3.1 Purchasing Practices

Purchasing practices and pricing may both positively impact labor standards in the company's supply chains and increase risks of forced labor and human trafficking.

The company:

- (1) is taking steps toward responsible raw materials sourcing;

- (2) is adopting responsible purchasing practices in the first tier of its supply chains, which include planning and forecasting;
- (3) provides procurement incentives to first-tier suppliers to encourage or reward good labor practices (such as price premiums, increased orders, and longer-term contracts); and
- (4) discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labor and human trafficking.

In FLA's Accreditation Report, it stated that "Pou Chen's Global Supply Chain Management Team oversees raw material suppliers and has implemented a compliance program to assess for basic ESH, child labor, and forced labor for all material suppliers that are not nominated by customers and some nominated suppliers. The team conducts basic audits at the raw material facilities that result in a letter grade. Material suppliers that receive an A or B audit grade are invited to have a booth at PCG's annual vendor fair, where product development and production staff from the business units can see the newest technologies and capabilities developed by material suppliers." Please refer to the link as below:

Source: "FLA Accreditation Report, p.22"

[http://www.fairlabor.org/sites/default/files/documents/reports/pou\\_chen\\_accreditation\\_assessment\\_june\\_2018.pdf](http://www.fairlabor.org/sites/default/files/documents/reports/pou_chen_accreditation_assessment_june_2018.pdf)

### 3.2 Supplier Selection

The company:

- (1) assesses risks of forced labor at potential suppliers before entering into any contracts with them and discloses details on the outcomes of this process; and
- (2) addresses risks of forced labor related to sub-contracting and discloses details on the outcomes of this process.

Pou Chen selects new suppliers based on ISO 9001 quality standards, adopts management indicators that comply with local environmental protection regulations and control measures. New suppliers are required to undertake in addition to their compliance assessments. The evaluation items include quality management, environmental management, fire safety, safety and health, and the Group's code of conduct. In addition, Pou Chen regularly conducts on-site field visits for new suppliers every year. After completing the two procedures of self-assessment and sampling on-site visits, it is then decided whether to be included as a supplier of Pou Chen.

Source: Pou Chen, "Website, new suppliers selection" <https://www.pouchen.com/index.php/en/supply-chain-management>

### 3.3 Integration into Supplier Contracts

The company:

- (1) integrates the ILO core labor standards, which include the elimination of forced labor, into supplier contracts;
- (2) discloses the percentage of suppliers whose contracts include such standards; and
- (3) requires its suppliers to integrate such standards into contracts with their own suppliers.

## THEME 4: RECRUITMENT

### 4.1 Recruitment Approach

The company:

- (1) has a policy that requires direct employment in its supply chains;
- (2) requires employment and recruitment agencies used by its suppliers to respect the ILO core labor standards, which include the elimination of forced labor; and
- (3) discloses information on the recruitment agencies used by its suppliers.

### 4.2 Recruitment Fees

According to the ILO, workers should not be charged directly or indirectly, in whole or in part, any fees for recruitment or related costs (such as costs for training, medical tests, or travel).

The company:

- (1) requires that no worker in its supply chains should pay for a job—the costs of recruitment (i.e., recruitment fees and related costs) should be borne not by the worker but by the employer ("Employer Pays Principle"); and
- (2) takes steps to ensure that such fees are reimbursed to the workers and/or provides evidence of payment of recruitment-related fees by suppliers if it discovers that fees have been paid by workers in its supply chains.

Pou Chen has signed the American Apparel & Footwear Association and FLA's Responsible Recruitment commitment which includes that no employee pays for a job. Afterwards, Pou Chen has established [Guidelines on employment standards to suppliers of Pou Chen Group] in 2020, where it required that all suppliers that no workers in supply chains pay for job, including recruitment fees and related costs and it is reimbursable if workers has paid such fees. In addition, suppliers are required to follow the guidelines and promise to respect relevant labor standards and eliminate human trafficking.

Source: Pou Chen, "Website, Implementation of Supplier Sustainability Management in 2020"

<https://www.pouchen.com/index.php/en/supply-chain-management>

[https://www.pouchen.com/download/corp-](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

[governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

<https://www.pouchen.com/index.php/en/corporate-governance/quarterly-results-9>

### 4.3 Monitoring and Responsible Recruitment

The company:

- (1) takes steps to ensure employment and/or recruitment agencies used by its suppliers are monitored to assess and address risks of forced labor and human trafficking; and
- (2) provides details of how it supports responsible recruitment in its supply chains (e.g., by collaborating with stakeholders to engage policy makers to strengthen recruitment standards).

### 4.4 Rights of Workers in Vulnerable Conditions

Migrant workers and other workers in vulnerable conditions are at a higher risk of being in forced labor, and additional steps are needed to ensure their rights are respected. Conditions which render workers vulnerable may include characteristics such as gender or age and external factors, including workers' legal status, employment status, economic conditions, and work environment (such as isolation, dependency on the employer, or language barriers).

The company:

- (1) takes steps to ensure migrant workers in its supply chains understand the terms and conditions of their recruitment and employment and also understand their rights;
- (2) takes steps to ensure its suppliers refrain from restricting workers' movement, including through the retention of passports or other personal documents against workers' will; and
- (3) discloses at least two outcomes of steps it has taken to ensure respect of the fundamental rights and freedoms of supply chain workers in vulnerable conditions (those articulated in the ILO core labor standards, which include the elimination of forced labor).

In 2020, with reference to FLA and various international standards, the [Guidelines on employment standards to suppliers of Pou Chen Group] has been established, which includes recruitment, training and retention, prohibition of child labor, addressing forced labor, non-harassment and discrimination, remuneration and benefits, working hours, freedom of association and collective bargaining, etc., In the recruitment chapter, it stated that suppliers must ensure every worker (includes migrant workers) understand terms and conditions and their rights in connection with employment after a person has been recruited. Refraining from restricting workers' movement and withholding workers' personal documents are not allowed.

Source: Pou Chen, "Website, Implementation of Supplier Sustainability Management in 2020"

<https://www.pouchen.com/index.php/en/supply-chain-management>

[https://www.pouchen.com/download/corp-](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

[governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

<https://www.pouchen.com/index.php/en/corporate-governance/quarterly-results-9>

## THEME 5: WORKER VOICE

### 5.1 Worker Engagement

The company:

- (1) takes steps to ensure its supply chain policies that address forced labor and human trafficking are communicated to workers in its supply chains;
- (2) takes steps to ensure that relevant stakeholders engage with and educate workers in its supply chains on their labor rights and/or supports worker-led efforts on labor rights education;
- (3) provides evidence of the positive impact of worker engagement in its supply chains; and
- (4) provides at least two examples of worker engagement initiatives covering different supply chain contexts.

In addition to requiring suppliers to improve environment, fire protection, health and safety, we also continue to pay attention to labor and human rights issues in supply chain. Suppliers are required to follow the [Guidelines on employment standards to suppliers of Pou Chen Group], respect relevant labor

standards, eliminate human trafficking and ensure the supply chain policy are communicated to workers in supply chain.

Source: Pou Chen, "Website, supply chain management"

<https://www.pouchen.com/index.php/en/supply-chain-management>

<https://www.pouchen.com/index.php/en/corporate-governance/quarterly-results-9>

## 5.2 Freedom of Association

The company:

- (1) works with independent local or global trade unions to support freedom of association in its supply chains;
- (2) discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labor rights agreement with trade unions or worker organizations;
- (3) takes steps to ensure workplace environments in which its suppliers' workers are able to pursue alternative forms of organizing (e.g., worker councils or worker-management dialogues) where there are regulatory constraints on freedom of association; and
- (4) provides at least two examples covering different supply chain contexts of how it improved freedom of association and/or collective bargaining for its suppliers' workers such as migrant workers (e.g., by taking action where suppliers impede workers' rights to freedom of association and/or collective bargaining or by engaging policy makers to improve respect for such rights).

With regards to Freedom of Association in supply chain, Pou Chen provides common terms and definition, suggested solutions and best practice examples on FOA and Collective Bargaining which are all listed out in the [Guidelines on employment standards to suppliers of Pou Chen Group].

Source: Pou Chen, "Website, supply chain management"

<https://www.pouchen.com/index.php/en/supply-chain-management>

<https://www.pouchen.com/index.php/en/corporate-governance/quarterly-results-9>

## 5.3 Grievance Mechanism

The company:

- (1) takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labor conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives;
- (2) takes steps to ensure that the existence of the mechanism is communicated to its suppliers' workers;
- (3) takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism;
- (4) discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism; and
- (5) provides evidence that the mechanism is available and used by workers below the first tier in its supply chains.

In 2020, Pou Chen assisted 5 suppliers in establishing grievance management mechanisms, including diversified grievance channels, grievance handling procedures, and non-retaliation policies. After the

introduction this year, a total of 38 allegations raised through grievance or whistle-blowing channels and 100% of them have been handled and resolved. Example grievance cases and improvements are listed in Pou Chen's 2020 Pou Chen Group Supplier Labor Rights Management which disclosed in website.

Source: Pou Chen, "Website, 2020 Implementation of Supplier Development"

<https://www.pouchen.com/index.php/en/supply-chain-management>

<https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Development-EN.pdf>

## THEME 6: MONITORING

### 6.1 Monitoring Process

To improve implementation of its supply chain policies, conditions at supplier level can be monitored in different ways. This could include specialized audits to detect forced labor at higher-risk suppliers or worker-driven monitoring (i.e., monitoring undertaken by independent organizations that includes worker participation and is guided by workers' rights and priorities).

The company has a supplier monitoring process that includes:

- (1) non-scheduled visits;
- (2) a review of relevant documents;
- (3) off-site interviews with workers;
- (4) visits to associated production facilities and related worker housing; and
- (5) steps to ensure that suppliers below the first tier are monitored.

In 2020, a total of 5 key supplier evaluations were conducted. By reviewing relevant documentation, interviewing with workers and investigating CCTV and related records, there were 49 non-compliances found in human rights management, relating to recruitment process, reward and punishment system, and special employee management. We also supported suppliers to complete 100% improvement.

Source: Pou Chen, "Website, Implementation of Supplier Sustainability Management in 2020"

<https://www.pouchen.com/index.php/en/supply-chain-management>

<https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf>

### 6.2 Monitoring Disclosure

The company discloses:

- (1) the percentage of suppliers monitored annually;
- (2) the percentage of unannounced monitoring visits;
- (3) the number or percentage of workers interviewed; and
- (4) information on the qualification of the monitoring organization used and/or the use of worker-driven monitoring (i.e., monitoring undertaken by independent organizations that includes worker participation and is guided by workers' rights and priorities); and
- (5) a summary of findings, including details regarding any violations revealed.

Pou Chen conducts Regular evaluation of cooperative suppliers, which includes Key supplier evaluation and supplier audits according to customer requirements. Related information can be found in 2020 Pou Chen Group Supplier Labor Rights Management.

Source: Pou Chen, "Website, Implementation of Supplier Sustainability Management in 2020"

<https://www.pouchen.com/index.php/en/supply-chain-management>

[https://www.pouchen.com/download/corp-](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

[governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

## THEME 7: REMEDY

### 7.1 Corrective Action Plans

The company discloses:

- (1) a corrective action process for its suppliers and potential actions taken in cases of non-compliance, such as stop-work notices, warning letters, supplementary training, and policy revision;
- (2) a means to verify remediation and/or implementation of corrective actions, such as record review, employee interviews, or spot-checks;
- (3) potential consequences if corrective actions are not taken; and
- (4) a summary or an example of its corrective action process in practice.

Pou Chen SD staff closely monitor the development and implementation of these CAPs through follow-up audits and record progress and verification status in monitoring platform system(MAP), which stores historical audit data, CAPs, and other information to enable root cause analysis. For suppliers that cannot meet the Group's sustainable development management standards, we will support guidance for suppliers to improve. If suppliers fail to complete the improvement within time limit, we will moderately reduce the proportion of procurement. Through MAP system, we conduct any necessary corrective action to track the improvement of non-compliance, including supplementary training and policy revision. Pou Chen has supported suppliers to complete 100% improvement.

Source: Pou Chen, "Website, Implementation of Supplier Sustainability Management in 2020"

<https://www.pouchen.com/index.php/en/supply-chain-management>

[https://www.pouchen.com/download/corp-](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

[governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf](https://www.pouchen.com/download/corp-governance/2020%20Implementation%20of%20Supplier%20Sustainability%20Management-EN.pdf)

### 7.2 Remedy Programs / Response to Allegations

A. The company discloses:

- (1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking; and

- (2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers; and
- (3) a description of what actions it is taking to prevent and remediate the use of forced Uyghur labor.

B.1. If one or more additional allegations regarding forced labor in the first or lower tier of a company's supply chains have been identified and disclosed by a third party(ies) in the last three years, the company discloses:

- (1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking;
- (2) that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s);
- (3) outcomes of the remedy process in the case of the allegation(s); and
- (4) evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

B.2. If one or more allegations regarding forced labor in the first or lower tier of a company's supply chains have been identified and disclosed by a third party(ies) in the last three years, and the company denies the allegation, the company discloses:

- (1) a process for responding to potential complaints and/or reported violations of policies that address forced labor and human trafficking;
- (2) a description of what actions it would take to prevent and remediate the alleged impacts; and
- (3) that it engages in a dialogue with the stakeholders reportedly affected in the allegation or requires its supplier(s) to do so.

## NON-SCORED DISCLOSURE

### Target Setting

The company discloses measurable and time-bound targets to address forced labor in its supply chains.

*Yes/No. Please provide details.*

The company reports on progress towards achieving previous targets on an annual basis.

*Yes/No. Please provide details.*

### Reporting Legislations

UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.

*Yes/No. Please provide link to a publicly available statement.*

California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

*Yes/No. Please provide link to a publicly available statement.*

### Due Diligence on Third-Party Products

Where a company—in addition to own branded products—sells third-party food and beverage products, the company discloses how it assesses and addresses forced labor risks related to third-party food and beverage products.

*Yes/No. Please provide details.*

### High Risk Sourcing<sup>1</sup>

*Please provide a full list of raw materials present in your supply chains, or alternatively indicate for each of the commodities below whether it is present in your supply chains. Note where a company does not provide this information, KnowTheChain will review the company's website as well as third party sources to identify relevant information.*

#### Raw Materials

- Bamboo
- Cashmere\*
- Cotton
- Rubber (natural)
- Silk
- Viscose\*

---

<sup>1</sup> Data according to US Department of Labor's list of Goods Produced by Forced Labor website as of September 2020. Accessed October 2020.

\* = Risk factors identified based on publicly available sources and discussions with expert organizations.

- Wool\*

Sourcing Countries for Apparel & Footwear Supply Chains (garments, textiles, etc)

- Argentina
- Brazil
- China
- Ethiopia
- India
- Malaysia
- Nepal
- North Korea
- Thailand
- Vietnam

Presence of Migrant Workers in Supply Chains

*Yes/No. Please provide details.*