

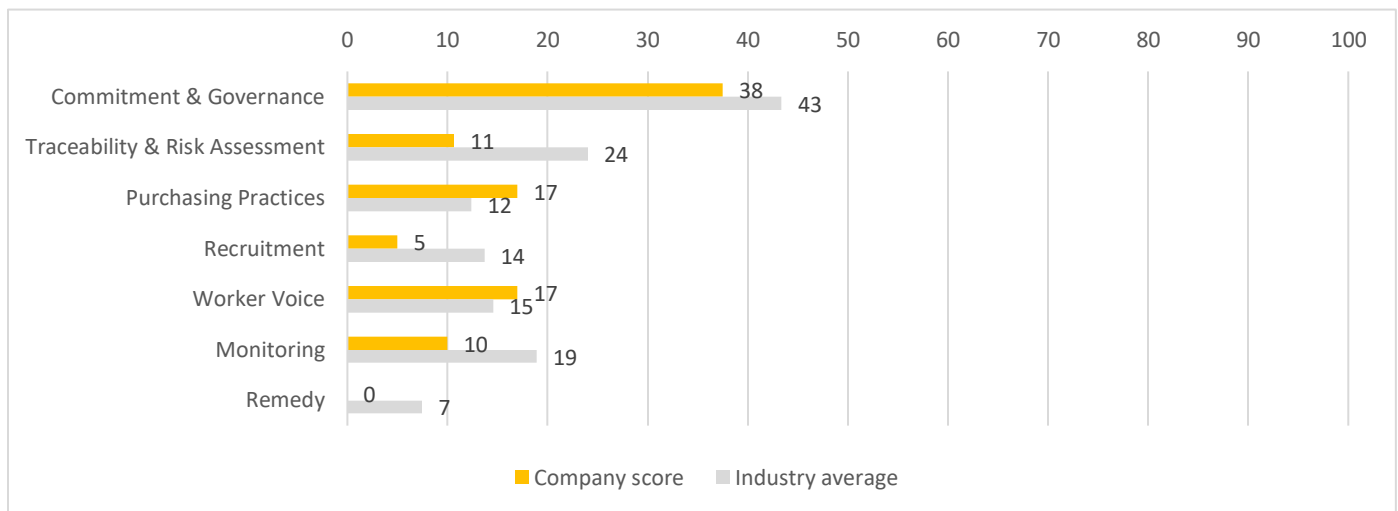
American Eagle Outfitters Inc. (AEO)

TICKER
NYS:AEO

MARKET CAPITALISATION
US\$3.56 billion

HEADQUARTERS
United States

DISCLOSURES
UK Modern Slavery Act: [Yes](#)
California Transparency in Supply Chains Act: [Yes](#)
Australia Modern Slavery Act: Not applicable

OVERALL RANKING
38 out of 65
[2021 Performance](#)
OVERALL SCORE
15 out of 100
THEME-LEVEL SCORES

KEY DATA POINTS
FIRST-TIER SUPPLIER LIST
 No

RISK ASSESSMENT
 Yes

DATA ON PURCHASING PRACTICES
 No

ENGAGED WITH KNOWTHECHAIN²
 Yes

NO-FEE POLICY
 Yes

REMEDY FOR SUPPLY CHAIN WORKERS
 No

HIGH-RISK RAW MATERIALS¹
 Cotton, leather, rubber, wool

SUMMARY

American Eagle Outfitters Inc. (AEO), a US apparel retailer, ranks 38th out of 65 companies. Since 2021, the company has updated its supplier code of conduct to specify “no worker should pay any fees during their recruitment process.” However, the company does not seem to have taken additional steps to strengthen its performance and disclosure. While the company scores slightly higher than average on the themes of Purchasing Practices and Worker Voice, it scores lower than average across all other themes, including 0 on the theme of Remedy. KnowTheChain identified one allegation of forced labour in the company’s supply chains, related to alleged Uyghur forced labour. However, the company does not disclose the steps it has taken to address the risks of alleged Uyghur forced labour across raw materials and supply chain tiers. The company is encouraged to improve its performance and disclosure on the themes of Traceability & Risk Assessment, Recruitment, and Remedy.

LEADING PRACTICES

None.

OPPORTUNITIES FOR IMPROVEMENT

Traceability & Risk Assessment: The company is encouraged to demonstrate a strong understanding of its supply chains by disclosing the names and addresses of its first-tier suppliers (either across high-risk commodities or across all first-tier suppliers), the names and locations of below-first-tier suppliers, and the countries from which it sources raw materials at high risk of forced labour. The company is further encouraged to disclose data on its supply chain workforce, such as the percentage of women and migrant workers and the percentage of workers being paid a living wage.

Recruitment: The company has established a policy that states workers should not pay recruitment-related fees. The company is encouraged to strengthen its policy to require that such fees be paid by the employer (“Employer Pays Principle”) and disclose how it ensures the implementation of this through the prevention of fees in its supply chains, such as through: mapping of migration corridors and labour agencies used by suppliers, specialised monitoring for fees, and evidence of supplier payment of fees to labour agencies directly. It may also consider steps to ensure that such fees are reimbursed to the workers and/or to provide evidence of payment of recruitment-related fees by suppliers.

Remedy: The company may consider establishing a process to ensure that remedy is provided to workers in its supply chains in cases of forced labour and disclosing details on this process, such as responsible parties, approval procedures, timeframes, and, crucially, engagement with affected stakeholders. To demonstrate to its stakeholders that it has an effective remedy process in place, the company is encouraged to disclose examples of remedy provided to its suppliers’ workers.

¹ For further details on high-risk raw materials and sourcing countries, see KnowTheChain’s 2023 apparel & footwear benchmark [findings report](#).

² Research conducted through June 2023 or through September 2023, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company’s positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).