

KnowTheChain 2023 Apparel & Footwear Benchmark

Additional Disclosure

Company Name: PUMA

Date: September 2023

Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- 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.
- 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.
- Column F in the Scored Research tab of your excel sheet highlights questions to your company where the KnowTheChain team is seeking clarification or further detail on particular points of your company's disclosure.

INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

Social Handbook https://cdn.about.puma.com/-/media/files/pdf/sustainability/codes-and-handbooks/2022/puma_handbook-soc-2022_.pdf?rev=355bc9136fdd40d489e50ec46979c979

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2.1 Vendor Requirements

PUMA pursues and maintains contractual relationships only with those factories and Licensees that have agreed to comply with the guidelines and directives set out in the PUMA Forever Better Sustainability Handbooks.

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

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Page 73.

PUMA has used e-learning from the International Organization for Migration in employer guidelines. 79 factory representatives from 36 factories from Mauritius, China (Taiwan), South Korea, Thailand

and Japan completed this 90-minute English course and were certified in October 2022. The e-course provides practical guidance on how to establish sustainable practices to safeguard migrant workers' rights, human rights policies, due diligence processes and remediation systems, and supports businesses to involve migrant workers to create sustainable solutions. Through the efforts of multi-stakeholder engagements, factories paid back more than \$ 100,000 to 255 foreign migrant workers, at six factories in Japan, South Korea, China (Taiwan) and Thailand.

Additional comments:

During the suppliers' meetings, factories were trained on:

- Code of Conduct, sustainability handbooks. Zero tolerances, critical issues, second quarter of 2020-
- Social goals, including elimination of recruitment fees, first quarter of 2021 and 2022
- PUMA's complaint hotline, second quarter of 2021
- PUMA's responsible purchasing policy and forced labour risk related audit issues (classified as more serious, moved to critical issues and zero tolerances). Last quarter of 2021 and 2022.

INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

> FLA full assessment report for 2021 can be found here:

<https://about.puma.com/sites/default/files/media/media-download/files/fla-2021-annual-evaluation-full-puma-se.pdf>

For FLA principle 1: Top Management Commitment, PUMA received full score.

The FLA's Board of Directors approved changes to accreditation timelines in February 2021. After a company has achieved accreditation, the FLA will use the annual evaluation to verify that all accredited companies are maintaining the Principles, benchmarks and KPIs. The recommendations in the annual evaluation reflect the things that PUMA must do to maintain your FLA accreditation.

FLA accredited companies are constantly improving their practices, and FLA will continue to recognize those who have demonstrated standards of excellence beyond the core accreditation requirements. The evaluation results will allow the FLA to publicly recognize the achievements of accredited companies who are demonstrating advanced leadership in their social compliance programs.

[Accredited Companies - Fair Labor Association](#)

2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

[ANNUAL REPORT PUMA 2022_sustainability \(2\).pdf](#)

Page 189 explains that sourcing function within PUMA is responsible for procurement

PUMA Group’s sourcing functions, referred to as PUMA Group Sourcing (PGS), manages all sourcing related activities for PUMA and Cobra, including vendor selection, product development, price negotiation and production control. These activities are centrally managed by PUMA International Trading GmbH (PIT), the group’s global trading entity, with its head office in the Corporate headquarters in Herzogenaurach (Germany). In addition, **PIT is responsible for procurement** and supply into the PUMA distribution channels worldwide. PIT receives volume forecasts from PUMA subsidiaries and licensees worldwide, translates these forecasts into production plans which are subsequently distributed to the referenced vendors. The PUMA subsidiaries confirm their forecasts into purchase orders to PIT, which in turn consolidates these requirements and purchases from the vendors. There is a clear buy/sell relationship between the sales-subsidiaries and PIT and between PIT and the vendors, for added transparency.

Additional information:

In 2022, all PUMA staff members involved groupwide in Sourcing, Product Development, Production, Planning and Purchasing Operations received training on **PUMA Responsible Purchasing Policy**. Footwear, apparel and accessories teams in all regions were trained.

The training reminded PUMA teams about the importance of open production capacity, production planning and sufficient lead time in order to avoid excessive overtime issues. Excessive overtime is one of the 11 ILO indicators of Forced Labor.

Page 235, RISK MANAGEMENT SYSTEM

The Management Board of PUMA SE bears overall responsibility for the risk management system.

The Risk Management Committee, which consists of the PUMA SE Management Board and selected managers, is responsible for the design, review and adaptation of the risk management system.

Page 242, MONITORING OF WORKING CONDITIONS is included in PUMA risk management system

An important aspect of corporate responsibility is maintaining and monitoring working conditions and human rights along the entire value chain. ILO (International Labor Organization) core labor standards form an essential part of this;

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

HUMAN RIGHTS POLICY

<https://cdn.about.puma.com/-/media/files/pdf/sustainability/codes-and-handbooks/2022/puma-human-rights-policy-12052022.pdf?rev=45363567689643aab3c645d62894fa8d>

Governance

Our Management Board has adopted this Human Rights Policy on behalf of the PUMA Group. PUMA's Chief Sourcing Officer oversees the overall policy adherence. Our sustainability, governance, sales, marketing and people & organization teams manage the policy implementation and report on progress and impact to the Management Board and the leadership team on a regular basis. Our incentive schemes are linked to the achievement of sustainability targets including human rights targets.

[ANNUAL REPORT PUMA 2022 sustainability \(2\).pdf](#)

Page 36.

At the Management Board level, with the responsibility for sustainability assigned to the Chief Sourcing Officer (CSO) - There were several Management Board meetings in 2022 with dedicated sustainability updates, on the sustainability target achievement status and more sustainable product initiatives, for example. - The PUMA CEO and CSO participated in our Conference of the People sustainability event focusing on collaboration, circularity and climate action. Other board members participated online. - **Our CSO has a monthly meeting with the sustainability leads for corporate and supply chain sustainability. Topics include, for example, human rights, health and safety and chemical programs, as well as climate and water projects in the supply chain.**

INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

3.1 the names and addresses of first-tier suppliers;

3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

INDICATOR 4: RISK ASSESSMENT

4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

4.2 details on forced labour risks identified in different tiers of its supply chains; and

4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

As stated in our 2022 Annual report page 144, PUMA used 96.2% cotton from Better Cotton, and 3.6% or recycled cotton.

At Better Cotton, we take a broad approach to decent work that considers the diversity of contexts in which cotton is produced, from family smallholdings to large-scale farms. Our approach aligns with International Labour Organization (ILO) standards — widely considered the international authority on labour matters — and we are continuously improving it as we grow and evolve as an organisation.

All Better Cotton farmers (from smallholders to large-scale farms) must, at a minimum, work to uphold four Fundamental Principles & Rights at Work:

-Freedom of association and the right to collective bargaining

-The elimination of forced labour

-The abolition of child labour

-The elimination of discrimination in employment and occupation

Principle six of the [Better Cotton Principles and Criteria](#) lays out 22 criteria for upholding these standards, with requirements from identifying work hazards to ensuring a worker's consent. Better Cotton Farmers are also required to follow national labour and occupational health and safety laws unless those laws set standards below ILO standards.

Better Cotton Global Forced Labour Risk Assessment Methodology

The Global Forced Labour Risk Assessment Methodology helps determine the country level risk of forced labour in cotton production for countries where Better Cotton operates. This risk-based approach is used to prioritise further assessment and investment into strengthening the labour management systems where the risk is elevated.

In order to ensure that we consider all decent work related challenges in our risk mapping, we are currently in the process of revising the methodology to include other key areas of decent work, like child labour and freedom of association. Once finalised, the expanded methodology will be shared here. Please note that the results of the mapping are for internal use only, informing our programming and resource allocation, and are not to be used in any other way.

Task Force on Forced Labour and Decent Work

Better Cotton formed the Task Force on Forced Labour and Decent Work in April 2020 to review the current Better Cotton Standard System globally. The aim of the Task Force was to highlight gaps and develop recommendations to improve the effectiveness of this system in identifying, preventing, mitigating and remediating forced labour risks. Read the final Task Force report and recommendations below, as well as how Better Cotton has onboarded the recommendations.

[How Better Cotton promotes decent working conditions around the world](#)

As stated in our 2022 Annual report page 145, PUMA uses 100% Leather Working Group (LWG) certified leather allowing to track origin and map where potential risks come from.

[Traceability - Leather Working Group](#)

[Chain of Custody - Leather Working Group](#)

LWG Social Assessment Requirements

For a scheme to be recognised there are two sets of criteria that must be met.

These define the social standards against which the audit, assessment or certification is undertaken. The scope of these covers all core social and labour elements. The social criteria are taken from the Consumer Goods Forum SSCI benchmark requirements for processing and manufacturing facilities. These were developed through extensive consultation and review across a wide range of industry sectors and geographies.

The SSCI's Social Criteria identify the key foundational elements of any effective and responsible social sustainability standard. These criteria ensure that all relevant social sustainability topics are being covered by an auditing scheme. The SSCI Social Criteria are informed by international reference frameworks such as principles from relevant International Labour Organization (ILO) Conventions, the 1998 Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and **the CGF Priority Industry Principles on Forced Labour**.

[SSCI Benchmark - The Consumer Goods Forum](#)

[Social Responsibility - Leather Working Group](#)

INDICATOR 5: DATA ON SUPPLY CHAIN RISKS

5.1 the percentage or number of supply chain workers who are women;

Available on Website in Human Rights > Suppliers' list, all T1, core T2 and T3 for viscose. Core T2 represent around 80% of PUMA sourcing volume

[Suppliers_PUMA-Global-FTY-List-202304.pdf](#)

5.2 the percentage or number of supply chain workers who are migrant workers' and

Available on Website in Human Rights > Suppliers' list all T1, core T2 and T3 for viscose. Core T2 represent around 80% of PUMA sourcing volume.

[Suppliers_PUMA-Global-FTY-List-202304.pdf](#)

5.3 the percentage or number of supply chain workers that are being paid a living wage.

[ANNUAL REPORT PUMA 2022_sustainability \(2\).pdf](#)

Page 72, we report 70,832 production workers are paid a living wage.

Page 63, we report a total of 546,286 workers in T1.

Approximately 13% of workers are paid a living wage in T1.

INDICATOR 6: PURCHASING PRACTICES

6.1 commits to responsible buying practices in its contracts with suppliers;

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

> FLA full assessment report for 2021 can be found here:

<https://about.puma.com/sites/default/files/media/media-download/files/fla-2021-annual-evaluation-full-puma-se.pdf>

For FLA principle 2: Responsible Purchasing Practice, PUMA received full score in most of the question. FLA raised the following recommendations:

1. The Living Wage Analysis and the Annual Report Fair Compensation language address all Blueprint criteria except for including how purchasing practices departments will be held accountable to support improvement of living wages.
2. Puma's Responsible Sourcing policies should address responsible order reduction and factory exit. Key elements include providing sufficient time (no less than 6 months) in notifying the factory of order reductions and/or exits and steps the company will take to mitigate retrenchment at the facility.

PUMA will be working on these recommendations.

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.

INDICATOR 7: RECRUITMENT-RELATED FEES

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle");

SOCIAL HANDBOOK

https://cdn.about.puma.com/-/media/files/pdf/sustainability/codes-and-handbooks/2022/puma_handbook-soc-2022_.pdf?rev=355bc9136fdd40d489e50ec46979c979

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PUMA is committed to respecting Migrant Workers Rights as per the International Convention on the Protection of the Rights of all Migrant Workers and Members of Their Families and expect suppliers to commit and respect Migrant Workers Rights. As per AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment, we commit to work with our global supply chain partners to create conditions so that: No worker pays for their job Workers retain control of their travel documents and have full freedom of movement; and All workers are informed of the basic terms of their employment before leaving home

[ANNUAL REPORT PUMA 2022_sustainability \(2\).pdf](#)

Page 73, we provide training to factories on employers' guideline in collaboration with the the International Organization for Migration, to prevent the charging of fees to workers in the first place.

PUMA has used e-learning from the International Organization for Migration in employer guidelines. 79 factory representatives from 36 factories from Mauritius, China (Taiwan), South Korea, Thailand and Japan completed this 90-minute English course and were certified in October 2022. The training provided an overview on different migration corridors and economic sectors, from fashion through to electronics and food manufacturing and the risks faced by migrant workers throughout their labor migration journey and what they can do to mitigate and prevent those risks. The e-course provides practical guidance on how to establish sustainable practices to safeguard migrant workers' rights, human rights policies, due diligence processes and remediation systems, and supports businesses to involve migrant workers to create sustainable solutions.

In 2023 we will keep monitoring factories' recruitment practices and set up training in collaboration with industry peers and the International Organization for Migration for Taiwanese suppliers who employ foreign migrants.

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

PUMA sustainability team checked the payment evidence as part of verification process regarding paying back recruitment fees for five factories in Japan, South Korea, Taiwan. For the Thai factory, an onsite verification was conducted by PUMA nominated 3rd party auditor, which included interviews with 18% of the 226 migrant workers.

INDICATOR 8: RESPONSIBLE RECRUITMENT

8.1 discloses information on the recruitment agencies used by its suppliers; and

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).

INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

> FLA full assessment report for 2021 can be found here:

<https://about.puma.com/sites/default/files/media/media-download/files/fla-2021-annual-evaluation-full-puma-se.pdf>

For FLA principle 6: P6: Functioning Grievance Mechanisms, PUMA received full score.

SOCIAL HANDBOOK

https://cdn.about.puma.com/-/media/files/pdf/sustainability/codes-and-handbooks/2022/puma_handbook-soc-2022_.pdf?rev=355bc9136fdd40d489e50ec46979c979

page 14

PUMA's social monitoring program applies, in principle, to all factories producing PUMA products (semi-finished or finished) or manufacturing materials, components, raw materials, trims, labels or packaging.

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The contact numbers and an email address of the PUMA Sustainability Team are displayed in each factory producing for PUMA through the mandatory posting of the PUMA Code of Conduct. Contact information is provided in the local language to be readily accessible.

It means that our contact details are available for workers in our Code of Conduct, translated in 40 languages, in our core 2 (manufacturing materials, components, trims, labels or packaging)

and warehouses.

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

10.3 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.

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

[ANNUAL REPORT PUMA 2022_sustainability \(2\).pdf](#)

Page 57, based on our Forced Labour management risk assessment conducted in 2021,

PUMA reviewed the severity grading of audit findings linked to forced labor indication, this will then also increase escalation and prioritized investigation and remediation processes. We revised our social handbook and trained our suppliers and sourcing colleagues accordingly

11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities).

PUMA partners with Better Work which methodology is based on workers' engagement.

<https://betterwork.org/what-does-it-mean-for-factories/>

(Better Work) Our guiding principles

The Better Work model is rooted in six key themes: Ownership, Partnership, Accountability, Dialogue, Gender Equality and Inclusion. Ownership means that each factory improvement process takes into account the views of the women and men working in the factory regarding what is important in the workplace to them and how they can bring about sustainable change

Initial advisory

During the initial advisory we will coach the factory so they create or work with an existing bipartite or **worker/management committee to discuss and resolve workplace issues on a regular ongoing basis.**

We will also coach the factory to self-diagnose where they need support to meet laws and standards. Needed improvements and follow-up actions are included in the improvement plan.

Continued advisory and learning

The advisory process now focuses on enabling the bipartite committee to address issues listed in the improvement plan – this includes self-diagnosed issues identified during the initial advisory and those that were identified during the BW assessment.

Factories will be supported through: tailored factory visits; issue specific seminars with peers from other factories; and training appropriate to the factory's specific needs.

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

SOCIAL HANDBOOK

https://cdn.about.puma.com/-/media/files/pdf/sustainability/codes-and-handbooks/2022/puma_handbook-soc-2022_.pdf?rev=355bc9136fdd40d489e50ec46979c979

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Alternative communication channel PUMA offers multiple communication channels to receive grievance from factory workers, external individuals or organizations, Civil Society Organizations or communities. PUMA commits to remedy and thus offers a confidential, third-party complaints/grievance channel for workers and external organizations to voice concerns. The aim of this process is to expedite the resolution of problems or issues that workers have already raised through the factory grievance mechanism but have failed to be resolved. Once a concern is raised, we actively follow up on remediation and aim to ensure the mitigation and remediation measures taken are according to the consideration of the person who raised the complaint. We expect the factory will set up preventive measures such as training factory staff on the policy, rules and regulations related to the specific issue raised through PUMA hotline. The contact numbers and an email address of the PUMA Sustainability Team are displayed in each factory producing for PUMA through the mandatory posting of the PUMA Code of Conduct. Contact information is provided in the local language to be readily accessible.

All complaints and/or grievances shall be dealt with promptly and, whenever possible, in a confidential manner that follows procedures in place. PUMA recognizes that there may be situations where the seriousness of the complaint warrants formal proceedings from the outset, and that confidentiality is not possible in those circumstances. Threatening reprisals at any stage of a complaints process towards anyone who used PUMA hotline will be considered a violation of PUMA's Code of Conduct and a Major Issue (see Sec. 3.7.3. PUMA expects full collaboration of the factory management throughout the remediation process. In principle, any issue raised through PUMA hotline will not impact the factory audit rating. In the case of lack of collaboration which leads to an unsolved issue, PUMA reserves the right to consider the unsolved issue as an audit finding and apply PUMA audit rating system (see Sec. 3.7.3). PUMA does not obstruct access to other remedies. Independent of the PUMA worker hotline, the Fair Labor Association also offers a formal third-party complaints mechanism, where complaints about violations of the FLA Code of Conduct can be raised by third-party institutions, such as unions or NGOs. In some countries, PUMA partnered with third party service providers to provide a broadly available mechanism for workers to report issues and anonymously or publicly submit feedback on specific topics and issues, via a factory owned worker engagement technology platform. Third Party Helpline of toll-free nationwide and available 24/7 is way to provide a safe, timely, and effective communication channel for the purpose of identifying and resolving safety and other concerns of workers from some suppliers.

3.16.3 Reprisal

Every employee has the right to raise concerns and make reports without fear of reprisal. Threatening reprisals at any stage of a complaints process will be considered a violation of PUMA's Code of Conduct and a Critical Issue (see Sec. 3.7.2). In the event of any threat of reprisal,

appropriate disciplinary proceedings will be initiated against those who attempt or implement such behaviors. The workplace complaints/grievance procedure shall include a plan for reprisals management and shall involve the trade union or workers' council, if such exists at the factory. The workers' organization shall have the right to raise the case to the workplace management in situations that warrant it.

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers.

[ANNUAL REPORT PUMA 2022 sustainability \(2\).pdf](#)

Page 68-Case study

Pakistan In September 2022 we received an e-mail from UK-based media, asking for PUMA's comments on the allegations made by the female employees of a factory in Pakistan. It was alleged that the managers of the factory were leaking the contact details of young female workers to other male colleagues without their consent and these female workers received inappropriate messages. In addition, there were allegations about unpaid wages during the COVID-19 pandemic. An unannounced investigation by a third party immediately took place in the same month. The auditor concluded that no wages were deducted during the pandemic but confirmed some inappropriate behaviour towards three female workers occurred in July 2022. The factory has already acted and dismissed the concerned supervisor in August 2022. Female workers interviewed during the investigation confirmed such cases did not happen anymore. In October 2022 the factory management agreed to take further actions to prevent similar cases from happening in the future, such as limiting access to personal contact information of employees to HR personnel only. An anti-harassment committee headed by female HR personnel was formed. 100% of committee members were trained in handling grievance cases. 100% female as well as male employees were given awareness training on harassment and abuse, reporting channels and the consequences or penalties of violating the anti-harassment policy. Awareness sessions are continuing as planned and are recorded accordingly.

B.1.1 that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s)

Based on all the information we gathered and the traceability and controls we have in place, we reiterate that PUMA does not have any business relationship with any suppliers in Xinjiang, and that we do not use any cotton from Xinjiang.

It has been the long-standing practice of PUMA to continuously and rigorously monitor our supply chain and conduct human rights due diligence on all of our suppliers globally, including those in major production hubs such as Vietnam, Bangladesh and China.

Additional Comments:

[Human Rights Statements | PUMA®](#)

PUMA has no direct or indirect business relationship with any manufacturer or supplier of raw materials in Xinjiang.

Once we heard about the allegations from German TV show Panorama, we immediately launched an investigation.

Our supplier guaranteed to us, that the cotton used to make the products shown at the program originates from Brazil. In addition, we had the products in question tested by an independent laboratory, which was unable to determine the origin of the cotton with full certainty.

This is because whilst the present technology works well on single origin cotton, it cannot determine the exact origin when cotton from multiple origins is blended – which is common practice in yarn spinning. As a result, we have had on on-going due diligence program with our partner laboratory, where we currently test selected samples of finished garments before shipments on regular basis.

B.1.2 outcomes of the remedy process in the case of the allegation(s); and

Based on all the information we gathered and the traceability and controls we have in place, we reiterate that PUMA does not have any business relationship with any suppliers in Xinjiang, and that we do not use any cotton from Xinjiang.

B.1.3 evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

Where an allegation is identified in the company's supply chains, but is denied by the company:

Based on all the information we gathered and the traceability and controls we have in place, we reiterate that PUMA does not have any business relationship with any suppliers in Xinjiang, and that we do not use any cotton from Xinjiang.

In line with our general compliance standards, we regularly perform due diligence in PUMA's supply chain. Our latest due diligence revealed that no supplier of PUMA – neither direct nor indirect and across all tiers – has business relations with Huafu Top Dyed Melange Yarn Co. Ltd.

B.2.1 a description of what actions it would take to prevent and remediate the alleged impacts; and

we have had on on-going due diligence program with our partner laboratory, where we currently test selected samples of finished garments before shipments on regular basis.

B.2.2 as part of this process, it would engage with affected stakeholders and their representatives.

Based on all the information we gathered and the traceability and controls we have in place, we reiterate that PUMA does not have any business relationship with any suppliers in Xinjiang, and that we do not use any cotton from Xinjiang.

It has been the long-standing practice of PUMA to continuously and rigorously monitor our supply chain and conduct human rights due diligence on all of our suppliers globally, including those in major production hubs such as Vietnam, Bangladesh and China.

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NON-SCORED RESEARCH

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.

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

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

High Risk Sourcing

Please indicate whether your company sources any of the below high-risk raw materials. 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.

- Bamboo
- Cashmere
- Cotton
- Leather (cattle)

- Rubber (natural)
- Silk
- Viscose
- Wool

Please indicate whether your company sources from any of the below high-risk locations.

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