

## KnowTheChain 2023 Apparel & Footwear Benchmark

### Additional Disclosure

Company Name: [Levi Strauss & Co.](#)

Date: [September 15, 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.

#### 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

[No further comments.](#)

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.

Please refer to our Worker Wellbeing Guidebook (<https://levistrauss.com/wp-content/uploads/2022/04/Worker-Well-being-Guidebook-Final-2022-1.pdf>). We have made commitments to work with our suppliers to make investments in areas proven to impact well-being at work, including gender equity, the workplace environment, and factory policies and systems.

See pages 15-18 of the Supplier Sustainability Guidebook: [https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO\\_Sustainability\\_Guidebook.pdf](https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO_Sustainability_Guidebook.pdf)

#### 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;

[No further comments.](#)

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

No further comments.

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.

No further comments.

#### INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

3.1 the names and addresses of first-tier suppliers;

No further comments.

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

No further comments.

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

No further comments.

#### 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;

We additionally conduct annual supplier assessments through an approved third-party against the LS&Co. Supplier Code of Conduct, Better Work standards, and SLCP standards. The assessment findings are categorized into three buckets depending on the severity of the risk/breach: zero tolerance violations, immediate action items, and continuous improvement items. Refer to the 2021 sustainability report for details. Refer to our Supplier Sustainability Guidebook for the terms of engagement with our suppliers, including addressing key risks.

[https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO\\_Sustainability\\_Guidebook.pdf](https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO_Sustainability_Guidebook.pdf)

<https://www.levistrauss.com/wp-content/uploads/2022/09/LCo.-2021-Sustainability-Report.pdf>

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

Refer to the Global Sourcing and Operating Guidelines here (based on the comment in the Excel, you were unable to find this document): <https://www.levistrauss.com/wp-content/uploads/2019/03/Global-Sourcing-and-Operating-Guidelines.pdf>

More details around the specific types of violations that were found in the annual supplier assessments conducted can be seen in the 2021 sustainability report. Forced labor falls under the "zero tolerance violation" category, and we disclose the findings by category type (see 'Number of Violations Found' table for the breakdown of finding type by supplier Tier (1 and 2)) as well as the top issues found (See 'Top Issues Found – Tier 1 and Tier 2 Facilities' graphic). Pages 183-189

<https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>

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.

Refer to the 'Our Stakeholders' section of the 2021 report for details on ways that we engage with suppliers and supply chain workers (amongst other stakeholders) - including through the Worker Well-being initiative, Better Buying surveys, supplier interviews and assessments, workshops and trainings, etc. We also list all the organizations we partner with to ensure we're consulting with relevant stakeholders (p.236-242), including the Social & Labor Convergence Program (SLCP) for supply chain.

<https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>

#### INDICATOR 5: DATA ON SUPPLY CHAIN RISKS

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

Refer to p. 204 of the 2021 report (section: Gender Equity and Women's Empowerment).

"Women are the driving force of the LS&Co. supply chain. In fact, at the factories participating in the Harvard SHINE study, women represent 60% to 80% of the workforce."

<https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>

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

In the comment in the Excel spreadsheet, there's a note that says "Ls&Co discloses that approximately 1,250 foreign migrant workers were employed in factories and mills in its supply chain during 2021, and states this accounts for less than 1% of all workers in the factories and mills supporting its products. **See questions to company.**" However, no questions were included. Please let us know your question so we can address it.

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

No further comments.

#### INDICATOR 6: PURCHASING PRACTICES

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

Refer to our commitments on page 3, and more detail on page 8 of the WWB Guidebook:

<https://levistrauss.com/wp-content/uploads/2022/04/Worker-Well-being-Guidebook-Final-2022-1.pdf>

Refer to 'Strengthening Our Responsible Sourcing Strategy' section of the sustainability report (page 190): <https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>

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

No further comments.

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

No further comments.

#### 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");

No further comments.

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

No further comments.

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.

Refer to 185-189 for details on the top issues found in our supplier assessments, where we disclose the percentage of findings related to recruitment and hiring per region. On page 189 we disclose the corrective action plans and how we engage with suppliers to remediate the issues noted.

<https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>, page 185-189.

#### INDICATOR 8: RESPONSIBLE RECRUITMENT

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

No further comments.

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).

No further comments.

#### 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;

No further comments.

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

We are also signatories to the Social & Labor Convergence Program (SLCP) organization, which through their program they help improve supply chain working conditions. See p. 241: <https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo.-2021-Sustainability-Report.pdf>

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

No further comments.

#### 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

No further comments.

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

No further comments.

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.

No further comments.

#### INDICATOR 11: MONITORING

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

See pages 15-18 of the Supplier Sustainability Guidebook: [https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO\\_Sustainability\\_Guidebook.pdf](https://www.levistrauss.com/wp-content/uploads/2021/09/LSCO_Sustainability_Guidebook.pdf)

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

No further comments.

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).

No further comments.

#### INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS

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

No further comments.

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

No further comments.

In addition, where an allegation is identified in a company's supply chains:

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

No further comments.

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

No further comments.

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

No further comments.

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

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

N/A

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

N/A

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