



ARCHIPELAGO COMPANIES

Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) Statement* May 30, 2024

Introduction:

Archipelago Companies, LLC, its subsidiaries and affiliates (collectively, “*Archipelago*”) is committed to complying with all applicable laws with respect to child and/or forced labor within our supply chain and with our manufacturing partners, including but not limited to, the Fighting Against Forced Labour and Child Labour in Supply Chains Act enacted in Canada in 2023. As an organization, we do not tolerate any form of forced labor and recognize the importance of implementing appropriate measures to mitigate the risk of such practices.

Our Organization:

Archipelago is based in Irvine, California. We are a privately held company organized in the State of Delaware.

Our business is the design, development and distribution of premium footwear, headwear, apparel, eyewear and related accessories through multiple channels of distribution. Our subsidiary brands (either wholly or majority owned) consist of OluKai, Melin, Roark and Kaenon. We have subsidiary organizations in Canada (Archipelago Brands Canada Ltd.) and the United Kingdom (OluKai Ltd.) which serve their respective markets. Additionally, we partner with a number of distributors in select geographies.

Our Policies Related to Child and Forced Labor:

We are committed to working with manufacturing partners and suppliers that do not engage in any form of child and/or forced labor. Our policies and compliance manuals contain provisions that target or contribute to mitigating the risk of child and/or forced labor in any part of our supply chain.

Our policies include:

- **Supplier Code of Conduct:** The Supplier Code of Conduct addresses compliance with applicable law; health and safety; forced and/or child labor; nondiscrimination; harassment

or abuse in the workplace; freedom of association and collective bargaining, health and safety; sustainable business practices; anti-bribery and anti-corruption; and a number of other standards. We require each of our suppliers, vendors and manufacturing partners to adhere to and comply with our Supplier Code of Conduct.

- **Vendor Compliance Manual:** Our Vendor Compliance Manual addresses our manufacturing and sourcing standards and requirements. Additionally, this manual incorporates the terms of our Supplier Code of Conduct and places additional requirements on our vendors to prevent the use of child and/or forced labor in the sourcing, manufacture or distribution of our products.

Steps and Measures We Take to Ensure Compliance:

As an organization, we take our commitment to preventing child and/or forced labor within our supply chain and with our manufacturing partners seriously. We regularly conduct inspections of the facilities operated by our supply chain and manufacturing partners to ensure compliance with our requirements and standards. Should we find any instances of non-compliance, we will take steps to promptly address and resolve the issues to our satisfaction, which may include termination of the relationship with our supply chain or manufacturing partner should the violation be egregious. Additionally, we regularly review and update our policies and provide guidance for our supply chain related to the required standards for the manufacture and distribution of our products.

We are currently in the process of developing and implementing training programs for our employees and partners addressing, among other items, swifter recognition and identification of possible instances of child and/or forced labor, and other unfair or discriminatory practices, in our supply chain. By implementing this training and better preparing our employees and contractors, we hope to minimize any instances of unfair labor (or other) practices that violate our standards and applicable laws.

This Fighting Against Forced Labour and Child Labour in Supply Chains Act Statement has been approved by the Board of Managers of Archipelago Companies, LLC.



James L. Harris
Managing Member and Chair of the Board of Managers

* This statement for the fiscal year ending December 31, 2023, is made on behalf of Archipelago Companies, LLC, a Delaware limited liability company, and its wholly and majority owned subsidiaries, pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada).