

Canada Bill S-211 Disclosure

Eddie Bauer of Canada Corporation

This report describes the approach and actions taken by Eddie Bauer of Canada Corporation to address the risk of forced labour and child labour in its operations and supply chain during the calendar year ending on December 31, 2023. The following statement is made in compliance with the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act:

Eddie Bauer of Canada Corporation is a corporation organized under the Canada Business Corporations Act. Eddie Bauer of Canada Corporation sells apparel and other goods and sources its products through Eddie Bauer LLC, which in turn sources its products from various suppliers. The details provided below relate to Eddie Bauer LLC's policies and processes.

Eddie Bauer engages with supply chains in countries in Asia and North America and has identified regions of Asia and particular materials that may carry a risk of forced labour or child labour. Eddie Bauer has sought additional audits, assurances, and/or testing from suppliers that source from these regions and/or use these materials. Eddie Bauer has not identified known instances of forced or child labour in its supply chain.

In 1998, Eddie Bauer adopted its Workplace Code of Conduct ("Code") and required all manufacturers of product (none of which are owned or operated by Eddie Bauer) to comply with the Code. The Code requires each factory to certify that it:

- Does not use forced labour of any kind
- Does not use child labour
- Prohibits harassment, abuse and discrimination
- Provides a safe working environment
- Allows workers freedom of association and collective bargaining
- Pays wages for all time worked, at minimum wage or higher, and pays overtime
- Does not require workers to work more than 48 regular and 12 overtime hours in a week or such lesser amount as mandated by law

Verification: Eddie Bauer requires that all factories making apparel products for Eddie Bauer be audited by an independent third party prior to commencement of the first production, and periodically thereafter, for compliance with our Code.

Auditing: Each manufacturer/factory agrees to unannounced audits of their facilities to confirm adherence with the Code. Auditing is conducted by a third-party independent audit firm. Eddie Bauer audits all factories on a rotating cycle.

Certification: Eddie Bauer's Purchase Order Terms and Conditions and the Code require that vendors (1) abide by all local laws, including laws regarding forced labour, (2) not use materials produced by forced labour in the construction of products for Eddie Bauer. From time to time, as issues are identified, Eddie Bauer joins with other retailers to prohibit the use of specific materials that have been derived in the past from forced labour (such as cotton from Uzbekistan).

Internal Accountability: Prior to placement of purchase orders, an authorized representative of each factory is required to sign a Certification of compliance with the Code. Failure to comply with the Code can result in cancellation or suspension of purchase orders. In addition, production of product cannot commence until satisfactory audit results are achieved.

Training: Eddie Bauer uses Bureau Veritas, an experienced third-party auditor, and other independent audit firms to conduct its Code audits. These third-party auditors identify any issues with Code compliance to Eddie Bauer's internal legal and regulatory counsel, as well as supply chain management, and the factory/manufacturer cannot be used for production of Eddie Bauer product until such Code compliance issues are corrected. Eddie Bauer does not provide specific training of its sourcing personnel because it relies on independent third-party auditors to identify the relevant issues.

Eddie Bauer measures the effectiveness of its suppliers' compliance with Eddie Bauer's policies and procedures through a variety of mechanisms, including regular auditing and testing.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signature: 

Full Name: Tim Bantle

Title: CEO

Date: 28.05.2024

I have the authority to bind Eddie Bauer of Canada Corporation.