



Child and Forced Labor Supply Chain Policy Disclosure

Gerber Childrenswear LLC (Gerber Childrenswear) is committed to eradicating any form of human trafficking, indentured, forced, or child labor in our supply chain. The following document discloses our policies and actions relating to slavery and human trafficking in our business and supply chain.

As included in this document, Gerber Childrenswear has developed and issued a code of conduct for suppliers that states we prohibit human trafficking, indentured labor, forced labor, or child labor in our supply chain. The code of conduct can be found in Appendix 1 of this document (pages 6-9). Modern slavery, human trafficking, forced labor, and child labor referenced in this document are defined in Appendix 2 (page 10).

Gerber Childrenswear LLC is classified as a limited liability company and does business in the textile industry producing, selling, marketing, and distributing infant and toddler apparel, bedding, bath, and shoes in owned, licensed, and private label brands.

Gerber Childrenswear's supply chain is comprised of forty-six factories, located in seven countries around the world. The bulk of Gerber Childrenswear's global supply chain and global network of material suppliers are in the country of India. In turn, Gerber Childrenswear sells products in multiple countries with our primary markets being the United States and Canada.

Gerber Childrenswear LLC is a commercial brand/seller bringing goods to market and doing business in Canada, and therefore meets the criteria for providing a disclosure statement for the Canadian Supply Chains Act which is satisfied by the document.

Gerber Childrenswear LLC conducts regular risk assessments of our supply chain. The risk assessments are conducted through multiple means such as facility visits by our internal teams, third party accredited audits and certifications, detailed supply chain mapping, and additional origin verification and traceability methods. Gerber Childrenswear uses a continuous approach to accessing and remediating risk in the supply chain that includes:

- *Vetting and investigative activities to identify risk before order placement*
- *Due diligence using Third-party evidence from assessments/audits*
- *Contractual use of Code of conduct and conditions of doing business terms*
- *Ongoing monitoring using Annual auditing, in person visitation, and intelligence*
- *Issue management with Required remediation plans and verification*

Gerber Childrenswear requires third party audits of all Tier 1 suppliers to evaluate compliance to our standards to prevent trafficking, slavery, and forms of child labor in the supply chain. Only auditing schemes or certifications that align with our Code of Conduct are accepted and are limited to:

*WRAP (Worldwide Responsible Accredited Production);
SMETA (Sedex Members Ethical Trade Audit);
SA8000 (Social Accountability International);
and BSCI (amfori Business Social Compliance Program).*

Audits are unannounced or semi unannounced and include employee interviews as well as record review. Audits are conducted by auditors certified by the Association of Professional Social Compliance Auditors (APSCA) on behalf of an APSCA member audit firm, approved and in good standing with both the program and with APSCA. Audits are conducted annually, and corrective actions if needed are verified. Suppliers are also required to sign, stamp, and attest to compliance with Gerber Childrenswear's code of conduct and our ethical supplier expectations annually.

In addition, Gerber Childrenswear has personnel on the ground in countries of production who make frequent visits to the facilities in the supply chain. Teams located in offices in India and China conduct internal assessments and inspections in facilities located in the countries in Asia and South Asia that we source from.

Each Tier 1 supplier is audited to verify compliance with the Customs Trade Partnership Against Terrorism (CTPAT) program requirements. Gerber Childrenswear will accept SCAN, GSV or WRAP third party audits for CTPAT security verification or will arrange internal teams to review suppliers' facilities and security processes.

Tier 1 suppliers must provide visibility and mapping of all tiers of the supply chain including raw materials, trims, and packaging used in our products. A review is conducted on the full supply chain to identify higher risk geographical locations or entities involved that would require further investigation or action. For products containing higher risk raw materials such as cotton, affidavits and supporting documentation are required for each processor or handler of the material. The supporting documentation required at time of shipment includes affidavits of origin, purchase orders, bill of lading, and transportation documents. Gerber Childrenswear also utilizes additional verification methods to identify geographical risk and ensure traceability of materials such as block chain tracing, tracer testing on branded fibers, and isotope testing for origin of cotton fiber.

Additionally, our investment in more sustainable fiber with embedded human rights standards and embedded traceability continues to increase. Examples of this commitment include our membership with the Better Cotton Initiative and the use of better cotton in our products, GOTS/OCS/GRS/RCS certifications for products, the use of nominated trim suppliers, and the use of tracer enabled man-made cellulose fibers such as viscose with forestry certifications.

In conducting risk assessments for human trafficking, forced and child labor, Gerber Childrenswear utilizes intelligence from a wide variety of sources, including but not limited to:

- *the U.S. Department of State's Human Rights and Trafficking in Person reports;*
- *the U.S. Department of Labor's List on goods produced by child and forced labor;*
- *the U.S. Department of Labor's report on Emerging Hot Spots for Forced Labor;*
- *the U.S. Department of Treasury Sanctions List;*
- *the Homeland Security UFLPA Entity List;*
- *the Social Responsibility Committee of the American Apparel & Footwear Association (AAFA);*
- *the Fair Labor Association investigations;*

- *press reports and industry publications such as the Sourcing Journal and Compliance Week;*
- *the ILO list of higher risk industries;*
- *reports from advocacy groups that focus on human trafficking such as Sheffield Hallam University and Know the Chain;*
- *and platforms such as Supply Trace providing trade data on suppliers.*

Further, Gerber Childrenswear LLC is a signatory to the [AAFA/FLA Commitment to Responsible Recruitment](#) and a member of the Fair Labor Association® (FLA). Gerber Childrenswear utilizes the intelligence, collaboration, resources, learning programs, and tools provided through the organizations in both our risk assessments and our work to eliminate forced labor and human trafficking.

Company staff combine this intelligence with the intelligence gathered from formal third-party audits, informal internal on the ground assessments, and supply chain mapping to determine areas of higher risk in our supply chain. Risk is identified based on geographical locations of suppliers or raw materials, known risk with specific products or services, the type of work or skill level required, and the employment mode and practices of suppliers such as the use of migrant workers.

From intelligence and resources available, Gerber Childrenswear has *identified that there is a broad potential risk* of slavery, human trafficking, child labor, or forced labor in the supply chain in countries in Asia and South Asia including China, Vietnam, Bangladesh, and India at the Tier 1 level. Additionally, a potential risk has been identified at the Tier 4 raw material level, specifically in China. However, Gerber Childrenswear *has not identified and does not believe* any instance of slavery, human trafficking, forced labor, or child labor exist in our supply chain.

Gerber Childrenswear has set forth policies to address and remediate cases of human trafficking, slavery, forced labor, and child labor in our supply chain. We have developed and issued a code of conduct to our direct suppliers that states that we prohibit human trafficking, slavery, forced labor, and child labor in our supply chain as in Appendix 1. Gerber Childrenswear also takes steps to push these policies further up the supply chain by requiring our suppliers to perform due diligence on 2nd, 3rd, and 4th tier suppliers to ensure they meet our code of conduct. On higher risk materials, 2nd, 3rd, 4th tier suppliers must provide sworn statements for each purchase order.

In the case of non-compliance where forced, indentured or child labor is found, Gerber Childrenswear reserves the right to examine the specific situation and develop the best possible strategy for resolution.

While Gerber Childrenswear wishes to aid in resolution and remediate incidences of human trafficking, slavery, forced labor, and child labor within our own supply chain and the global community at large, it is not possible to effectively solve the issue of noncompliance without the cooperation and intention of the supplier.

If cases of non-compliance are found and not resolved within a timely manner, Gerber Childrenswear may terminate the business relationship.

Gerber Childrenswear LLC also maintains and enforces internal accountability procedures for employees to prevent the incidence of slavery, human trafficking, forced labor, and child labor in its supply chain. Any detection of such grievances must be immediately reported to management, sourcing and compliance for investigation and remediation with

the supplier. Responsible sourcing is a priority with Gerber Childrenswear and is a joint function of sourcing, production, and compliance teams working collectively.

Gerber Childrenswear LLC requires certification from direct suppliers that materials and products comply with the slavery, human trafficking, forced labor, and child labor laws of the countries in which they are doing business. This certification is received through the suppliers third party facility audits/certification such as WRAP, SMETA, SA8000 or BSCI, and the suppliers' signature and attestation to Gerber Childrenswear Code of Conduct and condition of doing business.

Further, Gerber Childrenswear takes steps to receive the direct certification from material suppliers and processors in the supply chain at the PO level for higher risk raw materials by requesting signed affidavits and supporting documents from all parties involved in the production of goods being shipped.

Gerber Childrenswear has also established policies and procedures to remediate the loss of income to the most vulnerable families that results from forced or indentured labor in the supply chains. Gerber Childrenswear signed on to AAFA/FLA's [Commitment to Responsible Recruitment](#), which commits us to ensure that workers are re-imbursed for all fees paid to obtain their job. This policy has been incorporated into our company's social compliance standards and Code of Conduct. Gerber Childrenswear suppliers are not allowed to have employees pay fees to obtain their jobs. Suppliers must cover all fees for the employees and are audited on this point to ensure compliance. If instances of worker paid fees are found in employee interviews or supplier record keeping, suppliers will be required to reimburse all fees and affect a policy change in line with our code of conduct or may face loss of business.

Our compliance staff conducts internal training and supplier training on the Gerber Childrenswear's code of conduct to ensure the necessary participants in supply chain management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking, slavery, and worst forms of child labor, with a particular focus on mitigating risks. Global teams hold training sessions with each supplier as needed for on-boarding, new or updated requirements, and corrective action guidance.

Gerber Childrenswear encourages employees and suppliers in our supply chain to participate in additional internal and external training activities including retailer sponsored private label training, third party lab sponsored social compliance training, and web-based seminars on human trafficking, slavery, forced labor, and child labor sponsored by the AAFA and other industry leaders.

Gerber Childrenswear managers are members of AAFA Social Responsibility Committee and attend meetings bi-monthly which include intelligence related to risk on trafficking, forced labor, and child labor globally by country. Our membership with the Fair Labor Organization® requires quarterly training conducted through live webinars and their e-learning platform including how to identify and resolve instances of trafficking, forced labor, and child labor. Additionally, training and certification is given for employees and suppliers through Elevates' web-based learning platform.

Gerber Childrenswear conducts a continuous analysis of the effectiveness of our human trafficking, slavery, and worst forms of child labor eradication efforts. In our efforts thus far, we feel that we have been successful at ensuring our supply chain is free of human trafficking, slavery, and child labor.

We will continue to review our effectiveness and adjust processes and policies as needed including reviewing innovative technologies and software offered in the market with traceability and trade intelligence. We always seek to improve and streamline our efforts to be both effective and productive. Our organization looks forward to continuing to collaborate with industry leaders such as the AAFA and FLA for guidance and education in eradicating human trafficking, forced labor, and child labor in the supply chain. Their knowledge and connections in the industry are invaluable to our efforts and success.

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

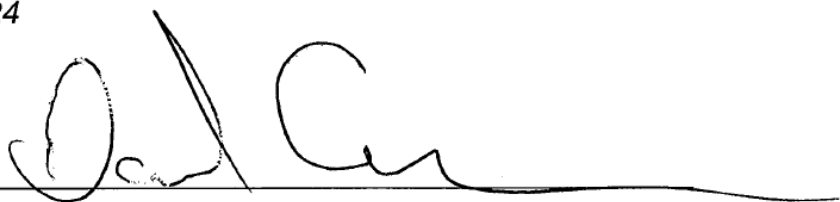
Reporting year: January 1, 2023, thru December 31, 2023

Full Name: David Queen

Title: Chief Operations Officer, Gerber Childrenswear LLC

Date: 5/14/24

Signature:

A handwritten signature in black ink, appearing to read 'D. Queen', written over a horizontal line.

I have the authority to bind Gerber Childrenswear LLC.

Appendix 1

Gerber Childrenswear LLC STATEMENT OF CORPORATE RESPONSIBILITY/ CODE of CONDUCT

Gerber Childrenswear (GCL) expects that all vendors, suppliers, manufacturers, contractors, sub-contractors, and suppliers of raw materials and components utilized by GCL suppliers abide by the following code of conduct.

General Coverage

1. Legal Requirements
2. Child Labor
3. Forced Labor/Indentured Labor
4. Wages and Benefits
5. Working Hours
6. Discrimination and Women's Rights
7. Disciplinary Practices
8. Freedom of Association
9. Health and Safety
10. Environmental Safekeeping
11. Monitoring Standards

Specific Expectations

1. LEGAL REQUIREMENTS

- a) GCL/Sub licensor expects its business partners at minimum to obey the labor laws of their respective countries.
- b) In the absence of specific laws, GCL/Sub licensor may set standards based on worldwide commonly accepted industry practices.
- c) GCL/Sub licensor also expects that international law related to the conduct of business between Nations be always followed.
- d) Customs' rules of Country of Origin must be strictly always obeyed.
- e) GCL/Sub licensor does not permit subcontracting unless the contractor receives specific permission from GCL/Sub licensor.

2. CHILD LABOR

GCL/Sub licensor's definition of illegal child labor is the more stringent of the following:

- a) Under the age of fifteen;
- b) Under the compulsory age to be in school; or
- c) Under the legal minimum age for employment in the host country.

GCL/Sub licensor also expects factory to meet all host county requirements pertaining to documentation, hours, and job placement of restricted age workers. GCL/Sub licensor expects on-site facility contractors (canteen service, cleaning service, trimming service, etc.) to comply with laws pertaining to child labor.

3. FORCED LABOR

GCL/Sub licensor prohibits forced, prison, indentured, incarcerated, or bonded labor in the supply chain.

There should be no restriction on free movement of employees to:

- a) Work in another factory, if legally allowed;
- b) Return to home county, if imported worker;
- c) Leave premises of factory if necessary; or
- d) Leave dormitory, if applicable, within reason;
- e) Terminate employment; with reasonable notice.

GCL/Sub licensor prohibits and will not allow the following:

- a) Involuntary withholding of passports or identification papers of employees
- b) Involuntary employee monetary deposits or other practices that would be unreasonably restrictive to workers.
- c) Any recruitment fees paid by the employee regardless of the origin of the fee to obtain or maintain a job. The employer shall pay all recruitment fees or reimburse fees and cost to the employee with record of proof in a timely manner.
- d) Employment of North Korean Nationals or any other trafficked or forced labor and violation of the code of conduct.
- e) Any violations of laws and regulations regarding the use of forced labor including the UFLPA.

GCL/ Sub licensor must inform all migrant workers, in their native language, of the basic terms of their employment before the workers leave their home.

4. WAGES AND BENEFITS

GCL/Sub licensor expects factory to comply with all applicable wage and benefit laws of host country including:

- a) Paying at least minimum wage for all hours worked to all employees, including piece workers;
- b) Paying all hours above standard workweek at legally defined overtime premium;
- c) Paying employees on schedule according to host country law; or
- d) Properly funding all legally required employee benefits accounts.

GCL/Sub licensor expects factory to comply with all applicable wage and benefit laws of host country including:

- e) Paying at least minimum wage for all hours worked to all employees, including piece workers;
- f) Paying all hours above standard workweek at legally defined overtime premium;
- g) Paying employees on schedule according to host country law; or
- h) Properly funding all legally required employee benefits accounts.

5. WORKING HOURS

GCL/Sub licensor expects factory to comply with host country laws pertaining to work hours:

- a) Work hours (per day, per week, per month) and days off (7m day rest, mandated holidays, vacation periods, etc.) must meet legal requirements; or
- b) If the law allows work hour exemptions, factory must have official documentation approving exemption.
- c) GCL/Sub licensor expects factory to have accurate and systematic time records to establish employee work hours and expects all work that is done by employees to be time recorded.

6. DISCRIMINATION AND WOMEN'S RIGHTS

GCL/Sub licensor expects that people will be employed based on their ability to perform a needed function, not based on personal beliefs and/or characteristics. GCL/Sub licensor prohibits employment practices and discrimination based on race, religion, creed, disability, gender, age, ethnicity, or sexual orientation.

GCL/Sub licensor views mandatory pregnancy testing as a violation of women's rights and will not allow pregnancy testing as a pre-employment reason to not hire or a post-employment reason to terminate.

7. DISCRIMINARY PRACTICES

GCL/Sub licensor does not condone any type of harassment, abuse, and corporal, mental or physical punishment of employees. GCL/Sub licensor specifically prohibits harassment of any form (verbal, physical, sexual, etc.) or physical/monetary punishment of any form. GCL/Sub licensor views consistent harsh language towards workers as verbal abuse. GCL/Sub licensor does not allow monetary deductions as a disciplinary practice.

8. FREEDOM OF ASSOCIATION

GCL/Sub licensor supports the employees' ability to exercise their legal rights of free association (FOA). GCL/Sub licensor believes employees have the right to:

- a) Establish legal organizations.
- b) Join or not join legal organizations of their own choosing.
- c) Not be penalized for their non-violent exercise of such legal rights.

9: HEALTH AND SAFETY

GCL/Sub licensor expects factory to meet all host country laws pertaining to health and safety in factories and dormitories (if applicable). In the absence of or in addition to specific host country standards, GCL/Sub licensor expects factory to have:

- a) Adequate first aid supplies;
- b) Exits clearly marked, unlocked, and unblocked;
- c) At least two exits per floor with adequate width for passage;
- d) Main exit doors allow clearance of building;
- e) Illustrated evacuation plan in native language of workers;

- f) Functional and accessible fire extinguishers or hoses on each floor, with valid inspection dates;
- g) Facility clean, free of obvious rodent infestation;
- h) Unrestricted access to potable water;
- i) Rest rooms clean and functional;
- j) Adequate ventilation; and
- k) No obvious fire hazards (exposed wiring, overloaded electrical outlets, improper storage of combustible materials, etc.).

10. ENVIRONMENTAL SAFEKEEPNG

GCL/Sub licensor expects its business partners to use manufacturing practices that ensure the safekeeping of natural resources and ecological surroundings. GCL/Sub licensor requires the following:

- a) Compliance with all local environmental laws;
- b) Maintenance of all applicable environmental certificates;
- c) And Business practices that minimize waste and maximize recycling.

11. MONITORING STANDARDS

GCL/Sub licensor expects the factory to allow GCL/Sub licensor employees or GCL/Sub licensor's designated monitors to inspect factory by appointment, unannounced visit or documentation request. During the inspection, all pertinent records, documents, certifications, and other materials necessary to demonstrate compliance with the above points covered by GCL/Sub licensor's Statement of Corporate Responsibility should be on site and made available to persons conducting inspection.

Payroll records, time records and piecework records must be kept on site for a minimum of six months or whatever the country law requires (whichever is greater). During the inspection, employees will be interviewed to verify information found during document reviews.

GCL/Sub licensor requires that the Statement of Corporate Responsibility be posted in a factory where it is clearly visible to employees. Factories should conduct employee training sessions to ensure understanding of GCL/Sub licensor's Statement of Corporate Responsibility.

Appendix 2

Modern slavery, human trafficking, forced labor, and child labor in the included policy document (sections 1-8) are defined as conduct which would constitute:

A.

Trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or

B.

Child labor, as defined under the Canadian Supply Chains Act, which means labor or services provided or offered to be provided by persons under the age of 18 years and that:

- a. are provided or offered to be provided in Canada under circumstances that are contrary to the laws applicable in Canada;
- b. are provided or offered to be provided under circumstances that are mentally, physically, socially, or morally dangerous to them;
- c. interfere with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work; or
- d. constitute the worst forms of child labour as defined in article 3 of the Worst Forms of Child Labor Convention, 1999, adopted at Geneva on June 17, 1999.

C.

Forced labor, as defined under the Canadian Supply Chains Act, which means labor or service provided or offered to be provided by a person under circumstances that:

- a. could be expected to cause the person to believe their safety or the safety of a person known to them would be threatened if they failed to provide or offer to provide the labor or service; or
- b. (b) constitute forced or compulsory labor as defined in article 2 of the Forced Labor Convention, 1930, adopted in Geneva on June 28, 1930. (travail forcé)