

Kellwood Company, LLC
Fighting Against Forced Labour and Child Labour in Supply Chains Report
For Fiscal Year Ended December 30, 2023
DRAFT as of May 31, 2024

Kellwood Company, LLC (“Kellwood” or the “Company”) is submitting this draft report under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”). This report describes steps Kellwood has taken to prevent and reduce the risk of forced labour and child labour in its supply chain.

Kellwood is a limited liability company organized in the State of Delaware, USA. The Company’s headquarters is located at 13071 East Temple Avenue, City of Industry, California, 91746, USA.

Kellwood designs, manufactures, and markets Women’s, Juniors, and Girls’ apparel under its own brands as well as under private labels, primarily for sale to customers in the United States. Kellwood takes pride in its products and is committed to manufacturing in a socially responsible manner, including the consideration of environmental sustainability. The Company has built strong relationships with its business partners throughout the supply chain so that it can deliver exceptional products to customers and to ensure that our business partners (which include suppliers, agents, vendors, factories, contractors and sub-contractors who manufacture products, components, or provide services associated with Kellwood’s products) are compliant with Kellwood’s Code of Conduct and abide by applicable laws and regulations of the country in which they are doing business, including laws related to labour practices. Kellwood’s vendors are located primarily in Asia (including Bangladesh, Cambodia, China, and Vietnam) and in Central America.

Social Responsibility Policies

Because Kellwood’s products are manufactured in Asia and Central America, where there is the possibility of encountering either forced labour or child labour, in order to promote high ethical standards, Kellwood maintains a Corporate Social Responsibility (CSR) program, including requirements for business partners, compliance assessment methodology, and corrective action and remediation procedures. As requirements set out in the CSR program, Kellwood requires that business partners shall not use forced, indentured, bonded, slave, or other involuntary labour, prison labour, and shall not engage in or be party to trafficking in persons. Business partners shall implement ethical and lawful recruitment and hiring practices, by which each employee shall be in a legal employment relationship. Employees shall be provided with written employment information and shall not pay any fees, travel expenses, administrative costs or other payments for the purpose of recruitment or employment or as a condition of employment.

Business partners shall not use cotton sourced, grown, harvested, processed, woven, or knit in countries which condone the use of forced labour or human trafficking, including but not limited to Xinjiang province, Uzbekistan or Turkmenistan. Business partners shall not produce any goods or services in Xinjiang province.

All employees shall be treated with dignity and respect and not be subject to verbal, physical, or mental abuse, coercion, pressure or threats, corporal punishment, or any form of harassment during

employment or recruitment. Business partners shall implement a written disciplinary procedure and not permit monetary fines as a disciplinary practice.

Business partners shall not employ individuals under the age of 15 or under the legal working age, whichever age is greater.

Business partners shall pay employees the legally required minimum wage or prevailing industry wage, whichever is higher. Employees shall receive payment for overtime, as legally required. The hourly overtime rate shall be in compliance with the law, but not lower than the regular hourly rate of compensation. Employees shall receive wages at least once per month, on time, with a pay slip understood by the employee. Business partners shall furnish all legal benefits. Kellwood encourages business partners to strive to improve wages and benefits to address the basic needs of workers and their families and provide for discretionary income.

Business partners shall engage in corrective action to promptly resolve any non-compliance with the Code of Conduct and shall identify root causes of non-compliances to implement management systems that ensure non-compliances are fully remediated. We encourage factories to see remediation of non-compliances as an integral step within continuous improvement.

Kellwood has zero tolerance policy against suppliers who are found with:

1. Child labour – anyone below 15 years old or age requirement of local law
2. Trafficked, prisoned, bonded, indentured labour
3. Sexual, psychological, physical, verbal harassment, abuse, intimidation and bullying
4. Emergency evacuation exits locked during business hours
5. Unauthorized subcontracting

Kellwood also requires our business partners not to source or use any products, raw materials or services originating from any country or region that condones the use of child and/or forced labour. Kellwood will request immediate and urgent remediation upon discovery of such practices. Kellwood may terminate any pending and future purchase orders and supplier relationship if any of the above Zero Tolerance violations are found.

In addition to complying with the CSR program, Kellwood's business partners must meet standards as set forth by the International Labour Organization (ILO).

Social Responsibility Compliance

To ensure compliance with the policies set out in Corporate Social Responsibility program, Kellwood requires all factories manufacturing its products to pass an initial social responsibility and security audit, as well as annual compliance audits. Kellwood requests factories to grant full access on an announced or unannounced basis to Kellwood or any appointed representatives including third party auditors or monitoring firms to inspect their production facilities and the production facilities of any sub-contractor. Access must be provided to all operations, including related documentation, employer-provided housing, and to conduct confidential employee interviews. Factories shall maintain, on site, all

documentation that may be needed to verify compliance with the Code of Conduct, including records pertaining to employment of employees and contracted employees.

Annual assessments are conducted on all our business partners as a measure to gather data about their social and labour practices to prevent and reduce risks of forced labour and child labour. In the past year, Kellwood did not identify any instances of forced labour or child labour in its supply chain that would involve the potential loss of income to vulnerable families. Kellwood uses these assessments to evaluate its effectiveness in ensuring that forced labour and child labour are not being used in its supply chain.

Training

Kellwood conducts training for both new and existing employees to ensure basic knowledge of social compliance issues. Any new hire to the production team, will receive detailed training on CSR program execution. Kellwood's design team employees also receive training to raise awareness of potential sourcing risks related to Kellwood's operations and use of business partners. Kellwood employees interacting directly with business partners, who may also execute on-site visits, will receive targeted training that will aid them in identifying non-compliance with the Code of Conduct.

Kellwood informs business partners of the CSR program including adherence to the Code of Conduct as well as other policies and standards (e.g. customs, product safety, conflict minerals, C-TPAT, Uzbekistan cotton requirements, Xinjiang Province Policy) through the Purchase Order Terms & Conditions, and the Supplier Manual. On-site verification of compliance with Kellwood's Code of Conduct and any applicable customer private label requirements shall also be considered to aid the business partner in identification, correction and remediation of non-compliance. Select business partners will receive structured and targeted training should Kellwood determine a need.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this draft report for Kellwood Company, LLC. 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 ended December 30, 2023.

In attempting to meet the deadline set forth in the Act, this report is being submitted in draft form, and has not been reviewed by the entire governing body of the entity. An updated report will be submitted in the next 7 days, following the review and approval by the entity's governing body.

I have the authority to bind Kellwood Company, LLC.

Signed: 

Name: Xiaopei Chin

Title: President, Kellwood Western Region

Date: 5/31/2024