Canadian Statement Against Forced Labour and Child Labour in Supply Chains

pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "*Modern Slavery Act*" (the "Act") for the fiscal year ending March 31, 2024

I. **REPORTING ENTITY**

This statement is made by Ralph Lauren Canada Corporation (hereinafter referred to as the "Company"), in respect of the Act, as referenced above.

II. STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

The Company is a wholly owned subsidiary of Ralph Lauren Corporation, a company incorporated in the United States of America designs, develops, and contracts with third party suppliers to manufacture Ralph Lauren-branded products. This report has been prepared by the Company for the financial year ending March 31, 2024.

The Company imports Ralph Lauren-branded fashion apparel and accessories into Canada and its principal activities are the distribution and sale of Ralph Lauren-branded fashion apparel and accessories in Canada. At the time of publishing this report the Company employs approximately 600 employees.

III. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED AND CHILD LABOUR

As a wholly owned subsidiary of Ralph Lauren Corporation, the Company abides by various policies and processes set by Ralph Lauren Corporation that apply across its business. Further details on such policies and processes are provided below. Ralph Lauren Corporation and its subsidiaries (including the Company) may be collectively referred to herein as "RL".

<u>Code of Business Conduct and Ethics</u>: RL's core compliance policies include its Code of Business Conduct and Ethics ("Code of Conduct") which requires all employees to comply with laws and regulations addressing, among other things: fair dealing, gifts and entertainment, conflicts of interest, protection of Company systems and assets, fair and truthful disclosures to the public, maintenance of accurate books and records, treatment of others with respect and dignity, and promotion of a safe and healthy working environment. The Code of Conduct expressly prohibits forced, indentured, bonded or compulsory labor obtained through human trafficking, coercion, slavery, or child labor.

Pursuant to the Code of Conduct, RL also requires reporting of, among other things, potential or actual violations of the Code of Conduct, our policies, or the law by our employees, business partners, or customers. It also sets forth the escalation process and provides a confidential reporting portal accessible on <u>www.ralphlauren.ethicspoint.com</u>, as well as RL's global toll-free hotline numbers for reporting potential or actual misconduct. Employees are encouraged to report any alleged violations or concerns to their supervisor, manager, or appropriate personnel. All employees of RL are required to undergo mandatory Code of Conduct training and are required to submit annual certifications of completion. Failure to adhere to the Code of Conduct may result in penalties, up to and including possible termination of employment.

<u>Human Rights Policy</u>: RL is committed to conducting its global operations ethically and with respect for the dignity of all people who make RL products. RL's company-wide commitment to respect internationally recognized human rights is outlined in the Human Rights Policy. Per the Human Rights Policy, RL carries out due diligence on salient human rights risks, such as child labour, forced labour, sexual harassment and gender-based violence, occupational health and safety, wages, and freedom of association and collective bargaining.

<u>Operating Standards</u>: All of RL's supplier contractual agreements oblige suppliers to adhere to RL's Operating Standards as a condition of working with RL. The Operating Standards require suppliers to observe certain operational standards for a safe, sustainable, inclusive, and ethical workplace.

These standards include a prohibition on the use of child labor. The Operating Standards require that workers must be at least 16 years old or beyond the age of compulsory education, whichever is higher. Workers between the ages of 16 and 18 are considered young workers and they must not undertake night and/or hazardous work. Suppliers must have robust age verification systems in place.

In addition, suppliers are prohibited from working with or arranging for purchase of any materials or services that supports or utilizes forced, indentured, bonded or compulsory labor obtained through human trafficking, coercion, or slavery.

Foreign Migrant Worker Standards: Under RL's Foreign Migrant Worker Standards, all foreign migrant workers in RL's supply chain are entitled to internationally recognized migrant workers' rights as described by the International Labor Organization, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families and in the United Nations Dhaka Principles on Migration with Dignity. These rights extend to workers during recruitment, hiring, migration, employment and termination, and as such, shall be upheld by all factories in RL's operations and supply chains. This includes the right to be free from forced and bonded labor.

For a comprehensive list of additional policies relating to forced and child labour, see our Global Citizenship and Sustainability Policies.

IV. ACTIONS TO ASSESS AND MANAGE FORCED AND CHILD LABOUR RISKS

As a wholly owned subsidiary of Ralph Lauren Corporation, the Company steps to assess and manage forced and child labour risks in the Company's supply chains are taken by RL.

<u>*Risk Assessments*</u>: RL conducts risk assessments to assess its operations and the likelihood and extent of human rights impacts of its business. RL utilizes various resources such as public indicators on country risk levels and salient risks in the industry to help assess social and human rights risks, such as: U.S. State Department Trafficking in Persons Report; U.S. Department of Labor List of countries producing goods using Child Labor/Forced Labor; ITUC Global Rights Index; Corruption Perceptions Index; and the UNDP Human Development Report. In addition, RL reviews the Verisk Maplecroft risk indices on human rights, including the forced labor index. RL constantly assess its supply chain for existing and potential risks and takes a proactive approach to mitigate potential impacts.

<u>Social Compliance Auditing and Monitoring</u>: The RL Global Citizenship team is responsible for administering the social compliance program, including human rights due diligence across the supply chain for all RL divisions (including the Company). The social compliance program includes supply chain due diligence, risk assessments, monitoring activities, including auditing and supplier engagement, training, and capability building. RL bases its human rights due diligence measures, in all material respects, on the framework set forth in the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment & Footwear Sector.

Preventing forced and child labour is a core pillar of RL's social compliance program. Per the program, the RL Global Citizenship team utilizes third party auditors, including the ILO-Better Work program where available, and the approved verification bodies of the Social & Labor Convergence Program ("SLCP"). In addition, RL's team also conducts select site visits to follow-up and monitor conditions.

RL's auditors are expected to be vigilant and pay specific attention to red flags alerting RL to potential forced and child labour violations. Audit results are reviewed by the RL Global Citizenship team and, where applicable, a Corrective Action Plan ("CAP") is developed with the factory. The Global Citizenship team monitors, confirms, and records the completion of CAPs.

RL conducts social audits to assess the working conditions of supplier locations and, post-audit, continues to engage with its suppliers to ensure implementation of corrective actions and appropriate remediation, where applicable. Where RL finds a supplier in violation of its standards, the supplier is expected to remediate the issue promptly and adequately. Where applicable, RL's social auditing protocol also includes foreign migrant worker interviews to verify compliance with its Foreign Migrant Worker Standards. If RL identifies and validates an instance of noncompliance with our requirements related to eradicating forced and child labour, RL will work with that supplier to make immediate changes; if the supplier is unable to make the changes RL requires, RL will cease business relations with that supplier.

<u>Grievance Mechanisms</u>: RL is committed to promoting an environment of open, honest communication in its workplace, with its customers, with its business partners and in its supply chain. RL encourages anyone to express concerns and provide the opportunity to file reports 24 hours a day, seven days a week through the RL Hotline. Reports may be submitted online or via phone. RL will not tolerate retaliation against anyone who reports a concern in good faith.

To support its commitment to human rights, the RL Grievance Mechanism Program is also accessible to supply chain workers and complements existing processes managed by the factories themselves. The program enables workers to escalate their concerns directly to RL using the RL Hotline, accessible through a QR code. Information is made available to workers on posters throughout factories in their local languages. Responding to affected stakeholders and their concerns are also a part of the program. Allegations and inquiries received through the RL Hotline are assessed to determine impact and whether further investigation or other appropriate action is needed. Each concern or allegation is addressed, and consistent action is employed when appropriate. RL Hotline metrics, including reports, are communicated routinely to the Board of Directors' Audit Committee.

Industry Engagement: RL is engaged with the industry to advocate for and develop successful, sustainable solutions to eradicate forced labor and other human rights violations from global

supply chains. RL leverages its membership in various industry associations such as the American Apparel and Footwear Association ("AAFA"), US Fashion Industry Association ("USFIA"), and Businesses for Social Responsibility ("BSR") to inform it of risks. Notably, RL belongs to the Joint AAFA/NRF/RILA/USFIA Forced Labor Working Group ("FLWG"). Additionally, RL is a signatory to the AAFA and Fair Labor Association's Commitment to Responsible Recruitment, a proactive industry effort which seeks to address potential forced labor risks for migrant workers in the global supply chain.

V. MEASURES TO REMEDIATE FORCED AND CHILD LABOUR

As stated above, RL's Operating Standards strictly prohibit forced and child labour throughout RL's supply chain and they may not be used in the production of any RL goods, including those goods sold by the Company.

To ensure these standards are understood and upheld, there is a dedicated monitoring team within RL's Global Citizenship and Worker Well-Being Department ("RL Global Citizenship team"). If these teams find that any facility, anywhere in the world, is not acting in accordance with RL's Operating Standards, RL will take appropriate remedial and disciplinary action or, where appropriate, cease the business relationship.

If a violation of our standards occurs, immediate action will be taken including, where required, requiring suppliers to remove the underage worker from the factory, reaching out to the family and begin discussing options for appropriate education and training, providing financial support to cover the education and lost wages, and agreeing to rehire the underage worker when they are 16 or at the legal working age if desired by the worker. As necessary, RL then monitors the case to ensure that the supplier completes any corrective actions and takes ownership of the remediation.

VI. MEASURES TO REMEDIATE LOSS OF INCOME RESULTING FROM MEASURES TO ELIMINATE THE USE OF FORCED OR CHILD LABOUR

RL has not identified any instances of forced or child labour in the Company's supply chain during the last fiscal year. Accordingly, no remediation measures (including those to remediate the loss of income stemming from such measures) have been taken.

VII. EMPLOYEE TRAINING ON FORCED AND CHILD LABOUR

RL's *Code of Conduct* sets out ethics and compliance policies to communicate RL's expectations for ethical business conduct and reinforce our culture of integrity. The *Code of Conduct* expressly prohibits forced, indentured, bonded, or compulsory labor obtained through human trafficking, coercion, slavery or child labor. All employees – including employees of the Company – receive training on the *Code of Conduct* during onboarding and are required to re-train and submit an annual certification of completion.

RL's *Code of Conduct* applies to all employees, officers and directors of RL. RL also expects those who work for RL or on RL's behalf, such as vendors, consultants, contractors, agents and suppliers, to comply with the law, meet the obligations outlined in their contracts and honor the principles outlined in the Code. Failure to do so may result in penalties, up to and including termination of employment or a business relationship with RL or its subsidiaries.

VIII. METHODS TO ASSESS EFFECTIVENESS OF MEASURES TO PREVENT FORCED AND CHILD LABOUR

RL maintains records and tracks the results of its social audits. RL works with suppliers to ensure its actions are addressing forced and child labour and other social compliance risks. RL continues to vet all new factories and audit existing factories on a regular basis. In all cases, when a factory has an issue or is not making visible remediation progress or improvements, RL's escalation process includes Global Manufacturing and Sourcing, and discussions that will drive business decisions. If a factory still does not respond in a manner consistent with RL's expectations, RL will discontinue business with that factory.

The RL Global Citizenship team provides regular reports on supplier social compliance ratings and human rights risk assessments to the Global Manufacturing and Sourcing teams. The supplier rating is a component of the Supplier Scorecard, a program used to review supplier performance.

Additionally, RL's Supplier Engagement Strategy is centered on the maintenance of long-standing relationships with key and strategic suppliers, enabling RL to partner closely and transparently for the benefit of the people who make RL products.

ATTESTATION

In accordance with the requirements of the Act, and in particular section 11(4)(a) thereof, I attest that I have reviewed the information contained in the report for the entity 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.

RALPH LAUREN CANADA CORPORATION

Full Name: Robert Alexander Title: Director Date: 31 May 2024

Robert Alexander

I have the authority to bind Ralph Lauren Canada Corporation.