



# Fighting Against Forced Labour and Child Labour In Supply Chains Report 2024

# Steps Taken To Prevent and Reduce Risks of Forced Labour and Child Labour

Few companies can say they have the world at their feet, both literally and figuratively. As a global marketer of branded footwear, as well as apparel and accessories, this saying not only speaks to our focus, but also to the bright future before us.

With a commitment to service and product excellence, Wolverine is one of the world's leading marketers and licensors of branded casual, active lifestyle, work, outdoor sport, athletic, children's and uniform footwear and apparel. The Company's portfolio includes the highly recognized Merrell®, Saucony®, Wolverine®, Sweaty Betty®, Chaco®, Bates® and HYTEST® brands, and is the global licensor of the Hush Puppies® brand. The Company is also the global footwear licensee of the popular Cat® Footwear and Harley-Davidson® Footwear brands. Wolverine's products are carried by leading retailers in the U.S. and globally in approximately 170 countries and territories.

One of our core values is to "Do the Right Thing – Always." Wolverine maintains high standards of business ethics and holds a deep regard for human rights. We recognize the importance of responsibly sourced products and are committed to working with supply chain Business Partners that are dedicated to safe, humane, and ethical working conditions that comply with international labor standards. We have established guidelines to assist in our efforts to select partners who share our ethical commitments. Wolverine has zero tolerance for forced labor, human trafficking, and slavery or involuntary work of any kind in our subsidiaries or anywhere in our supply chain.

Wolverine has taken additional steps to prevent and further reduce the risk of forced labour and child labour in our supply chains, including:

- Communication to our Executive Leadership team on the importance and requirements for forced and child labour reporting.
- Auditing new Business Partners as part of the onboarding process.
- Maintaining an annual audit procedure that targets social compliance issues including forced labour and child labour.
- Requiring all supply chain partners (including transportation providers) to adhere to Canada's Partners in Protection (PIP) and the United States' Customs Trade Partnership Against Terrorism (CTPAT) programs through contractual agreements. Regardless of the area of business, all partners must adhere to these programs.
- Maintaining a Production Code of Conduct which states Wolverine has a zero-tolerance policy towards forced labour and child labour.
- Maintaining a Manufacturing Purchase Agreement (MPA) with our manufacturers and factories to adhere to our Production Code of Conduct, as well as legal requirements and regulations.
- Conducting internal training through third party support.
- Developed an internal working group to oversee the forced labour and child labour policies.

## About this report

This joint report is made pursuant to section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C., 2023, c.9 (the Act) and has been prepared on behalf of Wolverine World Wide Canada ULC, a subsidiary of Wolverine World Wide, Inc., a Delaware corporation. As required by the Act, this report summarizes the steps that we have taken in the financial year ended December 31, 2023, to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Wolverine World Wide Canada ULC or of goods imported into Canada by Wolverine World Wide Canada ULC. The terms "we," "our," "us," "Company," and "Wolverine" as used in this document refer collectively to Wolverine World Wide Canada ULC., its parent company and subsidiaries, unless expressly mentioned otherwise. The term "Business Partners" means our manufacturers, factories and suppliers.

# Structure, Activities, and Supply Chains

## Our structure and activities

Wolverine is a designer, marketer and licensor of a broad range of quality casual footwear and apparel, performance outdoor and athletic footwear and apparel, kids' footwear, industrial work boots and apparel, and uniform shoes and boots. The Company's products are marketed worldwide in approximately 170 countries and territories.

The Company's products generally feature contemporary styling with proprietary technologies designed to provide maximum comfort and performance. The Company believes that its primary competitive advantages are its well-recognized brand names, patented proprietary designs, diverse product offerings and comfort technologies, wide range of distribution channels and diversified manufacturing and sourcing base. The Company combines quality materials and skilled workmanship to produce footwear according to its specifications at both Company-owned and third-party manufacturing facilities.

The Company's portfolio of brands are organized into the following reportable segments:

- **Active Group**, consisting of Merrell® footwear and apparel, Saucony® footwear and apparel, Sweaty Betty® activewear, and Chaco® footwear;
- **Work Group**, consisting of Wolverine® footwear and apparel, Cat® footwear, Bates® uniform footwear, Harley-Davidson® footwear and HYTEST® safety footwear.

While Wolverine does not generally produce goods in Canada, we do distribute and import goods in Canada and elsewhere as part of our operations and supply chains. Our operations are based in North America and Europe, where strong human rights legislation is enforced.

## Supply Chains

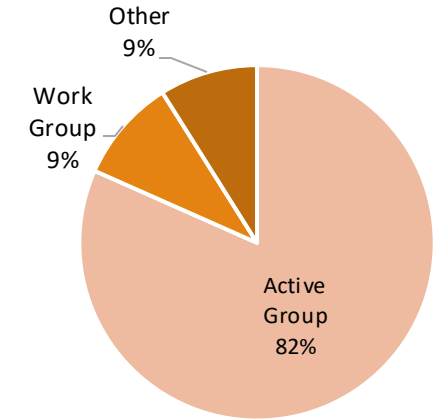
Wolverine's footwear products are primarily manufactured at third-party facilities in the APAC region that are primarily managed by Wolverine World Wide HK Limited (Wolverine HK, a subsidiary of Wolverine World Wide, Inc.). The products are sold by entities within the Wolverine group to end customers, retailers, third-party distribution entities, or in Wolverine-operated retail stores, among other distribution channels.

Wolverine distributors place orders with third-party manufacturers that are identified by Wolverine HK, and logistics for the transport of the goods are arranged by certain entities in the Wolverine group and a third-party logistics provider.

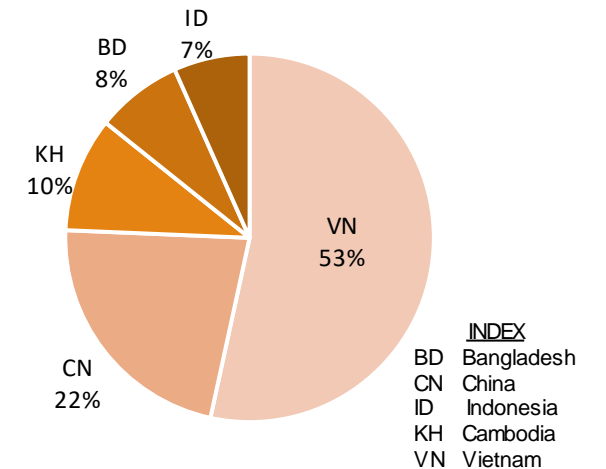
Our suppliers play a key role in our ability to live up to our sustainability commitments and attain our environmental, social and governance (ESG) goals.

Our supply chain partners must commit to upholding the human rights of workers, to treating them with dignity and respect, and to improving working conditions within their supply chain. They are required to adhere to a number of regulatory and legal requirements including UFLPA, PIP, CTPAT, California's anti-forced labor law, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains and Canada's Customs Tariff.

The following figure presents the 2023 percent of value of merchandise within the Wolverine supply chain.



The following figure represents the top 5 sourced countries within the Wolverine supply chain.



# Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

## Our Policies

Wolverine maintains a complete onboarding and regular review process for Business Partners. Violation of any compliance guidelines and policies during either the onboarding or regular review will be appropriately remedied at the cost of the Business Partners. Further, Wolverine reserves the right to discipline partners if they fail to demonstrate compliance, unwillingness to address unacceptable risks, and violations of the Production Code of Conduct, up to and including termination of the relationship.

Wolverine requires its Business Partners to adhere to a number of key policies including our Production Code of Conduct and Vendor Compliance Guide, and our manufacturers and factories must additionally adhere to our Manufacturing Purchasing Agreement (MPA) and our Report Line process.

## Production Code of Conduct

Wolverine's Production Code of Conduct outlines our requirements regarding the ethical standards and business conduct of our Business Partners. All manufacturers are required to adhere to the requirements upon executing the MPA, and ongoing compliance is a condition of continuing to do business with Wolverine.

Business Partners take ownership of their compliance program and ultimately improve business operations with fewer accidents, less employee turnover, less rework, and higher productivity. All of these improvements can lead to a stronger relationship and better collaboration.

Specifically, Wolverine expects that Business Partners will have effective management systems, as detailed below, to proactively identify and handle compliance issues in their facilities.

- A management representative must be appointed to implement the Business Partners' policies, procedures, and improvement objectives.
- Business Partners must have a working communication/grievance system in place, and workers must be made aware of and educated on how to use the system. Issues are to be reviewed regularly, responded to with a sense of urgency, and properly filed to demonstrate compliance.
- Managers, staff, supervisors, and workers must be trained on the Wolverine Production Code of Conduct to ensure full compliance with this Code. This training should be embedded in the orientation process for new workers.
- Business Partners must conduct internal assessments on a regular basis to ensure conformity to legal and regulatory requirements and the Wolverine Production Code of Conduct.
- Business Partners must maintain complete and accurate timekeeping and payroll documents and records on site that represent true work conditions.
- Continuous improvement will be the guiding principle for challenges in the areas of wages and working hours. Open communication between Business Partners and Wolverine will be expected regarding any challenges in meeting the wage and working hour standards. Communication, as well as partnership and collaboration, is key to the Corrective Action Plan development process.

## Wolverine Report Line

Wolverine has established a secure and effective complaint management system where Partners or other stakeholders can confidentially and anonymously report suspected unethical behavior or practices. The Wolverine Report Line can be found at [WolverineReportLine.com](http://WolverineReportLine.com). Any violation of the Production Code of Conduct is to be reported to Wolverine immediately upon discovery. Business Partners must allow their employees to report any potential misconduct or a possible violation of the Wolverine Production Code of Conduct without threat of retaliation or punishment.

## Contractual Requirements

Wolverine is committed to working with Partners who demonstrate the same level of strict compliance that Wolverine holds itself. Wolverine expects Partners to have their own policies and procedures in place to ensure they and their subcontractors are aware of and comply with applicable laws, regulations, and, where stricter, the Wolverine Production Code of Conduct.

## Our Due Diligence Process

The due diligence process at Wolverine is a collaborative effort involving our Brands, Materials Team, Sourcing, Legal Team, and Global Supply Chain. This collective approach ensures the identification and procurement of optimal materials, manufactured in factories that adhere to and uphold the standards outlined in our Production Code of Conduct. As we broaden our product range, we often leverage our existing business partnerships. However, to accommodate our escalating requirements, our Sourcing Team is occasionally tasked with engaging new suppliers and factories.

### Onboarding

The onboarding protocol at Wolverine commences with the identification of prospective manufacturers and factories for our products. These potential partners undergo a rigorous onboarding process, which includes an initial screening through Sanction Party List (SPL) screening. This procedure involves a comprehensive review against global official watch lists of individuals, companies, organizations, and entities to mitigate risks associated with fraud and illegal activities.

Wolverine enlists the services of an independent auditing firm to meticulously evaluate the social compliance programs of all key Business Partners. The audit scrutinizes various aspects to ensure absolute prohibition of slavery, trafficking, forced labour, child labour, or employment involving children or juvenile workers. It also rigorously assesses workplace conditions for any instances of harassment, abuse, or discrimination at any level within the factory setting. Additionally, the audit encompasses a thorough examination of safety protocols, including fire safety measures, chemical management practices, and electrical safety standards.

### Zero Tolerance Standards

Wolverine upholds stringent zero tolerance standards within its social compliance audit. If a potential Business Partner is found to be engaged in any activity that violates these standards, Wolverine will immediately terminate the onboarding process.

Zero tolerance activities include: slavery, trafficking, forced labour, and child labour.

These standards also encompass and prohibit discrimination, physical punishment, and bribery. These areas of concern are meticulously reviewed within the social compliance audit process.

### Supply Chain Security Audit

During the onboarding process, the prospective Business Partners undergo an audit for supply chain security. Wolverine maintains a “Tier 3” status within the Customs Trade Partnership Against Terrorism (CTPAT) program and is also certified within Canada’s Partners in Protection (PIP) program. Both programs enforce the security of our supply chain to safeguard the countries to which the product is being shipped.

The CTPAT and PIP security compliance programs evaluate the physical security, cybersecurity, agricultural security, personnel security, transportation security, and access controls of the factories. They also require businesses to maintain processes for mitigating anti-bribery, anti-money laundering activity, as well as Forced Labour and Child Labour within the supply chain. The Canadian and U.S. Governments have set minimum security standards that the factory must meet to demonstrate its credibility as a Business Partner. These programs play a crucial role in enforcing the security of our nations and protecting us from illicit activity.

### Financial Evaluation

As part of the onboarding process, Wolverine's Finance team conducts an evaluation of the potential Business Partner to ensure their fiscal responsibility.

### Final Review and Approval

Our Shared Services Team consolidates all audits, evaluations, and approvals for a comprehensive final review. They ensure that every step of the requirement process is fulfilled before the entity is recognized as an approved Business Partner within Wolverine global supply chain. This team also manages the Vendor Compliance Guide, which is distributed to all Business Partners to ensure compliance at every stage of our supply chain.

### Ongoing Vetting and Audits

Wolverine continues to vet its Business Partners through the Sanction Party List (SPL) screening with every completed financial transaction. Key Business Partners are subjected to annual audits for social compliance and supply chain security based on risk. This continuous review of Business Partners aids in enforcing Wolverine's requirements and standards across all business practices.

“Wolverine recognizes the importance of responsibly sourced materials and are committed to working with supply chain business partners that are dedicated to safe, humane, and ethical working conditions.”

# Training Provided to Employees on Forced Labour and Child Labour

## Internal Training

Wolverine conducts various training programs for employees, which serve as a platform to gain insights into social compliance, supply chain security, Customs compliance, workplace violence prevention, communication skills, and team building. Wolverine conducts training on different departments; employees better understand what each department does, the importance of the department and their structure. Finally, Wolverine training focuses on a variety of current industry challenges and concerns, so employees understand the impact to the community and world around them.

Wolverine mandates training for employees in pivotal roles and at critical locations within our organization. This training encompasses the security requirements of the facility and our supply chain. Training focuses on security best practices for our supply chain and examples of red flags of which employees should be aware. It also includes a review of Wolverine's confidential ReportLine for reporting suspicious or concerning activity. The ReportLine enables all employees and Business Partners globally to report any concerns via an anonymous tip line. Reports are promptly reviewed and addressed by our Legal Team.

Wolverine regularly provides additional training on the importance of vigilance and the appropriate channels for reporting concerns. This training is delivered in person or via electronic tools, such as webinars and company intranet.

## External Training

Wolverine organizes an annual Social Compliance Supplier Summit. Invitations are extended to all key factories to promote the exchange of best practices. While the training for Business Partners is not mandatory, it is highly attended. The training is timely, relevant, and impactful to Business Partners. The feedback received has been overwhelmingly positive, leading to enhanced commitments from our Partners.

The Annual Social Compliance Summit Training encompasses a wide range of topics including prevention of forced labour, child labour safety issues, adherence to the Production Code of Conduct, and minimum security requirements, among others. Our Chief Sourcing Officer delivers a keynote address during the summit to underscore the importance of social compliance and adherence to our trade programs. Additionally, special guests from our Legal Team provide insights into compliance with regulations and current legal issues. The summit also facilitates discussions on current supply chain issues and best practices.

In addition to the Social Compliance Annual Summit, Wolverine has made a public statement on anti-human trafficking and transparency in our supply chain. This statement is publicly available and accessible on our websites.

## Continuous Dialogue and Training

Wolverine's Social Compliance Team encourages ongoing dialogue with Business Partners to discuss concerns, review

upcoming challenges in the realm of social compliance, and share best practices. This continuous focus on critical issues ensures that our standards are consistently upheld.

Our Social Compliance Team is committed to auditing, monitoring, and educating Business Partners within our network. Each team member holds a certification focused on compliance and undertakes continuing education to maintain their certifications. This knowledge is then disseminated to Partners and Wolverine employees for broader understanding.

## Vendor Compliance Guide

Our Vendor Compliance Guide is distributed to Business Partners and employees to ensure compliance of our product requirements. This guide provides comprehensive information ranging from the type, size, and weight of shipping boxes to compliance with Customs programs and security. The guide includes the Production Code of Conduct to reinforce the importance of Wolverine's requirements and our expectations.

## Third-Party Partnership

Wolverine collaborates with a third-party travel security program that offers cultural tips and information to employees traveling abroad. This is beneficial in preparing employees who have not traveled to understand the cultural norms of the specific business area.

# *Areas of Supply Chain That Carry a Higher Risk, Steps To Manage That Risk, & Assess Effectiveness to Protect Against Forced Labour and Child Labour*

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Wolverine has proactively identified specific areas within its business and supply chains that pose a risk of forced labour and child labour. This assessment is based on the countries involved and the types of goods that are at a higher risk for human rights violations. To mitigate these risks, we have established robust processes during supplier onboarding and throughout our ongoing relationship with them, as detailed in the section above.

## **Risk Management**

At Wolverine, we recognize that our operational efficiency and sustained prosperity are intrinsically linked to our capability to identify and manage potential risks, including the risk of forced labour and child labour within our operations and supply chains.

Our Legal and Risk team is charged with the identification and comprehension of principal risks facing the Company, as well as ensuring that adequate systems are in place for monitoring, managing, and mitigating said risks. On a quarterly basis, the Legal and Risk team compiles a risk assessment which is then presented to the Board of Wolverine World Wide, Inc. This assessment conducts a thorough analysis and prioritization of risks throughout the organization, accentuating significant risks and trends. Risks are evaluated and ranked according to their potential impact and probability of occurrence; we strive to guarantee that mitigation strategies are well-conceived, appropriately prioritized, sufficiently resourced, and effectively implemented.

Our forward-thinking approach to risk management shapes our Company's strategy and operations while also ensuring that emerging risks are identified promptly—thereby equipping us with preparedness and proficiency in managing these challenges.

Wolverine has not identified any specific incidents of forced labour or child labour in its operations or supply chain in the past financial year. We have also not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains. We have therefore not taken any measures to remediate these issues. In the event an issue pertaining to forced labour or child labour arises, thereby escalating the risk, it would be addressed first under the Social Compliance Team, which is responsible for overseeing matters related to human rights. This team has the authority to recommend Company practices and may also sanction the implementation of systems designed to manage risks within their scope of responsibility, while ensuring their effectiveness through continuous monitoring. Any forced labor risk identified would be escalated to the Legal and Risk team.

Within our organizational structure, the responsibility for human rights, with a specific focus on the prevention and mitigation of forced labour and child labour within our supply chains, is primarily distributed amongst our Supply Chain Management, Social Compliance, and Legal and Risk functions. Our Social Compliance Team is tasked with the development and implementation of our sustainability strategy and policies, thereby ensuring that our sustainability strategy, inclusive of the protection of human rights, is seamlessly integrated into our business operations.

# Attestation & Contact Information

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## Contact Information

If you have any inquires concerning the 2024 Fighting Against Forced Labour and Child Labour In Supply Chains report, please contact [trade-compliance-ca@wwwinc.com](mailto:trade-compliance-ca@wwwinc.com)

Wolverine World Wide Canada ULC.  
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Mississauga Ontario, Canada L5N 0G2

Telephone: 905.542.8880

Wolverineworldwide.com

## Attestation

This report has been approved by the Board of Directors of Wolverine World Wide Canada ULC pursuant to 11(4)(a) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that the Board of Directors of Wolverine World Wide Canada ULC has reviewed the information contained in the report. 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.



Jennifer J. Miller,  
Vice President and Secretary  
May 30, 2024