

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 year ending 2/1/2025

1. INTRODUCTION

This is a statement made by Frank Bracken, President, Foot Locker Inc., and director of Foot Locker Canada Co. ("Foot Locker Canada Co." or "the Company") on behalf of the Company, in respect of the Act, as referenced above. Foot Locker Canada Co. is a corporation incorporated pursuant to the laws of Nova Scotia.

2. REPORTING ENTITY

This report concerns reporting entity, Foot Locker Canada Co., a retail trade entity, business number 134482702.

The reporting period of this report is 2/4/2024-2/1/2025.

- Although Foot Locker Canada Co. is not subject to reporting requirements under supply chain legislation in other jurisdictions, its parent Company, Foot Locker, Inc., which is headquartered in the United States, is subject to supply chain legislation including the United Kingdom's Modern Slavery Act 2015, California's Transparency in Supply Chains Act, France's Duty of Vigilance Act, Norway's Transparency Act, and the Uygher Forced Labour Prevention Act.

Foot Locker Canada Co. meets the applicable legislative requirements concerning business, size, revenue thresholds for reporting.

3. STRUCTURE, ACTIVITIES, AND SUPPLY CHAINS

Foot Locker Canada Co. is a Canada Corporation that engages in producing goods outside Canada and Importing goods manufactured outside Canada. Foot Locker Canada Co. engages in the sale of retail goods (footwear, apparel, and accessories).

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

Foot Locker Canada Co. has implemented policies and due diligence processes related to managing the risk of forced and child labour, including (1) embedding responsible business conduct into policies and systems; (2) identifying and assessing adverse impacts to operations, supply chains and business relationships; (3) ceasing, preventing and mitigating those adverse impacts; (4) tracking implementation and results; (5) communicating to stakeholders how impacts are addressed; and (6) remediation of cooperation when necessary.

Our Global Sourcing Guidelines are available at <https://investors.footlocker-inc.com/gsg>, and the Global Human Rights Policy is available at <https://investors.footlocker-inc.com/humanrights>.

5. PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

We recognize apparel is a potential area of risk and by its nature contains risk of forced and child labour. However, through our compliance practices and policies, we have performed due diligence to minimize risk in our

supply chain. In addition, Foot Locker Canada Co. continues to conduct regular assessments in an effort to strive to identify new and emerging risks. Among the considered in assessing risk in our supply chain are the types of products we produce, sell, distribute and import, along with the types of products we source. We also assess the locations of our activities and factories. An additional consideration is the raw materials used in our supply chains, such as cotton. Lastly, our risk assessment includes a review of our Tier 1, direct suppliers who may outsource, contract, or subcontract labour.

The Company uses various methods to prevent and reduce the risk of forced labour and child labour in our supply chain. Such activities include the following:

- a. Supply Chain Mapping;
 - b. internal assessments of risks of forced and child labour in our activities and supply chains;
 - c. developing and implementing action plans for addressing forced and child labour;
 - d. gathering information via our audit process on worker recruitment to ensure workers all workers are recruited voluntarily;
 - e. developing and implementing policies and processes for identifying, addressing and prohibiting the use of forced and child labour in our activities and supply chains;
 - f. prioritizing efforts on the most severe risks of forced and child labour;
 - g. requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced and child labour in their activities and supply chains;
 - h. developing and implementing child protection policies and processes;
 - i. developing and implementing anti-forced and child labour contractual clauses, standards, codes of conduct, and compliance checklists;
 - j. auditing and monitoring suppliers;
 - k. enacting measures to provide for, cooperate in, and remediate forced and child labour; and
 - l. developing and implementing procedures to track vendor performance in addressing forced and child labour.
6. **STEPS TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR**
Foot Locker Canada Co. has not taken measures to remediate forced or child labour because we have not identified any actual forced or child labour in our activities and supply chains.
7. **MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR**
Foot Locker Canada Co. has not taken measures to remediate loss of income to the most vulnerable families that result from measures taken to eliminate use of forced and child labour because we have not identified any

use of forced or child labour in our activities and supply chains during the applicable reporting period.

8. TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Foot Locker Canada Co. provides training to employees who are engaged in the entity's supply chain compliance to identify and deal with any potential instances of forced and or child labour. Training is provided from the parent company and from third-party providers.

9. HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS

The Company regularly reviews and audits the organization's policies and procedures related to forced and child labour. We partner with external organizations to conduct independent reviews and audits of the organization's actions. In addition, we work with our suppliers to measure the effectiveness of their actions in addressing forced and child labour, including tracking performance indicators. For additional information regarding our policies and procedures related to forced and child labour, please reference the Foot Locker, Inc. Impact Report.

ATTESTATION

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of President, attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

DocuSigned by:

Frank Bracken

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Name: Franklin R. Bracken

Title: President, Foot Locker Canada Co.

Date: 5/28/2025 | 7:06 AM EDT

1. This report is for: (Mandatory)

Note: Government institution has the same meaning as in section 3 of the Access to Information Act.

- An entity

2. State the legal name of the reporting entity or government institution (Mandatory)

You must use an alphanumeric naming convention. Do not use special characters (e.g., quotation marks).

Note: If you are an entity submitting a joint report, you will be asked to identify the name of the entities covered in the report later in the questionnaire.

Foot Locker Canada Co.

3. Reporting year (Mandatory)

Select from the drop down menu the applicable reporting deadline for which you are submitting a report:

- **May 31, 2025**

4. Financial year covered by report (Mandatory)

Note: All reports must reference the activities undertaken during the entity or government institution's previous financial year. Reports may be submitted on or before May 31. As such, the submission date of the report will determine which financial year you are reporting on.

2/4/2024 – 2/1/2025

5. Is this a revised version of a report that was already submitted this reporting year? (Mandatory)

Note: The previous version will be deleted and users will be unable to recover the previously submitted version.

- No

5.1 If yes, on what date was the original report submitted? (Mandatory)

5.2 Describe the changes made to the original submission, including the sections of the original report that were revised or any changes made to questionnaire responses (3,000 character limit). (Mandatory)

Please note that information entered could be identifying information. In order to protect privacy, entities and government institutions must not provide personal information of any kind in the open text box fields of this questionnaire.

6. For entities only: Business number(s) (if applicable, provide the business number of the entity completing this questionnaire):

134482702

7. For entities only: Is this a joint report? (Mandatory)

- No

7.1 If yes, state the legal name of each entity covered by this report. (Mandatory)

Note: Only the entity submitting the report should complete this questionnaire on behalf of all entities covered by the report. An entity submitting a joint report on behalf of multiple entities (e.g., its subsidiaries) may complete Part 1: Submission Information using information that reflects its own circumstances and operations. However, any information provided in Part 2: Annual Report should reflect the activities of all entities covered by the joint report. In cases where the information applicable to each entity differs significantly, each entity should submit its own report and to complete the online questionnaire separately.

7.2 Identify the business number(s) of each entity covered by this report (if applicable).

8. For entities only: Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Mandatory)

- No

8.1 If yes, select the applicable law(s). Select all that apply. (Mandatory)

While the entity itself is not subject to reporting requirements under supply chain legislation in other jurisdictions, the parent company is subject to supply chain legislation including the *United Kingdom's Modern Slavery Act 2015*, *California's Transparency in Supply Chains Act*, *Australia's Modern Slavery Act 2018*, *Germany's Act on Corporate Due Diligence Obligations in Supply Chains*, *France's Duty of Vigilance Act*, *Norway's Transparency Act* and the *Uyghur Forced Labor Prevent Act*.

9. For entities only: Which of the following categories apply to the entity? Select all that apply. (Mandatory)

Note: If none of these categories apply to your organization, you may not be required to report. Please visit Public Safety Canada's guidance for entities to confirm your obligations under the Act before proceeding with your submission.

- Canadian business presence (select all that apply):

- Has a place of business in Canada
- Does business in Canada
- Has assets in Canada
- Meets size-related thresholds (select all that apply):
 - Has at least \$20 million in assets for at least one of its two most recent financial years
 - Has generated at least \$40 million in revenue for at least one of its two most recent financial years
 - Employs an average of at least 250 employees for at least one of its two most recent financial years

10. For entities only: In which of the following sectors or industries does the entity operate? Select all that apply. (Mandatory)

- Retail trade
 - Clothing, clothing accessories, shoes, jewelry, luggage and leather goods retailers

11. For entities only: In which country is the entity headquartered or principally located? (Mandatory)

United States

Part 2 - Annual Report

Reporting for entities

1. Which of the following accurately describes the entity's structure? (Mandatory)

- Corporation

2. Which of the following accurately describes the entity's activities? Select all that apply. (Mandatory)

Note: If an organization is not involved in any of the following activities, then it may not be required to report, even if it meets the definition of **entity**.

- Producing goods (includes manufacturing, extracting, growing and processing), outside Canada
- Importing into Canada goods produced outside Canada

3. What steps has the entity taken in the previous financial year 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 the entity or of goods imported into Canada by the entity? Select all that apply. (Mandatory)

- Mapping activities
- Mapping supply chains
- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing an action plan for addressing forced labour and/or child labour
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily
- Addressing practices in the organization's activities and supply chains that may cause or contribute to the risk of forced labour and/or child labour
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour
- Requiring suppliers to have policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains
- Developing and implementing child protection policies and processes
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Auditing suppliers
- Monitoring suppliers

- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit).

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

5. Does the entity currently have policies and/or due diligence processes in place related to forced labour and/or child labour? (Mandatory)

- Yes

5.1 If yes, which elements of the policies and/or due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Mandatory)

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing potential and actual adverse impacts in operations, supply chains and business relationships
- Ceasing, preventing or mitigating potential and actual adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

6. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Mandatory)

Note: Entities are being asked to **indicate if they have considered the ways in which their activities and supply chains could potentially cause, contribute to, or be linked (directly or indirectly) to actual or potential forced labour or child labour.** Identifying parts of an entity's activities and supply chains that carry a risk does not indicate that forced labour or child labour was or is actually being used.

- Yes, we have identified parts of our activities and/or supply chains that carry risks to the best of our knowledge and will continue to identify emerging risks.

6.1 If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply.

(Mandatory)

- The types of products it produces or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- The use of outsourced, contracted or subcontracted labour

7. Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Mandatory)

- Retail trade
 - Clothing, clothing accessories, shoes, jewelry, luggage and leather goods retailers

8. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (3,000 character limit).

Please note that information entered could be identifying information. In order to protect privacy, entities must not provide personal information of any kind in the open text box fields of this questionnaire.

We recognize apparel is a potential area of risk and by its nature contains risk of forced labour or child labour. However, through our compliance practices and policies, we have performed due diligence to minimize risk in our supply chain, including the risks identified in response to Question 6.1

9. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Mandatory)

- Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

9.1 If yes, which remediation measures has the entity taken? Select all that apply. (Mandatory)

10. Has the entity taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Mandatory)

- Not applicable, we have 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.

11. Does the entity currently provide training to employees on forced labour and/or child labour? (Mandatory)

- Yes

11.1 If yes, is the training mandatory? (Mandatory)

- Yes, the training is mandatory for some employees.

12. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Mandatory)

- Yes

12.1 If yes, what method does the entity use to assess its effectiveness? Select all that apply. (Mandatory)

- Setting up a regular review or audit of the entity's policies and procedures related to forced labour and child labour
- Partnering with an external organization to conduct an independent review or audit of the entity's actions
- Working with suppliers to measure the effectiveness of their actions to address forced labour and child labour, including by tracking relevant performance indicators