



GBG

GLOBAL BRANDS GROUP



DISCLOSURE STATEMENT ON MODERN SLAVERY
September 2020

Introduction

Modern slavery is an umbrella term covering a variety of legal concepts including debt bondage, forced marriage, slavery and slavery-like practices, human trafficking and forced labor. In 2017, the International Labour Organization (ILO) estimated that 40.3 million people were victims of modern slavery, with 24.9 million people trapped in forced labor, the majority (16 million) working in the private sector, including in global supply chains¹. Owing to the anticipated impact of the coronavirus pandemic (a constantly evolving situation that is transforming our world both quickly and dramatically), instances of forced labor are expected to rise. Besides the health implications of the disease, the economic crisis and resulting disruptions to global supply chains presents unprecedented challenges for the world's most vulnerable workers.

Against this backdrop, Global Brands Group must take a proactive approach to addressing modern slavery; this includes ensuring respect for workers' human rights

and health and safety. The scale and complexity of the challenge requires proactive action and collaboration among a number of stakeholders, including governments, international organizations, civil society and the private sector, and we continue to work with these stakeholders across the apparel industry to promote adequate labor law protection, social security coverage, safe migration channels, non-discrimination and the right to freedom of association and collective bargaining for all workers.

The Sustainable Development Goals (SDG), including the adoption of two specific targets related to forced labor, human trafficking and safe migration, represent an opportunity for us to work in partnership with others, including our parent company, Fung Holdings (1937) Limited ("Fung Group"), to ensure stronger due diligence over supply chains, and to encourage robust labor market and migration governance in the countries where we operate².

SUSTAINABLE DEVELOPMENT GOALS

8 DECENT WORK AND ECONOMIC GROWTH



SDG 8: DECENT WORK AND ECONOMIC GROWTH

Target 8.7: Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.

10 REDUCED INEQUALITIES



SDG 10: REDUCED INEQUALITY

Target 10.7: Facilitate orderly, safe, and responsible migration and mobility of people, including through implementation of planned and well-managed migration policies.

This is our third disclosure statement on modern slavery and is published in accordance with the UK Modern Slavery Act (2015) and the SB657 California Transparency in Supply Chains Act. It sets out the steps taken from April 2019 to March 2020 to meet commitments made in our earlier statements and outlines our 2020 modern slavery strategy and commitments.

The statement is fully supported and approved by our Board of Directors and signed by our Chief Executive Officer, Rick Darling. "Consistent with our values, Global Brands Group recognizes the importance of combating

slavery and human trafficking, and endorses actions to eradicate modern slavery from our business and our supply chain. We uphold the standards set out in our policies for our employees and our supply chain partners, and are committed to ensuring slavery and human trafficking have no place in our business."

This statement was reviewed externally by the Mekong Club, a Hong Kong-based, non-governmental organization committed to ending modern slavery within the private sector by raising awareness and providing practical tools to address the problem within supply chains.

¹Modern slavery covers a variety of legal concepts. It refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception and/or abuse of power. ILO Estimates of Modern Slavery, International Labour Office (2017) Geneva.

²The SDGs supplement the existing international framework on forced labor and child labor. Including: Child Labour Conventions and Recommendations (C138 and R46; C182 and R190); United National Convention on the Rights of the Child; Buenos Aires Declaration on Child Labour, Forced Labour and Youth Employment (2017); ILO Forced Labour Conventions, Recommendations and Protocols (C29, P29, R35 and R203; C105); and The Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children.

Section 1: Structure, Business and Supply Chains

A. Business Structure

Global Brands Group (“GBG” or “the Group”) operates three business segments, selling branded products under its North America and Europe segments, and operating its global brand management business.

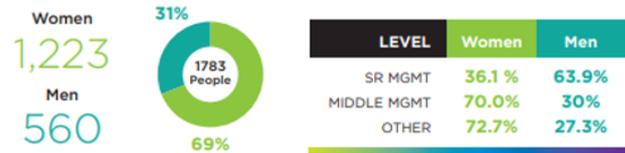
Operating primarily as a wholesale business, Global Brands sells its products through multiple distribution channels, including department stores, hypermarkets / clubs, off-price retailers, independent chains, specialty retailers and e-commerce sites. The Group benefits from a diversified licensed brand portfolio, without reliance on any one brand, product or demographic, or on any particular channel of distribution. The Group has a channel agnostic approach to distribution, allowing it flexibility and choice in terms of mapping the most appropriate product, pricing and distribution channel for each brand, in order to maximize the value of these brands in their respective lifecycles.

In addition to operating product licensing businesses within our North America and Europe segments, the Group continues to engage in its global Brand Management business as its third operating segment. Acting as a brand manager and agent for brand owners and celebrities, the Group offers expertise to expand its clients’ brand assets into new product categories, geographies and retail, and e-commerce collaborations, generating revenue by taking a percentage of the license fee or royalty paid by the licensees to the brand owner.

We employ approximately 1,783 associates directly, with approximately 33% in the Americas, 35% in Asia and 32% in Europe, the Middle East and Africa. Fung Holdings (1937) Limited (“Fung Group”), is the major shareholder and our parent company.



Gender Distribution

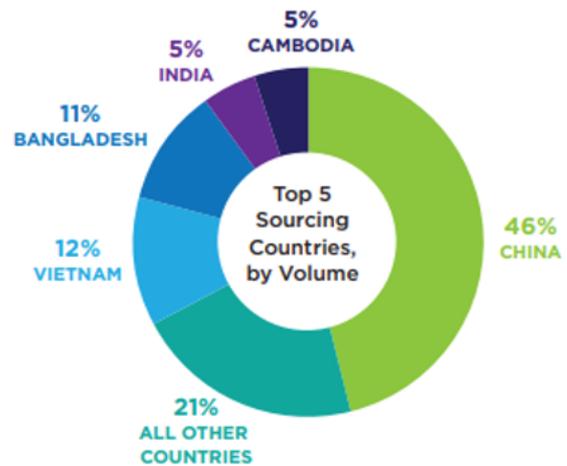


B. Supply Chain (Tier-1)

We seek supply chain partners who strive for compliance, efficiency and high standards in line with our own. We work closely with our internal business units and Li & Fung (a Fung Group company and our key sourcing partner) to monitor our suppliers’ operations, provide tools and programs to help them meet our standards, and work with them to correct issues and address concerns.

Currently, our monitoring efforts focus on tier-1 factories; all must be mapped and approved according to our minimum onboarding standards. Over the last twelve months, we have streamlined the factory partners we use, with a focus on creating or enhancing strategic relationships and, where possible, reducing our factory base. We reduced our tier-1 supplier base by 28% in FY2020, ending the fiscal year with 521 approved factories. We are also increasing our collection of data on suppliers further down the value chain and sourcing an increased amount of certified raw materials to gain further visibility. This will be a continuing focus for us to drive improved end-to-end traceability.

ALLOCATION OF PURCHASE ORDERS



Section 2: Policies in Relation to Modern Slavery and Human Trafficking

A. Cross-Departmental Senior Leadership for Modern Slavery

Engagement of senior leadership across the company is crucial to drive effective corporate responses and policies to end modern slavery. At GBG, ending modern slavery is a shared responsibility; it involves all company divisions and colleagues at every level. Through proactive initiatives and good corporate governance, we strive for positive impact for our people, our supply chain, our communities and the environment. We are committed to comply, at a minimum, with the laws and regulations of the jurisdictions in which we operate.

Our Board of Directors has overall responsibility for modern slavery oversight. Senior Management is responsible for integrating and prioritizing goals to tackle modern slavery in our corporate objectives. The Social and Environmental

Affairs (SEA) team is responsible for overseeing our vendor compliance operations and working with customers to strengthen compliance and sustainability performance in the supply chain – including overseeing risk assessments and due diligence measures to end modern slavery. The team, comprised of eight dedicated staff including the team's Senior Vice President, maintains its independence from external and internal stakeholders by reporting directly to the company Chief Executive Officer.

The Fung Group's Vendor Compliance and Sustainability teams that sit within the Group Chairman's Office, are responsible for governance, policy, internal audit and industry partnerships, including the development and mainstreaming of the Fung Group's strategy and related key performance indicators (KPIs) on ending modern slavery.

B. Codes of Conduct for: Employees, Suppliers, Contractors, and Business Partners

The Global Brands Group [Code of Conduct and Business Ethics](#) ("the Code") sets out the standards of conduct we expect our colleagues to uphold in everything they do. It requires all employees and Directors to adhere to the ten principles of the UN Global Compact and the principles contained in the ILO's Declaration on Fundamental Principles and Rights at Work, including the elimination of forced labor.

All new employees are introduced to the Code and must sign their commitment to the Code, during orientation. Policies and guidelines for addressing the Code are implemented in the acquisition of any new businesses and through our ongoing recruitment, training, performance assessment, disciplinary and grievance processes.

The Code also requires all employees to work with suppliers to ensure human and labor rights are upheld throughout the supply chain. For ease of reference and as a constant reminder, the Code is available on our [website](#).

We encourage employees and business partners to report code or policy violations in accordance with our Guidelines on Whistleblowing/Reporting of Concerns. This allows us to detect the first signs of impropriety and carry out corrective measures promptly.

Managing supply chain risk starts with GBG's [Supplier Code of Conduct](#) ("Supplier Code"). The principles enshrined in the Supplier Code are grounded in the United Nations Universal Declaration of Human Rights and the ILO's 1998 Declaration on Fundamental Principles and Rights

at Work, as well as local law. The Supplier Code, which is available to suppliers in multiple languages, incorporates guidelines on social, environmental and security standards as well as practical resources for implementing standards within factory operations and recommendations for best practice. All forms of modern slavery and child labor are considered zero-tolerance issues that require full remediation and may result in termination of business.

The Supplier Code is updated every three years, with the latest update in 2020. The updates incorporate emerging requirements, including strengthened standards related to safe workplaces, labor, human rights and environmental resilience. New provisions were also added in line with the adoption of ILO General Principles and Operational Guidelines for Fair Recruitment and Convention No. 190 and Recommendation No. 206 on combatting violence and harassment at work.



Global Brands Group, along with 140 brands, retailers and suppliers, is a signatory to the [American Apparel and Footwear Association \(AAFA\) Commitment to Responsible Recruitment](#).

Signatories agree to:

- Incorporate principles of Responsible Recruitment, including the employer pays principle, into their Supplier Codes of Conduct.
- Report on actions to embed Responsible Recruitment in policies and processes through sustainability reporting and legally-required modern slavery disclosure statements.

In line with those commitments, we have adopted the Fung Group's Responsible Recruitment Policy for our company and supply chain, which will be launched in FY2021.

GBG's Responsible Recruitment Policy - Key Highlights



Employer Pays Principle

Suppliers shall take steps to ensure workers do not pay recruitment fees or related costs to get a job. Suppliers shall ensure that where employees have paid recruitment fees or related costs, that workers are reimbursed. In the first year of implementation the focus is on illegal recruitment fees and costs with the goal to progressively cover all fees and costs. The progressive implementation gives suppliers time to prepare for the changes and to put the systems in place to recruit responsibly.



Due Diligence

Prior to selection, suppliers shall undertake a formal screening of labor recruiters to assess commitment and capacity to meet the requirements set forth in the policy. Suppliers shall also have a written contract with labor recruiters incorporating all principles of responsible recruitment and shall conduct ongoing risk assessments and audits, including interviews with migrant workers to evaluate adherence to the contract.



Dialogue and Training

The policy was developed based on dialogue with workers, management and industry partners. In-person consultations took place with suppliers to better understand the different stakeholder perspectives on responsible recruitment. The policy will be coupled with training for colleagues and suppliers to better understand how to implement the policy.

Section 3: Risk Assessment, Prevention and Mitigation

A. Overview of Existing Risk Assessment Procedures

We acknowledge that there are modern slavery risks that exist in the sectors and markets where we operate. The challenge is to proactively identify and dissect modern slavery risks at various levels (region, country, facility, worker and product) so they can be prevented, effectively mitigated or otherwise addressed.

We carry out direct recruitment of associates wherever possible and ensure that all new employees have a legal right to work in the country and are issued with suitable contractual agreements, where applicable. We consider the risk of slavery and human trafficking low for direct employment in our offices, stores and distribution centers.

We also assess this risk within our direct supplier base, where our exposure is elevated. Risk assessment of our supply chains cannot, therefore, be a static exercise. As modern slavery risks evolve and emerge in response to changing social, economic and political trends, it is important that we use knowledge from our industry partnerships together with our own supply chain insights to actively monitor developments. For example, we anticipate that the coronavirus pandemic will contribute to increased poverty. Vulnerabilities associated with poverty and sudden job loss often play a central role in pushing people into modern slavery³ as desperation and debt increase, and we must therefore be prepared to assess this increased risk as the situation develops.

³Global estimates of modern slavery: Forced labor and forced marriage, International Labour Office (ILO), Geneva, 2017.

In 2019, our dynamic risk assessments were informed by the following key sources of information:

- Mekong Club’s Risk Assessment Matrix, Quarterly Working Group and Knowledge Hub
- American Apparel and Footwear Association Social Responsibility Committee
- Center for Child Rights and Corporate Social Responsibility’s (CCR CSR) Working Group
- US Dept of State Trafficking in Persons Report
- US Department of Labor’s List of Goods Produced by Child Labour or Forced Labor
- ILO Global Estimates on Modern Slavery
- Walk Free Foundation 2018 Global Slavery Index
- Business and Human Rights Resource Centre – COVID-19 Outbreak: Supply Chain Workers

B. Overview of our apparel and footwear supply chain, highlighting key modern slavery risks, prevention and mitigation measures

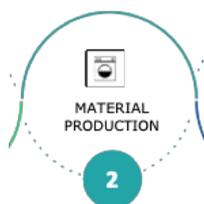


Salient Risks:

- Non-payment of minimum wages
- Forced overtime
- Violence in the workplace
- Limitations on freedom of movement
- Contract substitution
- Document retention
- Exploitation and/or discrimination of migrant workers and other ethnic minorities

Prevention and mitigation measures:

We take a comprehensive approach to monitoring and building the capacity of tier-1 factories, such as social compliance audits, spot checks, training and remediation. For more information please see section on due diligence and remediation.

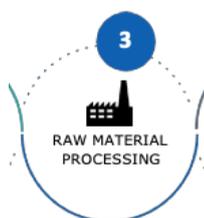


Salient Risks:

- In countries with weaker labor market governance, there are risks of the worst forms of child labor owing to the large amount of chemicals used to dye and finish fabrics.
- The other issues listed above in tier-1 factories also remain a concern.

Prevention and mitigation measures:

We are starting to build stronger relationships with our wet processing units and are increasing our collection of data on suppliers in this tier, working with our sourcing partners. Once we have greater visibility into our tier 2 suppliers, we will bring these into our strategic risk assessment process.



Salient Risks:

- As many spinning mills are still labor intensive, young women or migrant workers may experience delayed-payment schemes and/or limited freedom of movement.
- The leather processing industry in India and Pakistan is often characterized by hazardous and poor working conditions, which may be early indicators or eventually lead to forced labor.

Prevention and mitigation measures:

Due to reduced visibility and leverage at this tier of the supply chain, we are seeking opportunities to collaborate with industry peers to address risk collectively. We are currently looking to join the Leather Working Group and have been engaged in discussions regarding the Ethical Trade Initiative (ETI)’s program to support female millworkers in Tamil Nadu.



Salient Risks:

- Traceability to the raw material level is difficult, as both the cotton and polyester supply chains are highly fragmented and opaque. Key risks include:
- Under-age seasonal harvest work (cotton)
 - Forced and trafficked labor, including state imposed (cotton)
 - Modern slavery risks in conflict regions as well as in transportation (polyester)

Prevention and mitigation measures:

Whilst GBG’s monitoring program does not extend to tier-4 suppliers, in line with Fung Group’s commitments under the Fashion Pact, we aim to increase our percentage of certified, low-impact materials. Certifications offer greater traceability at the raw material level and often provide assurance on compliance with social, as well as environmental, standards. Joining with other apparel brands and retailers, we are also a signatory to the Responsible Sourcing Network Uzbek and Turkmenistan Cotton Pledge, a commitment to not knowingly source Uzbek or Turkmen cotton. In 2020, we will be initiating a survey to obtain more detail on the origin of cotton in our China supply chain in order to assess potential modern slavery risks.

C. Modern Slavery Risks, Mitigation and Prevention Measures in Production Markets

We use the Mekong Club Risk Assessment Matrix (RAM), which combines a series of standardized indicators to better understand our risk associated with raw materials and supply chain processes by product, process and region. The RAM aggregates multiple sources of audit data associated with specific materials and processes from different companies gathered in different formats. The matrix is currently based on the analysis of 70,000 data points and the latest dataset available.⁴

Below we have provided an example of regional and product modern slavery risks for our production countries as identified in the RAM tool. Red indicates states/regions where indicators and/or cases of modern slavery have been identified. Blue indicates where audit data is available but there is insufficient information to conclude whether modern slavery has been identified in the region. Areas uncolored indicate that the RAM does not hold data on that region.



⁴Latest dataset is from March 2019.

⁵Products extracted from United States Department of Labor (USDOL) List of Goods Produced by Child and Forced Labor.

⁶Section 4: Due diligence processes provides an explanation of Apprise Audit.

Section 4: Due Diligence Processes

A. Monitoring and Grievance Mechanisms

Increasingly, consumers, investors, licensors and other stakeholders require companies to monitor and report on their supply chains' social and environmental performance. Overall, supply chain transparency can help companies manage risk, realize efficiencies and deliver sustainable products, thus positively impacting sales and profits.

We engage a network of globally-recognized, unaffiliated third-party audit firms to conduct audits to monitor our supply chains in accordance with our modern slavery due diligence efforts. In certain instances, a separate audit is required by our retail customers or licensors ("customers"). These customer audits are performed either in addition to or in lieu of the GBG audit. In most circumstances, the customer must approve of the audit before GBG can place production in those factories. We continue to engage with our customers to find better ways to align to avoid duplication of audit efforts.

As a large percentage of our supply chain is sourced through our partner Li & Fung, we align with the Li & Fung approach to independent audits. To conserve supplier resources and avoid unnecessary audit duplication, audits are accepted from twelve, recognized social and/or environmental standards as part of the audit "equivalency" program. All of our direct suppliers (tier-1) are audited according to a timeline, which varies according to their level of risk.

As part of our assurance program for factories audited against industry and customer standards, in coordination

with Li & Fung, we deploy designated third-party audit firms to conduct unannounced spot checks on factories in our supply chain, with a particular focus on factories in countries where there are increased risk factors, such as a lack of transparency, or presence of vulnerable groups of workers. When a spot check focuses particularly on forced labor, Li & Fung appoints specialized third parties with a focus on worker interviews to illuminate the real conditions faced by workers throughout the continuum of the supply chain.

Where data from a spot check suggests a critical compliance issue has been systemically missed by an industry standard, Li & Fung will share that information with the industry standard for improvement. In FY2020, there were unannounced spot checks in 43 factories, across 8 sourcing countries, in our supply chain.

Grievance mechanisms are essential processes that provide access to remedy for workers and a critical component of ensuring factories achieve sustainable improvement. In 2020, we worked towards building more efficient and effective grievance mechanisms in our supply chain through our industry partnerships, such as Better Work.

In Bangladesh, we continue to respond to cases raised to the Nirapon helpline, Amader Kotha, through our sourcing partner Li & Fung. The helpline encourages workers to engage outside help for critical fire and safety risks.

B. Remediation

Non-compliances are identified through audits, spot checks or through one of the grievance mechanisms mentioned above. The issues found are discussed with the factory, that is required to develop a Corrective Action Plan (CAP), with a root cause analysis to ensure a focus on implementing the necessary systems to adequately prevent future non-compliances. When critical or zero-tolerance issues are identified, the factory is required to remediate violations within a defined timeline, with progress monitored by us. We coordinate remediation with Li & Fung, our customers and our partners (such as

Better Work), where appropriate. Failure to remediate may lead to the suspension or termination of business.

For non-compliances that involve underage workers, we work in partnership with the Center for Child Rights and Corporate Social Responsibility to develop a responsible solution that is in the best long-term interests of the child. Remediation follows available best practice and will seek to meet the educational, social and economic needs of any child concerned.

Remediation guidance includes:

- Information on immediate corrective action to be taken in cases of non-compliance, including providing assistance to the affected person(s) (the rights' holder) and paying back any outstanding wages or fees (where relevant)
- Preventative action, including the use of third-party experts to assist the factory in changing its management systems or policies that may have contributed to the violation
- Business consequences as needed related to both the non-compliance and any failure to remediate

In practice, remediating cases of forced labor or child labor is challenging given the severity of the issue, the time needed for sustainable improvement, and the need to balance consequences for zero-tolerance findings (termination) with remediation needs (which may require factory support). Remediation may also be unsuccessful when there is no or insufficient leverage or in cases where the affected person(s) refuses remediation support. In such cases, we engage our customers and industry partnerships to place additional pressure on the supplier and to generate the best possible outcome for the impacted worker(s).

We acknowledge that with the coronavirus pandemic, we must continue to explore innovative approaches using technology and digitalization to continue remediation efforts despite restrictions on travel and social interaction.

C. Responding to Incidents and/or Indicators of Modern Slavery

In FY2020, we identified one case involving an indicator for modern slavery at a supplier's factory and two instances involving underage workers, all in Bangladesh. The modern slavery indicator identified was excessive, forced overtime.

With the first case, successful remediation was completed and included payment of legal dues owed to impacted workers and the factories' participation in the ETI's social dialogue program to improve the bilateral communication between workers and factory management and ensure all overtime is done voluntarily and in accordance with local labor laws.

For the two identified cases of underage labor, we worked with the Center for Child Rights and Corporate Social Responsibility to develop and implement a remediation plan designed in the best interests of the child. In both cases, the underaged workers were immediately removed from the workplace, enrolled in a local school and will be paid a local living wage until they reach school leaving

age, as a replacement for the earnings they would have received through continued work.

In addition, Better Work Jordan (BWJ) cites non-compliances if migrant workers, recruited on or after 1 January 2019, have paid any recruitment fees, regardless of the amount. In calendar year 2019, BWJ and the Jordanian Labor Ministry carried out 73 joint inspection and advisory visits across affiliated garment and non-garment factories; a total of 20 factories were found to be non-compliant for migrant workers' payment of recruitment fees in their countries of origin. As one of these factories was in our supply chain, we have been supporting BWJ on the remediation process.

We continue to document our learnings from these examples and share them with our industry initiatives so we can collectively improve our engagement with suppliers and impacted workers.

Section 5: Training and Capacity Building

In FY2020, factories in our supply chain were invited to 20 capacity building workshops held in China, Vietnam, Bangladesh, India and Mexico. Each workshop covered one or more topics, including general compliance, our updated Supplier Code, specialized topic training on our zero-tolerance issues, including modern slavery and forced labor. 275 representatives joined the sessions covering 150 factories in our supply chain.

A. Mekong Club

We believe that participating in partnerships that join key stakeholders in the fight against modern slavery will lead to increased success by building the required leverage and impact to address the issue. To this end, GBG, as a member of the Fung Group, joined the Mekong Club, a membership-based organization focused on working with companies that are actively working to identify and eradicate modern slavery. The Fung Group representative is the point of contact for Mekong Club and coordinates access to Mekong Club's suite of tools and resources to educate staff about modern slavery issues. Through industry-specific networks and expert training, the club is a catalyst for change - engaging, inspiring and supporting the private sector to lead in the fight against modern slavery.

B. E-Learning on Modern Slavery



In March 2020, we rolled out a mandatory e-learning training to educate all compliance colleagues on modern slavery. The e-learning takes around 25 minutes to complete and runs through key concepts of modern slavery, risk indicators, best practices and prevention and remediation. The e-learning is available in English and Chinese.

The learning was interrupted by Covid-19, but completion will be required for all internal sourcing colleagues upon resumption of normal activities during FY2021. Our aim is to have 100% of GBG sourcing and compliance employees complete the training by end FY2021, along with factory management for facilities identified as high risk in China and Bangladesh.

C. ILO/BETTER WORK

All Jordanian factories in our supply chain are part of the ILO/IFC Better Work (BW) program. During a Project Advisory Committee meeting in early 2018, national stakeholders agreed that the industry will actively work towards implementing a zero-fee policy in BW factories. In 2019, BW held various training sessions with the Ministry of Labor and its labor inspectors to ensure better identification of non-compliances related to fee-charging.

Section 6: Effectiveness, Measured Against Appropriate KPIs

In 2020 and beyond, we recognize there will continue to be significant health and financial challenges related to the coronavirus pandemic that cause untold disruptions to our business and supply chain and stand in the way of progress. Still, we cannot pause our work in this important area when the need for action has never been greater, with modern slavery vulnerability increasing as a result of this crisis. We will need to be innovative to make progress despite travel restrictions and physical distancing.

GBG's focus for this coming financial year is on actively monitoring our supply chain to identify and reduce modern slavery risk, whilst collaborating with partners for sector-level change and ensuring victim-centric remediation, should any forms of modern slavery be detected. Particular attention will be paid to ensuring new risks and vulnerabilities in the supply chain, arising from COVID-19, are addressed.

We aim to achieve this through:

1. POLICY

Focus on enhanced governance related to responsible recruitment and reimbursement of illegal recruitment fees, with a longer-term focus on moving towards the employer-pays principle. Develop new standard operating procedures to maintain supply chain visibility despite the coronavirus pandemic, using technology to regularly collect data from suppliers and workers, including the use of targeted surveys on modern slavery.

2. RISK ASSESSMENT

Leverage technology to better identify and act upon specific modern slavery risks by country, region, product, tier, facility and worker demographic. Ensure risks are accurately described in qualitative and quantitative degrees to decision makers within GBG.

3. DUE DILIGENCE AND REMEDIATION

Leverage technology to increase the quality of worker interviews to illuminate the real conditions faced by workers throughout the supply chain and to ensure continued monitoring despite COVID-19-related restrictions. Focus will be on ensuring remediation processes put workers rights at the center and are undertaken by qualified third parties, thereby demonstrating the effectiveness of the responsible recruitment policy by ensuring workers are paid back illegally-obtained fees.

4. TRAINING AND PARTICIPATION IN MULTI-STAKEHOLDER INITIATIVES

Continue to use the collective knowledge, tools and advocacy of our industry initiatives on both a strategic and practical level with the goal of achieving positive social change. Our key topics for training will continue to be responsible recruitment and the overall risks related to modern slavery.

KPIs 2020-2021⁷

1. POLICY

Goal

Enhanced Governance on Responsible Recruitment

Indicator

Corporate policy implemented on responsible recruitment

2021 Target

Adoption of Responsible Recruitment Policy

2. RISK ASSESSMENT

Goal

Improved modern slavery risk assessment using more and better data

Indicator

Quality of annual modern slavery risk assessment

2021 Target

Improved quality of the annual risk assessment by using industry risk tools and guidance, incorporating the resulting ramifications of COVID-19

3. DUE DILIGENCE

Goal

Proactive monitoring and adoption of digital solutions

Indicator

factories audited using Apprise app

2021 Target

Pilot launched at facilities identified as high risk in Bangladesh

4. TRAINING

Goal

Colleagues and suppliers trained on modern slavery

Indicator (1)

% GBG colleagues trained on the modern slavery e-learning

2021 Target (1)

E-learning launched at facilities identified as high risk in China and Bangladesh

Indicator (2)

% core factories trained on the modern slavery e-learning

2021 Target (2)

E-learning launched at facilities identified as high risk in China and Bangladesh

As we advance our agenda to abolish modern slavery, we will monitor our progress against these KPIs and report progress in our next modern slavery statement.

We will continue to evaluate the effectiveness of our efforts to prevent modern slavery in our operations. We adhere to a principle of non-discrimination for workers in our supply chain and ensure that workers are compensated fairly and recognized based purely on merit regardless of their gender, race, religion, socio-economic background, or nationality. We are committed to expand industry collaboration and to equip factories in our supply chain with the necessary tools to identify and prevent all forms of modern slavery.

Rick Darling

CEO, Global Brands Group

Date: September 29, 2020

⁷2021 goals may need to be adjusted to account for coronavirus restrictions.