

# Modern Slavery Report for Workwear Outfitters, LLC, Imagewear Canada Co Ltd., and Kodiak Group Holdings Co.



This Modern Slavery Report (the “**Report**”) addresses the period commencing on January 1, 2023 and ending on December 31, 2023 (the “**Fiscal Year**”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (the “**Act**”), the Modern Slavery Act 2015 (UK), and the Transparency in Supply Chains Act (California). This Report is made on behalf of Workwear Outfitters, LLC (“**WWOF**”), Imagewear Canada Co Ltd. (“**Imagewear**”) and Kodiak Group Holdings Co. (“**Kodiak**”) (collectively “**we**”, “**us**” or “**our**”).

## 1. Introduction

Forced labor and child labor, each as defined in the Act, are crimes and serious violations of human rights. As a leading supplier of innovative work apparel and footwear across a diverse set of occupations, WWOF, Imagewear and Kodiak recognize the important role that we have in ensuring that our operations and products, and the supply chain that supports our business, adhere to the highest ethical standards, including the prevention and identification of forced labor and child labor in our supply chain. This Report sets out the steps we have taken during the Fiscal Year to prevent and reduce the risk that forced labor or child labor is used at any step in the production of goods in Canada or elsewhere by WWOF, Imagewear and Kodiak or of goods imported into Canada by WWOF, Imagewear and Kodiak.

## 2. Our Business

WWOF is a Delaware limited liability company with a corporate headquarters located in Nashville, Tennessee. Imagewear and Kodiak are wholly-owned subsidiaries of WWOF that conduct business in Canada. We are a leading supplier of innovative work apparel and footwear across a diverse set of occupations. We employ more than 6,000 people in facilities spanning the globe. Brands under our umbrella include Red Kap®, Bulwark®, Image Authority®, Kodiak®, Terra®, Walls®, Liberty®, Work Authority®, Workrite® Fire Service, and CritiCore®. We are also the exclusive licensee for Dickies® apparel in the B2B channel.

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We manufacture over half of our apparel in facilities we own and operate in Mexico and Honduras. We also own and operate about 75% of our distribution and fulfillment centers located in California, New York, Tennessee, Texas, Virginia, Belgium, Mexico, and Canada (Alberta and Ontario). As a result, we're able to closely manage our sustainability and social responsibility efforts. Our supply chain includes businesses that supply goods and services to our organization. In total, we procure goods and services from approximately 34 suppliers and contractors. The suppliers we engage include businesses that produce goods, supply raw materials and component parts, and provide services such as cutting and trimming, knitting and knotting, and coating and surface treatment.

### 3. Our Policies and Due Diligence Processes

#### Policies

Through our organizational and governance policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and make it clear that we do not tolerate any form of forced labor or child labor. We are committed to consistently evolving and improving our approach. We do not tolerate child, forced or bonded labor in any of our operations or by suppliers working for us. We make every effort, including conducting due diligence and audits to monitor the performance of our suppliers, to prevent our activities from having a negative impact on human rights. Our relevant policies are discussed in further detail below:

#### Code of Business Conduct

WEOF, Imagewear, and Kodiak are committed to conducting our business in a lawful and ethical manner. Our Code of Business Conduct (the "Code") sets out guiding principles and standards on doing business with WEOF, Imagewear, and Kodiak. The Code states that our business partner responsibilities include providing a safe workplace free of physical and health hazards, and complying with all applicable child and forced labor, worker safety, human trafficking, and other labor laws designed to safeguard worker well-being. Our company's policy is to obey the laws of each country and to honor our obligations to society by being an economic, intellectual, and social asset to each community and nation in which we operate.

#### Terms of Engagement

WEOF, Imagewear, and Kodiak operates under a Terms of Engagement, which sets forth the standards with which we expect our contractors, suppliers, facilities, and other business partners to operate. As part of these standards, we are committed to doing business with contractors, suppliers, and other business partners who operate within a set of ethical standards compatible with the Code and our Global Compliance Principles. Additionally, we require each contractor, supplier, and/or business partner, working for or on our behalf, to, at all times, comply with all applicable local, state, federal, national, and international laws, rules, and regulations, including those related to wages, hours, employment, labor, health and safety, the environment, and immigration. We require each of our authorized facilities to sign, as part of the Terms of



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Engagement, a statement agreeing to comply at all times with our global compliance principles – which include a section prohibiting the use of forced labor, including human trafficking.

**Global Compliance Principles**

Our Global Compliance Principles represent our commitment to our suppliers and our customers that WWOFF will endeavor to ensure that apparel and footwear produced in our name will be made consistent with internationally recognized labor standards, such as the U.N. Global Compact Principles and the International Labor Organization’s doctrine for human rights. Our Global Compliance Principles set out the basic requirements that we expect all facilities that produce goods for WWOFF to meet.

**Due Diligence**

We expect third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

We acknowledge that employees working in our facilities and our supply chain are at potential risk of forced labor or child labor. In order to mitigate this risk, we follow a due diligence approach that includes the following steps:

**Verification**

Our Master Manufacturing Agreement, attached to each purchase order, requires all company owned facilities and Tier 1 suppliers to confirm that their goods were not produced using forced labor. Further, through the use of our Terms of Engagement, we require all company owned facilities and Tier 1 suppliers to certify in writing that their facilities provide workers with a safe and healthy work environment and that the supplier is in compliance with all applicable occupational health, safety, and environmental protection laws. Our Terms of Engagement are signed by each Tier 1 supplier when they are first set-up in our systems.

**Audits**

We partner with a 3rd party vendor to conduct audits of company owned facilities and Tier 1 suppliers to evaluate supplier compliance with our standards for forced labor and child labor in supply chains. We expect that our company, and any individual or entity working for or on behalf of our company will operate in accordance with the Code, Terms of Engagement, and Global Compliance Principles. Per the Code, we expect that our company and any individual or entity working for or on behalf of our company will comply with all applicable child and forced labor, worker safety, human trafficking, and other labor laws designed to safeguard worker well-being.

Each of our contractors and suppliers agrees that, by accepting orders from us, it will abide by and implement our Terms of Engagement, which expressly requires all authorized facilities or factories to maintain, on site, all documentation necessary to demonstrate compliance with our Global

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Compliance Principles. All factories or facilities, with whom we do business, must allow us and/or our representatives full access to conduct announced and unannounced on-site inspections of its facilities and permit unrestricted access to all relevant records at all times during regular business hours.

In accordance with Occupational Health and Safety Administration (“OSHA”) regulations and internally defined safety and health requirements, which may exceed OSHA requirements in some circumstances, we have implemented a program entitled the Ideal Plant Model for our company owned factories, which defines the expectations for safety performance and other conservation standards.

### **Certification**

We partner with Worldwide Responsible Apparel Productions (“WRAP”) for a large portion of our 3<sup>rd</sup> party audits of company owned facilities and Tier 1 suppliers. WRAP is committed to the principles of fair treatment of workers and humane working conditions. These principles prohibit use of child labor, forced labor, harassment, or discrimination. Factories that undergo the WRAP audit must adhere to all laws of the jurisdiction where the plant is located. We endeavor to enforce these standards not only in our own factories, but in every factory which makes product on our behalf.

Further, we mandate that all factories producing our products operate in full compliance with the laws of their respective countries, including those relating to forced labor and child labor. Any facility operating on our behalf certifies its compliance with our Terms of Engagement, which, as mentioned above, specifically prohibits forced labor and human trafficking in business and supply chain operations. With each purchase order, facilities and Tier 1 suppliers certify, through our Master Manufacturing Agreement, that products are made in accordance with all applicable laws and regulations, as well as with all of our internal policies.

## 4. Assessing Our Risk

We engage in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced labor and child labor in our business and supply chain operations, we refer to external data sources, engage with our peers, consult with external experts, map supply chains, and conduct risk assessments, among other things. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce
- Dangerous or undesirable work
- Presence of migrant workers
- Presence of labor intermediaries
- Offshore production
- Long, complex, or non-transparent supply chains



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- Presence of child labor
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards

Our exposure to the risk of forced labor and/or child labor increases when we are engaging with third parties, particularly in categories such as manufacturing, clothing, and packaging. Based on our assessment, and in order to mitigate the risk in our supply chain, we take steps to evaluate our supplier relationships, which include following our risk-based due diligence and checks, as outlined above. Further, we plan to focus on improving areas of concern to further enhance our risk management program and implement appropriate corrective action plan(s) to remediate any identified risks.

## 5. Our Commitments

We respect human rights in our operations and extended value chain, and endeavor to conduct business ethically and sustainably. We support human rights as defined by the Universal Declaration of Human Rights, which recognizes that “all human beings are born free and equal in dignity and rights.” We work to elevate human potential through our products, partnerships, and operations. We expect the same from our suppliers, and we focus on working with long-term, strategic suppliers that demonstrate a commitment to engaging their workers and providing safe working conditions.

We take seriously and fully support national and international efforts to end forced labor. Moreover, we respect the ILO Core Conventions, the United Nations Universal Declaration of Human Rights, and the ten principles of the United Nations Global Compact. These standards are the foundation for our labor-related policies. The steps we have taken to prevent and reduce risks of forced labor and child labor include:

- Mapping activities;
- Mapping our supply chains;
- Conducting an internal assessment of risks of forced labor and/or child labor in our activities and supply chains;
- Contracting an external assessment of risks of forced labor and/or child labor in our activities and supply chains;
- Developing and implementing an action plan for addressing forced labor and/or child labor;
- Addressing practices in the organization’s activities and supply chains that increase the risk of forced labor and/or child labor;
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labor and/or child labor 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 labor;
- Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labor and/or child labor in their activities and supply chains;



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- Developing and implementing child protection policies and processes;
- Developing and implementing anti-forced labor and/or child labor contractual clauses;
- Developing and implementing anti-forced labor and/or child labor standards, codes of conduct and/or compliance checklists;
- Auditing suppliers;
- Monitoring suppliers; and
- Developing and implementing training and awareness materials on forced labor and/or child labor.

### **Remediation Measures**

The Code requires all partners of WWOFF, Imagewear and Kodiak to raise any ethical questions or concerns, and report on any suspected violations of the Code. Our policies promote compliance with all applicable child and forced labor, worker safety, human trafficking, and other labor laws designed to safeguard worker well-being. We also undertake diligence efforts (as further described in this Report) to ensure that the risk of forced labor and child labor is mitigated in our business.

We maintain internal accountability standards and procedures for employees, contractors, and facilities who fail to meet our standards regarding forced labor and child labor. Failure of one of our employees or contractors to abide by our Business Code of Conduct, Global Compliance Principles, or Terms of Engagement may result in appropriate remediation measures, including termination of employment or contractor relationship. Failure of factories to abide by our Business Code of Conduct, Global Compliance Principles, or Terms of Engagement may result in corrective action, including termination of our agreement with that supplier.

We have not identified any forced labor or child labor in our activities and supply chains, and as such, we have not taken any measures to remediate any forced labor or child labor or to remediate the loss of income to the most vulnerable families that results from any such measure.

### **Training**

We have an annual training program for our employees that have direct responsibility for supply chain management. This training was developed by a third party (NavexGlobal) and focuses particularly on mitigating risks within the supply chain for our products. In 2023, we conducted this training for 199 supervisors and vice presidents in our supply chain management department.

## **6. Our Progress and Effectiveness**

As stated above, we partner with 3rd party global compliance firms to perform periodic factory inspections to ensure compliance with our Global Compliance Principles, which represent our commitment to our suppliers and our customers that each piece of apparel and footwear produced in our name will be made consistent with internationally recognized labor standards, such as the U.N. Global Compact Principles and the International Labor Organization's doctrine for human rights.





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We assess the effectiveness of our policies by:

- Setting up a regular review or audit of the organization’s policies and procedures related to forced labor and child labor; and
- Partnering with an external organization to conduct an independent review or audit of our actions.

## 7. Approval & Signature

This Report was approved by the Board of Managers of Workwear Outfitters, LLC in accordance with section 11(4)(b)(ii) of the Act on May 17, 2024 and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company website at [www.wwof.com](http://www.wwof.com).

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for Workwear Outfitters, LLC, Imagewear Canada Co Ltd. and Kodiak Group Holdings Co. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



Chris Holcombe  
CEO, May 17, 2024

I have the authority to bind Workwear Outfitters, LLC, Imagewear Canada Co Ltd. and Kodiak Group Holdings Co.

