

Modern Slavery Statement
AUSTRALIA MSA
Annual Report (FY2021)

1.	Identification of Reporting Entity
	RALPH LAUREN AUSTRALIA PTY LTD
2.	Description of Reporting Entity Structure, Operations and Supply Chain
	<p>RALPH LAUREN AUSTRALIA PTY LTD (hereinafter referred to as the “Company” or “RLA”) is an Australian Proprietary Company, with its principal registered office and place of business located at Ground Floor, 16-18 Grosvenor Street, The Rocks NSW 2000.</p> <p>RLA is a wholly owned subsidiary of Ralph Lauren Corporation (“RLC”), a company incorporated in the United States of America, which designs, develops and contracts with third party suppliers to manufacture Ralph Lauren-branded products. The Company imports Ralph Lauren-branded fashion apparel and accessories, and its principal activities are the distribution and sale of “Ralph Lauren”-branded fashion apparel and accessories (“RL-product”) in Australia. The Company currently employs 330 employees.</p>
3.	Description of Risks of Modern Slavery Practices in the Operations and Supply Chains of the reporting entity, and any entities that the reporting entity owns or controls;
	<p>RLC works with a global network of suppliers, vendors, and factories, where it contracts with vendors who source materials from materials suppliers, such as textile from mills and dye plants. RLC does not directly manufacture products but rather it contracts for the manufacture of its products with third party vendors. In FY 2021, RLC worked with 489 active factories across 39 countries to manufacture our products. For more information on our supply chain, please see our 2021 Global Citizenship and Sustainability Report, https://corporate.ralphlauren.com/citizenship-and-sustainability.</p> <p>All RLC suppliers are independent entities subject to various legal jurisdictions with varying legal and regulatory frameworks in place to support efforts to eradicate modern slavery. To manage this variation, we developed the RLC <i>Operating Standards</i> which forms the basis of our relationship with our suppliers, and sets forth our standards and expectations with respect to legal and ethical matters, human and labor rights (including modern slavery), animal welfare and environmental compliance. The RLC <i>Operating Standards</i> set a benchmark of minimum acceptable conduct for all RL-suppliers. The RLC <i>Operating Standards</i> are supplemented by our <i>Foreign Migrant Worker Standards</i> to ensure fair employment terms for migrant and foreign workers who are particularly vulnerable</p>

	<p>to some forms of modern slavery (such as, debt bondage or forced overtime) in the apparel and footwear supply chain.</p>
<p>4.</p>	<p>Description of actions taken by entity, and any entity that reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes a. for example, development of policies and processes to address modern slavery risks, and providing training for staff about modern slavery</p>
	<p><i>Policies:</i> RLC’s core compliance policies include its <i>Code of Business Conduct and Ethics</i> which requires all employees to comply with laws and regulations addressing, among other things: fair dealing, gifts and entertainment, conflicts of interest, protection of Company systems and assets, fair and truthful disclosures to the public, maintenance of accurate books and records, treatment of others with respect and dignity, and promotion of a safe and healthy working environment. RLC’s <i>Code of Business Conduct and Ethics</i> specifically states that each individual should have the ability to work in an environment that prohibits discriminatory practices, and sets forth RLC’s expectations that the workplace is free of bias, harassment and violence. Additionally, RLC’s <i>Procedures for Reporting and Investigating Employee Complaints</i> (“Whistleblower Policy”) requires reporting of, among other things, potential or actual violations of the <i>Code of Business Conduct Ethics</i> and also sets forth the escalation process and provides a confidential reporting portal accessible on www.ralphlauren.ethicspoint.com, as well as RLC’s global toll-free hotline numbers for reporting potential or actual misconduct. Due to certain legal requirements in the European Union (“EU”) concerning data privacy, RLC maintains a separate hotline and website reporting system and reporting process for its EU employees. The RLC’s Whistleblower Policy is translated into [5] languages and the EU Whistleblower Policy is translated into [13] languages, reflecting the regions in which RLC currently does business. A list of global toll-free POLO Hotline and EU Polo Contact Line numbers is prominently published on RLC’s regional corporate intranet sites and displayed in RLC’s corporate facilities, sourcing offices and retail stores. Employees are encouraged to report any alleged violations or concerns to their supervisor, manager or appropriate personnel. All RLC employees are required to undergo mandatory Code of Business Conduct and Ethics training, and are required to submit annual certifications of completion.</p> <p>RLC, its affiliates and subsidiaries, including RLA, are committed to conducting its global operations ethically and with respect for the dignity of all people who make RL-products. Our commitment to respect internationally recognized human rights is outlined in our <i>Human Rights Policy</i>. To implement this commitment, we assess our supply chain for modern slavery risks, including forced labor, human trafficking, deceptive recruiting, and child labor. Our supplier contractual agreements oblige suppliers to adhere to the RLC <i>Operating Standards</i>. To ensure these standards are understood and upheld, we have a dedicated monitoring team</p>

within RLC's People & Development Division, Global Citizenship Department ("RLC Global Citizenship team").

Internal Team: The RLC Global Citizenship team is responsible for administering the social compliance program for all RL-divisions, including RLA. Preventing modern slavery is a core pillar of our social compliance program. RLC strictly prohibits all forms of modern slavery including, but not limited to, forced labor, human trafficking, deceptive recruitment and child labor. The social compliance program includes supply chain due diligence, risk assessments, monitoring activities, including auditing and supplier engagement, training, and capability building.

The RLC Global Citizenship team oversees the social compliance auditing and monitoring of factories that manufacture RL-product by utilizing third party auditors, including the ILO-Better Work program where available, as well as our own staff to conduct audits, all of whom are specifically trained to conduct social audits.

During audits, our auditors are compelled to be vigilant and pay specific attention to red flags alerting us to potential modern slavery findings as we consider a modern slavery finding as a zero-tolerance violation. Audit results are reviewed by the RLC Global Citizenship team and, where applicable, a Corrective Action Plan ("CAP") is developed with the factory. The team monitors, confirms, and records the completion of CAPs.

We conduct social audits to assess the working conditions of supplier locations and, post-audit, continue to engage with our suppliers to ensure implementation of corrective actions and appropriate remediation, where applicable.

Where we find a supplier in violation of our standards, the supplier is expected to remediate the issue promptly and adequately. Where applicable, our social auditing protocol also includes foreign migrant worker interviews to verify compliance with our *Foreign Migrant Worker Standards*. If we identify and validate a noncompliance with our requirements related to eradicating slavery or human trafficking, we will work with that supplier to make immediate changes; otherwise we will cease business relations.

Training and Engagement: When we enter new or renew existing contractual arrangements, suppliers are assessed for their business, quality, cargo security and social standards and capabilities. During the on-boarding process, all suppliers enter into written contractual agreements which include obligations to adhere to the RLC *Operating Standards*, pre-production and in-line production audits and approvals, and ongoing monitoring and remediation.

We recognize that engagement is a continuous process. Accordingly, we conduct ongoing monitoring of suppliers to ensure that they comply with our program of auditing, remediation, monitoring, supplier engagement, and capability building. In 2021, we rolled out our new *Supplier Engagement Tool* (SET), a tool covering demographic information, country-level, and factory-level risks. Our RLC Global Citizenship team utilizes the tool to conduct individualized supplier engagements, allowing for more touch points with suppliers and an iterative process to better assess human rights risks, understand supplier and worker needs, and tailor capacity building.

The RLC Global Citizenship team continually works with our internal cross-functional teams and suppliers, to educate and train them about the definition of forced labor and modern slavery, areas of risk, red flags, and escalation processes. In 2021, we held online training sessions focused on forced labor risks, for our Manufacturing and Sourcing staff in the Asia-Pacific region. Training sessions for staff in the Western Hemisphere, Europe and the Middle East are planned for early 2022. Additionally, RLC periodically organizes vendor summits wherein we further engage with our suppliers by reiterating our expectations, share learnings and best practices, and foster regular interaction and communication, as we work together to overcome our mutual challenges.

Additionally, the *RL Grievance Mechanism* is accessible to factory workers, excluding those subject to EU data privacy requirements. The *RL Grievance Mechanism* program complements the primary operational-level grievance mechanisms run by the factories themselves, and enables workers to escalate concerns directly to RLC using the RL Hotline, email address, or also accessible through a QR code. *RL Grievance Mechanism* program information is made available to workers on posters throughout factories in the workers' local languages. Information is currently available in 21 languages.

In FY 2021, the RLC Global Citizenship team focused on training factory managers and workers on effective grievance mechanisms. We worked with local experts and partners to deliver the trainings in applicable languages, reaching 102 factories in eight countries that collectively employ around 180,000 workers. We will continue educating managers and workers on the importance of grievance mechanisms, alongside evaluating and improving the effectiveness of our program.

Due Diligence and Risk Assessments: RLC conducts risk assessments to assess its operations and the likelihood and extent of human rights impacts of our business. We base our human rights due diligence measures, in all material respects, on the framework set forth in the *OECD Due Diligence Guidance for Responsible Supply Chains in the Garment & Footwear Sector*. We utilize various resources such as public indicators on country risk levels and salient risks in the industry to help assess social and human rights risks, such as: U.S. State Department Trafficking in Person Report; U.S. Department of Labor List of countries producing goods using

	<p>Child Labor/Forced Labor; ITUC Global Rights Index; Corruption Perceptions Index; and the UNDP Human Development Report. In addition, we review the Verisk Maplecroft risk indices on human rights, including the forced labor index. We constantly assess our supply chain for existing and potential risks and take a proactive approach to mitigate potential impacts.</p> <p>RLC is engaged with the industry to advocate for and develop successful, sustainable solutions to eradicate forced labor and other human rights violations from global supply chains. We leverage our membership in various industry associations such as the American Apparel and Footwear Association (“AAFA”), US Fashion Industry Association (“USFIA”), and Businesses for Social Responsibility (“BSR”) to inform us of risks. Notably, we belong to the Joint AAFA/NRF/RILA/USFIA Forced Labor Working Group (FLWG). Additionally, RLC is a signatory to the AAFA and Fair Labor Association’s Commitment to Responsible Recruitment, a proactive industry effort which seeks to address potential forced labor risks for migrant workers in the global supply chain. And, as part of our ambassador-level sponsorship of the YESS Initiative (Yarm Ethically & Sustainably Sourced), we are supporting the establishment of new standards for spinners and mills to help identify and prevent forced labor in cotton production and garment supply chains.</p> <p>Combined with the collaboration, resources, and tools provided by these associations, we rely on intelligence and expert analysis from on-the-ground stakeholders in the social compliance industry such as third party auditing firms and the ILO-Better Work program. The results of our risk assessments are incorporated into our mitigation strategies, and utilized to keep our Board of Directors updated on any issues raised.</p>
<p>5.</p>	<p>Assessment of the effectiveness of such actions</p> <p>RLC maintains records and tracks the results of our social audits. We work with suppliers to ensure our actions are addressing forced labor and other social compliance risks. We continue to vet all new factories and audit existing factories on a regular basis. In all cases, when a factory has an issue or is not making visible remediation progress or improvements, RLC’s escalation process includes Global Manufacturing and Sourcing, and discussions that will drive business decisions. If a factory still does not respond, RLC will discontinue business with that factory.</p> <p>The RLC Global Citizenship team provides regular reports on supplier social compliance risk ratings to the Global Manufacturing and Sourcing teams. The supplier risk rating is a component of the Supplier Scorecard, a program used to review supplier performance and directly influences our sourcing and business decisions. Additionally, RLC’s Supplier Engagement Strategy is centered on the maintenance of long-standing relationships with key and strategic suppliers, enabling us to partner closely and transparently for the benefit of the people who make RL-product.</p>

6.	Description of the process of consultation with any entities that the reporting entity owns or controls
	As discussed above, the RLC Global Citizenship team oversees the auditing and monitoring of all factories for all RL-divisions. We apply the same process, standards, and programs for all areas of the business.
7.	Any other information that the reporting entity considers relevant.
	n/a

Pursuant to the requirements of the *Commonwealth Modern Slavery Act 2018*, the Ralph Lauren Modern Slavery Act Statement, approved by its parent entity Ralph Lauren Corporation, is hereby approved by the Board of Directors of the Ralph Lauren Australia PTY (the “Registrant”), and signed on its behalf by the duly authorized undersigned.

RALPH LAUREN AUSTRALIA PTY LTD
ABN 61 118 847 359

By: _____

Name: Richard Barrett

Title: Director

Date: 22/12 2021