

Modern Slavery Statement  
Ralph Lauren UK Limited  
Annual Report (FY 2024)

**I. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS**

This statement is made by Ralph Lauren UK Limited (hereinafter referred to as the “Company”), in respect of the UK Modern Slavery Act of 2015. The Company is a United Kingdom limited company with its registered office at 46 Clarendon Road, Watford, Hertfordshire, WD17 1HE.

The Company is a wholly owned subsidiary of Ralph Lauren Corporation (“RLC”), a company incorporated in the United States of America that designs, develops, and contracts with third party suppliers to manufacture Ralph Lauren-branded products. This report has been prepared by the Company for the financial year ending March 31, 2024.

The Company imports Ralph Lauren-branded fashion apparel and accessories into the United Kingdom and its principal activities are the distribution and sale of Ralph Lauren-branded fashion apparel and accessories in the United Kingdom.

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 2024, RLC worked with 378 active Tier 1 factories across 31 countries, covering 94% of our business across all categories, to manufacture our products. All RLC suppliers are independent entities subject to various legal jurisdictions with varying legal and regulatory frameworks in place to support efforts to prevent human trafficking and modern slavery.

For more information on our supply chain, please see our [2024 Global Citizenship and Sustainability Report](#).

**II. POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

As a wholly owned subsidiary of RLC, the Company abides by various policies and processes set by RLC that apply across its business. Further details on such policies and processes are provided below. RLC and its subsidiaries (including the Company) may be collectively referred to herein as “RL”. Preventing modern slavery is a core pillar of RL’s social compliance program. RL strictly prohibits all forms of modern slavery, including, but not limited to, forced labor, human trafficking, deceptive recruitment, and child labor.

*[Code of Business Conduct and Ethics](#)*: RL’s core compliance policies include its Code of Business Conduct and Ethics (“Code of Conduct”) which requires all employees to comply with laws and regulations addressing, among other things: fair dealing, gifts and entertainment, conflicts of interest, protection of RL 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. The Code of Conduct expressly prohibits forced, indentured, bonded, or compulsory labor obtained through human trafficking, coercion, slavery, or child labor.

Pursuant to the Code of Conduct, RL also requires reporting of, among other things, potential or actual violations of the Code of Conduct, our policies, or the law by our employees, business partners, or customers. It also sets forth the escalation process and provides a confidential reporting portal accessible on [www.ralphlauren.ethicspoint.com](http://www.ralphlauren.ethicspoint.com) and RL's global toll-free hotline numbers (collectively, "RL Hotline") for reporting potential or actual misconduct. Employees are encouraged to report any alleged violations or concerns to their supervisor, manager, or appropriate personnel. All employees of RL are required to undergo mandatory Code of Conduct training and are required to submit annual certifications of completion. Failure to adhere to the Code of Conduct may result in penalties, up to and including possible termination of employment.

*Human Rights Policy*: RL is committed to conducting its global operations ethically and with respect for the dignity of all people who make RL products. RL's company-wide commitment to respect internationally recognized human rights is outlined in the Human Rights Policy. Per the Human Rights Policy, RL carries out due diligence on salient human rights risks, such as child labor, forced labor, sexual harassment, gender-based violence, occupational health and safety, wages, and freedom of association and collective bargaining (see Section III).

*Operating Standards*: All of RL's supplier contractual agreements oblige suppliers to adhere to RL's Operating Standards as a condition of working with RL. The Operating Standards require suppliers to observe certain operational standards for a safe, sustainable, inclusive, and ethical workplace. For example, suppliers are prohibited from working with or arranging for purchase of any materials or services that support or utilize forced, indentured, bonded, or compulsory labor obtained through human trafficking, coercion, or slavery. In addition, suppliers may not circumvent national or local laws to avoid regular employee entitlements such as benefits, wages, or other legal obligations.

*Foreign Migrant Worker Standards*: Under RL's Foreign Migrant Worker Standards, all foreign migrant workers in RL's supply chain are entitled to internationally recognized migrant workers' rights as described by the International Labor Organization, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, and in the United Nations Dhaka Principles on Migration with Dignity. These rights extend to workers during recruitment, hiring, migration, employment, and termination, and as such, shall be upheld by all factories in RL's operations and supply chain. This includes the right to be free from forced and bonded labor.

*Responsible Purchasing Practices Policy*: RL recognizes its role in providing an enabling environment for Suppliers to meet our Operating Standards through responsible purchasing practices. The Responsible Purchasing Practices Policy defines the Company's approach to working collaboratively with suppliers to enable processes, practices, and decisions that support their fulfillment of our business requirements, human rights commitments, and environmental sustainability goals and it is foundation to our Supplier Engagement Strategy (see Section V.).

### **III. DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING**

The RL Global Citizenship, Worker Well-Being Department ("Global Citizenship team") is responsible for administering the social compliance program, including human rights due diligence across the supply chain for all RL divisions, including the Company. The social compliance

program includes supply chain due diligence; risk assessments; monitoring activities, including auditing and supplier engagement; training; and capability building. RL bases its 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.

Per the program, the Global Citizenship team oversees the social compliance, auditing and monitoring of factories that manufacture RL-branded product by utilizing third party auditors, including the ILO-Better Work program, where available, and the approved verification bodies of the Social & Labor Convergence Program (“SLCP”). RL conducts social audits to assess the working conditions of supplier locations and, post-audit, continues to engage with its suppliers to ensure implementation of corrective actions and appropriate remediation, where applicable. Where RL finds a supplier in violation of its standards, the supplier is expected to remediate the issue promptly and adequately. Where applicable, RL’s social auditing protocol also includes foreign migrant worker interviews to verify compliance with its Foreign Migrant Worker Standards. If RL identifies and validates an instance of noncompliance with our requirements related to eradicating modern slavery and human trafficking, RL will work with that supplier to make immediate changes; if the supplier is unable to make the changes RL requires, RL will cease business relations with that supplier.

RL’s third-party auditors are expected to be vigilant and pay specific attention to red flags alerting RL to potential modern slavery and human trafficking violations. Audit results are reviewed by the Global Citizenship team and, where applicable, a corrective action plan is developed with the factory. The Global Citizenship team monitors, confirms, and records the completion of corrective action plans. The team also conducts select site visits to follow-up and monitor conditions.

#### **IV. RISK ASSESSMENT AND MANAGEMENT**

As a wholly owned subsidiary of RLC, the Company adopts RLC’s steps to assess and modern slavery and human trafficking risks in RL’s supply chain on a broad basis.

*Risk Assessments:* RL conducts risk assessments to assess its operations and the likelihood and extent of the modern slavery and human trafficking impacts of its business. RL utilizes various resources such as public indicators on country risk levels and salient risks in the industry to help assess modern slavery and human trafficking risks, such as: U.S. State Department Trafficking in Persons Report; U.S. Department of Labor List of countries producing goods using Child Labor/Forced Labor; ITUC Global Rights Index; Corruption Perceptions Index; and the UNDP Human Development Report. In addition, RL reviews the Verisk Maplecroft risk indices on human rights, including the forced labor index. RL constantly assess its supply chain for existing and potential risks and takes a proactive approach to mitigate potential impacts.

Combined with the collaboration, resources, and tools provided by our membership in various industry associations, as further discussed below, 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. Further information on our risk assessment approaches is available in our [Human Rights Disclosure](#).

*Internal Monitoring:* To ensure our Operating Standards are understood and upheld, there is a dedicated monitoring team within the Global Citizenship team. If these teams find that any facility, anywhere in the world, is not acting in accordance with RL's Operating Standards, RL will take appropriate remedial and disciplinary action or, where appropriate, cease the business relationship.

*Grievance Mechanisms:* RL is committed to promoting an environment of open and honest communication in its workplace, with its customers and business partners, and in its supply chain. RL encourages anyone to express concerns and provides the opportunity to file reports 24 hours a day, seven days a week through the RL Hotline, operated by NAVEX. Reports may be submitted online or via phone. RL will not tolerate retaliation against anyone who reports a concern in good faith.

To support its commitment to combatting modern slavery and human trafficking, the RL Hotline is also accessible to supply chain workers and complements existing processes managed by the factories themselves. Workers can escalate their concerns directly to the RL Hotline in most supplier countries and through an RL Hotline email address. Information is made available to workers on posters throughout factories in their local languages, accessible through QR codes.

Responding to affected stakeholders and their concerns are also a part of the process. Allegations and inquiries received through the RL Hotline are assessed to determine impact and whether further investigation or other appropriate action is needed. Each concern or allegation is addressed, and consistent action is employed when appropriate. RL Hotline metrics, including reports, are communicated routinely to the Board of Directors' Audit Committee.

*Industry Engagement:* RL is engaged with the industry in which it operates to advocate for and develop successful, sustainable solutions to eradicate modern slavery and human trafficking from global supply chains. RL leverages its membership in various industry associations such as the American Apparel and Footwear Association ("AAFA"), National Retail Federation ("NRF"), Retail Industry Leaders Association ("RILA"), US Fashion Industry Association ("USFIA"), and Businesses for Social Responsibility ("BSR") to inform itself of notable risks. Notably, RL belongs to the Joint AAFA/NRF/RILA/USFIA Forced Labor Working Group. Additionally, RL 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.

## **V. KEY PERFORMANCE INDICATORS TO MEASURE EFFECTIVENESS OF STEPS BEING TAKEN**

The RL Global Citizenship team provides regular reports on supplier social compliance ratings and human rights risk assessments to the Global Manufacturing and Sourcing teams. The Supplier Engagement Scorecard, a program used to review supplier performance, has social and environmental performance indicators that enable us to communicate our sustainability expectations, evaluate and monitor the progress of our suppliers and strengthen collaboration. This includes the use of industry tools, such as the Higg Facility Environment Module, Better Work and Social Labor Convergence Project, Aii Carbon Toolkit, and ZDHC chemical monitoring tools. In FY24, we diversified our social key performance indicators (KPIs) within the scorecard to align

with key areas: career advancement for workers, wage management and effective grievance mechanisms.

RL's Supplier Engagement Strategy ("SES") 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. This strategy focuses on strengthening performance in three key areas: business execution & partnership, citizenship & sustainability and quality.

## **VI. TRAINING ON MODERN SLAVERY AND TRAFFICKING**

RL's Code of Conduct sets out ethics and compliance policies to communicate RL's expectations for ethical business conduct and reinforce our culture of integrity. The Code of Conduct applies to all employees, officers, and directors of RL. The Code of Conduct expressly prohibits forced, indentured, bonded, or compulsory labor obtained through human trafficking, coercion, slavery, or child labor.

All RL employees, including employees of the Company, receive training on the Code of Conduct during onboarding and are required to re-train and submit an annual certification of completion. RL also expects those who work for RL or on RL's behalf, such as vendors, consultants, contractors, agents, and suppliers, to comply with the law, meet the obligations outlined in their contracts, and honor the principles outlined in the Code of Conduct. Failure to do so may result in penalties, up to and including termination of employment or a business relationship with RL or its subsidiaries.

Pursuant to the requirements of the UK's *Modern Slavery Act*, this statement is hereby approved by the Board of Directors of Ralph Lauren UK Ltd. and signed on its behalf by the duly authorized undersigned.

### **RALPH LAUREN UK LTD.**

Full Name: Cara Turilli

Title: Director

Date: 30 September 2024



---