

# Respecting Human Rights

At Ralph Lauren Corporation (Ralph Lauren or the Company or we) our Purpose is to inspire the dream of a better life through authenticity and timeless style. We deliver on this intention through our business operations, policies and practices that respect the dignity, well-being and human rights of all our employees, value chain workers, customers and the communities in which we operate.

Our commitment to respect human rights is formally outlined in our [Human Rights Policy](#), which recognizes our participation in the [United Nations Global Compact](#), our alignment with the [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#) and the [OECD Guidelines for Multinational Enterprises](#), and our support of the principles articulated in the [Universal Declaration of Human Rights \(UDHR\)](#) and the [International Labor Organization \(ILO\) Declaration on the Fundamental Principles and Rights at Work](#), which reflects the ILO core labor standards.

Human rights oversight is built into governance at multiple levels throughout our organization, including at the highest level of decision-making and accountability. Risk analysis, training and awareness raising are implemented across our internal teams and our wider value chain. Additionally, engagement with stakeholders, delivery of grievance and remediation processes, and reporting are part of our regular operations to uphold human rights.

The following principles underly our approach to respecting human rights:

- 1. Transparency** in learning and solving issues together with employees, brand partners, industry organizations, suppliers, workers and other concerned parties. When issues arise, we recognize that we are not facing these challenges alone.
- 2. Root cause analysis** to work on preventative measures. We recognize the limitations of only monitoring or mitigation and aim for more systemic and enduring change.
- 3. Continuous improvement** in that we recognize that ensuring the rights of all people touched by our operations requires that we listen, learn and remain open to improving.

## GOVERNANCE AND STAKEHOLDER ENGAGEMENT

Our Board of Directors is responsible for the oversight and impact of our [Global Citizenship and Sustainability \(GC&S\)](#) strategy, including human rights. The Board is updated on a quarterly basis by the Chief Global Impact & Communications Officer and the Chief People Officer, who are accountable for the implementation of the Human Rights Policy. The Board ensures that human rights due diligence (HRDD) is executed and updated through the People and Development, Belonging and Equity, Legal and the Global Health and Safety teams for Ralph Lauren employees and the Global Citizenship, Worker Well-being, Procurement, Global Transportation and Logistics teams for value chain workers.

GC&S is integrated throughout all levels of our organization and is governed by our Board. Our Chief Global Impact & Communications Officer leads our Global Citizenship and Sustainability Steering Committee, comprised of leaders from across the Company. The Committee provides oversight and direction to internal working groups across business functions, facilitating the development, execution and evaluation of our citizenship and sustainability initiatives to ensure continuous improvement and maximize impact. This oversight and direction includes tracking our commitment to respect human rights across our business operations.

Our leadership and team members participate in committees and groups of key stakeholders involved in advancing human rights. This ensures that we are learning new approaches from practitioners and sharing best practice with our peers. We hope and encourage our suppliers to similarly engage with stakeholders. Moreover, we also engage leading third parties to help improve our processes to identify and mitigate potential and actual human rights risks and impacts. For a list of our memberships, initiatives and partnerships, please see [Collaborating for Impact](#). For more information on how we engage, please see our [GC&S Report](#) and case study in [Champion Better Lives](#).

## RISK ASSESSMENT

To assess our actual and potential impacts on people as part of HRDD, we developed a Global Human Rights Risk Dashboard to prioritize risks across our operations and value chain. This process is informed by internal and external stakeholders, public information, including indicators on country-risk levels and salient risks in the industry, as well as private global risk assessment tools. Our risk assessment process is combined with a proactive approach to prevent, mitigate and address potential or actual adverse human rights impacts.

We conduct double materiality assessments (DMA) on a cadence in line with regulatory requirements, which assess the impacts of our own operations and upstream and downstream value chain on people and the environment (impact materiality), and the financial risks and opportunities sustainability issues present to our business (financial materiality). In FY25, we performed a double materiality assessment to align with the CSRD and the ESRS, along with European Financial Reporting Advisory Group's (EFRAG) Implementation Guidance for Double Materiality. Our assessments are conducted by a third-party and include extensive engagement with internal and external stakeholders. We also maintain ongoing stakeholder engagement throughout the year to inform strategies, priority issues and goals in-between formal double materiality assessments. For more information on our DMA, please see our [GC&S Report](#). The sections below illustrate the many steps we take to fulfill our corporate responsibility to respect the human rights of workers in our value chain. While we have prioritized our merchandise supply chain in this disclosure, we also assess and address risks for our non-merchandise supply chain, third-party logistics and transportation.

For information about respecting human rights within our own operations, please see our:

- [Champion Better Lives](#) page; and
- Our policies and systems, including the [Code of Business Conduct and Ethics](#), [Fair Treatment Policy](#) and the [RL Hotline](#).

## MERCHANDISE SUPPLY CHAIN

We have several fundamental expectations for supplier conduct across our merchandise supply chain. Our [Operating Standards](#) (OS), which include legal and ethical standards; labor, human rights, safety, environment and animal welfare standards; management systems; and grievance mechanisms are required to be met or exceeded by all suppliers to Ralph Lauren. The OS are available in [27 languages](#). Moreover, all Ralph Lauren suppliers are required to sign our Vendor Compliance Packet (VCP) as a condition of working with us. The VCP incorporates our OS, which reflects the ILO core labor standards and prohibition of forced labor, child labor and employment discrimination and its recognition of the right to freedom of association and collective bargaining.

Our Ralph Lauren Global Citizenship, Worker Well-being team drives our risk assessment process for social and labor risks in the merchandise supply chain, manages supplier compliance with our OS, builds supplier capabilities in key focus areas and implements worker empowerment programs.

In alignment with our peers and many other brands, the Company contracts for the manufacture of our products and we do not own or operate any production factories. As a result, Ralph Lauren products are made by independent manufacturers that we collaborate with to create a cohesive and transparent relationship. We recognize that these manufacturers are the stewards of their own businesses and must take a proactive approach to continuous management of their operations. However, in alignment with our principles and OS, we work closely with suppliers to support their compliance and capability building efforts.

When we need to end a business relationship with a supplier who makes RLC products, we are committed to ensuring that appropriate steps are taken to responsibly exit. Our [Responsible Exit Policy](#) supports the identification, management, and mitigation of potential or actual adverse human rights impacts on the supplier and its workers. This policy is part of our ongoing efforts to support responsible purchasing practices and respect human rights.

## TRACEABILITY & TRANSPARENCY

We recognize the importance of mapping our supply chain to both give optimal visibility to risks and to best mitigate any actual or potential adverse impacts. We further recognize the importance of supply chain transparency and are an active contributor of data to the Open Supply Hub. For a list of our contracted suppliers, please see [here](#). The list is updated regularly.

## ASSESSMENTS, MONITORING, REMEDIATION, AND CAPABILITY BUILDING

Our Global Citizenship, Worker Well-being team monitors social compliance at factories, works collaboratively to remediate non-compliances and aims to build supplier capabilities to sustain their performance. The team monitors social compliance through a range of tools, including site-level assessments. These assessments are conducted by third-party monitoring firms, including the approved verification bodies of [Social Labor Convergence Programs \(SLCP\)](#) and [ILO-Better Work](#) where available.

We schedule social compliance assessments through a risk-based approach and conduct these assessments (on an announced, semi-announced or unannounced basis) to evaluate the working conditions of supplier locations. Additionally, our risk assessment (referenced above) informs targeted monitoring activities to respond to existing and emerging issues.

The assessment process generally includes a facility tour to observe the worksite, review documents and conduct worker interviews. On average, we interview approximately 10% of workers at the factory. Suppliers are expected to provide a comfortable and private environment for the interviews, where workers can speak without the presence of factory management.

Post-assessment, we engage with our suppliers to ensure the implementation of corrective actions and appropriate remediation, where applicable. We work with suppliers to identify the root cause of issues and agree on corrective action plans (CAPs) that prioritize workers' welfare and livelihoods. Our approach to monitoring and remediation encourages transparency and continuous improvement.

In addition to ongoing monitoring of existing suppliers, any new suppliers will undergo an onboarding assessment prior to production. The assessment covers all aspects

of our OS. If any severe violations in one or more critical issues are found during the assessment, the supplier will not be approved for production. All new suppliers must meet our standards before we place an order with them.

Our program reflects the OECD's strategic approach to risk management by:

1. Continuing supplier relationships throughout the course of measurable risk mitigation efforts;
2. temporarily pausing business with suppliers while pursuing ongoing measurable risk mitigation; and
3. in the extreme, where suppliers are unwilling or unable to properly remediate issues, or if risk mitigation is not feasible, we may terminate the business relationship.

We only terminate a relationship when all recourse has been exhausted.

We believe in the importance of building supplier capabilities in a broad variety of areas to help understand and address risks and compliance trends, including grievance mechanisms, preventing forced labor and raising awareness on belonging and equity issues to mitigate the risks to vulnerable groups.

We hold capability-building training events which bring together suppliers in the same region to address shared compliance problems. During these sessions, we discuss strategies for improving and maintaining compliance at factories addressing these trends. For examples of recent roundtable topics and locations, please see our [GC&S Report](#).

Our Global Citizenship, Worker Well-Being team, who are experienced with social compliance assessments, also conduct individualized supplier engagements. They may discuss demographic information, country-level and factory-level risks. These engagements allow for more touch points with suppliers and an iterative process to better assess human rights risks, understand supplier and worker needs, and tailor capability building.

These activities help inform the supplier scoring in our [Supplier Engagement Strategy](#), which directly influences our sourcing and business decisions. For more information about our social compliance program, and the assessment result data, please see our latest [GC&S report](#).

## GRIEVANCE MECHANISMS

It is vital that workers in our value chain have access to effective grievance mechanisms in their workplace and can report concerns without fear of retaliation.

Our OS require suppliers to have effective systems in place as the primary operational-level grievance mechanism to report concerns. We assess these mechanisms against the UNGP's effectiveness criteria under which they should be legitimate, accessible, predictable, equitable, transparent, rights-compatible and a source of continuous learning.

In FY24, we reviewed 444 grievances across three countries: Bangladesh, India, and Turkey. These grievances were logged between January – March 2023. The top categories of grievances included: 44% related to health and safety conditions of the workstation or factory, 10% related to supervisor behavior and 6% related to benefits concerns. Twenty-six percent of grievances were categorized as "other." Of these, almost 94% of the grievances were reported as resolved, less than 5% were under investigation and slightly over 1% of grievances were unsubstantiated.

The RL Grievance Mechanism Program for value chain workers complements the mechanisms operated by the factories themselves. The program enables workers to

escalate their concerns directly to Ralph Lauren using the RL-Hotline email address, accessible through a QR code. Information is made available to workers on posters throughout the factory in their local languages. Responding to affected stakeholders and their concerns is also a part of our program.

In addition, we provide training to factory managers and workers on effective grievance mechanisms. As previously noted, we are committed to continuous improvement and regularly evaluate the effectiveness of our program. For instance, when we did not see high usage from workers on our grievance mechanisms, we specifically held sessions with workers to test their ability to scan the QR code and send us messages. We learned that while workers had the ability to access the QR code successfully, they needed more instruction on exactly how to use it. Following these sessions, we received direct messages from workers to which we promptly replied.

## **SALIENT RISKS**

Through our risk assessment process, referenced above, we have identified salient human rights issues in our supply chain. These issues are the focus of our human rights due diligence (HRDD) efforts. We take a risk-based approach and concentrate our efforts on high-risk geographies and activities where we can exert leverage to mitigate or remediate issues if they occur. We recognize that there are human rights issues beyond the most salient risks. As we make progress on these critical issues, we plan to address additional risks. We work with our partners to mitigate and address potential and actual human rights issues throughout the supply chain through assessments, remediation, capability building and training.

We would be remiss not to recognize the crucial role of human rights defenders (HRDs) in providing information that helps bring these salient risks to the forefront. We also recognize the threats that HRDs face around the world in their efforts to protect workers and strongly condemn any attacks, threats, intimidation, retaliation or harassment of HRDs.

We regularly monitor, evaluate and track the effectiveness of our actions to respond to human rights risks and impacts. We also seek to learn lessons from this work to help inform our approach moving forward.

Below, we list our identified salient risks, what they encompass, and how we address these risks in our supply chain.

### *Child Labor and Young Workers*

We are aware of the complexities underlying child labor, including poverty, underdeveloped educational systems and cultural norms.

Child labor is strictly prohibited throughout our supply chain and may not be used in the production of any Ralph Lauren goods. Our OS require that workers must be at least 16 years old or beyond the age of compulsory education, whichever is higher. Workers between the ages of 16 and 18 are considered young workers and they must not undertake night and/or hazardous work. Suppliers must have robust age verification systems in place.

If a violation of our standards occurs, immediate action will be taken and we require suppliers to remove the underage worker from the factory, reach out to the family and begin discussing options for appropriate education and training, provide financial support to cover the education and lost wages, and agree to rehire the underage worker when they are 16 or older if desired by the worker. We then monitor the case to ensure that the supplier completes any corrective actions and takes ownership of the remediation.

One tool to mitigate the risk of child labor is supplier training. In FY25, we worked with The Centre for Child Rights and Business to provide on-site training on child labor prevention and remediation to Tier 2 factories in Bangladesh. For more details, please see our [GC&S Report](#).

More recently, we joined the Fair Labor Association's Harvesting the Future – Cotton in India Initiative, which aims to improve working and living conditions at the village level through child protection efforts and responsible recruitment practices. We appreciate the need for collaborative multistakeholder approaches to addressing risks in the upstream supply chain.

### *Discrimination, Harassment, and Gender-Based Violence*

We are committed to ensuring that workers are not subject to any form of discrimination, harassment, abuse, or retaliation. Engaging in or tolerating physical, racial, sexual, psychological, or verbal harassment, coercion, punishment or abuse is strictly prohibited. Our OS forbid discrimination in employment practices, including recruitment, hiring, compensation, training, benefits, advancement, promotion, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, pregnancy, marital status, gender identity or expression, genetic information, trade union status or activity, social group, ethnic origin, caste or any other personal characteristics, beliefs or other status protected by applicable law.

In addition to regular assessments of factories that include looking for any signs of discrimination in hiring or promoting and ensuring that workers are free from harassment or abuse, we are proactively working to support a culture of belonging and equity at factories.

To advance this commitment, we expect suppliers to pay special attention to marginalized groups, such as women. We further mandate that suppliers ensure equal pay for all, including benefits, equal treatment, equal review of performance and equal opportunity for promotion.

We support several factory-level initiatives to enable safe workplaces.

For example, in FY24, we participated in Better Work Indonesia's Respectful Workplace Program (RWP). The RWP is an initiative dedicated to creating safe, harassment-free workplaces by enhancing self-awareness of inappropriate behaviors, developing the capacity of factories to prevent and resolve such issues, and adopting a comprehensive approach that involves everyone from top management to line workers and trade unions. Please see [GC&S Report \(2024\)](#) for more details.

More recently, we launched RISE Respect programs in two factories in India (FY25) and Guatemala (FY26) This program proactively prevents and addresses violence and harassment in the workplace.

For more information on our worker empowerment programs, our belonging and equity work with suppliers, and how we action our commitment to gender equity, please see our section on Worker Empowerment and Gender Equity.

### *Forced Labor*

As recognized by the ILO, forced labor is systemic in global value chains and its prevention is a key priority for the Company.

Preventing forced labor is a core pillar of our program. Our OS expressly prohibit suppliers from working with or arranging for purchase of any materials or services that supports or utilizes forced, indentured, bonded, or compulsory labor obtained through human trafficking, coercion, or slavery.

Ralph Lauren complies with the California Transparency in Supply Chains Act of 2010, the UK Modern Slavery Act of 2015, the Australia Modern Slavery Act of 2018, the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023, and the Swiss Code of Obligations and Ordinance on Due Diligence and Transparency of 2021. Our disclosures can be found [here](#).

We have also designed and delivered targeted trainings on identifying and preventing forced labor to key cross-functional partners and suppliers. Additionally, we are signatories to the updated American Apparel and Footwear Association 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.

#### FOREIGN MIGRANTS WORKERS AND RECRUITMENT

We recognize that foreign migrant workers (FMWs) can be particularly vulnerable to exploitation and unfair treatment. Accordingly, our Foreign Migrant Worker Standards aim to secure fair employment terms for them. These standards provide for ethical recruitment practices, including mandatory local language employment contracts, freedom of movement, grievance mechanisms for workers, and end of contract travel expenses.

Per our FMW Standards, we do not expect workers to pay any costs or fees associated with recruitment, migration, and employment. However, if we find a situation in which workers did pay such fees, we will work with the supplier to remediate the issue.

#### HOMEWORKERS

We appreciate the economic opportunities and flexibility offered by homework and the important role it plays in the global garment supply chain. However, we also acknowledge the increased vulnerability of homeworkers that require enhanced due diligence and tailored monitoring processes. Per our OS, suppliers can only use homeworkers with our prior written consent and approval. We partner with third parties, like [Nest](#), to support best practices for homeworkers. Indeed, we are actively engaged in the Nest Coalition, which works to highlight the importance of artisans and the role of Nest in implementing ethical handcraft.

#### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Article 22(1) of the [International Covenant on Civil and Political Rights](#) (ICCPR) states that "[e]veryone shall have the right to freedom of association with others, including the right to form and join trade unions for the protection of his interests." This is one of the core values of the ILO. Freedom of association ensures that both workers and employers are represented and have a voice. It further provides the basis for collective bargaining and social dialogue.

At Ralph Lauren, we recognize that respect for workers' rights to freedom of association and collective bargaining is an important aspect of employment that suppliers must recognize.

Accordingly, our OS provides that suppliers should permit their employees the right to associate with others, form and join (or choose not to join) organizations of their choice, and bargain collectively in accordance with applicable law, without risk of discrimination, harassment, interference or retaliation, subject to applicable domestic law and practice. Where the right to freedom of association and collective bargaining is restricted under law, the supplier must engage in their best efforts to otherwise comply with these principles (e.g., through the establishment of worker committees).

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#### Case Study — Respecting Freedom of Association in Cambodia

In FY24, a Cambodian union raised concerns regarding freedom of association at one of our suppliers, specifically alleging discrimination against union activities in the dismissal of workers. While challenges to independent unions are common in Cambodia, our Operating Standards require suppliers to respect freedom of association and collective bargaining rights.

In response to these concerns, we conducted a comprehensive investigation that included:

- Initiated an independent third-party review
- Engaged with key stakeholders both remotely and in-person, including the union, factory management, IndustriALL, and Better Factories Cambodia

Though the independent investigation did not substantiate the specific allegations, we facilitated dialogue between the factory and union to foster improved industrial relations. Through this mediation, both parties successfully met and resolved the initial concern.

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#### OCCUPATIONAL HEALTH AND SAFETY

At Ralph Lauren, we recognize that preventing work-related injuries and diseases is crucial to realizing decent work and we are committed to creating and maintaining healthy and safe work environments throughout our operations and supply chain.

To support our commitment to occupational health and safety, our OS require that suppliers ensure a safe and healthy work environment, that their employees are not subject to unsanitary or hazardous living or working conditions and that they have an operational health and safety management system in place and appropriate to the operations on site.

Accordingly, suppliers must obtain, maintain, and comply with all safety and health permits, including but not limited to, an obligation to ensure building integrity and fire safety with regularly scheduled emergency practice evacuations and frequent inspection of exit doors for proper emergency use. Moreover, supplier-provided housing facilities need to be in a separate building and these, and any kitchens, canteens, break rooms and toilet facilities must also comply with our OS.

#### WAGES AND BENEFITS

We require our suppliers to have wage and benefit policies consistent with all laws regulating wages, overtime and legally mandated benefits. For example, we expect suppliers to follow local regulations on annual leave, holidays, maternity rights and parental leave. We further mandate that wages are paid in a timely manner and include a wage calculation for each pay period, as provided under applicable law.

Ralph Lauren does not directly provide compensation to workers at factories, but we expect suppliers to provide compensation that is sufficient to meet their basic needs and allow for some discretionary income as outlined in our OS.

When compensation does not meet our expectations, we expect suppliers to work with Ralph Lauren to progressively realize a level of compensation that does meet these standards.

Read more details about our work on fair compensation in our wage management strategy, please see our section on Wage Management.

## WORKING HOURS

At Ralph Lauren, we recognize that standards on working hours help safeguard the physical and mental health of workers, while also ensuring workers in our supply chain can perform to their best abilities. To that end, our OS require that all regular and overtime hours must be voluntary and in accordance with national laws. In addition, under ordinary business circumstances, employees must not be required to work excessive working hours and overtime and have at least one day off in seven.

We recognize that achieving consistent working hours within acceptable limits is one of the most difficult issues for our industry to manage. Excessive working hours have many causes, and we acknowledge that apparel brands like ours may contribute to the problem but can also be part of the solution. We are addressing the role we play by implementing our [Responsible Purchasing Practices Policy](#) and related processes.

For example, if we place orders with short notice, we might exceed a factory's capacity to supply us on time. Consequently, the factory might subcontract the work without our authorization — which we do not allow — or impose longer hours on workers to fulfill our orders. To avoid this, before placing an order we confirm the factory's capacity to complete the order to prevent excessive working hours or subcontracting. We also have capability-building programs to help suppliers meet our capacity requirements. These programs help suppliers improve their performance and efficiency without requiring longer working hours. Careful order allocations and proper planning to improve the outcome of each phase of the product life cycle creates an efficient work environment and promotes high levels of compliance.

## WORKER EMPOWERMENT AND GENDER EQUITY

Women comprise the majority of the workforce within the global garment supply chain, and we acknowledge the critical role they play in its operations. We further recognize the systemic challenges that they face and are committed to empowering women at our factories. Our focus has been on health and financial education, as well as career progression.

We work with factories to improve the lives for workers through empowerment programs, with a particular focus on gender equity. Belonging and equity are central to our values and approach to doing business. We expect our suppliers to share our commitment to principles and practices that prioritize belonging and equity.

We have partnered with expert organizations to support this work locally to help address the unique societal and cultural challenges. For example, in FY23, we launched a partnership with the Apparel Training & Design Centre (ATDC), one of the largest vocational training networks in the garment sector in India to pilot a program to equip female factory workers with the interpersonal and technical skills needed for career progression in the sector. The pilot program was successfully completed, and we look forward to continuing to scale such opportunities for learning and advancement. Read more about this work and our progress in our [GC&S](#) report.

## WAGE MANAGEMENT

The payment of living wages is a salient human rights issue in the garment sector. A living wage is defined as one where a worker receives a wage that is sufficient to meet their family's basic needs, such as food, water, clothing, housing, education, and healthcare, plus some discretionary income for savings and unexpected events.

We address this high priority issue through our Wage Management Strategy. Our focus is on wage management systems at the factory level, as well as the impact of our purchasing practices, for suppliers to deliver fair compensation to their workers.

Key elements of our strategy include wage data collection and analysis, wage management system reviews and improvements, worker feedback, industry collaboration, and responsible purchasing practices. Currently, we are using the Fair Labor Association (FLA) Fair Compensation Toolkit to collect information on wages in alignment with the Anker methodology. We use this data to create wage ladders, plotting basic and total take-home wages against local minimum wage, the industrial average wage and various living wage benchmarks, such as those from the [Global Living Wage Coalition](#), [Fair Wage Network](#) (FWN), and the [Asia Floor Wage Alliance](#) (AFWA). We are also working with independent organizations such as the FWN to help us further understand fair wage levels and systems through assessments and direct worker feedback. We will pair wage data collections and analysis with our Human Resource Management (HRM) Playbook to identify trends and opportunities for improvement.

We recognize the important role we play in ensuring supply chain workers receive fair and timely compensation. To that end, our responsible purchasing practices help us to create the conditions for factories to meet fair compensation. Our work in responsible purchasing extends beyond wage management, but this is an important link. To better understand opportunities for improvement, we ask our suppliers to participate in the [Better Buying Institute Survey](#).

The Better Buying Survey seeks anonymous feedback from suppliers on what it is like to work with us so we can understand how our practices impact their factories and workers. With the results, our sourcing team and cross-functional partners are working to make improvements where necessary. We are committed to supplier feedback and continuous improvement.

Please see our [GC&S](#) report for more on our wage management strategy.