

# PVH Corp. Statement on Forced Labor, Child Labor, Human Trafficking and Modern Slavery for Fiscal Year 2023

This Statement provides an overview of the efforts that PVH Corp. (together with its subsidiaries, “PVH,” the “Company,” “we,” “us” or “our”) has taken, including during our fiscal year from January 30, 2023 to February 4, 2024 (“fiscal 2023”), to ensure that slavery, forced labor, child labor and human trafficking is not taking place in our business, including within our supply chain. We have prepared this Statement on a consolidated basis for PVH – although not all the entities in our consolidated group are subject to each or any of the California Transparency in Supply Chains Act, UK Modern Slavery Act, Canada’s Fighting against Forced Labour and Child Labour in Supply Chains Act or the Australian Commonwealth Modern Slavery Act – because we have a single compliance program, with one set of policies, relating to slavery, forced labor, child labor and human trafficking. To the extent applicable, the signature pages in this Statement include additional disclosures specific to the entities required to prepare a statement under one or more of the laws listed above.

In this Statement, PVH uses “forced and child labor” to refer to forced labor, slave labor, prison labor, indentured labor, bonded labor, human trafficking, child labor and similar conduct.

## Company Overview

PVH is a consumer-focused global growth platform for brands in our sector, building *Calvin Klein* and *TOMMY HILFINGER* into the most desirable lifestyle brands in the world. We have approximately 29,000 associates operating in over 40 countries and generated over \$9.2 billion in 2023 revenue.

We have an extensive established network of worldwide sourcing partners that enables us to meet our customers’ needs in an efficient manner without relying on any one vendor or factory or on vendors or factories in any one country. Our products were produced in approximately 1,000 factories in approximately 40 countries during fiscal 2023. We source finished products and, to a limited extent, raw materials and trim. Raw materials and trim include fabric, buttons, thread, labels and similar components. Finished products consist of manufactured and fully assembled products ready for shipment to our customers and our stores (apparel, footwear, accessories and related products). Raw material, trim, and finished product commitments are generally made two to six months prior to production. Our supply chain is constantly evolving, both at the manufacturer and country level. Please visit our [supplier disclosure](#) for details about business partners from whom we source and their location.

At PVH, Corporate Responsibility (“CR”) has long been central to how we conduct business and plays a critical role in our PVH+ Plan strategy. Through our *Forward Fashion* strategy, we have set commitments for human rights and climate action. We do this because human rights are non-negotiable for us, and these two issues must be addressed in tandem, to help advance human rights within the fashion industry. We aim to be transparent about our progress – please visit [responsibility.pvh.com](#) to read about our *Forward Fashion* strategy, and to access our current and past annual CR reports.

## PVH Policies; Alignment with International Standards and Regulations

PVH maintains a number of policies that speak to our commitment to prohibit forced and child labor in our operations, as well as modern slavery and human trafficking, including *The PVH Code of Business Conduct and Ethics* and the *HR Policy Guides*.

The requirements for doing business with PVH are based, in part, on the Universal Declaration of Human Rights and based on, in part, the International Labour Organization's ("ILO") Core Conventions and the United Nations Guiding Principles on Business and Human Rights, as well as other third-party standards, such as the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, frameworks and codes of conduct, some of which are discussed in this Statement. We communicate our standards and requirements to our business partners in our supply chain through the following:

- [A Shared Commitment](#), our code of conduct for all of our business partners, a copy of which is provided to each of them at the outset of our relationship. First introduced in 1991, *A Shared Commitment* prohibits forced and child labor and more generally requires our business partners to comply with ILO standards.
- [CR Supply Chain Guidelines](#), which are provided to both suppliers and licensees during our onboarding process. The CR Supply Chain Guidelines provide guidance to our suppliers and licensees on how to comply with all elements of *A Shared Commitment*, including its prohibitions on forced and child labor.

Specifically, our Migrant Worker Policy, which is part of the CR Supply Chain Guidelines, requires suppliers and licensees to comply with a "no fees" (*i.e.*, employer pays) policy, and ensures that migrant workers are not responsible for paying fees or expenses to secure or maintain employment with the factory at any point during the employment cycle. Additionally, our Migrant Worker Policy provides more detailed guidance to suppliers and licensees on the requirements for the responsible recruitment of migrant workers, and how to address, in a comprehensive and sustainable manner, the risks of forced and child labor. In support of our Migrant Worker Policy, we developed materials and practical tools to help suppliers improve their management and recruitment systems relating to migrant workers. These materials are also used in our supplier training courses in high-risk jurisdictions.

- [Our Approach to CR and Human Rights](#), which summarizes our efforts to protect and advance the rights of workers across our supply chain.

Additionally, PVH signed the [Turkmen Cotton Pledge](#) led by the Responsible Sourcing Network, committing not to knowingly source cotton from that country. PVH is also one of the signatories to the [AAFA/FLA Apparel & Footwear Industry Commitment to Responsible Recruitment](#) aiming to address forced labor risks for migrant workers.

We believe that we are in compliance in all material respects with all applicable regulations and laws relating to forced and child labor and other labor-related regulations.

### **Risk Areas of Forced and Child Labor**

We believe that forced and child labor risks in our own workforce are minimal due to the strength of our internal employment policies and procedures. Forced and child labor risks in the apparel industry for companies like ours are most prevalent at upper-tiers of our supply chain as we do not have direct relationships with them and they may be in jurisdictions with weaker protection of workers' rights and where migrant labor is used.

### **Verification of Product Supply Chains to Evaluate, Monitor and Address Risks of Forced and Child Labor**

We evaluate, monitor and address the risks of forced and child labor in our industry and supply chain in several ways.

## Evaluation

We participate in multi-stakeholder initiatives that help us evaluate and address the risk of forced and child labor in our industry and supply chains. PVH is a member of several industry associations and programs dedicated to protecting workers' rights, including the prevention of forced and child labor, such as the [Responsible Labor Initiative](#) ("RLI"), [American Apparel & Footwear Association](#), the [International Accord for Health and Safety](#), and the [Better Work Programme](#). PVH was the first apparel sector member to join the RLI.

We also consult third-party resources and databases, engage in other research, utilize consultants and work with members of civil society to evaluate forced and child labor risks.

PVH provides transparency concerning our efforts to evaluate, monitor and address the risks of forced and child labor through reporting, survey responses, meetings with stakeholders and other means.

## Monitoring/Addressing Risks

We continually monitor compliance with our CR requirements, including the prohibitions against forced and child labor, and promptly address identified risks or violations. We conduct pre-sourcing assessments at all Level 1 factories before they are allowed to produce any products for us. We also conduct pre-sourcing assessments at certain key Level 2 factories. In addition, we conduct regular audits at all Level 1 and key Level 2 factories once production begins, work closely with factories to remediate any identified deficiencies and, when necessary, terminate supplier factories that fail to comply with our policies, procedures or guidelines. PVH is committed to building a transparent and traceable value chain, from farm to factory, supported by document verification, auditing, and testing programs.

*Contractual Terms and Certifications:* At the beginning or renewal of a relationship, suppliers and licensees are required to acknowledge *A Shared Commitment* and agree to implement its requirements. In addition, all Level 1 and key Level 2 suppliers are required to represent and warrant that they will not use any forced or child labor in the growing, harvesting, mining, extraction, processing, refining, manufacturing, production or assembly of any PVH products.

*Factory Audits:* Audits are conducted by reputable third-party auditors, typically every 12 to 24 months. Several factors, including the results of the previous audit, dictate audit frequency. Audits are usually scheduled in advance with the suppliers, in order to foster a relationship of trust and cooperation, but unannounced audits are also conducted.

Audits are guided by the Social Labor Convergence Project ("SLCP"), an industry-wide data collection tool that aims to create an efficient and sustainable solution for social audits, with a goal of alleviating audit fatigue for our suppliers. The SLCP includes specific metrics relating to forced and child labor. In addition, as part of the audit, we seek workers' views in confidence, so that we can hear first-hand about factory conditions. We also monitor factory conditions through assessments by independent organizations, such as the Better Work Programme.

Given the challenges posed by recruitment systems, migrant workers can be disproportionately vulnerable to forced and child labor. For this reason, PVH has worked with an external partner to identify high-risk jurisdictions for migrant labor. The identified jurisdictions are located primarily in East Asia, Southeast Asia, the Middle East and Africa. To further enhance our monitoring capability relating to forced and child labor risks, we utilize a supplementary assessment tool as part of the factory audit for supplier and licensee factories in high-risk jurisdictions that is focused on recruitment practices and treatment of migrant labor. In parallel with these efforts, we have deepened our engagement with suppliers on the prohibition against the payment of recruitment fees and on other migrant labor issues.

*Remediation:* PVH’s audit program encourages our business partners to assume greater responsibility for their labor practices, and general compliance around employment and worker issues, by providing the opportunity for suppliers to remediate most identified issues. We believe that remediation best serves the interests of workers by enabling the supplier to develop safe, compliant and respectful workplaces. Continuous engagement with suppliers on their progress in addressing forced and child labor risks helps us ensure the effectiveness of our program. PVH has established policies and procedures and has taken action to remediate any finding of forced labor or child labor in its supply chain. For more information on these initiatives, please see our PVH Corporate Responsibility 2022 Report. We also reward those business partners that adopt and implement our standards and policies with continued business.

*Termination:* PVH views termination of a supplier or factory relationship as a remedy of last resort. This approach is intended to prevent additional harm to the employees of the supplier or factory and their families, including as a result of the loss of income. We, therefore, first seek to remediate issues through direct engagement with the supplier or factory or in conjunction with civil society, industry organizations and/or governmental authorities. We generally will terminate a relationship with a supplier or factory only if (i) it fails to remediate issues uncovered by an audit, or (ii) we identify what we would consider an egregious violation of our policies or guidelines, and remediation is not appropriate or feasible (*e.g.*, forced and child labor).

### **Internal Accountability & Training**

To ensure the effectiveness of our efforts to eliminate forced and child labor, we hold ourselves accountable through a robust governance structure, and clearly established roles and responsibilities.

Our Executive Leadership Team, led by our CEO, has established and upholds our vision and has final accountability for the implementation of our CR programs, including management of human rights practices across our value chain. The CR Committee of the PVH Corp. Board of Directors provides support and guidance to our Executive Leadership Team and reports to the full Board of Directors with respect to our CR policies and strategies. The CR Committee, which consists of three independent directors, meets four times a year to monitor our CR performance and progress across social and human rights-focused key performance indicators (“KPIs”) that are established annually to advance the program’s commitments. Meetings include updates on current issues, program updates, and discussion and committee approvals of any strategy updates or new partnerships/initiatives. The Committee is also involved in the review of our annual CR Report.

We have established clear lines of accountability for CR throughout PVH, from the subject matter experts on the CR team through to our CEO, via our Chief Sustainability Officer. Our CR team is composed of over 50 associates located in 10 countries across Europe, Asia and the Americas, who work closely with our business units and global supply teams to further align our *Forward Fashion* commitments, as well as implement on-the-ground assessments, remediation and capability-building programs in supplier regions. Our CR team is also responsible for internal and external reporting on CR, including through our annual CR Report.

All PVH associates are required to complete compliance and ethics training, which includes the review and certification of our core policies, upon hire and annually thereafter. The Company may take disciplinary action against any associate who violates any of our policies, guidelines or otherwise fails to uphold our moral, legal or ethical standards. Additionally, selected associates involved in supply and procurement-related activities are required to attend mandatory modern slavery training. Members of our CR team and other PVH associates attend external training programs and seminars on social compliance issues, including forced and child labor.

We also maintain a 24/7 reporting hotline (available online and by telephone in 21 languages) for use by associates, third party business partners and certain other stakeholders, so that they may report potential legal, regulatory, or policy violations and other ethical concerns. Grievances can be submitted anonymously and confidentially to the extent allowed under applicable law.

Additionally, PVH has a dedicated team responsible for addressing and responding to human rights issues throughout our supply chain, including grievances raised by unions, non-governmental organizations and workers. We investigate issues as they arise. Issues are discussed weekly with PVH leadership and are shared as needed with other senior PVH leadership in order to ensure appropriate action is being taken.

### External Training

To ensure that migrant workers in our Level 1 and key Level 2 supplier facilities do not pay recruitment fees, all suppliers and licensees in high-risk jurisdictions are required to complete a set of modules and quizzes, hosted on the RLI e-learning platform, on forced labor and recruitment of foreign migrant workers. We also require that key personnel at all factories we or our suppliers use in high-risk jurisdictions complete the suite of training courses on forced labor on the RLI e-learning platform when the factories are on-boarded.

Our CR team and other PVH associates also participate as speakers in other external training programs and seminars on forced and child labor to increase awareness and encourage the adoption of best practices to address these issues.

### **Assessing the Effectiveness of our Actions**

We track a number of KPIs to measure the effectiveness of our actions in regard to forced and child labor risks, including any audit findings and grievances submitted through our grievance mechanisms. We further track both the number and nature of findings and grievances. We also track the remediation of any identified issues.

In addition, we track our suppliers' compliance with our training requirements to ensure 100% completion.

### **Approval**

On March 21, 2024, this Statement was approved by the Corporate Responsibility Committee of the PVH Corp. Board of Directors on behalf of the PVH Corp. Board of Directors.


### Canada's Fighting Against Forced Labor and Child Labor in Supply Chains Act

Solely for purposes of compliance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, this Statement has been approved by the Board of Directors of PVH Canada Inc. and signed by a director of PVH Canada Inc. on April 9, 2024.

PVH Canada Inc.'s headquarters are located in Montreal, Quebec and it currently has approximately 2,000 employees. PVH Canada Inc. engages in local sales and marketing and provides related administrative support to PVH. PVH Canada Inc. makes design decisions in relation to its products but does not engage in direct manufacturing or make manufacturing decisions. PVH Canada Inc. has one fully owned subsidiary located in Brazil, WBR Industria e Comercio de Vestuario Ltda., which owns and operates its own local and international supply chain. The Brazilian entity does not engage in any business activities in Canada, including importing goods from or into Canada. PVH administers PVH Canada Inc.'s supply chain but maintains a separate order process to/from Canada. The principal risks of forced labor and child labor in PVH Canada Inc.'s operations and supply chain, and the actions taken by PVH Canada Inc. to assess and address the risks of forced labor and child labor and to assess the effectiveness of actions being taken, are the same as those of other PVH business units, which are discussed earlier in this Statement.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Stefan Larssen  
Director & Chief Executive Officer, PVH Corp.  
April 9, 2024  
I have the authority to bind PVH Canada Inc.

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UK Modern Slavery Act

PVH UK Group Limited is required to publish a statement under the UK Modern Slavery Act. This Statement was approved on April 9, 2024, by the Board of Directors of PVH UK Group Limited.

Solely for purposes of the UK Modern Slavery Act, this Statement was signed by Georg Faisst, a director of PVH UK Group Limited, on April 9, 2024.

Georg Faisst  
Director, PVH UK Group Limited  
April 9, 2024

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Australian Commonwealth Modern Slavery Act

Sunshine A Pty Ltd., Australian Company Number 631684770 (“Sunshine A”), an indirect wholly owned subsidiary of PVH Corp., is required to submit a statement under the Australian Commonwealth Modern Slavery Act.

Sunshine A, including through its subsidiaries identified below, engages in local sales and marketing and provides related administrative support. It makes design decisions in relation to its products but does not engage in direct manufacturing nor make manufacturing decisions. Its offices are located in Sydney, Australia and it currently has approximately 2,000 employees in Australia and 160 employees in New Zealand. Sunshine A has two subsidiaries operating in Australia, PVH Brands Australia Pty Ltd. and Gazal Pty Ltd. Because of the nature of Sunshine A’s operations, it does not have its own product supply chain separate from PVH.

The principal risks of forced labor and child labor in Sunshine A’s operations and supply chain, and the actions taken by Sunshine A to assess and address the risks of forced labor and child labor and to assess the effectiveness of actions being taken, are the same as those of other PVH business units, which are discussed earlier in this Statement.

This Statement was prepared after consultation with Sunshine A, including its owned and controlled entities, by making such entities aware of its preparation and providing them with an opportunity to participate. Solely for purposes of compliance with the Australian Commonwealth Modern Slavery Act, this Statement has been approved by the Board of Sunshine A and the Corporate Responsibility Committee of the PVH Corp. Board of Directors on behalf of the PVH Corp. Board of Directors on March 21, 2024]. The undersigned is an authorized officer and director of PVH Corp.

Stefan Larssen  
Director & Chief Executive Officer, PVH Corp.  
April 9, 2024

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