Tailoring Responsibility

Annex A Corporate Responses

The research presented in "Tailoring Responsibility" identifies exposure to the Uyghur Region in European apparel supply chains based on publicly available sources and bill of lading data available by subscription.

All companies named in "Tailoring Responsibility" were emailed to provide the opportunity to contribute to the report findings. (Some emails bounced back and additional email addresses were attempted where available.)

The research team invited Chinese companies to explain their relationship to the labour transfer programs in the Uyghur Region and asked downstream corporations to indicate any relationship they have to the named suppliers and intermediary manufacturers and to describe efforts they have made to exclude Uyghur Region products from supply chains.

The research team cannot independently verify these claims, but we allowed companies an opportunity to address the exposure identified in our research. Below are the responses received to date. Please note that some exchanges are still pending responses to follow-up inquiries as of the date of publication. These responses will be updated as new information is received.

Last Updated: February 5, 2024

Please note that an updated version of the Report was published in February 2024 to amend an error in the initial publication. Specifically, in assessing Anhui Huamao's supply chain, a previous version of this report incorrectly identified the manufacturers Shahi Exports (India), Gemini Enterprises (India), SM Lulla Industries Worldwide (India), and Penguin Sportswear (Sri Lanka) as customers of Anhui Huamao. This error arose from research for the report incorrectly identifying a supplier to these companies as a Xiamen-located subsidiary of Anhui Huamao. Shahi Exports (India), Gemini Enterprises (India), SM Lulla Industries Worldwide (India), and Penguin Sportswear (Sri Lanka) should not have featured in this report, which has been revised to remove reference to these companies and their downstream customers. The authors and publisher are grateful to have been alerted to this error and apologize for the incorrect inclusion of the listed entities in the original Report. The research team follow robust protocols to ensure the accuracy of all reports, and the inclusion of these entities was an unfortunate mistake which the authors are pleased to correct. By request, correspondence with Shahi Exports (India) has been removed from this Corporate Responses Annex.

Chinese Manufacturers

SUNRISE GROUP

Intermediaries

GEMINI ENTERPRISES

SMART SHIRTS

Brands

MANGO

H&M

M&S

PUMA

S. OLIVER

SKETCHERS

HUGO BOSS

INDITEX

PRIMARK

NEXT

FAST RETAILING

S.M. LULLA INDUSTRIES WORLD WIDE

Chinese Manufacturers

SUNRISE GROUP

Attached letter – Letter to Sheffield Hallam University 28 November 2023

Dear Sirs,

Your email communication headed "Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe" and potential publication of a report by the Helena Kennedy Centre for International Justice

1. Introduction We act for Sunrise Group Ltd (formerly Zhejiang Sunrise Garment Group Co Ltd) ("Sunrise Group") and for Smart Shirts Ltd ("Smart Shirts"). Sunrise Group is the parent company of a major garment manufacturing group and is listed on the Shanghai stock exchange. Smart Shirts is its wholly owned trading subsidiary incorporated in Hong Kong, which is responsible for the manufacture and sale of garments outside of China. We are aware that you have had some email correspondence from US lawyers acting for our clients in the United States. We note that during that correspondence, it was suggested that our clients' representatives would be interested in engaging with you directly.

However, in the email from your Edie Martin to Elise Shibles of our clients' US lawyers yesterday, you stated that your protocol was to conduct all exchanges in writing. Accordingly, please note that we are now acting in relation to this matter.

Following on from the above correspondence, we are writing to you in relation to the receipt by our clients of an email from you dated 21 November 2023 timed at 11.06am from the email address Edie.Martin@shu.ac.uk ("the Email").

The Email was headed "RESPONSE REQUESTED: Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe". It appears to herald the imminent publication of a report by the University's Helena Kennedy Centre for International Justice ("the HKC"). The Email (and presumably the report) purports to name a number of companies which are alleged to be involved in supplying products which have been sourced from a region of China associated with abhorrent labour practices. It is important that you take notice of this letter and its contents. A failure to do so may not only lead to damage being done to the reputation of the University and the HKC, but may expose the University and associated individuals to potential legal action. Our clients very much hope that such a scenario may be averted, once you have had the opportunity to consider what we say below. Continuation /2 MG/27759152/5 (2)

2. The Email

Put bluntly, the Email contains false and defamatory imputations against our clients which have the potential to cause serious harm to their reputation, including serious financial harm. That harm could literally run into hundreds of millions of \$s. Unfortunately, it may

already be too late to prevent some harm from happening if similar communications to the Email have already been sent out directly to our clients' commercial customers. However, there may still be time to prevent the situation being made considerably worse by the sending of any more similar emails or through the publication of your proposed report. This is because in the Email (and we assume, in the report itself) you are falsely alleging that our clients are supplying garments (and associated products) to European markets which are tainted by reason of their having been produced using forced labour from the Xinjiang Uyghur Autonomous Region of China. The whole issue of forced labour and mistreatment of workers in that region has had a high profile in recent years and has been a significant issue within the textile industry. It has led, amongst other things, to the introduction of legislation in the United States to sanction businesses which could be involved, whether directly or indirectly in such practices. Meanwhile, many of the World's leading apparel brands have sought to ensure that their own supply chains are not associated with such practices.

In the prevailing climate, it is obviously extremely damaging for any entity in the garment supply chain to be accused of trading in goods produced by forced labour (or made from raw materials harvested by such labour). Even where unproven allegations are made, these may well lead to suppliers being delisted or suspended as any brands they supply seek to protect their own reputations. In other words, it is all too easy for misinformation to cause significant damage to businesses and livelihoods. Our clients are understandably concerned that this may be about to happen as a result of what you are doing by emailing third parties as you have done.

Under the heading referred to above, the Email begins as follows: "I write from Sheffield Hallam University's Helena Kennedy Centre for International Justice. We are researching forced labor in the production and manufacture of textile and apparel products, including cotton, man-made and synthetic fibers, and final garments, particularly those destined for the European market. In the process of this work, we have identified significant evidence that the following Chinese textile and apparel suppliers are sourcing material inputs and labor from the Xinjiang Uyghur Autonomous Region" [emphasis added]...:"

A list of suppliers is then set out. Our clients are named in the first line of that list. However, they are described in the Email as follows: "ZHEJIANG SUNRISE GARMENT GROUP CO./ SUNRISE MANUFACTURE GROUP CO., YOUNGOR GROUP, and SMART SHIRTS" (The fact that Sunrise Group is referred to by its former name and by the name "Sunrise Manufacture Group Co" and the presence of Youngor Group in the Email, leads our client to question the research that has been done. Smart Shirts merged with Sunrise Group in 2011. Youngor Group are a minority shareholder in the listed Chinese Company). Youngor Group do not have any board seats nor any control of the operations of Sunrise Group or its decision-making.

The Email continues: "We write this letter to grant you the opportunity to respond to our findings....." Continuation /3 MG/27759152/5 (3) It also states: "Please be aware that we will also be contacting international companies that we have identified through shipping and/or public records as purchasers of your textile and apparel products." It is thus the case that via the Email and through other communications like it:

- (1) you are publishing serious allegations suggesting our clients' involvement in the supply of garments and associated products to the European market which include products sourced from the Xinjiang Uyghur Region of China;
- (2) your "findings" in this regard are apparently to be published in the form of a report;
- (3) the Email, you say, is an opportunity for our client to comment on that report and those findings; and
- (4) the Email also suggests that you may already have reached out in similar terms to the Email to our clients' customers who include many of the World's most famous apparel brands.

These are all very serious matters because our clients should not have been named in the Email. 3. Our clients: no use of forced labour etc Sunrise Group

As we have said, Sunrise Group is a large garment company listed on the Shanghai stock exchange. It sells primarily to the Chinese market. So far, in 2023, a very small percentage (less than 5%) of its turnover has related to products supplied to Europe. For all shipments of product to customers outside of China, Sunrise Group has a full set of traceability documents that provide robust, transparent transaction and production records from raw materials to finished garments. None of these have shown any contamination from the Uyghur Region Thus, you will appreciate why our clients are so concerned about your claim in the Email to have "significant evidence" that it is doing so. This cannot be correct. The imputations about Sunrise's involvement are false. Smart Shirts Sunrise Group has organised itself so that it is Sunrise's subsidiary, Smart Shirts, which sources, manufactures and sells garments for export markets beyond China, including Europe. But just as Sunrise Group itself has no place being named in the Email, the same is true of Smart Shirts. The reason for this is that Smart Shirts does not source any cotton from China. In fact, from cotton sourcing through to final manufacturing, Smart Shirts has established the whole of its fully traceable and transparent vertical supply chain outside of China. This began with our client's acquisition of a 15,000 hectare cotton farm in New South Wales, Australia, from which all cotton for Smart Shirts products is now sourced (with the exception of some specialty cotton produced elsewhere - outside China - as requested by customers). Smart Shirts does not manufacture in China either. (Much of its manufacturing is now carried out in Vietnam).

(4) Smart Shirts complies fully with the U.S. Uyghur Forced Labor Prevention Act and does not engage in or knowingly source materials from any entities that use forced labour (whether from North Korea, the Xinjiang Uyghur Region or anywhere else). It has developed an advanced tracing system, which captures data from Smart Shirts' entire supply chain and provides complete transparency and documentation so as to reassure its customers and relevant government authorities. In the US, Smart Shirts has engaged actively and successfully with US Customs & Border Protection authorities. No shipments of Smart Shirts' are subject to any active US withhold release orders and no shipments of their products have ever been detained under any other US legislation such as The Countering America's Adversaries Through Sanctions Act 2017 which targets, inter alia, goods produced using North Korean convict labour.

Given the considerable efforts and investments made by Smart Shirts to create a supply chain that is completely outside of China, you will appreciate why, in the circumstances, our clients are so concerned by the Email and the suggestion of what is yet to be published in your report. On the face of it, what you have alleged is not true and cannot be substantiated. Our clients therefore question how it is that you can claim to have "significant evidence" to the contrary.

4. The way forward

Our clients assume that the leadership of both the University and the HKC desire to ensure that accurate and up to date information is used in any report that may be issued – and in any communications circulated ahead of that publication. It cannot be in any of the parties' interests – or the public interest - for misleading claims or information to be published. Our clients are concerned that notwithstanding the earlier correspondence from our clients' US lawyers (albeit before you had been sent this letter), you continued to maintain your stance in relation to Smart Shirts. You had declined our clients' offer to travel and meet with you face to face.

Notwithstanding this, our clients remain willing to engage in a constructive dialogue with the University and the HKC to address any concerns or misunderstandings that may have arisen during its research process. There is still an opportunity to avoid the publication of a report that appears to be potentially misleading and inaccurate. More seriously, we would also expect the University take appropriate measures to avoid causing serious harm to our clients through the publication, whether via email or otherwise, of what would be extremely defamatory statements. If no or insufficient notice is taken of this letter and publication were to proceed regardless, these could also amount to malicious falsehoods.

Accordingly, our clients request that you kindly do the following as a matter of urgency:

- 1. Refrain from sending out any further emails or communications (in any form) to third parties, including to customers of our clients, in which it is suggested or claimed that our clients (or either of them) are involved in supplying goods to European markets which are the product in whole or part of forced labour and/ or are or which utilise products from the Xinjiang Uyghur Region of China;
- 2. Provide to us in writing as a matter of urgency, details of the "substantial evidence" that the University and the HKC claims to have to the contrary and to confirm what "findings" it has made in respect of our clients based on that "evidence";
- 3. Give our clients the reasonable opportunity to consider and comment on the information provided under paragraph 2 above;
- 4. Confirm that pending the conclusion of such exchanges, there will be no release in public or publication to third parties of the report referred to in the Email. Continuation /5 MG/27759152/5
- (5) Whilst all our clients' rights remain fully reserved, as we have indicated above, our clients would greatly prefer to address these issues in a non-adversarial and constructive way. They

would like to believe that the situation described above has arisen due to misunderstanding or misinterpretation of data and not due to any other motives. They hope that the negative response given to their US lawyers will not be repeated.

However, if this letter does not meet with a satisfactory response or is ignored and should any false or defamatory statements about our clients be published, our clients will have no option but to invoke their legal remedies should that be necessary.

We look forward to hearing from you as a matter of urgency and in any event by noon UK time on Thursday 30 November 2023.

Yours faithfully

Intermediaries

GEMINI ENTERPRISES

Note: A previous version of this Report incorrectly identified Gemini Enterprises as a customer of Anhui Huamao. The Report has been corrected to remove Gemini Enterprises. The correction statement may be read here

November 25, 2023

Dear Forced Labour Lab Team,

Thank you for reaching out to us regarding the research conducted by the Forced Labour Lab at Sheffield Hallam University's Helena Kennedy Centre for International Justice. We have carefully reviewed your letter dated 21st November 2023 and appreciate the opportunity to respond to the concerns raised.

After a thorough examination of our records, we can confirm that our company has not procured material from the Chinese textile and apparel suppliers mentioned in your report—ZHEJIANG SUNRISE GARMENT GROUP CO./SUNRISE MANUFACTURE GROUP CO., YOUNGOR GROUP, SMART SHIRTS, BEIJING GUANGHUA TEXTILE GROUP, BEIJING FASHION HOLDINGS, ANHUI HUAMAO GROUP CO., LTD., XINJIANG ZHONGTAI GROUP, and XINJIANG LIHUA GROUP and their subsidiaries, since January 2021 till date.

We would like to emphasize that our company is committed to ethical business practices and is fully aware of the forced labor allegations in the Xinjiang Uyghur Autonomous Region. To address these concerns, we have implemented stringent supplier due diligence procedures for all our suppliers, since 2021

Please feel free to reach out if you require any additional information or clarification.

Sincerely, **Suresh Babu Manager - HR**

SMART SHIRTS

November 27, 2023

Dear SHU Forced Labour Lab

Our client, Smart Shirts, would like to request a meeting with representatives of the SHU HKC Forced Labour Lab at your UK offices or other convenient location. Smart Shirts would like to share with you accurate information about their supply chain for the US and EU, as well as their system to fully trace the materials and processing for each shipment to the US and EU.

Smart Shirts has received your inquiry regarding an upcoming report on tracing textile products destined for the EU market and is extremely concerned about inaccuracies suggested in your inquiry. While the company intends to formally respond to your inquiry in writing, they believe a meeting before the publication of the report would be the most productive way to provide accuracy and transparency concerning their supply chain and ensure that this fully informs your findings and conclusions.

They will travel to you and will make themselves immediately available. Please advise as to your earliest availability.

Thank you Elise Shibles

Attached letter – Letter to Sheffield Hallam University 28 November 2023

Dear Sirs

Your email communication headed "Tailoring Responsibility: Tracing Apparel Supply Chains from the Uyghur Region to Europe" and potential publication of a report by the Helena Kennedy Centre for International Justice

1. Introduction We act for Sunrise Group Ltd (formerly Zhejiang Sunrise Garment Group Co Ltd) ("Sunrise Group") and for Smart Shirts Ltd ("Smart Shirts"). Sunrise Group is the parent company of a major garment manufacturing group and is listed on the Shanghai stock exchange. Smart Shirts is its wholly owned trading subsidiary incorporated in Hong Kong, which is responsible for the manufacture and sale of garments outside of China. We are aware that you have had some email correspondence from US lawyers acting for our clients in the United States. We note that during that correspondence, it was suggested that our clients' representatives would be interested in engaging with you directly.

However, in the email from your Edie Martin to Elise Shibles of our clients' US lawyers yesterday, you stated that your protocol was to conduct all exchanges in writing. Accordingly, please note that we are now acting in relation to this matter.

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2. The Email

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In the prevailing climate, it is obviously extremely damaging for any entity in the garment supply chain to be accused of trading in goods produced by forced labour (or made from raw materials harvested by such labour). Even where unproven allegations are made, these may well lead to suppliers being delisted or suspended as any brands they supply seek to protect their own reputations. In other words, it is all too easy for misinformation to cause significant damage to businesses and livelihoods. Our clients are understandably concerned that this may be about to happen as a result of what you are doing by emailing third parties as you have done.

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cotton, man-made and synthetic fibers, and final garments, particularly those destined for the European market. In the process of this work, we have identified significant evidence that the following Chinese textile and apparel suppliers are sourcing material inputs and labor from the Xinjiang Uyghur Autonomous Region" [emphasis added]...:"

A list of suppliers is then set out. Our clients are named in the first line of that list. However, they are described in the Email as follows: "ZHEJIANG SUNRISE GARMENT GROUP CO./ SUNRISE MANUFACTURE GROUP CO., YOUNGOR GROUP, and SMART SHIRTS" (The fact that Sunrise Group is referred to by its former name and by the name "Sunrise Manufacture Group Co" and the presence of Youngor Group in the Email, leads our client to question the research that has been done. Smart Shirts merged with Sunrise Group in 2011. Youngor Group are a minority shareholder in the listed Chinese Company). Youngor Group do not have any board seats nor any control of the operations of Sunrise Group or its decision-making.

The Email continues: "We write this letter to grant you the opportunity to respond to our findings....." Continuation /3 MG/27759152/5 (3) It also states: "Please be aware that we will also be contacting international companies that we have identified through shipping and/or public records as purchasers of your textile and apparel products." It is thus the case that via the Email and through other communications like it:

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- (3) the Email, you say, is an opportunity for our client to comment on that report and those findings; and
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These are all very serious matters because our clients should not have been named in the Email. 3. Our clients: no use of forced labour etc Sunrise Group

As we have said, Sunrise Group is a large garment company listed on the Shanghai stock exchange. It sells primarily to the Chinese market. So far, in 2023, a very small percentage (less than 5%) of its turnover has related to products supplied to Europe. For all shipments of product to customers outside of China, Sunrise Group has a full set of traceability documents that provide robust, transparent transaction and production records from raw materials to finished garments. None of these have shown any contamination from the Uyghur Region Thus, you will appreciate why our clients are so concerned about your claim in the Email to have "significant evidence" that it is doing so. This cannot be correct. The imputations about Sunrise's involvement are false. Smart Shirts Sunrise Group has organised itself so that it is Sunrise's subsidiary, Smart Shirts, which sources, manufactures and sells garments for export markets beyond China, including Europe. But just as Sunrise Group

itself has no place being named in the Email, the same is true of Smart Shirts. The reason for this is that Smart Shirts does not source any cotton from China. In fact, from cotton sourcing through to final manufacturing, Smart Shirts has established the whole of its fully traceable and transparent vertical supply chain outside of China. This began with our client's acquisition of a 15,000 hectare cotton farm in New South Wales, Australia, from which all cotton for Smart Shirts products is now sourced (with the exception of some specialty cotton produced elsewhere - outside China - as requested by customers). Smart Shirts does not manufacture in China either. (Much of its manufacturing is now carried out in Vietnam).

(4) Smart Shirts complies fully with the U.S. Uyghur Forced Labor Prevention Act and does not engage in or knowingly source materials from any entities that use forced labour (whether from North Korea, the Xinjiang Uyghur Region or anywhere else). It has developed an advanced tracing system, which captures data from Smart Shirts' entire supply chain and provides complete transparency and documentation so as to reassure its customers and relevant government authorities. In the US, Smart Shirts has engaged actively and successfully with US Customs & Border Protection authorities. No shipments of Smart Shirts' are subject to any active US withhold release orders and no shipments of their products have ever been detained under any other US legislation such as The Countering America's Adversaries Through Sanctions Act 2017 which targets, inter alia, goods produced using North Korean convict labour.

Given the considerable efforts and investments made by Smart Shirts to create a supply chain that is completely outside of China, you will appreciate why, in the circumstances, our clients are so concerned by the Email and the suggestion of what is yet to be published in your report. On the face of it, what you have alleged is not true and cannot be substantiated. Our clients therefore question how it is that you can claim to have "significant evidence" to the contrary.

4. The way forward

Our clients assume that the leadership of both the University and the HKC desire to ensure that accurate and up to date information is used in any report that may be issued – and in any communications circulated ahead of that publication. It cannot be in any of the parties' interests – or the public interest - for misleading claims or information to be published. Our clients are concerned that notwithstanding the earlier correspondence from our clients' US lawyers (albeit before you had been sent this letter), you continued to maintain your stance in relation to Smart Shirts. You had declined our clients' offer to travel and meet with you face to face.

Notwithstanding this, our clients remain willing to engage in a constructive dialogue with the University and the HKC to address any concerns or misunderstandings that may have arisen during its research process. There is still an opportunity to avoid the publication of a report that appears to be potentially misleading and inaccurate. More seriously, we would also expect the University take appropriate measures to avoid causing serious harm to our clients through the publication, whether via email or otherwise, of what would be extremely defamatory statements. If no or insufficient notice is taken of this letter and publication were to proceed regardless, these could also amount to malicious falsehoods.

Accordingly, our clients request that you kindly do the following as a matter of urgency:

- 1. Refrain from sending out any further emails or communications (in any form) to third parties, including to customers of our clients, in which it is suggested or claimed that our clients (or either of them) are involved in supplying goods to European markets which are the product in whole or part of forced labour and/ or are or which utilise products from the Xinjiang Uyghur Region of China;
- 2. Provide to us in writing as a matter of urgency, details of the "substantial evidence" that the University and the HKC claims to have to the contrary and to confirm what "findings" it has made in respect of our clients based on that "evidence";
- 3. Give our clients the reasonable opportunity to consider and comment on the information provided under paragraph 2 above;
- 4. Confirm that pending the conclusion of such exchanges, there will be no release in public or publication to third parties of the report referred to in the Email. Continuation /5 MG/27759152/5
- (5) Whilst all our clients' rights remain fully reserved, as we have indicated above, our clients would greatly prefer to address these issues in a non-adversarial and constructive way. They would like to believe that the situation described above has arisen due to misunderstanding or misinterpretation of data and not due to any other motives. They hope that the negative response given to their US lawyers will not be repeated.

However, if this letter does not meet with a satisfactory response or is ignored and should any false or defamatory statements about our clients be published, our clients will have no option but to invoke their legal remedies should that be necessary.

We look forward to hearing from you as a matter of urgency and in any event by noon UK time on Thursday 30 November 2023.

Yours faithfully

Brands

MANGO

November 28, 2023

Dear colleagues of Forced Labour Lab - Helena Kennedy Centre for International Justice,

We would like to inform you that Mango is not a customer of any of these companies or their subsidiaries. Conscious of the situation in Xinjiang Region, we carefully consider the Chinese facilities we are sourcing from, just as we also trace our garments from yarn/fabric production and processing to the final product.

Thank you for cooperating with us.

Best regards,
Helena Aranda
Social Impact | Sustainability

H&M

Note: A previous version of this Report incorrectly identified H&M as a downstream customer of Anhui Huamao. The Report has been corrected to remove H&M from the Anhui Huamao supply chain tracing section. The correction statement may be read here.

November 28, 2023

Thank you for contacting us on this important matter.

Some of the intermediaries that you have shared in your list below consist of several facilities or production units. Would you be able to share the exact names (and possibly addresses) of these facilities with me? This would help to understand possible connections.

Thank you very much and best regards,

Yola Kiwok

December 4, 2023

Thank you very much for reaching out to us. Transparency about our supply chain is very important to us and we have come far in that work - please find our public supplier list here: https://hmgroup.com/sustainability/leading-the-change/transparency/supply-chain/. In addition, you will find information about our standards and policies at hmgroup.com and in our Annual and Sustainability Report.

Kind regards Yola Kiwok

Yola Kiwok (she/her) Global Sustainability Department

M&S

Note: A previous version of this Report incorrectly identified M&S as a downstream customer of Anhui Huamao. The Report has been corrected to remove M&S from the Anhui Huamao supply chain tracing section. The correction statement may be read here.

December 1, 2023

Hope you're well – will come back to you on the below before COP Monday.

Can I just confirm is this for a report, with press release as well? And will the report be hosted on your website?

Thanks, Olivia

December 5, 2023

Hope you're well. Please find our response below – if using, please attribute to M&S Spokesperson:

We do not source from any of the Chinese suppliers listed in this report and do not have any factories in the Xinjiang region in our supply chain. We do have relationships with three of the intermediary manufacturers outside of China and will review the full findings of the report when they are available. Ethical trading is core to how we do business which is why in 2020 we introduced a ban on Xinjiang cotton and in 2021, were one of the first companies to sign up to the Coalition Call to Action on human rights abuses. We take this commitment extremely seriously and have rigorous controls in place, including a partnership with Oritain $^{\text{TM}}$ to verify fibre origins, to ensure our policy is upheld.

Would you please be able to share a publication date for the report?

Thanks very much,

M&S

PUMA

December 4, 2023

We refer to your emails of 21st and 23rd November, which we have reviewed carefully.

PUMA does not have any business relationship with any suppliers in Xinjiang, and we do not use any cotton from Xinjiang. We are not sourcing from the 4 identified Chinese Textile and Apparel companies as per Sheffield Hallam University's email.

It has been the long-standing practice of PUMA to rigorously monitor our supply chain and conduct human rights due diligence on all of our suppliers globally, including those in major production hubs such as Vietnam, Bangladesh and China.

All our suppliers are contractually held to the standards and principles in our Code of Conduct and Sustainability Handbooks (cf.

https://about.puma.com/en/sustainability/codes-policies-and-handbooks). In turn, they must also hold their subcontractors and their suppliers to the same standards and principles.

Pursuant to our Code of Conduct and Handbooks, we have implemented systems and processes that ensure traceability and controls across our supply chain, including a supplier audit program accredited by the Fair Labor Association and applied to all PUMA suppliers, both prospective and existing. Fair Labor Accreditation is a rigorous, multi-year process that evaluates companies' systems to protect workers throughout global supply chains. If critical deviations from PUMA's or international social and environmental standards are found as part of these audits, the supplier in question is required to remedy them immediately or else face termination.

Over the years, our compliance program has been expanded to cover our supply chain beyond our direct suppliers. It now includes key suppliers of materials and product components.

We have also established an on-going due diligence program in partnership with an independent laboratory in Germany, where we currently test samples of finished garments before shipment on a regular basis. We collect material data consumption on an annual basis along with the country of origin, and require our suppliers to keep all the supportive documentation at disposal. This move has further strengthened traceability and control across our supply chain, from the raw material to the finished products.

In the interest of transparency, the number of audits and factory grading performed is published annually in our sustainability report.

Our <u>Annual Report</u> also includes a detailed sustainability section (cf. <u>https://annual-report.puma.com/2022/en/index.htmlor 2022</u>).

We offer a follow up call in the coming days at your convenience, preferably morning time CET.

Veronique Rochet Senior Head of Sustainability

S. OLIVER

December 4, 2023

Request: Sheffield Hallam University

Topic: Xinjiang Cotton Date:

2023/12/04

Safeguarding human rights within the supply chain is a central element of the integrated sustainability program and deeply embedded into the DNA of the S.OLIVER GROUP.

We as a company take this responsibility seriously by integrating strict social standards into purchasing contracts, regularly auditing suppliers, and actively engaging with industry stakeholders such as Fair Wear Foundation to create safe and responsible working conditions. With many of our suppliers we have been working together closely for many years, maintaining relationships from our sourcing offices in the respective sourcing countries to further raise standards in close cooperation.

Following the report from Sheffield Hallam University in 2021, the S.OLIVER GROUP increased its due diligence measures in the following areas:

- **Policies & Standards:** Relevant for all suppliers of the S.OLIVER GROUP we communicated a ban on the use of cotton from the Xinjiang region for our entire supply chain. Furthermore, we revised all supplier contracts in 2022, with sustainability requirements being strengthened, and a Forced Labour Policy that was put into place.
- Strategic Material Sourcing: Since 2010, we are increasingly sourcing cotton from certified and verified sources such as the "Cotton made in Africa" model, via the Organic Cotton Standard (OCS) or through the Better Cotton Initiative (BCI). In 2022, more than 90% of our cotton came from one of those sources. We are working towards reaching our goal of 100%. Also, for materials such as man-made and synthetic fibres we continuously integrate increasing percentages from certified or verified sources, such as the Global Recycling Standard (GRS) or Lenzing.
- **Supply Chain Transparency**: We are further increasing our supply chain transparency and data management through our collaboration with the company Retraced and have built up the first farmto-product supply chains with our "Empowering Farmers" project to further increase traceability.
- **Specific risk cases:** We further introduced sample isotope tests for finished goods and finished fabric, to verify the cotton origin of our products, in case of critical indication.

With regard to the named companies in your email, we do have a direct relationship to a subsidiary of Beijing Guanghua Textile Group, namely "Bejing Guanghua Times Textile & Clothing Co. Ltd.", with whom we, as we do with all our business partners, have a clear understanding about our ban on forced labour. To our knowledge, none of their production processes or used materials have a connection to Xinjiang. We apply above mentioned measures to substantiate this claim. No manufacturer producing goods for the S.OLIVER GROUP is situated in Xinjiang.

Nevertheless, we do take any external information that is brought to our attention seriously and integrate these in our internal risk evaluation to corroborate the existing risk status of

our respective suppliers and manufacturers. In light of the complexity of global supply chains in the textile industry, a degree of residual risk cannot be excluded, but we do everything we can to eliminate it.

SKETCHERS

December 4, 2023

Human rights is a core value at the heart of how Skechers U.S.A., Inc. ("Skechers") conducts its business, at every level of the company. Skechers has robust policies and procedures to ensure that its products and their supply chains meet high ethical standards. For example, we have a detailed Supplier Code of Conduct (available online), which all suppliers must meet in order to collaborate with Skechers. Skechers also employs a dedicated Social Compliance team, which monitors and audits suppliers' adherence to Skechers' standards. Skechers has zero tolerance for forced labor anywhere in its supply chain.

In response to your specific question, we note that neither Skechers nor its apparel suppliers are customers of the following companies or their subsidiaries: Zhejiang Sunrise Garment Group Co./Sunrise Manufacture Group Co., Youngor Group, and Smart Shirts; Beijing Guanghua Textile Group and Beijing Fashion Holdings; Anhui Huamao Group Co., Ltd.; and Xinjiang Zhongtai Group & Xinjiang Lihua Group. Accordingly, you are incorrect to allege that Skechers is "at risk of importing textile and/or apparel goods made wholly or in part in Xinjiang" – an allegation for which you provided no evidence. We urge you to ensure that any reports and other statements issued by the Helena Kennedy Centre for International Justice appropriately reflect these facts.

Sincerely,

Jennifer Clay

HUGO BOSS

Note: A previous version of this Report incorrectly identified Hugo Boss (DE) as a downstream customer of Anhui Huamao. The Report has been corrected to remove Hugo Boss (DE) from the Anhui Huamao supply chain tracing section. The correction statement may be read here.

December 4, 2023

Thank you for your email. HUGO BOSS is fully committed to fair working conditions. The respect of human rights and applicable labor standards are an integral part of our human rights due diligence standards at HUGO BOSS – as also stated in the <u>Supplier Code of</u>

<u>Conduct and our Human Rights Statement</u>. In general and especially in our supply chains, we do not tolerate forced or compulsory labor or any form of modern slavery.

HUGO BOSS does not source any goods in its direct supply relationship that originate from the Xinjiang province (China).

We would like to comment on the companies mentioned to the best of our knowledge.

HUGO BOSS is **not a direct customer** of the named companies or their subsidiaries:

- 1. Beijing Guanghua Textile Group
- 2. Beijing Fashion Holdings
- 3. Anhui Huamao Group Co., Ltd.
- 4. Xinjiang Zhongtai Group & Xinjiang Lihua Group
- 5. Smart Shirts (Sri Lanka)
- 6. Shahi Exports (India)
- 7. Gain Lucky (Vietnam)

When it comes to the Zhejiang Sunrise Garment Group Co. / Sunrise Manufacture Group Co., Youngor Group, and Smart Shirts, we only have a connection with Smart Shirts Vietnam. A subsidiary of Smart Shirts located in Vietnam and not in China. However, we have already started moving away the production from Smart Shirts Vietnam this year (deliveries will continue into 2024 for contractual reasons). When it comes to May YSS, there has never been a direct supplier relationship with HUGO BOSS – but we have checked, and they are currently still part of our indirect supply chain. As a part of a general revision of our supplier network, we are currently moving away from them within our second tier, but some deliveries continue into 2024 as in the before mentioned case.

As can be seen from the business relationships described, HUGO BOSS has undertaken a global process to review and realign its direct and indirect suppliers. In this context, the company has decided against the suppliers mentioned and has already initiated the withdrawal.

Furthermore, we would like to inform you that we are publishing our suppliers on our <u>website</u>. HUGO BOSS attaches great importance to disclosing its own supply chain in order to ensure a high level of transparency towards our customers, partners and third parties.

Besides we, are complying with all global import regulations as part of our business, be it for the US or Canada or elsewhere.

Best regards, Dominik Heske

December 4, 2023

As I just discovered, part of our answer to the following suppliers is still missing.

- **Gemini Enterprises (India):** HUGO BOSS was ordering from Gemini until November 2023. The products are **not** directly delivered to US/Canada.
- **SM Lulla Industries Worldwide**: HUGO BOSS was ordering from SM Lulla until November 2023. The products are **not** directly delivered to US/Canada.
- Penguins Sportswear: We are currently trying to make an exact assignment.

Please excuse the confusion.

Best regards, Dominik Heske

INDITEX

December 4, 2023

Thank you for your email.

Inditex Group is fully committed to respecting, promoting and protecting Human Rights across its entire value chain and rigorously adheres to all stipulations and mandates delineated by the existing forced labor regulations.

According to our due diligence system, it should be noted that to be part of our supply chain, all suppliers must accept first all the IMRs (Inditex Minimum Requirements) that apply to them. The IMRs are made up of a series of documents (such as the Code of Conduct for Manufacturers and Suppliers¹, the Policy on Human Rights² or the Traceability requirements for Suppliers and Manufacturers) where the social, environmental and product health and safety standards with which our suppliers and manufacturers must comply, are set out.

Inditex regularly conducts detailed due diligence and monitoring of its suppliers to ensure compliance with our IMRs and it is fully committed to the traceability of the raw materials used in garments production.

With regard to the latter, the Group applies its traceability procedures to follow up on the fulfillment of the standards mentioned above and all the compliance requirements in all the markets where it operates with all the products that the company sells.

Suppliers failing to comply with our established strict standards are consequently excluded from our supply chain.

As part of its Sustainability strategy, Inditex is committed to ensuring a responsible supply chain in social and environmental terms. Traceability allows to know the origin of raw materials, production processes, facilities and intermediaries related to its products. All suppliers and manufacturers of the I n d i e Group must comply with our traceability requirements. Suppliers are responsible for enforcing such requirements across its entire supply chain.

These requirements are:

- Select a supply chain made up of ethical and responsible companies.
- Provide accurate, true and appropriate information about the supply chain used for each order: suppliers shall disclose to inditex within the term set, all the factories and intermediaries involved in each of the production processes, from raw materials to final garment.

¹ https://www.inditex.com/itxcomweb/api/media/8d88d29-0571-43d5-a6c3-abc34671e4c1/inditex_code_of_conduct_for_manufacturers_and_suppliers.pdf7t=1655306501225

² https://www.inditex.com/itxcomweb/api/media/7e50ddce-a4de-4d51-9ab0-f7c248d23656/inditex_policy_on_human_rights.pdfPt=1655306506255

• As regards more sustainable materials, they must have the documentation confirming their origin from a more sustainable source and any facilities certifications, if appropriate. Inditex should be provided with this information within the terms set.

To assess compliance with our traceability requirements, we carry out three types of controls: traceability audits, allocation controls and certificate controls. Breaches detected during the corresponding controls are classified according to their severity.

Recognizing the complexity of our supply chain, we are actively working to introduce advanced methods, including forensic isotope analysis and the use of physical tracers. These techniques aim to enhance our understanding of the origin of our raw materials. In addressing this industry wide challenge, we are committed to ongoing development and collaboration with various stakeholders to explore innovative solutions.

Knowledge of our supply chain is fundamental to our sustainability strategy. We are committed to continuously deepening this understanding. Upon identifying any incidents, we take decisive action to address them. We believe in this proactive approach, and reports like yours are helpful in guiding our efforts.

With regards to the results of your research, although we have had purchase operations with some of the four companies mentioned in your email, we confirm that we are not currently engaged in any relationship with them, nor do we plan entering into dealings with them in the future.

As for the eight intermediary manufacturers mentioned in your second communication, we can confirm that we have a commercial relationship with a few of them. Through our internal control system previously described, we ensure that our products fully comply with all applicable regulations.

We take this opportunity to share more information about the key aspects of Inditex's commitment with respect to human rights (Inditex's 2022 Human Rights report)and a description of Inditex's responsible management of its entire supply chain included in our last Annual report.

We remain at your disposal for any additional questions,

Best regards, Raúl Estradera Vázquez Chief Communication Officer INDITEX

PRIMARK

December 4, 2023

PRIMARK STATEMENT

Adhering to the terms of our Supplier Code of Conduct is a mandatory condition of working with Primark. In 2019, we found we could no longer conduct effective human rights due diligence in the Xinjiang Uyghur Autonomous Region of China (XUAR), a critical tenet of our Code. Subsequently, in September 2020, we prohibited all Primark suppliers with factories

who make products on behalf of Primark from using or sourcing products, materials, components, or labour originating in any way from the region.

We remain committed to this position and its enforcement. This includes obtaining our suppliers' written acknowledgement of compliance with our mandate, specifically naming several organisations from which they cannot source. This list is reviewed and recirculated to suppliers regularly. As an immediate next step, we will update it with the organisations outlined in your letter as part of our intent to continually update this list and share with suppliers.

This is part of our wider objective to convey the heightened importance of supply chain transparency and traceability with our suppliers, including:

- For the past six years, we've published our Global Sourcing Map, which covers tier 1 factories that make our products, in addition to the number and gender of workers at each site shown.
- Over the last two years, we've been building a partnership with a market-leading
 platform for supply chain traceability, TrusTrace. Its traceability software and online
 platform allows us to gather data from the supply chain of a product, from raw
 materials through to finished product. We started with the supply chains of products
 containing cotton, as it is our most used fibre, with a pilot involving suppliers that
 account for around a third of our cotton used. We have since expanded the
 programme to include more suppliers, fibres and products.
- Since last year, any new factories onboarded are required to provide a supply chain map as a matter of course, and we carry out our own analysis to check for risk of exposure to the XUAR.
- We have recruited a dedicated Transparency and Traceability team within our Sourcing team to lead this programme. This team is based centrally in our Head Office and in our sourcing markets.
- 44% of the cotton we use comes from the Primark Sustainable Cotton Programme.
 Now 10 years old, this programme sources cotton from smallholders and small-scale farmers in India, Pakistan and Bangladesh. Forensic specialists Oritain provide us with additional verification of the origin of this cotton which further reduces our exposure to the XUAR.
- We continue to train suppliers on a regular basis around our traceability expectations. Last year, we ran training for all tier 1 suppliers on how legislation and supply chain due diligence are driving traceability requirements, and the challenges we'll need to work through together to ensure compliance. This year, we also ran face-to-face training with 48 suppliers in China highlighting the importance of traceability, why it matters and what is required from a Primark-supplier perspective.
- Primark has a large Ethical Trade team in China who have received specific training on how to monitor for the presence of XUAR labour. We've doubled the number of inspections this team conducts in Primark-approved factories throughout China as an additional due diligence mechanism in response to these risks.

Upon receipt of your letter, we immediately began to investigate for the presence of the four facilities you have named. We can confirm the use of Anhui Huamao Group Co Ltd. in two suppliers' supply chains. We have spoken at length with the suppliers linked to this facility and, so far, we have not been able to find any direct link to the XUAR and so would welcome information from your research to help us conclude our investigation. In the meantime, out of caution, our supplier has agreed with us to immediately stop using the facility in question while our investigation is ongoing.

As a business, we comply with all relevant regulations as required in the markets in which we retail and from which we source. This includes compliance with any requirements under the US Uyghur Forced Labor Prevention Act (UFLPA).

More broadly, we continue to engage with stakeholders such as Anti-Slavery International (ASI), with whom we have a close and productive relationship. We have had discussions with members of Coalition to End Forced Labour in the XUAR where Uyghur representatives have been involved. Through ASI, we also engage around forced labour issues in other regions such as Uzbekistan and Turkmenistan. Cotton from these two countries remains prohibited from Primark supply chains.

NEXT

December 5, 2023

Dear Forced Labour Lab,

Thank you for your emails of 21 and 23 November on behalf of the Forced Labour Lab at the Helena Kennedy Centre for International Justice at Sheffield Hallam University.

We take allegations of forced labour in our supply chain extremely seriously and are taking steps to investigate the information in your email. As you will be aware, there are significant challenges in investigating issues of this nature. We are engaging with relevant internal and external stakeholders including the Ethical Trading Initiative and British Retail Consortium to explore proportionate and appropriate next steps.

Next has its own directly employed Code of Practice team based in our top ten sourcing countries (including China) and therefore has to consider the safeguarding of our employees in any communications or actions we may take. Given these sensitivities, there is some information that we would not share publicly at this stage.

Gaining traceability of our full supply chain is a key area of focus and more information can be found in our Corporate Responsibility Report https://www.nextplc.co.uk/~/media/Files/N/Next-PLC-V2/documents/cr-reports/next-cr-report-2023.pdf.

If there is further information that you are able to share to support our investigation, specifically in relation to the Next supply chain, please do let us know.

Thanks

Investor Relations

FAST RETAILING

December 12, 2023

Thank you for contacting us about your report.

As you may know Fast Retailing has no partner factories in the Xinjiang region, none of our items are manufactured there, and none of our production partners subcontract to fabric mills or spinning mills in the region. Although we do not manufacture in the region, we recognize that enhanced traceability is an important means of protecting workers throughout global supply chains.

For your reference, allow us to share some recent updates on our sustainability efforts: www.fastretailing.com/eng/sustainability/news/2311071510.html

Best Regards, Fast Retailing Sustainability team

S.M. LULLA INDUSTRIES WORLD WIDE

Note: A previous version of this Report incorrectly identified SM Lulla Industries Worldwide (India) as a customer of Anhui Huamao. The Report has been corrected to remove SM Lulla Industries Worldwide (India). <u>The correction statement may be read here.</u>

December 21, 2023

Hello!

Sorry for my late reply the below mail had gone to spam. We just managed to open it.

We do due diligence of all our suppliers

We would like to inform you that we do not deal with any of the below mentioned suppliers.

Thanks & Regards

P.Bala Murugan S.M.LULLA INDUSTRIES WORLD WIDE