

# UK Modern Slavery Act: Slavery and Human Trafficking Statement

Updated: July 2019

## Structure:

- I. [Abercrombie's Structure, Business, and Supply Chain](#)
- II. [Abercrombie's Policies in Relation to Slavery and Human Trafficking](#)
  - [Policies](#)
  - [Ensure Appropriate Policies Exist and Human Rights Policies are Updated](#)
  - [Suspicious Behavior and Reporting](#)
- III. [Due Dilligence Processes in Relation to Slavery and Human Trafficking in Abercrombie's Business and Supply Chains](#)
  - [High Risk Areas](#)
  - [How We Minimize Risk Using Internal and External Resources](#)
- IV. [Risk Assessment](#) - The Parts of Abercrombie's Business / Supply Chain Where There is a Risk of Slavery and / or Human Trafficking and the Steps We Take to Address Those Risks
  - [Country Risks](#)
  - [Sector Risks](#)
  - [Transaction Risks](#)
  - [Business Partnership Risks](#)
- V. [Measurement of Effectiveness Against Our Key Performance Indicators](#)
- VI. [Abercrombie's Training About Slavery and Human Trafficking](#)

## Abercrombie's Structure, Business, and Supply Chain

Abercrombie & Fitch ("Abercrombie" or the "Company") is an international retailer specializing in men's and women's apparel, personal care, and accessories. In the UK, Abercrombie stores (which includes the Hollister brand), are operated by AFH Stores UK Limited, a subsidiary of Abercrombie & Fitch Europe SAGL and Abercrombie & Fitch International, Inc., respectively.

Abercrombie designs merchandise and relies on third-party manufacturers to assemble goods commensurate with the Company's quality standards. Our third-party manufacturers are located world-wide.

## Abercrombie's Policies in Relation to Slavery and Human Trafficking

### Policies

Any form of forced servitude is contrary to Company values. Abercrombie will not tolerate forced labor, slavery, or human trafficking. This is reflected in policies including our

*Commitment to Social Sustainability, Code of Business Conduct and Ethics, and Vendor Code of Conduct.* These policies reflect our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to reduce the risk of any slavery and human trafficking taking place any where in our business or supply chains.

As stated in our *Commitment to Social Sustainability*, "Abercrombie & Fitch is proud of our commitment to international human and labor rights, and to ensuring that our products are only made in safe and responsible facilities. We partner with suppliers who respect local laws and share our dedication to utilizing the best practices in human rights, labor rights and workplace safety. Abercrombie & Fitch believes that business should only be conducted with honesty and respect for the dignity and rights of all people."

Further, our *Code of Business Conduct and Ethics* binds all employees to the following: "We also believe in respecting and protecting human rights wherever we operate. Ensuring that our products are only made in safe and responsible facilities is important to us. We only partner with third parties who respect local laws and share our dedication to upholding human and labor rights, as well as workplace safety...We never allow the use of child or forced labor in any of our operations or facilities or by our vendors or their subcontractors. We never participate in or condone human trafficking or slavery of any kind. We will never permit exploitation of children; physical, verbal, or emotional abuse; or involuntary servitude."

Finally, our *Vendor Code of Conduct* specifically communicates to our vendors: "Abercrombie will not tolerate the use of convict, indentured, slave, bonded, or other forced involuntary labor, including human trafficking, either directly or indirectly, by its vendors, or by any subcontractors utilized by its vendors." Each vendor that receives Abercrombie business must acknowledge this.

#### **Ensure Appropriate Policies Exist and Human Rights Policies are Updated**

Our policies are reviewed and updated regularly to confirm content remains relevant and consistent with the Company's strong commitment to human rights and ethical labor practices in particular. Our Vendor Code of Conduct was last updated in 2015. Our Commitment to Social Sustainability was last updated in 2013. The Code of Business Conduct and Ethics was last updated in December of 2015.

#### **Suspicious Behaviors and Reporting**

As part of our initiative to identify and mitigate risk, employees who witness suspicious behavior within the business, or in our supply chains, are trained to reach out to their manager, Human Resources representative, or the Company's Chief Ethics and Compliance Officer or Legal department. Employees are also encouraged to raise issues and concerns about suspected violations of the company's Code of Business Conduct and Ethics through the use of the Company's ethics hotline. This is a confidential hotline that allows associates to report their concerns anonymously, either by phone or online. The hotline is available to all associates in our stores and corporate offices world-wide.

Our partner vendors are required to follow our *Vendor Code of Conduct*, which requires conformity with local laws and carries certain additional standards. Specifically prohibited actions include:

- Holding Documents (e.g., Passport, work permit, etc.)
- Forced overtime without pay or penalty
- Physical abuse of employees
- Verbal abuse of employees
- Unauthorized deductions from pay
- Not paying required benefits
- Hourly rates (regular or overtime) below legal limit

Vendors are also encouraged to contact members of the Sustainability team at Abercrombie with any questions. The Abercrombie Sustainability team has employees in the US and Hong Kong who have responsibility for assisting on such inquiries.

Finally, Abercrombie uses third-party auditors to inspect factories (see section on [How We Minimize Risk Using Internal and External Resources](#), below). Auditors are trained to recognize "hard" and "soft" indicators of forced labor or servitude. This includes not only checking worker identification to verify age, but also identifying the suspicious behaviors described above.

## **Due Dilligence Processes in Relation to Slavery and Human Trafficking in Abercrombie's Business and Supply Chains**

### **High Risk Areas**

Those areas we have identified as highest risk for human trafficking or forced labor are the factories in our international supply chain. Often, we source materials or production in countries which seek economic development through foreign trade or investment in manufacturing (for example China, Vietnam, India, Cambodia, Bangladesh, and Guatemala). We take proactive steps to ensure that we are working with the most responsible vendors, factories, and mills, in order to combat forced labor and human trafficking.

Although human trafficking and forced labor could arguably occur at other stages of the retail process - for example, in store or Home Office environments - we feel that certain characteristics inherent in these environments, together with Abercrombie's policies and approach, reduce that risk compared to earlier stages in the supply chain. In particular, our stores and Home Office benefit from strong relationships with Human Resources, systemic work verification measures, and a well-trained employee population. These forces give us confidence that these environments are lower-risk for forced labor and human trafficking than other stages, such as our partner factories abroad, and allow us to focus our efforts on these higher-risk areas.

### **How We Minimize Risk Using Internal and External Resources**

In terms of internal resources, our Company leadership is committed to industry best practices in labor and human rights. Our Sustainability department supports that commitment, and has since its inception in 1999. Our Sustainability department operates with a dual charter of protecting

environmental and social imperatives in our supply chain and product lifecycle. This department disseminates and updates our policies, solicits employee engagement with social and environmental initiatives, and generally advances the agenda of Corporate Social Responsibility in the United States and abroad.

Externally, we leverage independent third-party auditing firms to ensure our partner factories adhere to their promises in the *Vendor Code of Conduct*. These monitoring firms employ and provide experts who are knowledgeable in local law, attuned to factory risks, and speak local language(s) to perform audits. Using auditors with this level of expertise helps us to minimize risk in our factories abroad.

When we engage a new third party monitoring firm, one or more employees from our Sustainability department may accompany auditors from the monitoring firm to ensure they fully understand and follow our *Vendor Code of Conduct*.

Auditors visit our partner factories annually or biennially and administer a full audit with every visit. Certain high risk factories or new facilities may receive more frequent audits. Each audit consists of a factory walk-through, confidential interviews with workers, and a review of relative documentation (e.g. payroll, time records, employee age verification, etc.). To maintain the integrity of the audit, the Company does not provide the audit date to the factories ahead of time. However, to ensure the necessary personnel is available and the documentation can be gathered in time, we do offer a two-week window during which the audit will occur.

If any labor issues are uncovered during an audit, the factory must take immediate steps to correct the problem. This begins with creating a corrective action plan within 30 days. The vendor then comes under Company conservatorship to ensure there are no recurrences, which requires regular updates on the corrective measures taken, as well as photographic evidence.

## **Risk Assessment - The Parts of Abercrombie's Business / Supply Chain Where There is a Risk of Slavery and / or Human Trafficking and the Steps We Take To Address Those Risks**

### **Country Risks**

The Company aims to not source from countries with known histories of forced labor or human trafficking. For example, the Company has a policy against using Uzbek and Turkmen cotton due to the government-sanctioned use of forced child labor during the harvesting process. We prohibit the use of cotton sourced from Uzbekistan and Turkmenistan and textiles produced using Uzbek or Turkmen cotton. We also exclude sourcing any products from Uzbekistan and Turkmenistan.

Further, the Company does not source conflict minerals. Conflict minerals are those mined or sourced in furtherance of armed conflict, specifically from conflict areas in the Democratic Republic of Congo ("DRC"). Conflict minerals may include tantalum, tin, gold and tungsten. To verify that the raw materials used in our product do not fuel conflict, we require suppliers to disclose the origin of the smelter of these minerals. As a member of the Conflict-Free Smelter Program, Abercrombie is aligned with other industry leaders on this important issue.

Even beyond these specific cases, the Company uses a "trust but verify" approach with respect to its vendors, mills, and factories (described in detail above in How We Minimize Risk Using Internal and External Resources). Therefore, regardless of the country in which sourcing or manufacturing occurs, the Company's partners and their downstream partners are held to an independent standard in labor practices which exceeds legal compliance.

### **Sector Risks**

As a member of the apparel, personal care, and accessories sectors, Abercrombie has taken special care to monitor human rights risks associated with our product lifecycle. For our company and others in our sector(s), that risk is greatest at the international factory stage. We offset risks here by employing third-party auditors who are experts in our policies, local laws and regulations, country- specific risks in the retail manufacturing sector, and warning signs of forced labor or human trafficking. As leading worldwide experts in the auditing field, we trust our partners to effectively reinforce our standards and relay to us any issues identified at the factory level.

### **Transaction Risks**

Transactional risks at Abercrombie are distinct from vendor risks. Transactional risks are risks that originate from the infrastructural supports to the Company's business operations. Although transactional risk in our industry is comparatively less than in other industries with higher transactional profiles (banking, for example), our contractual process requires every service provider to agree that all of their business dealings will be in alignment with our *Code of Business Conduct and Ethics*. Service providers are explicitly prohibited from inducing any Abercrombie employee to violate the *Code of Business Conduct and Ethics*, and commit to same as part of their contractual arrangement with the Company. Finally, service providers are required to observe specific and general labor and employment laws. These measures ensure that our service providers support our Company commitment to social responsibility.

### **Business Partnership Risks**

We vet partnership risk before committing to a partner and monitor risk throughout the life of the partnership.

#### **Vendors:**

before we begin production with any new factory, it must first go through a rigorous Quality Assurance inspection to make sure its operations meet Company standards. A factory also must complete an initial social audit and commit to our *Vendor Code of Conduct* before the partnership can be approved. As described above, our *Vendor Code of Conduct* binds factories to specific standards of operation, and requires vendors to address any signs of forced labor or human trafficking. During the life of the partnership, the factory not only receives audits as described above, but product is inspected for compliance with our regulatory and quality standards. If any factory should fail on any of these indicators and/or refuse to make improvements, the relationship could be terminated.

#### **Auditors:**

we only contract with third-party monitoring firms who employ true experts as auditors. We require that auditors be experts in the local laws of the country and possess local language skills. As a Company, we continually monitor auditor performance.

### **Mesurement of Effectiveness Against Our Key Performance Indicators**

For 2016-17, we added a Key Performance Indicator (KPI) of training all employees Company-wide on the *Code of Business Conduct and Ethics*, which includes training on social sustainability, forced labor, and human trafficking.

In the next few years, we will leverage these efforts to begin realignment around a hybrid KPI for our Merchant and Sourcing teams that considers both economic cost and social impact. Improved documentation of product component sourcing, lifecycle, path of travel, and social and environmental impact will also be a long-term addition to our Company KPIs.

### **Abercrombie's Training About Slavery and Human Trafficking**

Abercrombie aims for every employee to be familiar with the Company's commitment to social sustainability and opposition to forced labor and human trafficking. Whilst as mentioned above, we endeavor to train all employees on the *Code of Business Conduct and Ethics*, we ensure that all Home Office associates are trained on the Code of Business Conduct and Ethics as a priority.

Further training is administered to those who interact directly with our supply chain. All Home Office or remote team members and managers directly involved in Supply Chain Management are required to take a training course on human trafficking and slavery that discusses the risks of human trafficking for business, and actions that can be taken to mitigate those risks.

Finally, in our *Vendor Code of Conduct* all of our vendors agree to take measures against involuntary (forced) labor and human trafficking. To ensure the efficacy of these promises, we make sure vendors are familiar with and aware of the different acts, means, and purposes of human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ending February 2, 2019.

Gregory Henschel  
Director  
AFH Stores UK Limited

Retrieved from: <https://www.bercrombie.com/shop/CustomerService?pageName=modern-slavery-act&storeId=19658&textKey=LEGAL MODERN SLAVERY ACT&catalogId=11556&langId=-1>

On 16 September 2019