

Modern Slavery Statement

Levi Strauss (UK)

FY 30 November 2024

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Modern Slavery Statement

This statement sets out Levi Strauss UK's commitment to tackling and eradicating modern day slavery from our supply chains and ensuring our policies and procedures protect the rights of all employees.

This statement is for Levi Strauss (UK) Ltd (**Levi Strauss UK**) covering the financial year ending 30 November 2024.

For the purposes of providing this statement, the greater Levi Strauss & Co. international network will be referred to as simply **LS&Co.**

This statement is published in accordance with the UK *Modern Slavery Act 2015* (**the Act**).

1. OUR BUSINESS, STRUCTURE AND SUPPLY CHAIN

BACKGROUND AND BUSINESS

For over 170 years, LS&Co. has worked to honor the pioneering spirit of hard work, individuality and authenticity in how it makes its products and runs its company.

Founded in 1853, LS&Co. opened a wholesale dry goods business in San Francisco that became known as Levi Strauss & Co. In 1873, the company received a United States patent for "waist overalls" with metal rivets at points of strain. The first product line designated by the lot number "501" was created in 1890.

LS&Co. is dedicated to elevating the dignity of the people who work to bring its clothing to market. LS&Co. has invested time, energy, heart and resources in improving the future of these communities.

In October 2005, LS&Co. was the first apparel company to release the names and locations of all its active, approved owned-and-operated, contract and licensee factories that manufacture and finish Levi's®, Dockers®, Signature by Levi Strauss™, and Denizen® products. LS&Co. believes that making its factory list public fosters collaboration with other brands and leads to sector-wide improvement in workplace conditions.

In 2018, LS&Co. continued to advance supply chain transparency, by expanding its public supplier list beyond manufacturing and finishing suppliers to include fabric mills.

Today, LS&Co. is one of the world's largest brand-name apparel companies and a global leader in jeanswear. The company designs and markets jeans, casual wear and related accessories for men, women and children under the Levi's®, Dockers®, Beyond Yoga® and Levi Strauss Signature™. Its products are sold in more than 120 countries worldwide through a combination of chain retailers, department stores, online sites, and a global footprint of approximately 3,200 brand-dedicated stores and shop-in-shops.

LS&Co. sources products primarily from independent contract manufacturers located in approximately 34 countries around the world.

LS&Co. requires all third-party contractors and subcontractors who manufacture or finish products for it, to comply with the LS&Co. Supplier Code of Conduct (**SCoC**). Similarly, LS&Co. requires its licensees to ensure that their manufacturers comply with LS&Co.'s SCoC. In 2022, we expanded coverage of the SCoC requirement to suppliers from whom LS&Co. procures goods and services for its own use.

ORGANISATION STRUCTURE

Levi Strauss (UK) Ltd (**Levi Strauss UK**) is a wholly owned subsidiary of Levi Strauss & Co. Europe BV which in turn is a lower-tier subsidiary of Levi Strauss & Co., a company listed on the New York Stock Exchange.

OPERATIONS

Levi Strauss UK and its subsidiaries conduct sales through physical and online stores.

Levi Strauss UK and its subsidiaries sell products through branded physical stores and online channels, which are either owned and operated by Levi Strauss UK or its subsidiaries, or are managed by franchisees.

Levi Strauss UK and its subsidiaries also sell products to multibrand retail customers, that buy and on-sell the products in multibrand stores.

As of end of FY 2024, the LS&Co. network employs approximately 19,100 people worldwide. Levi Strauss UK employs a total of approximately 1500 employees. These employees are employed in a range of office, distribution, and retail capacities.

OUR SUPPLY CHAIN

Levi Strauss UK and its subsidiaries work with a number of its suppliers directly for items including goods and services used in providing products to customers.

The suppliers and partners of Levi Strauss UK and its subsidiaries are largely categorised as follows:

1. Products manufacturing
2. Marketing services
3. Human Resource services
4. Accounting and finance
5. Professional services
6. Warehouse and distribution
7. IT and cloud services
8. Retail and sales solutions
9. Office and administration related services and supplies.

Levi Strauss UK and its subsidiaries have inserted a clause with respect to addressing aspects of modern day slavery requirements, with respect to the performance of services in a safe and lawful manner, in its standard purchasing terms and conditions for indirect procurement.

LS&Co. manages some of its supply chain, vendors and manufacturers of branded products under separate legal entities named Levi Strauss Global Trading Co Ltd which is registered in Hong Kong (**Levi Strauss Global Trading**).

RISK OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

The greater LS&Co. international network is involved in sourcing textile manufacturing, apparel, accessories, and product lines across international borders. This heightens the risks of purchasing, or seeking services from countries where slavery may be taking place.

The indirect business relations in the supply chain pose greater risk. However, LS&Co. aims to select suppliers of LS&Co. products that comply with the **SCoC**. It has put in place a program to monitor how the suppliers operate, including the requirements for the suppliers to ensure that their sub-contractors also comply with the SCoC.

In managing our suppliers in Malaysia and New Zealand where the subsidiaries of Levi Strauss UK are located, LS&Co. seeks to comply with all applicable laws and regulations of the subsidiaries by requiring suppliers to comply with our standards for performance of services.

LS&Co. (particularly in the realm of factory and milling) has supplier relationships in Asia, South and Central America, greater Europe, greater Africa, and North America. It is possible that LS&Co.'s suppliers may outsource services, including for example, manufacturing, development and creation of products to high risk countries, where the risk of exploited labour is inevitably increased. Under those circumstances, all suppliers are required to inform LS&Co. if any of the products or processes are going to be subcontracted and LS&Co. will carry out a full SCoC assessment. Only after this assessment is completed and the risk is evaluated, the products or processes can be outsourced.

2. ACTIONS LS&CO. TAKES TO ASSESS AND ADDRESS THESE RISKS

We are committed to a process of upholding practices against modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all of our business relationships. Our commitment is also supported by policies and procedures which ensure responsibility and accountability for improving business practices and eliminating modern slavery in supply chains at all levels of our business.

In 1991, we introduced our Terms of Engagement, a comprehensive code of conduct for our direct suppliers that manufactured finished branded goods for LS&Co. In 2022, this was replaced by an updated document, the LS&Co. SCoC, which is applicable to every factory, subcontractor, licensee, agent, or affiliate that manufactures branded products for LS&Co. In 2022, we expanded the SCoC to apply to indirect procurement suppliers, including parties from whom LS&Co. procures goods and services for its own use. The updated SCoC outlines our requirements for fair, safe and healthy working conditions and environmental responsibility throughout the tiers of our supply chain. These suppliers must operate in accordance with the SCoC, and in full compliance with all applicable laws and regulations, opting for whichever standard is higher should the requirements differ.

Our branded products suppliers are required to sign a master supply agreement (MSA), which contains the requirement to comply with the SCoC. Our MSA requires any supplier engaged under its terms to comply with all rules, regulations and policies of the greater LS&Co. network, including maintaining general health and safety practices and procedures. LS&Co. also requires the supplier to ensure that all persons, whether employees, agents, subcontractors, or any other personnel acting for, or on behalf of the supplier, are properly licensed, certified, accredited and that its employees are suitably skilled, experienced, and qualified to perform the services. As our indirect suppliers contract with our business through a variety of routes and documents, new indirect procurement suppliers are requested to sign the SCoC at the point of onboarding to our ERP system, prior to being approved for transacting. We have also progressively sought to engage existing indirect procurement suppliers in signing up to the terms of the SCoC.

LS&Co. assesses the risks related to the branded products supply chain and new indirect procurement suppliers as a fundamental element of our standard supplier and licensee engagement process. Our commitment to responsible business practices is embodied in our SCoC, which may be accessed through

the following link: https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo_Code-of-Conduct.pdf

The SCoC guides our decisions and behavior as a company everywhere we do business. Since becoming the first multinational to establish such guidelines in 1991, LS&Co. has used them to help improve the lives of workers manufacturing our products, make responsible sourcing decisions and protect our commercial interests. The guidelines are a cornerstone of our business relationships with hundreds of contractors worldwide.

Our branded products suppliers may access the SCoC through the regularly updated SCoC Implementation guidebook via the following link: <https://www.levistrauss.com/wp-content/uploads/2023/02/2023-supplier-code-conduct-final-spreads.pdf>.

The SCoC includes the ban on the use of child labour, prison labor, indentured labor, bonded labor and trafficked labor. In addition, the SCoC has a specific section dedicated to foreign migrant workers and their rights. The foreign migrant workers' requirements cover the areas of:

1. Recruitment
2. Employment Contracts
3. Remuneration and Benefits
4. Worker Communication
5. Accommodations and Food
6. Social Activities and Religious Practices
7. Repatriation

In November 2020, the SCoC Implementation Guidebook was updated to include a broadened definition of forced labor and relevant policies. The following sections have been updated accordingly:

1. New policies focused on advancing gender equity throughout various sections
2. Foreign Migrant Workers
3. Wages & Benefits
4. Freedom of Association

In February 2023, the SCoC Implementation Guidebook was again updated where we have expanded risk categories and emphasized the severity of risk concerning workers safety and security. The following sections have been updated:

1. Child Labor
2. Prison, Forced or Trafficked Labor
3. Disciplinary Practices
4. Working Hours
5. Wages & Benefits
6. Discrimination
7. Foreign Migrant Workers
8. Health & Safety

In December 2024, the SCoC Implementation Guidebook was again updated where we have expanded risk categories and emphasized the severity of risk concerning payment of minimum wages and working hours, increasing the consequences for suppliers that do not follow local laws and international labour practices.

We conduct regular assessments and follow up visits of our Tier-1 (product manufacturing sites) & Tier-2 (fabric mills) suppliers based on the conditions outlined in the SCoC, which all our suppliers receive in the

Supplier Code of Conduct Implementation Guidebook. These assessments involve on-site and off-site discussions with workers, management interviews, review of factory records (such as timecards and payroll) and health and environmental safety inspections. Each assessment identifies areas for improvement and a detailed corrective action plan, including actions, responsible parties and timelines. Regular follow-up visits are also conducted to ensure suppliers are completing their corrective action plans on a timely basis. We conduct unannounced assessments.

Where a business partner fails to meet our standards or comply with any of the SCoC, they are given a reasonable period to correct the non-compliance. If, on our next inspection, certain cases of non-compliance have not been resolved in a timely manner, LS&Co. has rights, where appropriate, to terminate the business relationship.

LS&Co. is a signatory of the Social and Labor Convergence Program (SLCP), a non-profit multi-stakeholder initiative that offers the tools and system to assess working conditions in global supply chains. This multi-stakeholder initiative includes data sharing and replaces the need for repetitive social audits. This increases transparency in global supply chains, helps combat audit fatigue, enables the redeployment of resources into further improving working conditions, enhances industry-wide consistency and strengthens accountability. In addition, the assessment framework supports joint remediation and shared responsibilities among brands in the same supplier factories.

In 2018, LS&Co. signed onto the industry Commitment to Responsible Recruitment developed in conjunction with the American Apparel and Footwear Association and the Fair Labour Association.

It further amplified to our suppliers and other stakeholders LS&Co.'s commitment to create conditions in our supply chain under which:

1. no workers pay for their job;
2. workers retain control of their travel documents and have full freedom of movement; and
3. all workers are informed of the basic terms of their employment before leaving home.

The above requirements had already been included in the SCoC.

Since 2012, LS&Co. has been a signatory to the industry's Uzbek Cotton Pledge, coordinated by the Cotton Campaign. In 2018, we also became a signatory to the newly introduced Turkmen Cotton Pledge. As an early signatory to both Pledges, we publicly stated our firm opposition to the use of forced labor in Uzbekistan's and Turkmenistan's cotton production.

We committed to not knowingly sourcing Uzbek and Turkmen cotton for the manufacturing of any of our products, until the governments of Uzbekistan and Turkmenistan end the practice of forced labor in their cotton sectors. These Pledges are in alignment with LS&Co.'s sourcing bans, which are already outlined in the SCoC.

We regularly communicate with our suppliers to reiterate our policies on key issues. LS&Co. requires regular renewal of suppliers' attestation to the SCoC. Suppliers are held accountable for their own staff and the manufacturing of LS&Co. products. The company has taken action to educate and hold accountable our direct suppliers, licensees and nominated fabric mills to ensure compliance with applicable laws and regulations relating to forced labor, including sanctions. This includes communications in 2020, 2021 and 2023 from the company to LS&Co.'s suppliers. On an ongoing basis, LS&Co. reviews all supplier relationships to determine if any supplier, or their sub-suppliers or subsidiaries, have links to forced labor or human trafficking. LS&Co. deploys various technologies as part of the company's global supply chain due diligence efforts. All LS&Co. products are included in the process, regardless of country of import.

Furthermore, in 2011 LS&Co. launched the Worker Well-being (**WWB**) initiative. The initiative aims to improve the lives of the women and men who make our products with factory-based programs that address issues related to health, financial security and gender equality. We set a goal to reach 200,000 workers in our supply chain through our WWB programs by 2020. We surpassed that goal in May 2019, and by year's end, we had reached 219,000 workers, in 113 factories, in 17 countries, and more than 65% of total product volume at that point of time was made in factories that have WWB initiatives. In 2024, these efforts resulted in 66% of key suppliers operating with well-established and functional worker-management committees, and within those committees, 57% are comprised of 50% or proportionate women in the workforce in decision making.

More than 90 percent of the WWB initiatives sites offer health interventions to their workers. Approximately 50 percent of these sites provide financial literacy workshops (some factories provide multiple programs for workers). Based on a survey carried out among participating sites in 2019, three quarters of participating factories report improvements in worker engagement, and over half report improved satisfaction and lower absenteeism. A majority of suppliers self-fund their own WWB programs. Based on a survey carried out among participating sites in 2019, only 40 percent rely on LS&Co. for support.

To deepen our impact, we recently refreshed the WWB strategy and our vision for 2025 and 2030. Learn more about our revised WWB strategy and operational framework, accessed through the following link: <https://www.levistrauss.com/wp-content/uploads/2022/04/Worker-Well-being-Guidebook-Final-2022-1.pdf>

In recent years, we have expanded our work to combat gender inequality in the supply chain, building on the improving business performance through the Gender Equality Report (**Gender Equity Report**) published by the Levi Strauss Foundation in 2018. A copy of the Gender Equity Report may be accessed through the following link: https://www.levistrauss.com/wp-content/uploads/2019/03/IMPROVING-BUSINESS-PERFORMANCE-THROUGH-GENDER-EQUALITY_OCT-2017_FINAL.pdf.

We work with industry experts to pursue impactful systemic changes that address the power imbalances between largely female workers and predominantly male managers. Through our multi-year partnership with the Sustainability and Health Initiative for NetPositive Enterprise (**SHINE**) at Harvard's T.H. Chan School of Public Health, we are discovering new areas for attention. This multi-year study, which has connected directly with more than 13,000 workers, most of whom are women making our products in Cambodia, China, Mexico, Poland and Sri Lanka, is showing us that factories that cultivate trust, respect and fairness lead to improvements in gender equality, well-being and productivity. We expanded and elevated our work designed to combat gender inequality in the supply chain, by using the data to build on the Gender Equity Report. To improve the assessment process, we instituted a requirement that all assessment teams include female members and, where possible, female leaders, and we continue to collaborate with partners on the ground such as Better Work in Cambodia, Swasti in India, and Better Work in Bangladesh and Change Associates to advance the effort.

The Gender Equity Report assists LS&Co. and its apparel supply chain to acknowledge and focus on skill development, pregnancy and parenthood, menstruation, wages, work hours, harassment and gender-based violence. The Gender Equity Report also promotes 10 strategies to make the global apparel supply chain more fair, engaging and productive for all.

Since October 2005, LS&Co. is committed to publishing the list of its worldwide finished goods suppliers. The most recent full copy of the factory and mill list is publicly available and can be accessed on the following link (<https://www.levistrauss.com/sustainability-report/community/supplier-map/>). The list specifically details the countries where the factories or mills are located, in addition to their factory name,

address, city, state, the type of product that is being manufactured (i.e. apparel or accessories), the total number of employees and contract staff, any applicable LS&Co. initiatives implemented in the workplace and the parent company name of the factory or mill. This is a testament to LS&Co.'s level of accountability and transparency of its supply chain.

To date, we actively support the International Labour Organisation's Better Work Program (**ILO Better Work**), which is the leading global organisation focused on protecting human rights and improving working conditions in the apparel industry. ILO Better Work makes targeted investments in our manufacturing suppliers' workers, training apparel workers and factory management, on their rights and responsibilities in the workplace. A substantial portion of LS&Co.'s production takes place in countries that participate in ILO Better Work. They currently include Bangladesh, Cambodia, Indonesia, Vietnam, Egypt and Jordan.

LS&Co. maintains and enforces internal accountability procedures for employees and contractors regarding company standards on forced labour and human trafficking. While these accountability procedures have previously targeted the risks of forced labour and child labour, amongst others, these have been amended to include a broader reference to modern slavery and human trafficking. In the case of non-compliance, LS&Co. reserves the right to examine the specific situation and develop the best possible strategy for resolution.

We employ full-time staff located globally to oversee compliance, advise on and monitor branded products suppliers' sustainability programs. To supplement our own monitoring efforts, we use third-party monitors to conduct regular assessments of every factory, nominated fabric mills and our product licensee suppliers. All third-party monitors understand the scope of our labour, environment, and health and safety standards and know the local languages, laws, culture and business context of each country in which they operate. All third-party audit firms must be individually approved by LS&Co. to conduct SCoC assessments in factories. In accordance with our supplier arrangements, these firms apply the standards of either the local law, or the SCoC, whichever are stricter should the requirements differ.

We seek to more deeply integrate the SCoC and our business. Integrating SCoC performance into our business has become a key factor in the effectiveness of our due diligence procedures.

Weighted with other key factors, including delivery time, quality and price, SCoC performance ratings are used by our manufacturing operations team in considering which suppliers to use and how much production to give them. Poorly performing suppliers that are not completing their corrective action plans on time will be given formal warnings that they are in danger of having their production orders reduced, unless they improve their SCoC performance. In most cases, such notification motivates the supplier to quickly improve.

If the supplier does not improve, we may reduce production orders. If SCoC performance still does not improve after the order reduction, we may exit the supplier and end our business with them. Such a situation rarely occurs, as most suppliers are interested in retaining our business, and will typically bring their performance to acceptable levels when future business is at stake. In case this outcome occurs, LS&Co. implements a responsible exit strategy.

OUR CODE OF CONDUCT AND POLICY FRAMEWORK

The LS&Co. Board has the responsibility for establishing policies and ensuring that these are implemented. The board delegates this responsibility to the leadership and management teams within LS&Co.

LS&Co.'s Worldwide Code of Business Conduct (**Code of Conduct**), which is separate from the SCoC, sets the behavioural standards for LS&Co.'s employees, officers and directors. A copy of the Code of Conduct may be accessed through the following link: <https://www.levistrauss.com/wp->

<content/uploads/2020/06/Code-of-Conduct-English.pdf>. The Code of Conduct and policy framework helps set a consistent global approach for all LS&Co. employees and expectations in respect of dealings with clients, suppliers and contractors. All employees are expected to act consistent with our core values of:

- Originality
- Integrity
- Courage
- Empathy
- Performance

At LS&Co., our values underpin our everyday actions and we use them as a guiding principle in our conduct and working relationships. We see ourselves as being modern day advocates in our industry and understand the role we play in setting an example.

With respect to legal compliance, the Code of Conduct encourages staff to obey the law and when in doubt about what to do, ask managerial staff or get in touch with the Ethics and Compliance team, Human Resources or Legal department.

In the Code of Conduct, LS&Co. sets the standard for the moral code of its employees. LS&Co. does not tolerate workplace violence, discrimination and harassment of any kind by any employee. LS&Co. promotes a safe working environment, and its employees' responsibility to obey health and safety rules and policies, report accidents, and report any unsafe working conditions to supervisors immediately.

If employees are uncomfortable raising issues to their manager, the Ethics and Compliance team, Human Resources or Legal Department, LS&Co. has in place an Ethics and Compliance Reportline, where employees may anonymously report their concerns by phone on 1-800-405-8953 or online. This is contained in LS&Co.'s Accounting and Auditing Whistleblower Policy.

All staff members are responsible for being aware of the policies whether they are ethical, or legal and need to ensure they apply it to their jobs. Our Managers and Executives are responsible for creating and promoting environments in which we comply and ensure ethical business is conducted. All of our policies and procedures can be found internally on our intranet via the Business Management System, and are communicated to all employees.

TRAINING

We encourage employees to notify the Ethics and Compliance team, Human Resources or Legal Department of any concerns they have, and aim to continue to promote awareness among employees on how to identify the key signs of modern slavery.

Our Workers Wellbeing Guidebook also outlines the expectations LS&Co. has for its suppliers to train its employees on worker wellbeing.

LS&Co. conducts internal training on the Code of Conduct annually, to ensure we provide our employees with a clear set of standards and guidance for conducting our business with integrity and the highest degree of compliance with the law.

Additionally, LS&Co. conducts internal training of our supply chain management to ensure that management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking and slavery, with a particular focus on mitigating risks.

3. HOW LS&CO. ASSESSES EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS THESE RISKS

LS&Co. is committed to assessing the effectiveness of actions being taken to assess and address the risks of modern slavery within its operations.

As stated above and with respect to legal compliance, the Code of Conduct encourages staff to obey the law and when in doubt about what to do, ask managerial staff or get in touch with the Ethics and Compliance team, Human Resources or our Legal Department. While this method can be effective for direct staff, it may be difficult to ascertain legal compliance on a supply chain basis (ie. within mill and factory settings).

On this basis, LS&Co. regularly assesses Tier-1 & Tier-2 products suppliers on the conditions outlined in the SCoC, and issues all direct suppliers with the SCoC Implementation Guidebook. We consider that since the assessments involve on-site and off-site discussions with workers, management interviews, review of factory records (such as timecards and payroll) and health and environmental safety inspections, this is an effective way to ensure that supplier entities are held accountable. It also ensures that supplier entities are aware of the risk of losing LS&Co.'s business for non-compliance. The issuing of action plans to non-compliant suppliers is also an effective method to ensuring the supplier is assisted in bringing its standards to par with legislation and regulations.

LS&Co.'s regular communication with suppliers also ensures that suppliers hold a level of accountability for their own staff and the manufacturing of LS&Co. products.

Otherwise, LS&Co. is able to remain abreast of its impact on a worldwide scale, through data collected in its numerous initiatives including WWB, the Gender Equity Report and ILO Better Work.

As LS&Co. takes an active role in auditing its direct supply chain worldwide, to the extent that it can produce a comprehensive factory and mill list, it is able to remain aware of the activities of its business partners, and call on them to comply with LS&Co.'s values, if and when needed.

Further to the above, the utilisation of third-party monitors to conduct regular assessments of every factory, fabric mill and product licensee suppliers, can be effective in obtaining accurate information about the nature of a supplier's business dealings.

Notwithstanding all of the robust measures LS&Co. has detailed above, LS&Co. will continue to assess what further actions and measures can be taken, to ensure LS&Co. is able to regularly assess how it can combat modern slavery risks.

Levi Strauss UK has consulted and worked alongside its colleagues at LS&Co., in preparing this modern slavery statement through internal reviews. This statement has been prepared in consultation and co-operation with the management of Levi Strauss UK and its subsidiaries.

This statement was approved on 19th of May 2025 by the Board of Levi Strauss (UK) Ltd.

Signed,

Andrea Vanessa Whitelaw
Director, Levi Strauss (UK) Ltd.

Anne Madison
Senior Vice President,
Product Development & Sourcing,LS&CO.