

Modern Slavery Report

Reporting Year 2025

Our COO/CFO's Message

At United Legwear & Apparel Co.,(ULAC) we are dedicated to supporting the human rights of all individuals. ULAC stand united against forced labor and child labor, collectively known as modern slavery.

Our commitment to human rights is guided by the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. We uphold these principles across all facets of our business operations, including our supply chain, vendor relationships, and partnerships.

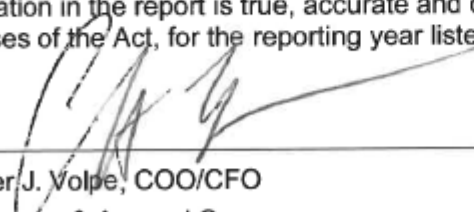
We go beyond this commitment by adhering to rigorous social compliance regulations, conducting factory inspections, and performing verified audits to ensure ethical treatment throughout our supply chain.

We believe that collective collaboration is essential for achieving sustainable, positive change. We are dedicated to partnering with suppliers who share our values and commitment to combating modern slavery and protecting human rights. As our business grows, we will continue to enhance our practices and drive continuous improvements.

This report is prepared in accordance with Modern Slavery Act covering the reporting period January 1, 2025, to December 31, 2025. This report represents ULAC's ongoing commitment and efforts to enhancing human rights due diligence, transparency, and accountability throughout our sourcing practices and operations.

Approval and Attestation

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



Christopher J. Volpe, COO/CFO
United Legwear & Apparel Co.
May 28, 2026

I have the authority to bind United Legwear & Apparel Co.



2025 Key Highlights

This report covers United Legwear & Apparel Co. efforts to identify, assess, and address the risks of modern slavery, including forced labor and child labor within our operations and global supply chain for the reporting period January 01, 2025, to December 31, 2025.

Supply Chain Transparency

Achieved 100% supply chain visibility from Tier 1 to Tier 5 across all core suppliers. All mapping data has been uploaded and is actively monitored on our platform.

Audit Program

100% of social compliance audit reports collected from core suppliers. Top 3 non-compliances identified as health & safety, working hours, and wages and benefits to establish our 2025 baseline for year-over-year tracking.

No Forced or Child Labor Identified

United Legwear & Apparel Co. identified no instances of forced labor or child labor in 2025. No remediation measures were required, and no loss of income to vulnerable families was identified because of our due diligence activities.

Workforce & On-Site Oversight

United Legwear & Apparel Co. employs 42 on-site Quality Assurance auditors (including 3 regional managers) across 9 countries, providing continuous factory-level visibility. Total workforce of 649 direct and 385 indirect employees across 9 offices and 8 distribution centers.

Looking Ahead

Phase 3 of our supply chain transparency program is Chain of Custody Documentation and is targeted for pilot launch by end of 2026, enabling document traceability from Tier 1 to Tier 5.



Business Structure, Operations, and Supply Chain Transparency

United Legwear & Apparel Co. is a privately held global entity that conscientiously designs, responsibly manufactures, and distributes women's, men's and kids' apparel, legwear, bodywear, and accessories for some of the world's most recognizable brands.

We have:

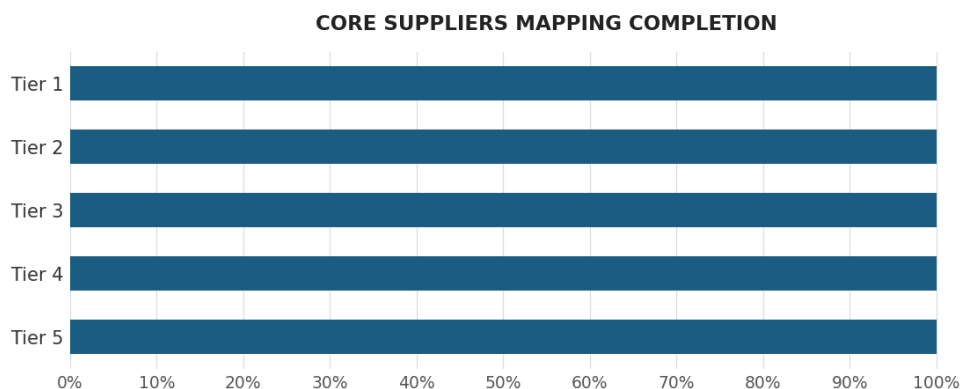
- 649 Direct Employees
- 385 Indirect Employees
- 15 Brands
- 9 Offices
- 8 Distribution Centers

Our supply chain for the Tier 1 suppliers is in 9 different countries. We have 42 onsite QA auditors, including 3 regional managers to monitor, assess, and ensure compliance with requirements.

Traceability

We are continuously enhancing our traceability efforts to strengthen our due diligence processes. Our goal is to identify, assess, and prevent risks in the upstream supply chain. We are committed to collecting data to ensure transparency throughout our supply chain.

For our Core suppliers, we have achieved: 100% visibility from Tier 1 to Tier 5.



Key for Apparel

Tier 1: Manufacturer
Tier 2: Dyeing/Finishing
Tier 3: Weaving/Knitting
Tier 4: Spinner
Tier 5: Ginner/Raw Materials

Key for Socks

Tier 1: Manufacturer-Knitting/Finishing
Tier 2: Yarn Dyeing
Tier 3: Yarn Spinning
Tier 4: Ginner/Raw Materials

Risk of Modern Slavery in Operations and Supply Chain

RISK ASSESSMENT

As a global company working with legwear, bodywear, accessories and apparel manufacturers, we identify potential forced labor and child labor risks by leveraging the guidance from the Uyghur Forced Labor Prevention Act (UFLPA), and the blacklist maintained by the U.S. Customs and Border Protection (CBP) agency.

The UFLPA and CBP blacklist serve as critical resources for identifying industries, regions, and entities that are at higher risk of engaging in forced labor practices, particularly the exploitation of Uyghur and other minority groups in the Xinjiang Uyghur Autonomous Region (XUAR) of China.

Additionally, Brands and Retailers send bulletins and updates on restricted regions, which we will adopt and integrate into our operations.

Our risk identification process also involves assessing the following factors:

Industry Sectors

We operate in the textile industry, which has a higher risk of forced labor practices.

Sourcing Locations

We assess the regions where our manufacturing facilities, and upstream suppliers are located, with particular attention to high-risk areas such as XUAR and Uzbekistan. Prior to diversifying to another location, we will conduct comprehensive risk assessments (see Additional Risk Assessment: New Suppliers)

Supply Chain Mapping

We conduct comprehensive supply chain mapping to identify potential risks of forced labor, especially among upstream facilities (see section Traceability)

Third-party Audits

We review third-party audit reports to ensure no human rights violations are occurring.

Labor Practices

Our 3rd party audit will disclose any labor practices of our suppliers, including recruitment processes and employment conditions, which involve forced labor or unethical practices.

ADDITIONAL RISK ASSESSMENT

On-Site Quality Assurance

We employ 42 Quality Assurance personnel including 3 Regional Managers who work onsite across 9 different countries at the manufacturing facilities. Their role is to monitor, assess, and verify adherence to our established quality/compliance standards, procedures, and policies. Major and critical issues are immediately escalated to management.

New Suppliers

New suppliers must complete the necessary prescreening documents to evaluate their compliance with our requirements and code of conduct, including all subcontractors they use. The supplier must demonstrate they have effective policies and procedures to ensure compliance with social, environmental, quality, and production standards at both factory and subcontractor levels. If the supplier fails to meet our standards during the pre-screening, our on-site Quality Assurance team will not conduct an internal pre-assessment walkthrough.

Specific Requirements

We must follow our Brand and Retailers' stringent and in-depth risk assessment prior to getting any supplier added to their approved supplier matrix. Criteria include social, environmental, and quality, and production assessment.

Existing Suppliers

Existing suppliers are required to undergo an annual third-party Social Compliance Audit. If any non-compliance issues are identified, they must complete a Corrective Action and Preventative Action Plan (CAPAs). The factory must submit their remediation plan to address the violations and complete them within the specified time frame. If the violations involve forced labor or child labor, we will not continue business with that supplier.

Third-party Social Audit Program

Our Third-party Social Audit Program collects pertinent information on worker recruitment. This helps determine if internal controls are in place to ensure all workers are recruited voluntarily.

Transparency Policy

We require full transparency and immediate escalation from all factories and suppliers regarding any critical violations of Social Compliance. This is outlined in our Supply Chain Risk Management and Transparency Policy.



Unauthorized Factory Policy

All factories are required to comply with our Unauthorized Factory Policy. We immediately address the practices of unauthorized factory production. We work with only approved factories.

Membership Engagement

We collaborate with industry partners (for e.g., AAFA and Nirapon) to identify risks, assess risk, and adopt the best practices to combat forced labor and create a safer working environment.

Isotope Testing

Determines the origin of raw materials. These are mandatory. Retailer specific requirements that further helps identify upfront and mitigate potential risks related to forced labor or child labor.

REMEDIATION MEASURES

Remediation measures taken for forced labor or child labor

ULAC did not find any instances of remediation for forced labor or child labor in 2025. We will continue our due diligence to monitor and assess.

Measures taken to remediate loss of income

ULAC has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labor or child labor in our activities and supply chains in 2025. We will continue to monitor and mitigate these risks.

DUE DILIGENCE POLICIES AND PROCESSES

ULAC distributes the following documents to suppliers on an annual basis, which they must read and acknowledge by signing the Manuals, SOPs, Policies, or Terms.

Compliance-Quality Assurance Manual includes the following sections

- New Factory Onboarding Process
- Factory Audits
- Unannounced Audits
- Zero Tolerance Issues
- Unauthorized Factory Policy
- Human Rights Policy and Code of Conduct
- Anti-Corruption Policy
- Migrant Worker Policy

Traceability of Raw Material Standard Operating Procedure (SOP)

The due diligence process outlined in this SOP requires suppliers to have:

- Their written Supplier Code of Conduct addressing forced labor
- Training records demonstrating adherence to our Compliance-QA Manual
- Monitoring their supply chain for compliance with our Human Rights Policy and Code of Conduct
- Valid third-party Social Compliance audits and records verifying the entity's good standing and freedom from forced labor, compliant with our Code of Conduct

Supply Chain Risk Management and Transparency Policy

This policy requires suppliers to conduct a risk assessment of their internal policies, processes, and identify high- risk gaps, including but not limited to Social Compliance, Human Resources, and Operational Policies and Procedures.

Anti-Slavery and Human Trafficking Terms

This document is part of our Vendor Agreement. Suppliers must comply with all anti-slavery laws, refrain from purchasing any goods or services, or delivering products using modern slavery, must maintain records to trace the supply chain of all goods, services, and products, remediate any risks, and implement a system of training for all employees, including subcontractors they use.

2025 ULAC SUPPLY CHAIN: CODE OF CONDUCT EMPLOYMENT PROCESSES

Employment Practices – the following specific guidelines must be followed:

WAGES AND BENEFITS



Wages must equal or exceed the minimum wage required by law and legally mandated benefits must be provided. In addition to compensation for regular working hours, employees must be compensated for overtime hours at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.

WORKING HOURS



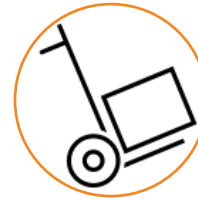
Employees must not be required, except in extraordinary circumstances, to work more than 60 hours per week including overtime or the local legal requirement, whichever is less. Employees must be allowed at least one day off for every seven-day period. Overtime should be voluntary, compensated at a premium rate, and should not be a regular occurrence.

CHILD LABOR



Business partners must not employ children who are less than 15 years old or below the local legal minimum age, whichever is higher, including the age for completing compulsory education, in the country of manufacture. Any workers under 18 shall be protected from working overtime, night shifts, hazardous work, and their tasks shall respect boundaries set out by legal requirements and best practices.

FORCED LABOR



Business partners are prohibited from using any form of forced labor including prison labor, indentured labor, trafficked labor, or bonded labor. Our business partners are prohibited from requiring employees to pay any recruitment-related fees, post bonds or make a deposit to obtain a job or as a condition of employment.

NO DISCRIMINATION



Business partners must treat all employees with respect and dignity and must not discriminate against any of their employees. We do not tolerate any form of discrimination based on age, disability, gender, marital status, pregnancy, nationality, political view, race, religion, or sexual orientation.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING



Business partners are obligated to ensure that their employees have the right to join unions, or other work or industry related associations, and engage in collective bargaining. These rights must be provided without fear of harassment, intimidation, or retaliation.

DIGNITY AND RESPECT



Employees must be treated with respect and dignity. No employee may be subjected to any physical, sexual, psychological, or verbal harassment or abuse, or to fines or penalties as a disciplinary measure.

ETHICAL BUSINESS PRACTICES



ULAC is committed to conducting our business ethically and with integrity. We will not allow corruption either within our supply chain or in our own operations.

DUE DILIGENCE POLICIES AND PROCESSES

Regular Factory Visits

Our 42 on-site QAs, leadership, and Compliance-QA team conduct regular factory visits, enabling us to monitor our existing suppliers/factories and provide visibility into their activities and compliance.

Grievance Mechanisms

All suppliers conducting business with ULAC must have grievance mechanisms in place, which are verified through third-party social audits.

New Suppliers

All new factories must undergo pre-assessment (See Risk Assessment: New Suppliers)

Existing Suppliers

Existing suppliers must have an annual 3rd party audit in good standing. Any non-compliance requires a remediation plan for the 3rd party and/or our review. Suppliers must also have policies and procedures for identifying and prohibiting forced and child labor in their activities and supply chains, as stated in our Manual, SOPs, and Policies that address protecting against child and forced labor.

CAPAs

We require our suppliers to complete CAPAs to address non-compliances identified by our team or through 3rd party audit. Suppliers must determine the root cause to ensure the non-compliance is corrected to prevent recurrence. We provide guidance throughout this process to ensure issues are resolved, drive continuous improvements, and implement effective action plans. In the event of an ongoing or major issue that cannot be resolved, we will consider terminating the business relationship, while being mindful of the impact on affected workforce.

Zero Tolerance Policy

Our Human Rights Policy and Code of Conduct enforce a strict Zero Tolerance Policy regarding labor violations, as outlined in our Compliance-QA Manual. This includes human rights violations such as forced labor and/or child labor, which are non-negotiable.

TRAINING AND AWARENESS MATERIALS

We are committed to ensuring our suppliers receive comprehensive training and awareness materials on forced labor and child labor as follows:

Annual Training

All Puma approved suppliers, ULAC Compliance-QA, and ULAC QA must undergo annual mandatory sustainability training, which includes in-depth modules on identifying, preventing, and addressing forced labor and child labor practices. Additionally, major Retailers we partner with host annual training sessions that our Compliance-QA and Sustainability teams attend.

Documents

To ensure adherence to our stringent policies and procedures, we annually distribute our Manuals, Standard Operating Procedures (SOPs), and Policy documents (see list of documents under Due Diligence Policies) to all suppliers. These documents outline our zero-tolerance stance on forced labor and child labor, and suppliers are required to sign and acknowledge receipt and compliance with these guidelines.

Mandatory Annual Audits

Furthermore, we have established procedures to track performance in addressing forced labor and child labor. Annual third-party social audits are mandatory for all suppliers, enabling us to monitor and evaluate their compliance with our labor standards and identify any areas requiring remediation or improvement.

Through this multi-faceted approach, encompassing training, policy enforcement, and performance tracking, we maintain our commitment to combat forced labor and child labor from our supply chain, fostering a culture of ethical and responsible business practices.

ENGAGEMENT

Engaging with Supply Chain Partners

Our Compliance-QA team maintains daily communication and engagement with our agent/factories to obtain Social Audit reports, resolve remediation plans, and ensure compliance. In addition, our 42 on-site QAs work closely with the factories, fostering a collaborative approach to monitor and address potential forced labor and/or child labor issues.

Collaborating with Experts and Stakeholders

We actively engage with various organizations, experts, and stakeholders to address forced labor and child labor challenges. Our partners include:

- AAFA (American Apparel & Footwear Association) — industry policy guidance and best practice adoption on forced labor prevention
- Better Work (ILO/IFC) — factory-level labor compliance assessment and capacity building in our sourcing countries
- BSCI (Business Social Compliance Initiative) — social audit framework used to evaluate supplier compliance with labor standards
- Higg Index / FSLM (Facility Social & Labor Module) — standardized social performance data collection and benchmarking across our supply chain
- Nirapon — worker safety and social compliance monitoring program specifically supporting Bangladesh-based suppliers
- Sedex — shared platform for storing and sharing ethical supply chain data, supporting supplier transparency and audit sharing
- Social & Labor Convergence Program (SLCP) — reducing audit fatigue by enabling a single verified assessment accepted across multiple frameworks
- WRAP (Worldwide Responsible Accredited Production) — independent factory certification program verifying compliance with labor, human rights, and safety standards

Direct Engagement with Workers

During the mandatory third-party Social Audits conducted at factories, auditors engage directly and interview workers to identify potential risks of forced labor and/or child labor, as required by our company's policies. Through this multi-step approach, involving supply chain partners, expert organizations, and direct engagement with workers, we strive to comprehensively address the complex issues of forced labor and child labor, fostering transparency, accountability, and sustainable solutions.

MEASURING OUR EFFECTIVENESS

ULAC has processes and systems in place to effectively monitor and report on our efforts to address forced labor and child labor.

Tracking Performance

In 2025, we continued to implement our Supply Chain transparency system across 3 phases as follows:

Phase 1: Supply Chain Mapping

- **Action:** 100% of the core suppliers provided their T1 to T5 supply chain mapping. This data has been uploaded to our platform. We are able to review progress and completion of this mapping.
- **KPI:** 100% transparency to each of the tiers.

Phase 2: Social Compliance Reports

- **Action:** We have collected 100% of all the Social Compliance reports from our core suppliers. These reports are uploaded into our system.
- **KPI:** Track Top 3 non-compliances for 2025. We will be able to track the frequency of non-compliance incidents received and resolved.
- **Baseline Data:** Top 3 non-compliances for 2025 will be our baseline data to track year-over-year improvements:
 - Health and Safety
 - Working Hours
 - Wages and Benefits
- **Score:** Each supplier is assigned a standardized score based on their overall social compliance results. These scores were harmonized across alpha, numeric, or color-coded grades for consistency. We can implement an annual improvement rating system to measure progress effectively across all suppliers.
- **Trend Analysis:** Additionally, we can identify trends by country, by commodity, and by Brand which will help us identify specific areas needing improvement.

Phase 3: Chain of Custody Documentation

- By the end of 2026, the core suppliers will be able to test pilot and upload their documents from Tier 1 to Tier 5. This will further help drive traceability and transparency within our supply chain.
- By systematically tracking performance and implementing these phases, ULAC is committed to addressing forced labor and child labor effectively, ensuring continuous improvement and accountability across our supply chain.