

# Our Approach to CR and Human Rights

## Our Corporate Responsibility Strategy

At PVH, Corporate Responsibility (“CR”) has always been central to how we conduct business and plays a critical role in our strategy. As we continue to adapt to the evolving retail landscape and position ourselves for long-term success, we recognize we have both a responsibility – and an opportunity – to play a leading role in advancing sustainable development and supporting human rights.

Through our CR strategy, Forward Fashion, we have set a new level of ambition and transparency for sustainable business at PVH. We do this because resources are limited and, for us, human rights are non-negotiable. Our efforts are guided by our commitment to the United Nation’s (“UN”) Global Compact, on which our Chairman is a board member, and the UN Guiding Principles on Business and Human Rights.

We have always prioritized people and planet over short-term wins. In 1991, we were one of the first apparel companies to issue a code of conduct – A Shared Commitment – and build a global team to support our human rights work. Our Board of Directors has a CR Committee that provides support and guidance with respect to our CR policies and strategies. We were one of the founding members of the [Accord on Fire & Building Safety in Bangladesh](#) (“Accord”). We undertake these actions to ensure we do not just address the current issues in our industry, but also actively contribute toward a safer, sustainable apparel supply chain.

*Forward Fashion* includes seven human rights-focused priorities that cover the scope of our salient human rights risks and opportunities. These priorities were built following thorough risk assessments, and collecting extensive inputs from key partners, thought leaders and leadership from across our supply chain and the industry. Together, these priorities represent our path forward to protect and advance the rights of workers across our supply chain by prioritizing the systemic challenges that many continue to face.

- **Source Ethically:** Expand the application of our social and environmental standards to the manufacturing of all products and materials
- **Amplify Worker Voice:** Improve working environments through worker engagement and representation
- **Promote Safe Workplaces:** Ensure safe and healthy workplaces for all workers in our supply chain
- **Advance Living Wages:** Create conditions for national living wage agreements through industry-wide collective bargaining linked to our purchasing practices
- **Recruit Ethically:** Partner with our suppliers to ensure ethical recruitment practices for migrant workers
- **Empower Women:** Remove barriers to advancement and create pathways to opportunity and choice for women in our supply chain
- **Foster Inclusion & Diversity:** Create an inclusive environment where every individual is valued

- **Develop Talent:** Develop a talented and skilled workforce that embodies PVH’s values and an entrepreneurial spirit, while empowering associates to design their future
- **Educate the Future:** Support the needs of women and children around the world by creating safe spaces, improving access to education and enhancing quality of life

It is important to note that our work on human rights does not start and end with our supply chain, but addresses our entire value chain, from our global PVH associates to our brand consumers.

**Stefan Larsson**  
Chief Executive Officer

## Our Human Rights Policy

Our human rights policy is embodied in our *A Shared Commitment* code of conduct, which outlines our commitment to and expectations of our business partners, including suppliers, contractors, vendors, licensees and agents. This code embodies our commitment to the workers who manufacture our products and their communities, and adherence to the human and labor rights standards outlined in it is a prerequisite for establishing or continuing a relationship with PVH. We actively seek business associations with those who share our values, and do not conduct business with any organization or individual in our supply chain that fails to adhere to these standards in their own operations, or those of their business partners. We believe that by working together to see these standards enforced, our company and business partners can help to achieve genuine improvement in the lives of people around the world and the communities in which they live. This mission has been a guiding principle of our company for more than 140 years, and it will continue to guide us in the future to take precedence over any economic or business interests.

*A Shared Commitment* is currently informed by the UN's Universal Declaration of Human Rights and is based on the Core Conventions of the International Labour Organization ("ILO"). It encompasses 10 standards relating to:

- Employment Relationship
- Nondiscrimination
- Harassment and Abuse
- Forced Labor
- Child Labor
- Freedom of Association
- Health and Safety
- Compensation and Benefits
- Hours of Work
- The Environment

## Identifying Our Human Rights Risks

At PVH, we identify human rights risks through our assessment program, engagement with industry groups and partnerships, and our issues management process, as well as our regular materiality assessment.

Our factory assessment is the first step on a journey to achieve continuous improvement with our suppliers. We currently evaluate strategic raw materials suppliers and finished goods factories against comprehensive human rights and environmental criteria, with ratings based on a traffic light-like system. Factory ratings inform our sourcing decisions and remediation actions and determine the cadence for subsequent assessments. Better rated factories receive "green" or "yellow" ratings. An "orange" rating indicates that immediate action is required for the factory to maintain its authorization as a PVH supplier. If a supplier receives a "red" rating, we end our business relationship, making a responsible exit.

Throughout the assessment process, we look beyond the scope of typical audits by partnering with our suppliers to address shared goals. We set expectations at the outset, conduct thorough factory inspections and solicit workers' views in confidence. We engage factory managers in an open discussion on the findings, exploring root causes, and support them in developing corrective action plans ("CAPs"). We meet with our suppliers between assessments to review their progress in implementing remediation activities and provide further guidance. Learn more in our [PVH CR Supply Chain Guidelines](#).

In addition to our assessment process, which serves to identify actual risk(s) at the supplier level, we consult additional risk tools to further refine our risk analysis. We use ELEVATE, a service focused on inherent risk that uses data not only from our audits, but also from their entire customer base, as well as risk indices across the broader industry. This combined approach of inherent and actual risk assessment

provides a comprehensive view and allows us to work to remediate possible risks before they happen.

We work with partners such as ACT ("Action, Collaboration, Transformation"), Responsible Labor Initiative ("RLI") and Better Work to identify and address risks. By attending annual board meetings, consulting with them on updated standards and through various industry forums, we share and engage with industry actors to discuss the most salient human rights issues and work on collective ways to drive systemic change.

We operate a thorough issues-management process, with a team dedicated to addressing and resolving human rights issues that are raised via various avenues, including issues raised by non-governmental organizations ("NGOs"), suppliers or issue-specific media campaigns.

Under the guidance of the CR Committee, we piloted the Sustainable Business Risk Assessment (SBRA) process in 2021 to assess actual and potential risks to our business. Our SBRA analytical framework covers PVH's owned and operated facilities and the supply chain, using qualitative and quantitative data to identify and prioritize salient issues. The 2021 SBRA identified human rights and the environment as salient issues.

In early 2022, we conducted a materiality assessment to identify and prioritize the CR topics and issues that are most material to our business and stakeholders. We started by creating a list of CR topics, based on landscape research and existing documentation. We reviewed past CR Reports, our previous materiality assessment (2018), employee and consumer surveys, and various investor-related publications. External sources included sustainability reporting frameworks, including the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), Task Force on Climate-related Financial Disclosures (TCFD) and others. We initially prioritized topics based on their impact on various forms of capital and validated the prioritized topic list through third-party-led interviews with internal

and external stakeholders. During validation, stakeholders rated topics based on the risk and opportunity each topic presents to PVH as a business. As a result, we plotted 23 ESG topics on a materiality matrix – together these topics are the most material to our business. For the full list of topics and definitions, see our [Materiality Assessment](#).

## Our Salient Human Rights Issues

In addition to the approach detailed above, we also looked at the most rigorous frameworks available and incorporated advice from the OECD, SASB and the UN Guiding Principles on Business and Human Rights into our target setting. Human rights was identified as a material risk for PVH in our 2018 materiality assessment. We discussed the boundaries of our past work and included these findings and the provided stakeholder input into our Forward Fashion CR strategy, which sets seven human rights-specific priorities mapped to time-bound targets.

The human rights risks most critical are:

- Expanding the application of PVH's social and environmental standards to the manufacturing of all products and materials
- Improving working environments through worker engagement and representation
- Ensuring safe and healthy workplaces for all workers in our supply chain
- Creating the conditions for national living wage agreements through industry-wide collective bargaining linked to our purchasing practices
- Partnering with suppliers to ensure ethical recruitment practices for migrant workers
- Removing barriers to advancement and create pathways to opportunity and choice for women in our supply chain
- Creating an inclusive environment where every individual is valued

- Developing a talented and skilled workforce that embodies PVH's values and an entrepreneurial spirit, while empowering associates to design their future
- Supporting the needs of women and children around the world by creating safe spaces, improving access to education and enhancing quality of life

## Integrating Findings and Taking Action

Our *Forward Fashion* strategy is built around taking action to prevent, mitigate and remediate the above human rights risks. Each Forward Fashion priority has a time-bound target to hold us accountable as we aim to reach a set level of impact. To achieve each target, we have rigorous global action plans in place to work across the company and our businesses, and with supplier partners on the ground. For our strategy on how we will achieve each target, please see our [PVH.com/responsibility](http://PVH.com/responsibility).

An example of where we have taken action on a salient human rights issue includes our work on recruitment fees and migrant workers. As part of our CR assessment tool, we have a set of forced labor indicators, including one that specifically addresses recruitment fees. In evaluating our CR assessment data, we recognized the need to conduct a deeper dive on this issue in countries of high-risk, offer further training to our business partners, and augment our Migrant Labor Policy to provide further clarification on the definition of recruitment fees, as well as guidance on how to effectively implement management systems to ensure compliance. We similarly recognized the need to engage with industry experts such as the RLI, where PVH serves as a member of the Steering Committee, and provide strategic direction to the organization as it works to ensure that the rights of workers who are vulnerable to forced labor in global supply chains are consistently respected and promoted.

## Remediation and Capability Building

We are dedicated to supporting our suppliers' continuous improvement. Our CR program includes remediation and capability building services focused on long-term solutions, created through dialogue and cooperation between management and workers. Facilities are supported through a range of services including tailored phone calls or facility visits, training customized for the facility's specific needs, or are referred to expert resources. We are committed to using our best efforts when working with our suppliers to remedy the adverse impacts on those workers and communities affected.

As detailed in the Corporate Responsibility Supply Chain Guidelines in the Initial Factory Engagement Workflow, immediately after an audit (referred to as an "assessment" by PVH), any discovered non-compliances result in a Corrective Action Plan (CAP) with draft findings of non-compliance issues. A final CAP (with detailed root cause evaluation, timelines for completion, responsible parties, etc.) is developed by the factory and provided to PVH's CR team within 14 calendar days and within 30 calendar days for licensees, unless otherwise specified after the assessment.

Our CR team will approve the final CAP via email, while suppliers are expected to address all identified non-compliance issues, with priority given to address the most serious issues first. Progress or completion of issues identified as "Critical – Immediate Action"

must be immediately communicated to PVH CR representatives within seven business days after assessment. Completion of other corrective actions is verified during reevaluation assessments and/or through regular communication and contact with the supplier.

In addition to the above process for addressing any issues found in our supplier facilities through worker hotlines or our assessments, we are committed to working with suppliers as closely as needed on any and all reports of human rights violations through

trainings, incorporating market-specific remediation measures and industry advocacy. Our goal is to partner with our suppliers to improve issues that impact the lives of workers and build capabilities that empower our suppliers to proactively manage human rights challenges and establish long-term value-adding improvements. Example programs we have in place to do this include:

- Our Workplace Cooperation Program, in partnership with Better Work, a joint initiative of the ILO and the International Finance Corporation. By supporting democratic workplace elections and sharing problem-solving techniques, the program assists with the implementation of fairly elected worker-management committees focused on proactively improving working conditions and amplifying the voice of workers.
- Gap Inc.'s Personal Advancement Career Enhancement ("P.A.C.E.") learning program, aimed at providing female workers the professional and life skills they need to succeed in their lives through holistic training. In line with our commitment and approach to build our suppliers' own capabilities, we are the first company to implement a vendor-to-vendor collaboration model to extend P.A.C.E. by having certified vendors collaborate with new vendors to share best practices for P.A.C.E. implementation. This unique methodology has opened the pathway for vendors to develop mutually beneficial relationships as they implement P.A.C.E. programming together. It also creates more autonomy for suppliers and, through leading this effort, enables them to become better employers and strengthen their internal systems.

We aim to address the systemic challenges that exist for long-term improvement and we are also committed to continuously working with suppliers in partnership to address HR violations/issues, which are raised through the means outlined above.

## Remedying Adverse Impacts and Incorporating Lessons Learned

We are committed to remedying the adverse impacts which we may have caused or contributed to. One example is the approach we took to remediate health and safety issues in the Bangladeshi garment industry, some participants in which are PVH business partners. In 2013, the Rana Plaza disaster occurred in Bangladesh, resulting in the deaths of over 1,000 garment factory workers. While we had no production there, we have worked tirelessly to ensure such a tragedy will never happen again. In the wake of the Rana Plaza building collapse, we became founding members of the Accord on Fire and Building Safety in Bangladesh to help stop further tragedies and develop a culture of health and safety in garment factories. This evolved to become the International Accord — known simply as "The Accord" — and is a legally binding commitment to improve fire and building safety in Bangladesh. Our SVP of CR, Michael Bride, currently serves as a member of the Accord Steering Committee, representing us at a strategic level.

Through the Accord, we collaborate with multiple stakeholders to identify and address fire, electrical and structural risks, and drive positive change. Importantly, we recognize the pressing need to empower workers to formally voice their health and safety concerns with factory managers. In factories producing goods for PVH, we both assess our suppliers and coordinate safety improvement efforts on behalf of our fellow Accord members purchasing from those factories. Our CR and supply chain teams work closely with our Bangladeshi suppliers to identify the root causes behind any safety issues and partner with suppliers to develop lasting solutions. Among Accord members, including over 200 apparel companies, PVH has consistently demonstrated leading performance, including overseeing timely remediation at its suppliers' factories.

Overall, we have addressed nearly 97 percent of the initial issues uncovered at our suppliers' factories. The coalition announced an extension to expand its work through 2021, which PVH continues to support. Rob Wayss, Executive Director of the Accord, commented on our partnership, noting:

"From its inception, PVH has had a leadership role in the governance and implementation of the Accord. PVH's reliable support for and commitment to the goals of the Accord has made the ready-made garment industry in Bangladesh much safer."

### Joris Oldenzienl

Executive Director, International Accord for Health and Safety in the Textile and Garment Industry

We are working closely with industry partners, governments, and worker and employer representatives amid the COVID-19 pandemic to find solutions for workers' immediate needs, support employment across the supply chain and to contribute to long-term plans that can strengthen social protections in key garment exporting countries. As such, we fully endorsed the views, priorities and actions outlined in COVID-19: Action in the Global Garment Industry published by the ILO, together with The International Organisation of Employers ("IOE"), the International Trade Union Confederation ("ITUC") and IndustriALL Global Union. We know that together, we can work to establish a more just and resilient garment industry that is better equipped to mitigate the impact of COVID-19 and other future crises.

In partnership with Better Work, a joint initiative of the ILO and the International Finance Corporation ("IFC"), we have established a Workplace Cooperation Program with our suppliers. Historically, Compliance or Human Resources Managers in factories depended on PVH and other buyers to advise which issues to solve and how to solve them. To enable our business partners to proactively remedy adverse impacts and incorporate lessons learned to prevent future adverse impacts, PVH and Better Work provide trainings on workplace communication and problem-solving techniques to factory worker-management committee representatives.

Workers and managers can then enable factories to proactively and independently develop and implement solutions to social and environmental issues.

For more information about our human rights remediation efforts and partnerships, visit our [Corporate Responsibility Supply Chain Guidelines](#).

## Grievance Mechanisms

Through programs such as Workplace Cooperation Program, we work closely with our suppliers and their workplace managers to provide guidance and trainings to support the development and implementation of their own robust grievance mechanisms for employees. Wherever possible, our focus is on ensuring that capabilities to credibly manage grievances are in place across our suppliers.

In addition to supporting supplier-run mechanisms, our global reporting hotline, Tell PVH, has been made available to all workers in our supply chain who receive PVH's CR assessment, and to all our global PVH associates. It acts as a channel for PVH to capture and address concerns or complaints raised by our associates, as well as the people who work for our suppliers and elsewhere. Subject to certain legal limitations, they can report any suspected policy violation, inappropriate behavior and unethical practices via the hotline. In the majority of cases, they can make reports anonymously, either online or by telephone, in one of 15 languages. Because of our commitment to engage with NGOs as a key stakeholder, we receive and respond to inquiries from NGOs engaging with our sourcing communities.

Supply chain partners are provided informational cards with instructions on how to access Tell PVH. We also provide clear guidance and best practices about grievance mechanisms and the use of Tell PVH to suppliers in our Corporate Responsibility Supply Chain Guidelines. Supplier workers can also communicate with PVH, using Tell PVH, after an assessment. The supplier should not inter-

fere with, discourage or punish workers for communicating with PVH or PVH representatives. Tell PVH is not a substitute for any existing supplier grievance mechanisms.

Retaliation of any kind against employees who provided information in good faith during an assessment or through Tell PVH, as well as part of an investigation, is strictly prohibited.

For more information, please see page 42 of [PVH CR Supply Chain Guidelines](#).

## Communications

As we continue to make progress against our priorities, we are committed to transparency through reporting and communicating our efforts, and take action where needed to solve systemic challenges and scale impact. In 2016, we signed the Transparency Pledge with a commitment to publicly disclose our complete factory list, and we have continued to increase our level of detail and transparency year on year. We currently disclose all of our Level 1 direct factories and key fabric and trim suppliers, and include details such as facility names, addresses, number of workers and product type, fully aligning with the Transparency Pledge. Click here to find the [PVH Factory Disclosure List](#). We are committed to reporting on human rights data and qualitative updates on our Forward Fashion CR programs in PVH's annual CR report each year. We share stories and updates about our efforts on our social media channels, our [PHV.com](#) and the [PVH.com/responsibility](#). Internally, we distribute a monthly newsletter that updates the entire PVH organization on our programs and progress. We regularly post stories on our internal intranet, and we conduct classes and trainings through PVH U, our internal education platform. Externally, our Chief Sustainability Officer actively harnesses ways to promote and expand dialogue, and share our solutions, as well as our challenges.

We have a dedicated team responsible for addressing and responding to human rights issues and events throughout our supply chain. We investigate issues as they arise. Issues are discussed weekly

with PVH leadership and are shared as needed with other senior PVH leadership in order to ensure appropriate action is being taken. When we deem it necessary, we post updates to policies, resources and positions on our [PVH.com/responsibility](#) in response to numerous stakeholder inquiries on notable/salient issues. Our MSI partners, such as Better Work, ACT and the Accord also report publicly on factory progress and issues, and are a key stakeholder for accountability.

For more information, including the following documentation, please visit: <https://pvh.com/responsibility/resources>.

- [A Shared Commitment: Our code of conduct](#)
- [Statement of Corporate Responsibility](#)
- [Factory List Disclosure](#)
- [Corporate Responsibility Supply Chain Guidelines](#)
- [Corporate Responsibility Governance & Stakeholder Engagement](#)