

Under Armour

Modern Slavery Act Statement 2017

This statement has been published in accordance with the Modern Slavery Act 2015 (“the MSA”). In substance, the MSA applies to corporations, wherever incorporated or formed, that reach a certain annual revenue threshold regarding business in the United Kingdom. This statement summarizes steps taken by Under Armour during the fiscal year 1 January 2016 to 31 December 2016 to address risks of modern slavery in its business and supply chains.

### **1. Organization’s Structure, Business and Supply Chains**

The overwhelming majority of our products are built by independent third-party manufacturers. They work directly with us as our business partners, or indirectly, through an agent or Under Armour licensees. They, too, work to build and Protect their Houses. Together with these businesses and the people who work for them, our supplier teammates, we work as a single global team despite being present in over 20 countries. We all live and work on a single planet, our global House. Our principal business activities are the development, marketing and distribution of branded performance apparel, footwear and accessories for men, women and youth. The brand’s performance apparel and footwear are engineered in many designs and styles for wear in nearly every climate to provide a performance alternative to traditional products. Our products are sold worldwide and are worn by athletes at all levels, from youth to professional, on playing fields around the globe, as well as by consumers with active lifestyles. Our product offerings consist of apparel, footwear and accessories for men, women and youth.

#### *Apparel*

Our apparel is offered in a variety of styles and fits intended to enhance comfort and mobility, regulate body temperature and improve performance regardless of weather conditions. Our apparel is engineered to replace traditional non-performance fabrics in the world of athletics and fitness with performance alternatives designed and merchandised along gearlines.

#### *Footwear*

Our footwear offerings include running, basketball, cleated, slides and performance training and outdoor footwear. Our footwear is light, breathable and built with performance attributes for athletes.

### *Accessories*

Accessories primarily include the sale of athletic performance gloves, bags and headwear.

### *Licensed Products*

During 2016, our licensees offered collegiate, National Football League and Major League Baseball apparel and accessories, baby and kids' apparel, team uniforms, socks, water bottles, eyewear and other specific hard goods equipment that feature performance advantages and functionality similar to our other product offerings.

## **2. Policies**

Under Armour is a Participating Company in the Fair Labor Association and the Head of our Sustainability program is a member of the FLA's Board of Directors, its Monitoring Committee and its Audit Committee. Under Armour uses the FLA's [Sustainable Compliance Initiative](#) methodology (SCI) to advance workers' rights through efforts aimed at continuous improvement of employment practices and working conditions.

The Under Armour [Supplier Code of Conduct](#) ("the Code") reflects core ILO conventions and includes provisions on Forced Labor, Hours of Work, Freedom of Association And Collective Bargaining, Non-Retaliation, and Harassment or Abuse, all of which set forth expectations for the protection of workers and seek to mitigate risks including forced or slave labor. We have a grievance hotline for suppliers and employees to report violations of the Code of Conduct. The hotline allows for anonymous reporting depending on location and is monitored 24 hours a day, seven days a week.

### Code of Conduct

Under Armour expects its product supply chain business partners, including manufacturers, licensees and agents and their subcontractors, to comply with Under Armour's [Supplier Code of Conduct](#) (the "UA Code"). The "Forced Labor" provision states that "Under Armour suppliers and their subcontractors shall not use forced labor, whether in the form of prison labor, indentured labor or

bonded labor, or other forms of forced labor to make or perform work on Under Armour products or their components or materials or permit their suppliers to do so.” Under Armour also expects its product supply chain business partners, including manufacturers, licensees and agents and their subcontractors to comply with the [Fair Labor Association’s Workplace Code of Conduct and Compliance Benchmarks](#).

### Assessments

Under Armour has engaged independent, third-party firms ("third party audit firms") to conduct assessments of direct suppliers that include assessments of the risks of forced labor, slavery and human trafficking. Under Armour has developed and issued a [Supplier Code of Conduct](#) to our Suppliers. As a Fair Labor Association ("FLA") Participating Company, we also apply the FLA's Workplace Code of Conduct to the part of our supply chain that is covered by that membership. Direct suppliers' compliance with our Supplier Code of Conduct and the FLA Workplace Code of Conduct is assessed through third-party audit firm supplier assessments. Those assessments may be announced or unannounced, and include surveillance. Additionally, the FLA conducts Independent External Assessments (IEA) of certain factories that fall within our FLA affiliation obligations.

Tier 1 factories are assessed for Code and legal compliance before they may be authorized to make Under Armour products. Factories are expected to remediate issues raised during assessments/verifications and to submit timelines and plans for how they propose to continuously improve conditions and work toward achieving sustainable compliance during the course of their business relationship with Under Armour.

After assessors complete supplier assessments, they give Initial Management Action Plans (IMAP) to factory management as part of a meeting with supplier management at the end of the assessment, where the assessors and management discuss assessment findings. After we receive the assessment reports, our Sustainability team subsequently prepares Management Action Plans (MAP) to fine tune and, in some cases, to broaden the steps that we expect suppliers to take to address issues raised by the assessments. The MAP also may include specific requirements aimed at emphasizing the importance of Code awareness by requiring management to conduct periodic training sessions on the Code’s standards and benchmarks for workers, supervisors, and other employees in managerial positions. We expect that these training sessions are documented, include interactive question-and-answer time, and are conducted (and include materials) in all applicable worker and manager languages and dialects. As factories hire new workers, management is

required to build their new workers' awareness of the FLA and Under Armour's Code of Conduct in orientation meetings that are documented in each worker's personnel file.

### Internal Accountability Standards

Under Armour employees and contractors are expected to meet company standards and procedures regarding, and prohibiting, slavery and human trafficking (including those reflected in its Supplier Code of Conduct and the FLA Workplace Code of Conduct) and may be held accountable for failing to comply with such standards and procedures.

### **3. Due Diligence Processes**

Verification: Under Armour has conducted, and has required the independent third-party firms that conduct direct supplier inspections to conduct, assessments of the risks of forced labor, which would include slave labor. Under Armour seeks to address those risks by actions including those summarized herein.

Certification: Under Armour's current manufacturing agreement requires its direct suppliers to certify that materials incorporated into our products comply with laws regarding slavery and human trafficking of the country or countries in which they are doing business, and other laws and standards regarding slavery and human trafficking.

### **4. Areas of Risk**

Under Armour performed a GRI-based labor risk assessment using 2014 and 2015 assessments, accounting for 80% of all assessments commissioned by Under Armour.

In addition, Under Armour worked to build a Human Rights Country Risk model to assess country-level human rights risks. This model scores countries against factors/categories including their perceived General Governance Capacity, Protection of International Bill of Rights, and Respect for the ILO's Eight Core Conventions. Under Armour used this assessment as part of its human rights due diligence process, including fostering its awareness of country-level trends and enhance its ability to engage with suppliers about related potential risks.

**Actions:** Key members of Under Armour's Sustainability and Sourcing teams work on the same floor of one of corporate office buildings to facilitate data exchange and collaboration regarding onboarding new suppliers, all in a cross-functional effort to mitigate risks, including assessing whether aspects of purchasing practices may increase the risk of forced labor in its supply chain. The Sustainability team provides periodic information about suppliers' social and environmental compliance performance to corresponding sourcing personnel and seeks to work with them and new facility onboarding personnel as part of an integrated and cross-functional effort to avoid purchasing practices that increase the risk of human trafficking and forced labor in the supply chain (e.g. such as addressing issues posed by suppliers' use of short-term contracts, sudden changes of workload). Among other instances, these issues are addressed in the Sustainability Council meetings and meetings with other internal and external Under Armour Employees, manufacturers and suppliers, among others. This enables the Sustainability and Sourcing teams to collaborate and to seek to work with manufacturing business partners that over time strive to perform better on key labor and other rights performance indicators.

## **5. Training**

Under Armour has previously provided its employees and management, who have direct responsibility for supply chain management, with training on slavery and human trafficking, particularly with respect to seeking to mitigate related risks within the direct suppliers of products. Additionally, Under Armour expects to provide additional training to employees and management individuals on slavery and human trafficking issues and risks in the future. Finally, with respect to employees who may not be formally trained, we expect to provide materials for their review.

### **Goals for Fiscal Year 2017**

#### **1. Supply Chain Transparency**

In March 2017, Under Armour disclosed a [supply chain list](#) of strategic and specialty vendors. This list sought to reflect in excess of 70% of our business and includes the country, address, number of workers, and product type of each factory. Under Armour has also committed to continuing to evaluate and consider expanding this disclosure over time.