

## Modern Slavery Act Transparency Statement

### Triumph Group Slavery and Human Trafficking Statement – 2022

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It constitutes *Triumph Group's slavery and human trafficking statement for the financial year 2021*

#### Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking.

We understand that modern slavery is a global issue that may affect our organisation and our supply chains alike.

**Triumph Group** possesses subsidiaries around the world covering significant activities of its value chain from design to sales. Such a long period of success is only possible with a keen sense for fashion and excellent insights into the desires and needs of our consumers as well as with caring and engaging approach to its employees and stakeholders.

For over a century, Triumph continuously strived to recruit new talent, offering them one of the textile industry's most international working environment, excellent conditions and great development opportunities in an ever-evolving company.

We manufacture in socially compliant and high tech production facilities, a number of them owned and operated directly by us, using environmentally friendly and energy-saving production methods and the most modern and skin-friendly material.

Since 2012, our organisation has been and currently is a participant of the Business Social Compliance Initiative (now called amfori BSCI), which supports companies to drive social compliance and improvements within the factories in their global supply chains.

We endorse the Triumph Code of Conduct and, as an amfori BSCI Participant, we endorse the amfori BSCI Code of Conduct and its terms of implementation and cascade them through our supply chain. Therefore, Triumph Group does not tolerate any form of slavery, servitude, forced, compulsory labour and human trafficking and commits strongly to the early detection, monitoring and remediation of such issues in its supply chain. Triumph Group remains open to constructive engagement with stakeholders who can help to combat this phenomenon.

#### Organizational structure

##### *International*

Triumph Group, one of the world's leading intimate apparel companies, has been founded in Germany in 1886. Today, it is headquartered in Bad Zurzach (Switzerland) and continues to be a fully privately owned company.

Triumph today enjoys a presence in over 120 countries all across the world. For its brands Triumph and sloggi the company develops, produces and sells underwear, lingerie, sleepwear and swimwear.

Globally, the company serves 40,000 wholesale customers and sells its products in 4,050 controlled points of sale as well as via several own online shops.

## **UK**

Triumph Group runs a sales and marketing operation including supporting functions to serve valued customers in the United Kingdom and Republic of Ireland. The company operates across different sales channels including wholesale, distant retail and e-commerce, which includes our own UK Triumph and Sloggi web sites.

### **Supply chain structure**

Many of our products are manufactured in Triumph own manufacturing facilities and the rest is being produced by trusted and reliable partners with whom we've typically collaborated for several years. Our third party finished goods suppliers are continuously evaluated on various criteria including compliance. We expect our suppliers to comply with legal requirements as well as environment, social standards and our Code of Conduct.

### **Internal Policies, procedures and contractual controls**

Triumph Group is committed to conduct our business in a legal, responsible and sustainable manner that is ethically sound and concerned with the welfare of our people, communities, our stakeholder and the natural environment. Our Policy Framework sets the context within which we wish to sustain our successful business. It contains the principles and rules of corporate conduct to guide behaviour both within and outside of our company.

As an amfori BSCI Participant, Triumph has developed the necessary management systems, policies and procedures to effectively prevent and address any adverse human rights' impact that may be detected in its supply chains.

### **Social Compliance Policy**

Our Social Compliance Policy was rolled out in April 2012 in order to increase visibility, transparency and risk manageability for finished goods suppliers by providing a single and structured approach to identify, evaluate and approve the suppliers complying with our policy.

We have implemented governance and compliance standards to uphold our commitment accordingly. Simultaneously, Triumph joined amfori BSCI in 2012 in order to drive sustainable improvement of labor and workplace conditions by adhering to both our own Code of Conduct as well as amfori BSCI's Code of Conduct, which includes prevention of servitude, forced, bonded, indentured, trafficked or non-voluntary labor.

### **Business Ethics Guidelines**

Our values, principles and codes of conduct ensure that expectations around ethical behaviours are clear, monitored and that specific corrective actions are implemented in case of any violations.

**For more detailed information please visit:**

[GLOBAL Triumph International Business Ethics Guidelines.pdf](#)

### **Due diligence and remediation in our own business and supply chains**

As an amfori BSCI Participant, Triumph commits to act diligently in

- (a) assessing actual and potential adverse impacts of our business against the values and principles of the amfori BSCI Code of Conduct;
- (b) identifying throughout the supply chain where the most significant risks for these adverse impacts may occur and

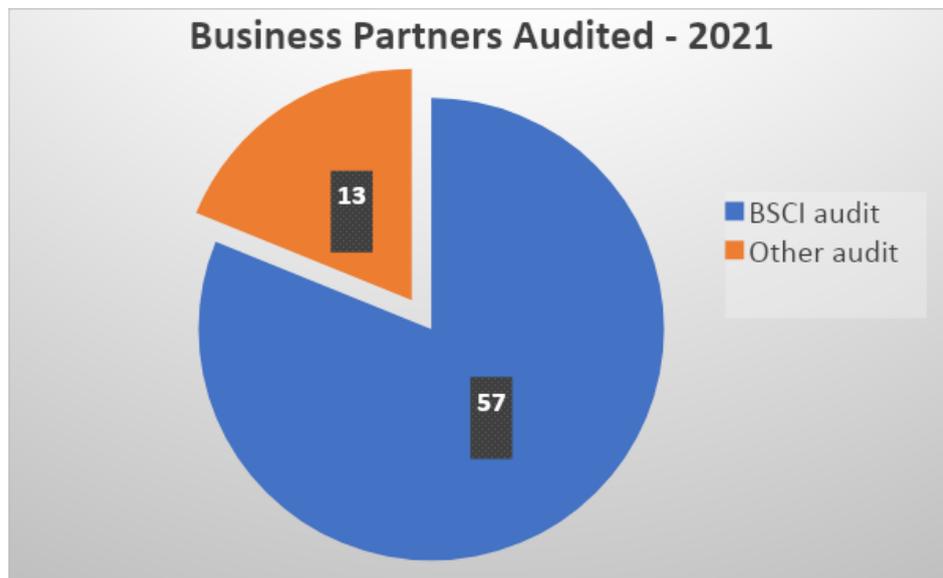
(c) acting upon them with the aim of preventing and/or addressing them in line with the BSCI Code of Conduct.

In this context, we have undertaken the following due diligence steps:

### ***Mapping and monitoring our supply chains***

We have gathered and assessed reliable information about our business partners' responsible behaviour, among others by using BSCI audits. In 2021, **100** finished garments factories supporting Triumph business across 18 countries.

**70** factories were selected and audits were organized, out of which 57 were audited under BSCI audit protocol and 13 factories were audited based on other audit schemes like WRAP, Better Works, SMETA and ICS etc. (see the graph below)



#### **Remarks:**

Selected factories were not audited in 2021 due to the below reasons:

- Factories were located in low risk countries like Japan, Germany, etc.
- Factories' audits dates were valid for 2021

We have requested our significant business partners to sign the amfori BSCI Code of Conduct and Terms of Implementation and asked them to pass it onto their own significant partners, creating a positive cascade effect

In 2021, since most of the countries had imposed restrictions due to Covid-19 pandemic, we were unable to conduct random on-site inspections of our suppliers. However, we were closely tracking the audit results issued by the qualified audit firms and monitor their improvement in social compliance status.

#### ***Grievance mechanism and worker's involvement***

Our organisation has put effective grievance and whistle blowing mechanisms in place as per amfori BSCI Code of Conduct for individuals and communities who may be adversely impacted by our organization's activity, including potential or factual forced labour.

We have set up an integrity hotline ([integrity@triumph.com](mailto:integrity@triumph.com)), which is an independent and confidential channel for receiving information relating to improper business conduct and open to both Triumph employees as well as third parties

In addition, being an amfori BSCI Participant, any third party can lodge a grievance about our BSCI implementation activities through the amfori BSCI Grievance Mechanism [[system@amfori.org](mailto:system@amfori.org)].

#### ***Incidents of forced labour and remediation***

Through BSCI audits and other social compliance audit schemes, we have not identified any case of unacceptable performance under the heading of bonded labour. This concludes that our business partners have better management system as below;

- a) Exercise due diligence to avoid engaging in any form of bonded labour – particularly when recruiting migrant workers directly or indirectly;
- b) Have prevention procedures and build knowledge to prevent forced labour and human trafficking through hiring;
- c) Enforce vigilance to avoid inhumane or degrading treatment – including through disciplinary procedures.

#### ***Stakeholder engagement and industry collaboration***

Being an amfori BSCI Participant, we are part of an industry wide network that we use it to work collaboratively and exchange lessons learned and solutions in a pre-competitive basis

#### **Assessment of Modern Slavery risk within our business and supply chain**

To understand where we have the biggest risks, Triumph Group has undertaken the following risk assessment steps both in our own organization and in our supply chains:

With the help of the tool from amfori BSCI, we have identified the severity of the risk in different countries for sourcing. For countries with high risk like China, India, Vietnam and Cambodia etc, apart from arranging the social compliance audit regularly (at least once in a year generally), with due diligence and if the situation allows, our social compliance team would also arrange visits regularly on them for an on-site evaluation to better understand the social compliance status of the factory which includes the evaluation on the human resource policies and recruitment practice etc.

Country Risk Classification: <http://duediligence.amfori.org/countryRiskClassification>

#### **Assessment of our effectiveness in preventing and combatting Modern Slavery**

We understand that forced labour, human trafficking and slavery risks are not static, therefore we regularly track, measure and evaluate our internal due diligence processes to better understand our performance, progress, effectiveness, remaining risks and impact of our own operations and those of our business partners.

The amfori BSCI helps Triumph define overall goals and targets to assess our progress in achieving them. With regards to combatting Modern Slavery, we recognize the following key targets to be monitored:

- Our own staff increases awareness of forced labour and human rights risks, particularly those related to forced labour and human trafficking.

- Our supply chains' business partners show continuous improvement, particularly with regard to the BSCI Performance area on bonded labour.

Assessing the effectiveness of our measures on a regular basis helps Triumph maintain efforts that have proven to be successful and allows the exploration of innovative solutions when needed.

### **Training and further steps**

At Triumph, our employees are introduced to our Codes of Conduct, trained on our values and principles and asked to familiarize themselves with our corporate policies.

In addition, every finished goods suppliers are introduced to our Code of Conduct. Factories, which are audited on amfori BSCI system, are further expected to cascade amfori BSCI's Code of Conduct down their supply chain to further drive awareness beyond the first tier. We also encourage our factories to partake in one of the many amfori BSCI workshops to further reinforce amfori BSCI's Code of Conduct.

Training sessions on Social Compliance and Modern Slavery have also been done for our global sourcing team within the Group.

Going forward, we are planning to instil the concept of human rights and modern slavery more specifically into our business partners down the supply chain.

This statement has been approved by the Global Head of Supply Chain on **23<sup>rd</sup> June 2022** and constitutes Triumph Group's commitments to avoid slavery and human trafficking for the financial year ending 2021.