

**Clean
Clothes
Campaign**



Red de
Solidaridad de la
Maquila
Solidarity Network
www.maquilesolidarity.org



Company Responses Received by the Coalition¹

1. American Eagle Outfitters, November 7, 2016
2. ASICS, November 4, 2016
3. C&A, March 15, 2017
4. Canadian Tire, March 27, 2017
5. Columbia Sportswear Company, December 20, 2016
6. Esprit, November 23, 2016
7. Foot Locker, November 4, 2016
8. G-Star RAW, March 9, 2017
9. H&M Group, April 2, 2017
10. Hudson's Bay Company, November 4, 2016
11. Hugo Boss, November 23, 2016
12. Inditex, November 7, 2016
13. KiK, November 7, 2016
14. Loblaw, November 7, 2016
15. Mizuno, November 14, 2016
16. Nike, March 6, 2017
17. Pentland Brands, November 2, 2016
18. Primark, November 1, 2016
19. Puma, December 19, 2016
20. Sainsbury's, November 7, 2016
21. Shop Direct, December 2, 2016. The company did not write back to the coalition with a substantive response to the letter.

¹ This Annex produces all company responses received by the coalition on company letterhead. Email exchanges between company and coalition representatives are on file with coalition members.

AMERICAN EAGLE OUTFITTERS®

November 7, 2016

Dear Ms. Yanz,

Thank you for your interest in American Eagle Outfitters' (AEO) responsible sourcing program. A commitment to safe and healthy working conditions for factory workers in our supply chain is a core value of our company. Our Vendor Code of Conduct, inspired by universally-accepted human rights principles and the conventions of the International Labour Organization, establishes rigorous requirements and expectations for all of our suppliers that are in addition to compliance with local laws and regulations. They must contractually agree to the terms of the Code before producing for us. In fact, we conduct pre-sourcing inspections of facilities – if they do not meet our standards, they don't work with us.

Once approved, we hold suppliers to high standards of implementation, conducting annual factory inspections with our own and third-party auditors to ensure that they are meeting expectations and remedying any issues identified. These extensive inspections include a review of workplace safety, working hours and wage compliance and treatment of workers through interviews, worker surveys, and observation. If an issue is identified, we first work with the management collaboratively on remediation. If suppliers are unable or unwilling to make necessary changes, we take steps up to and including ending our relationship with that supplier.

We share the goals of your supply chain initiative, as demonstrated by our commitment to safe working conditions, backed up with our continual efforts to improve working conditions, including our work with you on initiatives such as the Bangladesh Accord and the Better Work programs. We appreciate you reaching out to us regarding your efforts, and we believe our policies and performance speak for themselves.

Sincerely,



Michelle Tarry
Director, Responsible Sourcing
American Eagle Outfitters, Inc.

CC:

Amol Mehra, Director, International Corporate Accountability Roundtable
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch
Jyrki Raina, General Secretary, IndustriALL Global Union
Lynda Yanz, Executive Director, Maquila Solidarity Network
Philip Jennings, General Secretary, UNI Global Union
Scott Nova, Executive Director, Worker Rights Consortium
Sharan Burrow, General Secretary, International Trade Union Confederation
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Appendix I

The Apparel and Footwear Supply Chain Transparency Pledge

("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps ~~within three months of signing it.~~

Publish Manufacturing Sites

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.¹
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.²
5. Worker numbers at each site.³

Companies will publish the above information in a spreadsheet or other searchable format.



ASICS Corporation
Global Legal & Compliance Division
Executive Officer Senior General Manager,
Megumi Ohta

¹ Processing factories include printing, embroidery, laundry, and so on.

² Please indicate the broad category—apparel, footwear, home textile, accessories.

³ Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.



Brussels, March 15th, 2017

Letter to: Aruna Kashyap, Senior Counsel Human Rights Watch

Dear Ms. Kashyap,

Thank you for reaching out to us with regards to C&A being part of the “Apparel and Footwear Supply Chain Transparency Pledge”. We agree that the Transparency Pledge helps demonstrate the commitment of apparel and footwear companies towards greater transparency in their manufacturing supply chain.

For C&A, creating long lasting and powerful relationships with our suppliers will allow us to source the highest quality products and build trust and increased ownership of our suppliers' environmental and social responsibilities. Transparency leads to accountability - we are focused on understanding the human and labour rights conditions in our supply chain to demonstrate that we are managing them effectively. Therefore, C&A has put transparency at the top of its agenda and as a result of this, in May 2016, we disclosed the names and addresses of our suppliers' first-tier production units (cut & sew, finishing, packaging, shoes, accessories). These production units are the actual location where C&A merchandise is manufactured. They can be found on the following website <http://materialimpacts.c-and-a.com/supplier-list/>

Furthermore, as of June 2017, we have committed to increase our degree of transparency by disclosing all 1st tier garment production units, as well as second tier production units (garment wash and dye, printing, embroidery, screen printing) from all our sourcing countries including local production in Brazil and Mexico. On top of the above commitment, C&A will also publish on its website the following information related to the production units:

- a) The parent company of the business at the site
- b) Type of products made¹
- c) Number of workers at each site²

All the above mentioned information will be updated regularly throughout the year to ensure it is reliable and provides a real picture of our supply chain.

Should you have further questions, please do not hesitate to contact me.

Sincerely,

Aleix Busquets Gonzalez

Global Head of External Stakeholder Engagement

¹ C&A will indicate the broad category—apparel, footwear, home textile, accessories for each of the Production Unit used.

² C&A will indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers



March 27, 2017

Amol Mehra, Director, International Corporate Accountability Roundtable
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch
Jyrki Raina, General Secretary, IndustriALL Global Union
Lynda Yanz, Executive Director, Maquila Solidarity Network
Philip Jennings, General Secretary, UNI Global Union
Scott Nova, Executive Director, Worker Rights Consortium
Sharan Burrow, General Secretary, International Trade Union Confederation
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Dear Ladies & Gentlemen,

Thank you for your letter regarding the benefits of transparency in garment and footwear supply chains. We support the purpose of your efforts as you work to prevent potentially adverse impacts to human rights in overseas factories.

While we are not going to sign your Apparel and Footwear Supply Chain Transparency Pledge today, we continue to work diligently to select vendors and factories that support our values. Integrity, honesty and respect are at the core of what makes Canadian Tire Corporation a trusted company. Through our Supplier Code of Business Conduct, which clearly outlines our expectations for ethical business dealings, we aim to ensure that our values are not only understood, but shared by the vendors with whom we work around the globe. All of our vendors must sign our Supplier Code, and our vendors' ethics drive the efforts surrounding our vendor-management process are aimed at monitoring compliance with code.

Our Sourcing and Quality teams are trained and educated on social compliance matters and work on the ground with factories that manufacture our private label products. We have a robust auditing process in place and an integrated approach to ensuring product quality and the meeting or exceeding of labour, safety, human rights and local environmental laws. In 2016, we completed 613 supplier code factory audits, which provide us with a way of helping our vendors find new ways to meet emerging challenges, solve problems and make sustainable improvements in their practices and performance.

Our experience as a founding member of the Alliance for Bangladesh Worker Safety has been very rewarding and has demonstrated how industry collaboration can build capability and lead to sustainable change. We will continue to focus on selecting and working to build capacity with vendors and factories that demonstrate our values.

For more information, please visit sustainability.canadiantirecorporation.ca.

Warm regards,

Robyn Collver
Senior Vice President, Risk & Regulatory Affairs

CANADIAN TIRE CORPORATION, LIMITED

2180 YONGE ST. P.O. BOX 770, STATION K, TORONTO, ONTARIO, CANADA M4P 2V8
TELEPHONE (416) 480-3000 FAX (416) 544-7715





December 20, 2016

Aruna Kashyap, Senior Council, Human Rights Watch
Amol Mehra, Director, International Corporate Accountability Roundtable
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch
Lynda Yanz, Executive Director, Maquila Solidarity Network
Philip Jennings, General Secretary, UNI Global Union
Scott Nova, Executive Director, Worker Rights Consortium
Sharan Burrow, General Secretary, International Trade Union Confederation
Valter Sanches, General Secretary, IndustriALL Global Union

Re: The Apparel and Footwear Supply Chain Transparency Pledge

Dear Aruna et al.,

Thank you for contacting Columbia Sportswear Co. ("Columbia") regarding the work you are doing to facilitate company's transparency in supply chains. Columbia agrees that greater transparency in supply chains as well as transparency with the work companies are doing in Corporate Responsibility will not only facilitate better engagement with stakeholders, but also help achieve our overarching goal of improving working conditions in the facilities that make our product.

Columbia is committed to continuously improving transparency; we began publishing our finished goods factory list on our website starting in 2013 (www.columbia.com/About-Us_Corporate-Responsible_Manufacturing.html), and we are very pleased to announce the recent release of our inaugural Corporate Responsibility report, which can be found on our website at www.columbia.com/corporateresponsibility. The report summarizes our extensive work in the areas of Product Sustainability, Responsible Manufacturing, Collaboration, Internal Operations & Logistics and Community Involvement.

We commend you on organizing the Transparency Pledge, which will help to encourage those companies who have not yet published their factory lists to become more transparent. As mentioned above, Columbia is already publishing our factory list, and have been actively collaborating with other brands and NGOs to improve working conditions. Therefore, we do not feel it is necessary for us to sign the Transparency Pledge at this time; however, we would be open to have further dialogue with you about it.

Warm regards,

Mary Bean, Corporate Responsibility Program Manager
Peter Haney, Sr. Manager, Corporate Responsibility Stakeholder Engagement
Abel Navarrete, Vice President, Corporate Responsibility

Amol Mehra, Director, International Corporate Accountability Roundtable
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch
Jyrki Raina, General Secretary, IndustriALL Global Union
Lynda Yanz, Executive Director, Maquila Solidarity Network
Philip Jennings, General Secretary, UNI Global Union
Scott Nova, Executive Director, Worker Rights Consortium
Sharan Burrow, General Secretary, International Trade Union Confederation
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

November 23, 2016

Re: The Apparel and Footwear Supply Chain Transparency Pledge

Dear Transparency Pledge Participants:

Esprit received your letter of October 4th regarding the release of our supplier list. As we subsequently indicated to Aruna, the Senior Counsel of Human Rights Watch's Women's Rights Division, Esprit had, in fact, posted our supplier list on our web site some time prior to receiving the letter. A link to that information was sent to Aruna.

The information we currently have on our web site does not, however, meet all of the requirements of the Pledge. Specifically, we do not currently include the product category, parent company, or number of workers in each factory. The document is also a PDF file, which is not searchable. Esprit is currently in the process of gathering the additional information needed, and undertakes to update our supplier list in accordance with the Apparel and Footwear Supply Chain Transparency Pledge within 90 days.

I'm sure you understand that releasing this information is not comfortable for many companies, but the time has come to do it. Esprit is pleased to join with our industry peers and concerned stakeholders to take this significant step toward supply chain transparency.

Best regards,



Lary Brown

Vice President- Head of Global Social and Environmental Sustainability
Esprit

November 4, 2016

Apparel and Footwear Supply Chain Transparency Pledge
transparency@hrw.org

Dear Sir or Madam:

Mr. Johnson has asked that I reply to your letter to him dated October 4, 2016. We appreciate hearing your comments and views, and thank you for your interest in the practices that Foot Locker follows in connection with its global supply chain. We wish to assure you that Foot Locker does apply social standards to its supply chain.

The vast majority of products sold by Foot Locker come from our name brand suppliers, such as Nike, adidas and Puma. We produce no private label footwear. While we will not be participating in the Transparency Pledge at this time, we do commit to continue to adhere to the highest social standards in the manufacture of our products, and will maintain our Global Sourcing Guidelines to address core issues in global sourcing, including child labor, forced labor, nondiscrimination, wages and benefits, health and safety, working hours, and freedom of association. We communicate these requirements to each of our private label suppliers, and we have in place a system of factory inspections and monitoring to ensure compliance with our Guidelines.

Thank you for taking the time to write to us.

Respectfully,



Saadi A. Majzoub
Senior Vice President – Supply Chain
smajzoub@footlocker.com

The Apparel and Footwear Supply Chain Transparency Pledge

("The Transparency Pledge")

This Transparency Pledge helps demonstrate apparel and footwear companies' commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company's manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company's human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps within three months of signing it:

Publish Manufacturing Sites

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.ⁱ
2. The site addresses.
3. The parent company of the business at the site.
4. Type of products made.ⁱⁱ
5. Worker numbers at each site.ⁱⁱⁱ

Companies will publish the above information in a spreadsheet or other searchable format.

As an apparel company, G-Star Raw C.V., commits towards greater transparency in its manufacturing supply chain. G-Star will therefore commit to extend its Manufacturing Map with the points mentioned above and will add a spreadsheet with its supply chain data online before the end of the year.

Date: March 9, 2017.



Frouke Bruinsma

CR Director

ⁱ Processing factories include printing, embroidery, laundry, and so on.

ⁱⁱ Please indicate the broad category—apparel, footwear, home textile, accessories.

ⁱⁱⁱ Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.

2017-04-02



The Apparel and Footwear Supply Chain Transparency Pledge
(“The Transparency Pledge”)

This Transparency Pledge helps demonstrate apparel and footwear companies’ commitment towards greater transparency in their manufacturing supply chain.

Transparency of a company’s manufacturing supply chain better enables a company to collaborate with civil society in identifying, assessing, and avoiding actual or potential adverse human rights impacts. This is a critical step that strengthens a company’s human rights due diligence.

Each company participating in this Transparency Pledge commits to taking **at least** the following steps by December 2017:

Publish Manufacturing Sites

The company will publish on its website on a regular basis (such as twice a year) a list naming all sites that manufacture its products. The list should provide the following information in English:

1. The full name of all authorized production units and processing facilities.¹
2. The site addresses.
3. Supplier name and relationship to factory, indicating whether ownership or contractual control applies
4. Type of products made.²
5. Worker numbers at each site.³

X

Pascal Brun
Global Sustainability Manager

Notes related to above points

1. Processing factories include printing, embroidery, laundry, and so on.
2. -
3. Adding information that states supplier’s ownership or contractual control over the factory in connection to supplier name in our supplier map. The supplier map includes first tier manufacturing supplier factories that account for about 98.5% of all commercial pieces produced for the H&M Group. Additionally, it includes all processing factories, which can be subcontracted by our first tier manufacturing supplier factories for specific tasks.
- 4.
5. Please indicate the broad category—apparel, footwear, home textile, accessories.
6. Please indicate whether the site falls under the following categories by number of workers: Less than 1000 workers; 1001 to 5000 workers; 5001 to 10,000 workers; More than 10,000 workers.

Companies will publish the above information in a spreadsheet or other searchable format.



November 4, 2016

Dear Human Rights Watch,

Thank you for your letter of October 4, 2016 **Re: The Apparel and Footwear Supply Chain Transparency Pledge**. We applaud your efforts for continued transparency in the clothing industry. As I am sure you are aware, Hudson's Bay Company (HBC) is one of the first Canadian retailers to publicly disclose factories that produce private brand product. This public list has been made available since 2014 and can be found on www.hbc.com. Information disclosed includes the names, addresses, and countries where factories are located. Therefore we already fulfill requirements 1 and 2 of your Transparency Pledge.

Additional information you have requested will be reviewed.

Thank you again for your letter. If you have additional questions about HBC's ethical sourcing policy and process please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Yan', is placed over a light gray rectangular background.

Julie Yan

Director, Corporate Social Compliance
Hudson's Bay Company

HUGO BOSS

HUGO BOSS AG Postfach 12 52 D-72543 Metzingen

Via Mail

Metzingen, 23. November 2016

The Apparel and Footwear Supply Chain Transparency Pledge

Dear ladies and gentlemen

Thank you very much for your letter and your interest in HUGO BOSS and corporate sustainability activities.

Referring to your letter and the request for disclosure of the supplier within the supply chain of HUGO BOSS please note that at the premium and luxury sector the competition is quite high, due to sometimes relatively small orders or specialized suppliers. This is mainly the reason why HUGO BOSS has so far not agreed to disclose its entire supply chain as we might lose our competitive edge.

During the first International Stakeholder Meeting of HUGO BOSS on October 28th, with national and international attendees such as TEKSIF, the IG Metall, representatives from FEMNET, Better Work and FLA, beside many others, transparency was one of the most important topics and requirements from several stakeholders. HUGO BOSS is taking these requests very serious as transparency built on mutual trust is imperative for any kind of business relation.

Hence HUGO BOSS is currently elaborating on how to integrate this request into our sustainability strategy and how to proceed in a meaningful way.

We have therefore decided that within the first quarter of 2017 we will provide much more and detailed information on our supply chain on our official HUGO BOSS website. In the meantime we would be happy to invite you to our Headquarters in Metzingen in order to show you our supplier lists and other relevant materials, if needed.

.../...

HUGO BOSS

Seite 2

23. November 2016

In case of further questions, please do not hesitate and contact us at any time.

Sincerely,



Dr. Hjördis Kettenabch

Head of Corporate Communications
& Corporate Citizenship



Dr. Reiner Hengstmann

HUGO BOSS
Sustainability Consultant

Arteixo (Spain), 7th November, 2016

Dear Sirs,

Thank you very much for your mail encouraging to companies to promote workers' rights through transparency. Inditex not just supports this goal, it also has taken different measures during last years to standardize methods of ensuring traceability and transparency of supply chain and guaranteeing maximum compliance of every supplier and manufacturer involved in production with legislation on labour, the environment and product health and safety.

Apart from the above mentioned, Inditex has promoted both transparency and promotion of workers' rights through the signature of framework agreements with UNI Global Union and IndustriALL Global Union, which Inditex provides on regular base all information of its supply chain.

We of course respect the decision of those brands that have publicly release one list of factories or suppliers, but definitely we understand that a real commitment is to guarantee free access to trade unions to supply chain and respect for freedom of association of workers through Global Framework Agreements as well as other initiatives carried out along with trade unions during last years. The option of give publicity cannot substitute to real commitment for changing things on the ground.

We also understand that commercial and competitive reasons need to be considered when we talk about transparency of supply chains so we understand that any initiative in this sense should include the possibility of either publicly disclosure of supply chain details or disclosure of it to trade unions through a Framework Agreement. Definitely it is needed a real commitment of brands (not just from the retail, all industry sectors) with transparency but it is needed to articulate tools that balance this need with the defense of the competitive advantage of a business that give work to more than 1 million workers worldwide that are part of Inditex supply chain.

We have seen during the last years in different cases that transparency without collaboration does not provoke any change, while collaboration with global unions can really improve lives of workers and promote defense of its rights. You know that you will always have our active commitment on that.

We keep at your disposal for jointly comment this or other points that you consider. Just from the dialogue and understanding of each other position we think that will be able to move forward together.

Kindest regards and thanks



Felix Poza Peña

Head of Sustainability Department

Inditex Group



KiK Textilien und Non-Food GmbH • Postfach 1243 • 59194 Bönen

November 7, 2016

Recipients:

Amol Mehra, Director, International Corporate Accountability Roundtable
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch
Jyrki Raina, General Secretary, IndustriALL Global Union
Lynda Yanz, Executive Director, Maquila Solidarity Network
Philip Jennings, General Secretary, UNI Global Union
Scott Nova, Executive Director, Worker Rights Consortium
Sharan Burrow, General Secretary, International Trade Union Confederation
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign

Dear all,

thank you very much for your letter dated 04.10.2016 which has been forwarded to me according to my respective responsibilities and I am happy to answer. Your letter requests the disclosure of our complete list of suppliers in respect to "The Apparel and Footwear Supply Chain Transparency Pledge".

In fact, profound and reliable supply chain information is important to achieve further improvements towards a sustainable business model. We also agree that collaborating not just with civil society but with all stakeholders is helpful to achieve structural changes – such as achieving significant and sustainable improvement of working conditions in our supply countries.

KiK is therefore very active in this field and member in several Multi-Stakeholder Initiatives such as the Accord for Bangladesh (disclosing all relevant supply chain data to the respective stakeholder), CPI2 and addressing numerous projects and capacity building measures in its supply chain. We are sure that you understand that working in these initiatives is linked with a lot of administrative efforts.

Furthermore, KiK is actively involved in the Partnership for Sustainable Textiles, as you are surely aware of. In this initiative we deliver the required internal transparency to all participants. The Partnership takes a holistic look at the textile supply chain, from garments to bedclothes, i.e. it incorporates the entire supply chain from raw materials production to final disposal. In this Partnership, companies and associations, civil society, government, trade unions and standard organizations all contribute their standpoints and work together constructively to draw up binding goals and come to reliable decisions for continuous improvements related to the people living in the sourcing countries.



The Partnership for Sustainable Textiles is the officially mandated multistakeholder-platform to discuss the question of supply chain transparency and related issues. The question of disclosing global supplier lists has been raised and discussed in the Textile Partnership recently, also with the participation of the mandated NGO representatives in the Partnership. Amongst all parties it was agreed, that the disclosure of all details regarding the suppliers' production and processing sites does not necessarily contribute to an improvement of working and living conditions in the respective countries. The data we are being asked for are subject to competition and anti-trust regulation. Same applies to the Accord for Bangladesh where the shared information is treated confidentially for a defined purpose by all parties.

As we do not see any additional advantage in spreading sensitive business data in the public domain in relation to the efficient and trustful cooperation we already have, we regret not to be able to sign on "The Transparency Pledge" attached to your letter.

To leverage impact of collective action such as the Partnership for Sustainable Textiles and to act in a coherent and efficient way, we would very much appreciate if our common efforts would be directed to those companies/organisations which are still not engaged in our existing processes and initiative.

KiK Textilien & Non Food GmbH

Ansgar Lohmann
Head of CSR Department

November 7th, 2016

Ms. Janet Walsh
Human Rights Watch
transparency@hwr.org

Sent Via Email

Re: Apparel and Footwear Transparency Pledge

Dear Ms. Walsh,

Thank you for taking the time to reach out with regard to the "Apparel and Footwear Transparency Pledge." We appreciate the ongoing work of your organization and that of the other seven signatories to the October 4th letter.

I am pleased to inform you that Loblaw will begin disclosing the names of the factories with which we do direct apparel and footwear business.

By February 1st 2017 we will post, on our corporate website, a revised list twice annually, of all factories where we source apparel and footwear directly.

We continue to make efforts to build on our offshore sourcing processes to ensure we are 'Sourcing Responsibly' and we feel this new disclosure is another step in that process.

We would be pleased to discuss this positive step with you and answer any questions you might have.

Thank you again for your letter.

Kind regards,



Bob Chant
SVP, Corporate Affairs and Communication
Loblaw Companies Limited

c. Lynda Yantz, Maquila Solidarity Network



November 14, 2016

Our Ref:CLD-CSR330

Mr. Amol Mehra, Director,
International Corporate Accountability Roundtable
Ms. Janet Walsh, Acting Director,
Women's Rights Division, Human Rights Watch
Mr. Jyrki Raina, General Secretary,
IndustriALL Global Union
Ms. Lynda Yanz, Executive Director,
Maquila Solidarity Network
Mr. Philip Jennings, General Secretary,
UNI Global Union
Mr. Scott Nova, Executive Director,
Worker Rights Consortium
Ms. Sharan Burrow, General Secretary,
International Trade Union Confederation
Ms. Ineke Zeldenrust, Clean Clothes Campaign International Office,
Clean Clothes Campaign

Re: Reply to your request

Dear Sirs,

This letter is based on the decision of Board of Directors meeting of Mizuno Corporation held on 10th November, 2016

At first, on behalf of Mizuno Corporation, we appreciate that you sent a thought-provoking letter to our company.

We have not disclosed the supplier list for the several reasons including an obligation on confidential information in the OEM agreement. In spite of the above fact, we have been considering a possibility of disclosure of our supplier information from a transparency point of view in these years.



We have carefully reviewed your request by your letter dated October 4, 2016 that is calling upon Mizuno Corporation to sign on to and implement the attached Transparency Pledge.

We believe it is reasonable to say now that we will implement measures in below instead of signing on the Pledge.

1. Mizuno Corporation will publish the supplier list on our website by the end of January, 2017.
2. The supplier list shall include at least the factory name, location and product type.

Very truly yours

Tadashi BEPPU

A handwritten signature in black ink, appearing to read '別府忠司' (Beppu Tadashi).

Deputy Senior Manager for Corporate Social Responsibility

Mizuno Corporation

1-12-35, Nanko-Kita, Suminoe-Ku,

Osaka, JAPAN



March 6, 2017

Dear Ms. Yanz,

We appreciate the collective efforts of the NGO community to promote transparency in the Garment and Footwear Supply Chains and your broad recognition of Nike's leadership and proactive steps in this area.

As you are aware, transparency has been a cornerstone of Nike's sustainability efforts for over a decade. Since voluntarily disclosing the names and locations of our contract factories publicly in 2005, we have continued our leadership in transparency by releasing an interactive map featuring factory location and worker statistics [iMAP](#) in 2010. Further, in 2016, Nike released our [Sustainability Report](#) starting page 58, which details the drivers we have in place to transform our working relationships with contracted factories to incentivize changes that benefit workers throughout our supply chain.

We see the proposed 'Apparel and Footwear Supply Chain Transparency Pledge' as aligned to Nike's most recent calls, [Sustainability Report](#) starting page 59, and long term advocacy for greater transparency across the industry. As such, we welcome the Pledge, and would appreciate it being noted in the published materials that we agree to continue our transparency leadership role by providing our signature support to the steps outlined in the Pledge (Appendix 1).

Sincerely,

Noel Kinder
VP, Sustainable Manufacturing & Sourcing
Nike Inc.

Human Rights Watch
Audrey House
16 – 20 Ely Place
London
England
EC1N 6SN
Via: transparency@hrw.org.

2 November 2016

Amol Mehra, Director, International Corporate Accountability Roundtable;
Janet Walsh, Acting Director, Women's Rights Division, Human Rights Watch;
Jyrki Raina, General Secretary, IndustriALL Global Union;
Lynda Yanz, Executive Director, Maquila Solidarity Network;
Philip Jennings, General Secretary, UNI Global Union;
Scott Nova, Executive Director, Worker Rights Consortium;
Sharan Burrow, General Secretary, International Trade Union Confederation;
Ineke Zeldenrust, Clean Clothes Campaign International Office, Clean Clothes Campaign.

Re: The Apparel and Footwear Supply Chain Transparency Pledge

I write in response to your letter of 4th October 2016.

We welcome your call for transparency in apparel and footwear supply chains. Thank you for getting in touch on this important subject.

Pentland Brands have maintained full visibility of our tier 1 suppliers for well over a decade. This helps us monitor and improve working conditions in line with [Our Standards](#).

At the beginning of this year we started discussing the value of making our tier 1 supplier list public, and have recently began preparing to publish this list. Our plan is to launch the information plotted on a map in conjunction with our first Modern Slavery report in January 2017.

Our map will include every factory site that assembles our branded products. For each factory we will report on at least the five criteria you request. We're also looking to include additional data that will provide deeper insight into our supplier relationships and purchasing practices, although we're not yet in a position to give detail or timeframes on this.

I can therefore confirm that Pentland Brands will happily sign up to The Transparency Pledge, and commit to taking the steps outlined in your letter by the 7th February 2017.

Yours sincerely,



Andy Long
Chief Executive Officer

Pentland Brands Ltd
Lakeside
Squires Lane
London, N3 2QL

T: +44 (0) 208 346 2600
www.pentland.com



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01 November 2016

Dear Mr Mehra, Ms Walsh, Mr Raina, Ms Yanz,
Mr Jennings, Mr Nova, Ms Burrow & Ms Zeldenrust,

Thank you for your letter of 4th October 2016 regarding The Apparel and Footwear Supply Chain Transparency Pledge.

As a responsible brand Primark works hard to ensure that the workers in its supply chain have decent work in safe factories. We have a team of over 75 people, based in our key sourcing countries, who are solely dedicated to this area.

Primark's Ethical Trade team works both unilaterally, and also as importantly, collaboratively with a large number of organisations including governments, NGOs, charities, institutions and other brands to help address issues across the supply chain. Wherever Primark uncovers, or is alerted to, issues within its supply chain, we thoroughly investigate, and try to address the issues with the support of our local partners.

As you are aware, we work with a number of the signatories of your letter, on many important initiatives where we share factory information that is essential to the work being undertaken, and we will continue to do this as appropriate. A good example would be the Bangladesh Accord where supply chain information, including our own, was provided by all members.

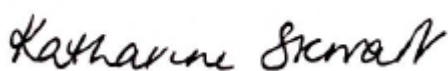
We also share detailed information with the Ethical Trading Initiative through the annual reporting on our supply chain. However we do not intend to publish publicly a list of the production and processing sites for Primark product at this time.

Furthermore we share a significant amount of information and data about our Ethical Trade programme via our website. This was recognised in the Ethical Consumer Fashion Transparency Index published in April 2016, which ranked Primark as 'High-Middle' rating and 5th out of the 40 brands surveyed.

http://www.ethicalconsumer.org/portals/0/downloads/fr_fashiontransparencyindex.pdf

We are committed to the welfare of workers in our supply chain and will continue to expand the Ethical Trade Team, and build our networks with local partners, to deal with any issues that come to light that need to be addressed.

Yours sincerely,



Katharine Stewart
Ethical Trade Director



STEFAN SEIDEL ■ STEFAN.SEIDEL@PUMA.COM

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via email to:
International Corporate Accountability
Roundtable
Clean Clothes Campaign
Human Rights Watch
Maquila Solidarity Network
Worker Rights Consortium
International Trade Union
Confederation
IndustriALL Global Union

12/19/2016

Dear Aruna,
Dear Leaders of Civil Society Organizations,
Dear Leaders of Global Union Federations,

Thank you so much for your letter dated November 29.

PUMA has been a strong advocate of transparency in the supply chain since 2005, when the first PUMA supplier list was published. Today, our entire core supplier list, covering over 80% of PUMA's business volume worldwide, is displayed on our website <http://about.puma.com/en/sustainability/supply-chain> and therefore available to the public. Furthermore, we have differentiated the suppliers in the list by both production country and category of supplier (finished goods, components or materials).

We take the impact of modern production methods on the environment very seriously and are consequently a founding member of the ZDHC. The ZDHC has recently published waste water guidelines, which cover the whole industry, and the publication of wastewater test results are part of these guidelines. In addition to the work we are doing to encourage the vendors with industrial wet processes to publish their results, we are happy to identify these vendors on the Core Supplier List for your information.

Lastly, as you are certainly aware, we report to the public about our sustainability program on a yearly basis as part of the PUMA Annual Report. The sustainability section

puma.com

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GESCHÄFTSFÜHRENDE DIREKTOREN/
MANAGING DIRECTORS:
BJÖRN GULDEN
MICHAEL LÄMMERMANN
LARS SOERENSEN



contains detailed information on audit findings, workers' complaints as well as capacity building projects and is externally verified by our statutory auditors.

We feel strongly that transparency is important and we are therefore pleased to see that you are encouraging other brands to follow in the same direction as PUMA has done since 2005. We are able to accommodate your request to classify our suppliers further by product category and number of employees and adding the suppliers' addresses to the list. We will include this information in the next updated edition.

However, at the same time, we do not feel it would be appropriate to disclose the same level of information about our niche suppliers, who we may only work with from time to time and who account for less than 20% of our business volume. Furthermore, we are unable to provide further information about holding or parent companies. It is up to the discretion of the suppliers in question to provide such information upon your request.

Despite PUMA's public commitment to transparency in the supply chain over many years, we are unable to accommodate all of your requests and we regret that we are therefore not in a position to sign your pledge.

We trust in your understanding and remain at your disposal for further questions.

Kind regards,

Michael Bennett
Global Director SourceCo

Stefan Seidel
Head of Corporate Sustainability

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Date 7th November 2016

Dear Janet Walsh

RE: The Apparel and Footwear Supply Chain Transparency Pledge

Thank you for your letter regarding the Apparel and Footwear Supply Chain transparency pledge. Our values are at the heart of everything we do, which includes building positive relationships with our suppliers, the sites and their workers. In addition, our customers want to be confident that the people who make and sell our products are not being exploited, or exposed to unsafe working conditions.

At Sainsburys we take the responsibility of managing our suppliers and their sites seriously; working with our sourcing offices across China, India and Bangladesh and suppliers concerned to ensure our purchasing practices and site compliance improvement programmes are robust. Our Code of Conduct for Ethical Trade covers the employment practices we expect from our suppliers, both in the UK and abroad.

Extensive third party audits underpin our approach to assurance and we undertake, both collectively and solely, significant capacity and capability activities to ensure and improve standards within our global supply chains.

Transparency has a role to play and this is reflected in The Modern Slavery Act, passed in March 2015, and the associated Transparency in Supply Chains Clause (TISC). The requirements to report against TISC are already being updated into our commercial terms and conditions. We do not believe that publishing details of suppliers and sites alone is the best approach and will therefore not be signing your Transparency Pledge. As a business we will update more broadly on our approach to modern slavery in the context of the TISC guidance ahead of our first regulatory reporting requirement due by September 2017.

Yours Sincerely

Colin Bradford

2nd December 2016

Aruna Kashyap
Senior Counsel
Women's Rights Division
Human Rights Watch
kashyaa@hrw.org

Dear Ms Kashyap,

Re: The Apparel and Footwear Supply Chain Transparency Pledge

Thank you for your letter dated 14th November 2016. We fully appreciate your thoughts on transparency in supply chains and welcome the work you are doing to encourage retailers to be more transparent.

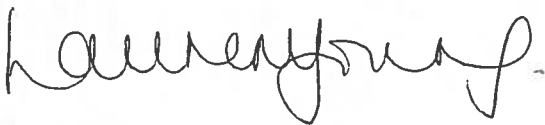
As you know, as a business we have a strong commitment to CSR and a dedicated CSR board that meets quarterly and which I chair. The next meeting of the CSR board will take place in January and I would like the opportunity to take your proposal to this meeting for discussion.

Once we have had these discussions, we will be more than happy to update you further on our plans regarding the Transparency Pledge.

We hope that you can understand our position regarding further internal consultation on this issue and we look forward to coming back to you with a further update in the New Year.

If you have any questions in the meantime, please do not hesitate to contact us.

Yours sincerely,



Lauren Young
Head of external communications, Shop Direct



Littlewoods

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