



CANADA SUPPLY CHAINS ACT DISCLOSURE

FY 30 November 2023

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Canada Supply Chains Act Disclosure

This statement sets out Levi Strauss & Co. (Canada) Inc./Levi Strauss & Cie (Canada) Inc.'s commitment to tackling and eradicating forced and child labor from our supply chains and ensuring our policies and procedures protect the rights of all employees.

This statement is for Levi Strauss & Co. (LS&Co.) covering the fiscal year ending 26 November 2023 and Levi Strauss & Co. (Canada) Inc./Levi Strauss & Cie (Canada) Inc. (BN 10331 4613) ("Levi Strauss Canada") covering the financial year ending 30 November 2023.

For the purposes of providing this statement, the greater Levi Strauss & Co. international network will be referred to as simply **LS&Co.**

This statement is published in accordance with Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the **Act**).

1. OUR BUSINESS, STRUCTURE AND SUPPLY CHAIN

BACKGROUND AND BUSINESS

For over 170 years, LS&Co. has worked to honor the pioneering spirit of hard work, individuality and authenticity in how it makes its products and runs its company.

Founded In 1853, LS&Co. opened a wholesale dry goods business in San Francisco that became known as Levi Strauss & Co. In 1873, the company received a United States patent for "waist overalls" with metal rivets at points of strain. The first product line designated by the lot number "501" was created in 1890.

LS&Co. is dedicated to elevating the dignity of the people who work to bring its clothing to market. LS&Co. has invested time, energy, heart and resources in improving the future of these communities.

In October 2005, LS&Co. was the first apparel company to release the names and locations of all its active, approved owned-and-operated, contract and licensee factories that manufacture and finish Levi's®, Dockers®, Signature by Levi Strauss™, and Denizen® products. LS&Co. believes that making its factory list public fosters collaboration with other brands and leads to sector-wide improvement in workplace conditions.

In 2018, LS&Co. continued to advance supply chain transparency, by expanding its public supplier list beyond manufacturing and finishing suppliers to include fabric mills.

Today, LS&Co. is one of the world's largest brand-name apparel companies and a global leader in jeanswear. The company designs and markets jeans, casual wear and related accessories for men, women and children under the Levi's®, Dockers®, Levi Strauss Signature and Beyond Yoga® brands. Its products are sold in more than 110 countries worldwide through a combination of chain retailers, department stores, online sites, and a global footprint of approximately 3,200 brand-dedicated stores and shop-in-shops.

LS&Co. sources products primarily from independent contract manufacturers located in approximately 24 countries around the world.

LS&Co. requires all third-party contractors and subcontractors who manufacture or finish products for it, to comply with the LS&Co. Supplier Code of Conduct (**SCoC**). Similarly, LS&Co. requires its licensees to ensure that their manufacturers comply with LS&Co.'s SCoC. In 2022, we expanded coverage of the SCoC requirement to suppliers from whom LS&Co. procures goods and services for its own use.

ORGANIZATION STRUCTURE

Levi Strauss Canada is majority owned by Levi Strauss International, a California USA corporation. Levi Strauss & Co. holds the remaining ownership interest in Levi Strauss Canada. Levi Strauss International is a holding company and a wholly owned subsidiary of Levi Strauss & Co., a company listed on the New York Stock Exchange.

OPERATIONS

Levi Strauss Canada conducts sales through physical and online stores, which are either owned and operated by LSC or are managed by franchisees. Levi Strauss Canada also sell products to multi-brand retail/wholesale customers. There are approximately 49 mono brand stores and 2,700 multi brand stores that sell LS&Co. products in Canada.

As of end of FY 2023, LS&Co. and its subsidiaries employ approximately 19,100 people worldwide. Levi Strauss Canada employs a total of approximately 900 employees. These employees are employed in a range of office, distribution, and retail capacities.

OUR SUPPLY CHAIN

LS&Co. and Levi Strauss Canada collectively work with a number of its suppliers directly for items including goods and services used in providing products to customers.

The suppliers and partners of LS&Co. and Levi Strauss Canada are broadly categorized as follows:

1. Products manufacturing
2. Marketing services
3. Human Resource services
4. Accounting and finance
5. Professional services
6. Warehouse and distribution
7. IT and cloud services
8. Retail and sales solutions
9. Office and administration related services and supplies.

LS&Co. and Levi Strauss Canada have contract clauses addressing compliance with laws in their standard purchasing terms and conditions for indirect procurement.

LS&Co. manages some of its supply chain, vendors and manufacturers of branded products under separate legal entities named Levi Strauss Global Trading Co Ltd which is registered in Hong Kong (**Levi Strauss Global Trading**) and Levi's Footwear & Accessories (Switzerland) SA which is registered in Switzerland (**Levi's Footwear and Accessories**).

RISK OF MODERN SLAVERY, AND FORCED/CHILD LABOUR PRACTICES IN OPERATIONS AND SUPPLY CHAINS

The greater LS&Co. international network is involved in sourcing textile manufacturing, apparel, accessories, footwear, and product lines across international borders. This heightens the risks of purchasing, or seeking services from countries where slavery, forced labour and/or child labour may be taking place.

LS&Co. aims to select suppliers of LS&Co. products that comply with the SCoC. It has put in place a program to monitor how the suppliers operate, including the requirements for the suppliers to ensure that their sub-contractors also comply with the SCoC.

In managing our suppliers, LS&Co. and Levi Strauss Canada seek to comply with all applicable laws and regulations by requiring suppliers to comply with our standards for performance of services.

Our SCoC prohibits unauthorized subcontracting, and we do not knowingly allow any suppliers to subcontract work to locations or facilities that are known to engage in slavery practices, forced labour, or improper employment of child labour.

2. ACTIONS LS&CO. AND LEVI STRAUSS CANADA TAKE TO ASSESS AND ADDRESS RISKS

LS&Co. and its subsidiaries, including LS Canada, have long been committed to a process of upholding practices against modern slavery/ human trafficking and the use of forced and child labour in our supply chains, and, indeed, in any part of our business. Our commitment is supported by policies, procedures and binding contractual clauses which ensure responsibility and accountability for good business practices and the prevention of violations of labour laws, including prohibitions on forced and child labour, promoting responsibility and accountability for internal and third-party business practices.

In 1991, we were the *first* multinational company to introduce a form of Terms of Engagement (“TOE”) for our direct suppliers responsible for manufacturing our finished branded goods. The TOE represented a comprehensive code of conduct regulating ethical, labour (including forced labour), environmental, chemical, workplace safety, manufacturing and compliance standards. Since that time, we have considered compliance with the TOE to be a cornerstone of our business practices.

In 2022, the TOE was refreshed as the global “Supplier Code of Conduct (“SCoC”). The SCoC applies to every factory, subcontractor, licensee, agent, or affiliate that manufactures branded products for LS&Co. In 2022, we went further - and expanded the SCoC to apply to indirect procurement suppliers, including parties from whom LS&CO. procures goods and services for its own use. Currently, all of our existing direct suppliers and new indirect suppliers must commit to operate in accordance with the SCoC, and in full compliance with all applicable laws and regulations, including without limitation those laws and regulations applying to forced and child labour.

Our branded products suppliers are required to sign a master supply agreement (“MSA”), which contains the express obligation to comply with the SCoC. Our MSA requires any supplier engaged under its terms to comply with all rules, regulations and policies of the greater LS&Co. network, including maintaining general health and safety practices and procedures, and maintaining compliance with all labor laws. LS&Co. also requires its suppliers to ensure that all persons, whether employees, agents, subcontractors, or any other personnel acting for, or on behalf of the supplier, are properly licensed, certified, accredited

and that its employees are suitably skilled, experienced, and qualified to perform the services. Furthermore, our new indirect suppliers, who contract with our business through a variety of routes and agreement forms, are directed to sign the SCoC at the point of onboarding, prior to being approved for transacting. We also continue to proactively seek to engage existing indirect procurement suppliers in signing up to the terms of the SCoC.

LS&Co. assesses the risks related to the branded products supply chain and new indirect suppliers as a fundamental element of our standard processes. Our commitment to responsible business practices is embodied in our current SCoC, which may be accessed through the following link: https://www.levistrauss.com/wp-content/uploads/2022/09/LSCo_Code-of-Conduct.pdf. We do not view the SCoC as a finished product, but instead seek to continually improve and enhance the compliance expectations and obligations contained therein.

The SCoC guides our decisions and behavior as a company everywhere we do business. Since the founding of these requirements in 1991, LS&Co. has used them to help improve the lives of workers manufacturing our products, make responsible sourcing decisions, and protect our commercial interests.

Specific to this reporting, the SCoC includes an express ban on the use of child labour, prison labour, indentured labour, bonded labour and trafficked labour. In addition, the SCoC has a specific section dedicated to foreign migrant workers and their rights. The foreign migrant workers' requirements cover the areas of:

- Recruitment
- Employment contracts
- Remuneration and benefits
- Worker communication
- Accommodations and food
- Social activities and religious practices
- Repatriation

In November 2020, we updated the SCoC Implementation Guidebook to include a broadened definition of forced labour, along with relevant policies. The following sections have been updated accordingly:

- New policies focused on advancing gender equity
- Foreign Migrant Workers
- Wages & Benefits
- Freedom of Association

In February 2023, we again updated the SCoC Implementation Guidebook to expand identified risk categories and emphasize the severity of risk concerning workers safety and security. The following sections were updated:

- Child Labour
- Prison, Forced or Trafficked Labour
- Disciplinary Practices
- Working Hours
- Wages & Benefits
- Discrimination
- Foreign Migrant Workers
- Health & Safety

We conduct regular, unannounced, direct and third-party assessments and follow-up visits of our Tier-1 (product manufacturing sites) & Tier-2 (fabric mills) suppliers based on the conditions outlined in the SCoC. These assessments include surveillance, on-site and off-site discussions with workers, management interviews, review of factory records (such as timecards and payroll) and health and environmental safety inspections. Each assessment identifies areas where improvement may be necessary or recommended, and a detailed corrective action plan, including actions, responsible parties and timelines. Follow-ups are also conducted to ensure suppliers are completing their corrective action plans on a timely basis.

Where a business partner fails to meet our standards or comply with any of obligations imposed by the SCoC, they are given a reasonable period to remediate. If, on our next inspection, certain cases of non-compliance have not been resolved in a timely manner, LS&Co. has rights, where appropriate, to terminate the business relationship. Certain violations are considered “Zero Tolerance” and suppliers have limited time and opportunity to correct before they become flagged as prohibited vendors. Any forced labor violation is considered a zero-tolerance violation. Vendors who do not immediately correct such a violation are promptly identified and treated as prohibited vendors.

LS&Co. and its subsidiaries collaborate on a variety of multi-stakeholder initiatives that help reduce the risk of forced labor in our supply chain. LS&Co. is a signatory of the Social and Labour Convergence Program (SLCP), a non-profit multi-stakeholder initiative that offers the tools and system to assess working conditions in global supply chains. Amongst other benefits, these assessments support joint remediation and shared responsibilities among brands in the same supplier factories.

In addition, in 2018, LS&Co. signed onto the industry Commitment to Responsible Recruitment developed in conjunction with the American Apparel and Footwear Association and the Fair Labour Association. This further amplified LS&Co.'s commitment to create conditions in our supply chain under which:

- No workers pay for their jobs
- Workers retain control of their travel documents and have full freedom of movement
- All workers are informed of the basic terms of their employment before leaving home

Relevant requirements related to this commitment are included in the SCoC.

LS&Co. pays attention to areas of risk. Since 2012, LS&Co. has been a signatory to the industry’s Uzbek Cotton Pledge, coordinated by the Cotton Campaign. In 2018, we also became a signatory to the newly introduced Turkmen Cotton Pledge. As an early signatory to both Pledges, we publicly stated our firm opposition to the use of forced labour.

Indeed, LS&Co. has long been a leader in the apparel industry in the area of protecting workers’ rights in our supply chains. In 2011 LS&Co. launched its industry-leading Worker Well-being (**WWB**) initiative. The initiative aims to improve the lives of the women and men who make our products with factory-based programs that address issues related to health, financial security and gender equality. We set a goal to reach 200,000 workers in our supply chain through our WWB programs by 2020. We surpassed that goal in May 2019, and by year’s end, we had reached 219,000 workers, in 113 factories, in 17 countries, and more than 65% of total product volume at that point of time was made in factories that have WWB initiatives. To date, we have far surpassed our initial goals in connecting with workers.

More than 90 percent of the WWB initiatives sites offer health interventions to their workers. Approximately 50 percent of these sites provide financial literacy workshops (some factories provide multiple programs for workers). Based on a survey carried out among participating sites in 2019, three quarters of participating factories report improvements in worker engagement, and over half report improved satisfaction and lower absenteeism. A majority of suppliers self-fund their own WWB programs.

Based on a survey carried out among participating sites in 2019, only 40 percent rely on LS&Co. for support.

To deepen our impact, we recently refreshed the WWB strategy and our vision for 2025 and 2030. Learn more about our revised WWB strategy and operational framework, accessed through the following link: <https://www.levistrauss.com/wp-content/uploads/2022/04/Worker-Well-being-Guidebook-Final-2022-1.pdf>

In recent years, we have expanded our work to combat gender inequality in the supply chain, building on improving business performance through the Gender Equality Report (**Gender Equity Report**) published by the Levi Strauss Foundation in 2018. **A copy of the Gender Equity Report** may be accessed through the following link: https://www.levistrauss.com/wp-content/uploads/2019/03/IMPROVING-BUSINESS-PERFORMANCE-THROUGH-GENDER-EQUALITY_OCT-2017_FINAL.pdf.

We work with industry experts to pursue impactful systemic changes that address the power imbalances between largely female workers and predominantly male managers. Through our multi-year partnership with the Sustainability and Health Initiative for NetPositive Enterprise (**SHINE**) at Harvard's T.H. Chan School of Public Health, we are discovering new areas for attention. This multi-year study, which has connected directly with more than 13,000 workers, most of whom are women making our products in Cambodia, China, Mexico, Poland and Sri Lanka, is showing us that factories that cultivate trust, respect and fairness lead to improvements in gender equality, well-being and productivity. We expanded and elevated our work designed to combat gender inequality in the supply chain, by using the data to build on the Gender Equity Report. To improve the assessment process, we instituted a requirement that all assessment teams include female members and, where possible, female leaders, and we continue to collaborate with partners on the ground such as Better Work in Cambodia, Swasti in India, and Better Work in Bangladesh and Change Associates to advance the effort.

The Gender Equity Report assists LS&Co. and its apparel supply chain to acknowledge and focus on skill development, pregnancy and parenthood, menstruation, wages, work hours, harassment and gender-based violence. The Gender Equity Report also promotes 10 strategies to make the global apparel supply chain more fair, engaging and productive for all.

Since October 2005, LS&Co. has been committed to publishing the list of its worldwide finished goods suppliers. The most recent list is publicly available at (<https://www.levistrauss.com/sustainability-report/community/supplier-map/>). This is a testament to LS&Co.'s level of accountability and transparency vis-a-vis its supply chain.

LS&Co. has a history of actively supporting the International Labour Organization's Better Work Program (**ILO Better Work**), which is the leading global organization focused on protecting human rights and improving working conditions in the apparel industry. ILO Better Work makes targeted investments in our manufacturing suppliers' workers, training apparel workers and factory management on their rights and responsibilities in the workplace. A significant majority of LS&Co.'s production takes place in countries - currently including Bangladesh, Cambodia, Indonesia, Nicaragua, Vietnam and Egypt – that participate in ILO Better Work.

LS&Co. maintains and enforces internal accountability procedures for employees and contractors regarding company standards on forced labour and human trafficking. We employ full-time staff located globally to oversee compliance and advise on, and monitor branded products suppliers' sustainability programs. To supplement our own monitoring efforts, we use third-party monitors to conduct regular assessments of every factory, key fabric mill and our product licensee suppliers. All third-party monitors understand the scope of our labour, environment, and health and safety standards and know the local

languages, laws, culture and business context of each country in which they operate. All third-party monitors must be individually approved by LS&Co. to conduct SCoC assessments in factories. These monitors apply the strictest of standards between our SCoC and applicable local law.

We seek to integrate the SCoC more deeply into our business, and doing so has become a key factor in the effectiveness of our due diligence procedures.

Weighted with other key factors, SCoC performance ratings are used by our manufacturing operations team in considering which suppliers to use and how much production to give them. We regularly communicate with our suppliers to reiterate our policies on key issues. In 2019, our senior management team sent a letter to all Tier-1 & Tier-2 products suppliers, reminding them of our zero-tolerance policy around forced labour. Under no circumstances will we continue operating with vendors who consistently violate our SCoC, and particularly the prohibitions on forced labor.

At LS&Co., our values underpin all of our activities, and we use those values as guideposts in all of our working relationships. We see ourselves as being modern-day pioneers and leaders in our industry, and understand the role we play in setting appropriate examples for industry conduct.

OUR CODE OF CONDUCT AND POLICY FRAMEWORK

The LS&Co. Board has the responsibility for establishing policies and ensuring that these are implemented. The board delegates this responsibility to the leadership and management teams within LS&Co. and its subsidiaries.

LS&Co.'s Worldwide Code of Business Conduct (**Code of Conduct**), which is separate from the SCoC, sets the behavioural standards for LS&Co.'s employees, officers and directors. **A copy of the Code of Conduct** may be accessed through the following link: <https://www.levistrauss.com/wp-content/uploads/2020/06/Code-of-Conduct-English.pdf>. The Code of Conduct and policy framework helps set a consistent global approach for all LS&Co. employees and expectations in respect of dealings with clients, suppliers and contractors. All employees are expected to act consistent with our core values of:

- Originality
- Integrity
- Courage
- Empathy

At LS&Co., our values underpin our everyday actions, and we use them as a guiding principle in our conduct and working relationships. We see ourselves as being modern day advocates in our industry and understand the role we play in setting an example.

With respect to legal compliance, the Code of Conduct requires staff to obey applicable laws and when in doubt about what to do, ask managerial staff or get in touch with the ethics and compliance team, Human Resources, or our legal department.

In the Code of Conduct, LS&Co. sets the standard for the moral code of its employees. LS&Co. does not tolerate workplace violence, discrimination and harassment of any kind by any employee. LS&Co. promotes a safe working environment, and its employees' responsibility to obey health and safety rules and policies, report accidents, and report any unsafe working conditions to supervisors immediately.

If employees are uncomfortable raising issues to their manager, the Ethics and Compliance team, HR or Legal Department, LS&Co. has in place an Ethics and Compliance Reportline, where employees may anonymously report their concerns by phone on **1-800-405-8953** or online. This is contained in LS&Co.'s Accounting and Auditing Whistleblower Policy.

All staff members are responsible for being aware of the policies whether they are ethical, or legal and need to ensure they apply it to their jobs. Our Managers and Executives are responsible for creating and promoting environments in which we comply and ensure ethical business is conducted. All of our policies and procedures can be found internally on our intranet via the Business Management System, and are communicated to all employees.

TRAINING

We encourage employees to notify the Ethics and Compliance team, Human Resources, or our Legal Department of any concerns they have, and aim to continue to promote awareness among employees on how to identify the key signs of modern slavery.

Our Workers Wellbeing Guidebook also outlines the expectations LS&Co. has for its suppliers to train its employees on worker wellbeing.

LS&Co. conducts internal training on the Code of Conduct annually, to ensure we provide our employees with a clear set of standards and guidance for conducting our business with integrity and the highest degree of compliance with the law.

Additionally, LS&Co. conducts internal training of our supply chain management to ensure that management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking and slavery, forced labor, and child labor – with a particular focus on mitigating risks.

3. HOW LS&CO. ASSESSES EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS THESE RISKS

LS&Co. is committed to assessing the effectiveness of actions being taken to assess and address the risks of forced and child labor related to its operations.

As stated above and with respect to legal compliance, the Code of Conduct requires staff to obey the law and when in doubt about what to do, ask managerial staff or get in touch with the Ethics and Compliance team, Human Resources or our Legal Department. While this method can be effective for direct staff, it may be difficult to ascertain legal compliance on a supply chain basis (i.e. within mill and factory settings).

On this basis, LS&Co. regularly assesses Tier-1 & Tier-2 products suppliers on the conditions outlined in the SCoC, and issues all direct suppliers with the Supplier Code of Conduct Implementation Guidebook. We consider that since the assessments involve on-site and off-site discussions with workers, management interviews, review of factory records (such as timecards and payroll) and health and environmental safety inspections, this is an effective way to ensure that supplier entities are held accountable. It also ensures that supplier entities are aware of the risk of losing LS&Co.'s business for non-compliance. The issuing of action plans to non-compliant suppliers is also an effective method to ensure the supplier is assisted in bringing its standards to par with legislation and regulations, and Company expectations.

LS&Co.'s regular communication with suppliers also ensures that suppliers hold a level of accountability for their own staff and the manufacturing of LS&Co. products.

Otherwise, LS&Co. is able to remain abreast of its impact on a worldwide scale, through data collected in its numerous initiatives including WWB, the Gender Equity Report and ILO Better Work.

Further to the above, direct inspection of facilities by LS&Co. staff and the utilization of third-party monitors to conduct regular assessments of every factory, fabric mill and product licensee suppliers, can be effective in obtaining accurate information about the nature of a supplier's business dealings.

Notwithstanding all of the robust measures LS&Co. has detailed above, LS&Co. will continue assess what further actions and measures can be taken, to ensure LS&Co. is able to regularly assess how it can combat modern slavery risks.

4. SUMMARY

Levi Strauss & Co. has consulted and worked alongside its colleagues at Levi Strauss Canada, in preparing this modern slavery statement.

This statement was approved by the Board of Directors of Levi Strauss & Co. pursuant to section 11(4) of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I, Robert Eckert in my role as a member of the Board of Directors of Levi Strauss & Co., attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act for the 2023 reporting year. Pursuant to resolutions passed by the Board of Directors, I have authority to bind Levi Strauss & Co.



Robert Eckert

Member of the Board of Directors of Levi Strauss & Co.

July 17, 2024