

BELLA+CANVAS

BELLA+CANVAS Human Rights Policy

Introduction

Respect for human rights is a fundamental value at BELLA+CANVAS, LLC (collectively with our subsidiary entities, “BELLA+CANVAS”). We support human rights and are committed to the fair and ethical treatment of employees and the communities where our operations are located. In line with the United Nations Guiding Principles on Human Rights, this Human Rights Policy is guided by:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The United Nations Guiding Principles on Business and Human Rights;
- The 1998 International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work and other applicable ILO conventions amended in 2022; and
- Our commitments as a Fair Labor accredited company and as signatories to the [American Apparel & Footwear Association \(AAFA\) / FLA Industry Commitment to Responsible Recruitment](#).

BELLA+CANVAS’ operations, and that of its joint ventures and partners encompass various countries, cultures and ways of conducting business. While we respect those differences, the scope of this policy covers our entire value chain. We are aware that achieving the standards set by this policy and other related tools developed by BELLA+CANVAS¹ can be challenging in different parts of the world.

This Human Rights Policy further supports our commitment to conducting business in a responsible way wherever we operate.

Scope

This Human Rights Policy applies to all our officers, directors, contractors and employees (whether permanent, fixed-term or temporary) and owned operations, as well as our contract manufacturing partners and their employees, all of whom are required to understand and uphold this policy regardless of their position, geographical location or level of responsibility.

BELLA+CANVAS also expects all suppliers to uphold these principles and urges them to adopt similar policies within their own businesses. For a more detailed explanation of the expectations we have of our suppliers, please see our [Social Compliance Manual](#).

Communication and Accountability

This Human Rights Policy complements BELLA+CANVAS tools related to responsible business conduct such as our Code of Business Ethics, Workplace Code of Conduct, and Social Compliance Manual. This Human Rights Policy is communicated to all BELLA+CANVAS employees, contractors, suppliers, agents,

¹ Please refer to the BELLA+CANVAS Workplace Code of Conduct, the Social Compliance Manual, our Code of Business Ethics and other BELLA+CANVAS policies.

and consultants and is authorized by BELLA+CANVAS' management and our President is accountable for upholding it. The President, through his direct reports, is responsible for implementing this Human Rights Policy. Any violations of are promptly escalated to these company leaders.

Everyone within the BELLA+CANVAS operation has a responsibility to respect human rights in general and as stated in this Human Rights Policy, and to comply with this and other company policies and procedures. Employees must familiarize themselves with BELLA+CANVAS policies and procedures and attend training sessions as required or requested by the company. Managers and supervisors must act as role models by upholding only the highest standards of conduct.

Due Diligence, Monitoring, and Remediation

BELLA+CANVAS is committed to identifying, preventing, and remediating adverse human rights impacts that result from or are caused by our business activities. Business partners are subject to a rigorous verification process that may include auditing, remediation, tracking and public reporting to ensure compliance with governing laws as well as BELLA+CANVAS' internal policies and procedures.

The company conducts labor rights assessments prior to engaging with potential facilities for acquisition and contract manufacturing business partners. Moreover, once approved, both owned facilities and contract manufacturing business partners are subject to a rigorous verification process that includes annual labor rights auditing, remediation of any instances of noncompliance, tracking remediation and progress, and internal and stakeholder reporting to ensure compliance with applicable laws as well as with the [BELLA+CANVAS Workplace Code of Conduct](#).

Responsible Purchasing and Production

We recognize that decisions made during product development, design, sales, sourcing, and production planning stages can also impact working conditions on the factory floor. That is why, in our owned facilities and in contract manufacturing facilities, we strive to maintain decent working conditions that comply with our Code of Conduct and with responsible purchasing and production planning practices. We maintain a Responsible Purchasing & Production (RP&P) Policy, which dictates how our team members must operate in order to support, not hinder, facilities in adhering to our Workplace Code of Conduct. The RP&P Policy covers crucial topics such as supplier selection, due diligence, ethics, financial terms, lead time, balanced annual planning, responsible order reduction, and references our related policies and procedures on Responsible Exit, Retrenchment, and Closure.

Our Responsible Purchasing & Production Policy is modeled on the FLA framework.²

Community and Stakeholder Engagement

BELLA+CANVAS is committed to and engages with stakeholders to ensure that we are listening to, learning from and considering their views on human rights issues. These include issues within our company and across our supply chain, through which we seek to promote respect for human rights. Examples include, but are not limited to:

²A full expression of FLA's related frameworks can be found at *Principles of Fair Labor and Responsible Purchasing and Production for Manufacturing: (A) Responsible Sourcing, Principle 2* and *(B) Responsible Production, Principle 2* at <https://www.fairlabor.org/accountability/standards/manufacturing/mfg-principles/>.

- *Fair Labor Association* – A strategic partner, multistakeholder initiative promoting workers' rights, which sets standards to which we commit, offers guidance toward improvement, evaluates our performance, and publicly reports on our progress and opportunities.
- *Americas Group* – A multistakeholder forum of brands, manufacturers, and labor rights groups supporting decent work in the Americas.
- *Local unions* – We maintain productive relationships with factories from which we source, and where unions exist, we work with their representatives in collective bargaining agreements, social compliance assessments, and other related outreach and communication.

Employees

Valuing Diversity

The diversity of our employees and our business partners' employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment. BELLA+CANVAS does not engage, support or tolerate discrimination - any unfair treatment or arbitrary distinction - in employment practices such as recruitment, promotion, access to training, remuneration, allocation of work, termination of employment, retirement, general treatment in the workplace based on a person's race, sex, gender identity, religion, nationality, marital status, ethnic origin, caste, sexual orientation, disability, diseases, pregnancy, age, language, social origin or other status, migration status, membership in worker organizations including unions, political affiliation or any other personal characteristics or protected class under applicable federal, state, and local laws.

Freedom of Association and Collective Bargaining

At BELLA+CANVAS we recognize and respect the right of employees to freedom of association and collective bargaining in our own operations and at those of our business partners, including contractors, suppliers, and agents.

Safe and Healthy Workplace

BELLA+CANVAS and our business partners, including contractors, suppliers, and agents, strive to provide safe and healthy workplace settings to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work as a result of operations at our respective facilities.

Forced Labor and Human Trafficking

We are committed to the fair treatment of workers throughout our entire supply chain. In 2020, BELLA+CANVAS signed the [AAFA/FLA Industry Commitment to Responsible Recruitment](#) to address these issues.

As a signatory, we are committed to the fair treatment of workers in the apparel, footwear, and travel goods supply chains. One important part of this ongoing effort is working together to eliminate conditions that can lead to forced labor in the countries from which we source products. We are working with our global supply chain partners to create conditions so that:

- No worker pays for their job;
- Workers receive a timely refund of fees and costs paid to obtain or maintain their job;
- Workers retain control of their travel documents and have full freedom of movement; and
- All workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin.

Child Labor

No person shall be employed under the age of 15 or under the local mandatory age for completion of compulsory education, whichever is higher, in our owned operations and in the operations of any business partner involved in manufacturing BELLA+CANVAS products.

Hours of Work

BELLA+CANVAS and our business partners, including contractors, suppliers, and agents, shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. We shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. We shall not request overtime on a regular basis and shall compensate for all overtime at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

Guidance and Reporting Opportunities

BELLA+CANVAS is committed to an environment where open, honest communications are the expectation, not the exception. Our employees and those of our contractors have multiple channels for communicating complaints or suggestions, not only to supervisors or Human Resources representatives, but also through suggestion boxes, the Social Compliance Department phone and email address, and, in owned facilities, through Conecta, a third party-managed confidential hotline. Grievances are treated confidentially, and issuers have the option to submit them anonymously. However, we encourage issuers to provide their name and contact information to aid in any investigations and so that we can more effectively deliver and report on remediation.

Similarly, we want to hear from external stakeholders that may have concerns about potential risks caused by our operations. In the event that external stakeholders of BELLA+CANVAS or our manufacturing partners would like to raise a concern, we welcome them to file a complaint via the [FLA's Third Party Complaint Mechanism](#). They may also report concern to compliance@bellacanvas.com. No reprisal or retaliatory action will be taken against anyone or tolerated for raising such concerns. We are committed to investigating, addressing, and responding to any such issues raised and to taking appropriate corrective action in response to any violation of this policy.

This Human Rights Policy was approved by the Board of Managers of BELLA+CANVAS, LLC on December 16, 2024.