



## Forced for Hire and Human Rights Policy

At The Children's Place, we are committed to excellence in every aspect of our business. This commitment includes ethical and responsible conduct in our global operations and respect for all human rights. We support the principles articulated in the Universal Declaration of Human Rights and the International Labor Organization (ILO) core conventions. We expect our vendors and business partners to share and adopt these same commitments.

In alignment with the UN Guiding Principles on Business and Human Rights and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, we strive to avoid adverse human rights impacts in our own operations and across our business relationships. We carry out human rights due diligence as part of the conduct of our business and work to embed human rights considerations into business decisions. We continue to identify salient human rights issues and assess prevention and mitigation opportunities in each area applicable to our business. Violations to human rights such as, modern slavery in the form of forced and compulsory labor, indentured child labor, servitude, human trafficking, and similar violations, are not tolerated in the TCP supply chain. These issues are identified and addressed through our corporate HR policies, factory audit and remediation processes, screening of sourcing countries and programs around worker well-being. This Forced for Hire and Human Rights Policy will continue to evolve to ensure it reflects changing circumstances, new knowledge, and opportunities for The Children's Place.

In addition, The Children's Place requires all Vendors and their factories to operate in full compliance with the laws of their respective countries and with all other applicable laws, rules and regulations, including the standards outlined in The Children's Place Vendor Code of Conduct ("CoC"), which states Suppliers shall at all times comply with Uyghur Forced Labor Prevention Act (UFLPA) and shall ensure that all subcontractors and any third party in its supply chain shall comply with UFLPA, including without limitation, not purchasing or procuring, whether directly or indirectly, any services or raw materials, including without limitation, any textiles, yarns or raw cotton fibers, from any supplier included on the [Uyghur Forced Labor Prevention Act \(UFLPA\) Entity List](#).

Therefore, The Children's Place *prohibits*:

- *Use of forced labor in our supply chain; and*
- *Use of raw materials from certain regions.*

### **Community**

As a pure-play children's specialty apparel retailer, The Children's Place aims to embrace every child and every family. We have a responsibility to conduct our business in a manner that meets the diverse needs of our customers. Promoting inclusivity and respecting the rights of all who shop our brands is essential in earning and preserving the trust of our customers. We also strive to provide a safe and trusting experience for everyone who does business with The Children's Place, including all business partners, contractors and vendors.

The Children's Place seeks to work with global third-party vendors whose business practices align with our principles on human rights, especially for at-risk groups such as women and highly vulnerable populations. We place significant time and effort into identifying and working with only those vendors who are committed to providing fair and safe working conditions for their factory workers.

We also recognize our role in promoting worker well-being and helping vendors expand their knowledge of human rights issues. We work to promote education, personal development and training programs that positively impact communities by focusing on workers' needs. Our engagement with Vendors continues to evolve as we strive to do our part in addressing global issues such as forced labor, gender-based violence and harassment and gender equity.



Our Responsible Sourcing team members carry out day-to-day operations within the supply chain, with support from cross-functional partners. To help us address the complexity and scale of human rights issues, we also collaborate with experts, NGOs, non-profit organizations and industry peers to identify and implement initiatives.

### **Requirements**

1. **Regular auditing** - We administer a global factory audit program that holds vendors and factories accountable to their commitment to comply with our CoC.
2. **Supplier supply chain mapping** - Vendors and nominated mills are required to conduct supply chain mapping (from the sourcing of raw material to the production of the final product) and are obligated to provide transaction evidence / certificates/ other documents, as required.
3. **Vendor training** - We conduct training for our corporate and international offices and also training to our Vendors to reinforce our policy on the prevention of forced labor in the supply chain.

### **Remediation**

If non-compliance issues are found, our first step is to partner with the Vendor and/or its factory to institute needed improvements over time. While we reserve the right to terminate our business relationship for any breach of our CoC, we first work collaboratively with the factory on a corrective action plan in an attempt to address issues and maintain orders so that workers are not adversely affected.

### **Vendor Responsibility**

1. *Risk Assessment and Prevention* - All Vendors and their factories should proactively assess and prevent risk of forced labor in their daily operation. This is done through identifying at-risk groups and having in place a robust prevention of forced labor policy to ensure compliance. Training should also be given by Vendors and their supply chain to ensure prevention of forced labor is communicated to all levels (workers, supervisors and management). A set of clear rules and consequences should be put in place to ensure compliance to ensure all parties abide by the policy and are aware that actions will be taken in the event of a breach.
2. *Notification to The Children's Place* - All Vendors must immediately notify The Children's Place of any violations of this policy found in their own operations or their supply chain's operations by using [The Children's Place web-based reporting tool](#).

### **Confirmation**

Vendor confirms that the below statements are true and correct:

- Vendor and its supply chain shall at all times comply with Uyghur Forced Labor Prevention Act (UFLPA) and shall ensure that all subcontractors and any third party in its supply chain shall comply with UFLPA, including without limitation, not purchasing or procuring, whether directly or indirectly, any services or raw materials, including without limitation, any textiles, yarns or raw cotton fibers, from any supplier included on the [Uyghur Forced Labor Prevention Act \(UFLPA\) Entity List](#).
- Vendor and its supply chain does not and will not use any slavery, human trafficking, forced, bonded or involuntary labor, including in the production of any TCP Brand Product, or where applicable, in the production of any raw materials used in any TCP Brand Product.
- Vendor and its supply chain does not and will not purchase or use, whether directly or indirectly, any services or raw materials, from any third party that uses slavery, human trafficking, forced, bonded or involuntary labor in its supply chain, including for use in any TCP Brand Product.



- Vendor and its supply chain has conducted and continues to conduct, diligence into its supply chain to make the foregoing statements and to ensure no forced labor is used, including in the production of any TCP Brand Product, or where applicable, in the production of any raw materials used in any TCP Brand Product.
- Vendor shall require all its supply chain to be aware of the CoC and shall obtain confirmation that its supply chain strictly adhere to the CoC at all times.

For the purposes of this document, the Company understands that:

- the term “forced labor” shall have the meaning as defined in CoC;
- The term “TCP Brand Product” means any product supplied to The Children’s Place for retail sale or wholesale, and include all materials, component parts, packaging and labelling of such goods.
- The term “supply chain” includes all factories, facilities, subcontractors, service providers, and/or suppliers used by the Company in the manufacture of TCP Brand Product, whether owned by the Company or contract manufacturers, and also includes the employees thereof, and all suppliers of all materials used in any such TCP Brand Product.

The Company acknowledges that in the event a shipment containing TCP Brand Product is detained by U.S. Customs and Border Protection (“CBP”) pursuant to the UFLPA or pursuant to the CBP Withhold Release Order process, the Company agrees to immediately indemnify The Children’s Place for all expenses, charges, fines, actual losses (including lost profits) resulting from the detainment of such shipment due to any failure on the part of the Company to abide by the requirements as stated in this certification.

### **Governance**

Policy creation and implementation of our Human Rights and Forced for Hire Policy resides with the General Counsel, Senior Vice President, Head of Sourcing, and the Responsible Sourcing Team. The Audit Committee of the Board of Directors is responsible for overseeing our financial and enterprise risk matters, including matters related to our global supply chain, such as vendor selection and compliance with labor laws and standards regarding forced labor and gender-based harassment/violence. The Corporate Responsibility, Sustainability & Governance Committee of the Board of Directors oversees our Environmental, Social and Governance risk management activities, including matters related to climate, energy, water and chemicals, raw materials, waste and circularity, as well as social topics such as worker well-being and responsible sourcing in the company’s global supply chain. These committees meet on a regular basis to review social policies and practices to align those efforts with The Children’s Place overall business strategy.

The focus areas detailed in this policy are informed through collaboration with external stakeholders. These partners help us more effectively contribute to finding solutions to complex human rights issues. We will continue to seek input from our partners as we develop new policies and initiatives, and expand our public disclosures on human rights issues to demonstrate accountability to our commitments.