



# SLAVERY & HUMAN TRAFFICKING STATEMENT

2025

## MODERN SLAVERY ACT TRANSPARENCY STATEMENT

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It constitutes Triumph Group's slavery and human trafficking statement for the financial year 2024.



## TRIUMPH GROUP

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

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

### WE MANUFACTURE IN SOCIALY COMPLIANT

and production facilities, a number of them owned and operated directly by us, employing environmentally friendly and energy-saving production methods and the most modern and skin-friendly material.

### SINCE 2012, OUR ORGANIZATION

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

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



## ORGANIZATIONAL STRUCTURE

### INTERNATIONAL

Triumph Group, one of the world's leading intimate apparel companies, has been founded in Germany in 1886. Today, it is headquartered in Wallisellen, Switzerland and continues to be a fully privately owned company. Triumph is distributed in over 80 countries across the world. For its brands, Triumph and sloggi, the company develops, produces and sells underwear, lingerie, sleepwear and swimwear.

### UK

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

## SUPPLY CHAIN STRUCTURE

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

## ORGANIZATIONAL POLICIES

Triumph Group acknowledges and respects internationally recognized human rights protocols across our global operations and supply chain articulated in our Code of Conduct (CoC) in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Our commitment covers all internationally recognized human rights, including those contained in the International Labour Organization (ILO) core labor conventions, including Forced Labour Convention (no. 29) and Abolition of Forced Labour Convention (No. 105), the Minimum Age Convention (no. 138) and the Worst Forms of Child Labour Convention (no. 182).

## CODE OF CONDUCT

Triumph's Code of Conduct is based on the "General Declaration of Human Rights", which regulates and promotes positive working and economic relationships. Our CoC serves as a guiding framework that defines and implements our expectations of our suppliers and business partners based on those human rights standards.

Since 2012, our organization has been a participant in the amfori Business Social Compliance Initiative, which supports companies to drive social compliance and improvements within the factories in their global supply chains. As an amfori BSCI participant, we endorse the amfori BSCI Code of Conduct and its terms of implementation and cascade them through our supply chain.

## BUSINESS ETHICS GUIDELINES

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

For more detailed information, please visit:

[GLOBAL\\_Triumph\\_International\\_Business\\_Ethics\\_Guidelines.pdf](#)

## DUE DILIGENCE AND REMEDIATION IN OUR OWN BUSINESS AND SUPPLY CHAINS

We are in the continuous process of implementing our commitment to human rights using approaches set out in the OECD Due Diligence Guidance for Responsible Business Conduct. In this context, we have undertaken the following due diligence steps and developed our Risk Management System:

(a) Adhere to Triumph & amfori BSCI responsible business conduct and policy standards.

(b) Identify and assess significant risks to human rights through annual social audit.

(c) Implement measures and supplier training to prevent, cease, and mitigate adverse impacts.

(d) Monitor the implementation of policies and actions.

(e) Maintain regular communication with internal and external stakeholders to ensure transparency and accountability.

# APPROACH TO IDENTIFYING, MITIGATING OR PREVENTING ADVERSE IMPACTS WITHIN OUR BUSINESS AND STAKEHOLDER RELATIONSHIPS

## RESPONSIBLE SOURCING PRACTICES

### ONBOARDING

Triumph considers the issue of human rights violations when onboarding suppliers, incorporating a stringent evaluation process. This process involves a thorough examination of third-party audit reports and a meticulous review of relevant documents. Our CoC requires suppliers to prohibit modern slavery within their operations and obligates Triumph to investigate any reasonable suspicions of its various forms, such as slavery, servitude, forced and compulsory labour, and human trafficking.

As the CoC is part of the contract with any potential supplier, new suppliers must provide a valid social audit proving that no forced labour issues have been identified before commencing any business relationship. Following the documentation review and final visits, the supplier will be onboarded and introduced to our policies and procedures.

### REGULAR MONITORING PRACTICES

The CoC mandates Triumph to address any alleged violations, stating, "If a supplier violates one or more of the regulations within this CoC, the company concerned will be approached to instigate immediate corrective measures." The CoC grants Triumph the right to investigate suppliers, as it is incorporated into our standard contract terms. This provides us with the contractual right to conduct audits to monitor compliance with the CoC and to terminate agreements for non-compliance.

We maintain constant vigilance over the risk of modern slavery through ongoing assessments conducted by qualified third-party entities. Our own production facilities and business associates are required to furnish a valid third-party audit report, with most audits being semi-announced, providing a window of possible visits. Non-compliance with local law or our CoC, including the prohibition on forced labour, may result in immediate termination or remediation measures agreed upon with the supplier, documented in a Corrective and Preventive Action (CAPA) plan to ensure

long-term improvement. Failure to adequately address non-compliance can lead to contract termination.

## ASSESSMENT OF RISK WITHIN THE SUPPLY CHAIN

There are certain instances under which the Social Compliance Department can demand additional verification measures if the perceived risk is high, where contrary extra caution is warranted (e.g. factory being located in a high-risk area, regional compliance issues, etc).

In 2024, all 106 finished garment factories and 3 Triumph production centres supporting Triumph's business across 16 countries were monitored for social compliance. As such, 99 factories located in 'Medium Risk' and 'High Risk' countries were selected, and audits were organized.

| <i>Country Name</i>           | <i>*Risk Label</i> | <i>*Overall Risk</i> | <i>UNICEF Children's Rights in the Workplace Index</i> |
|-------------------------------|--------------------|----------------------|--|
| <i>Bangladesh</i>             | Medium Risk        | 22.83                | Enhanced   |
| <i>Bosnia And Herzegovina</i> | Medium Risk        | 33.68                | Enhanced   |
| <i>Bulgaria</i>               | Medium Risk        | 56.42                | Enhanced   |
| <i>Cambodia</i>               | Medium Risk        | 26.22                | Enhanced   |
| <i>China</i>                  | Medium Risk        | 41.97                | Enhanced   |
| <i>Germany</i>                | Low Risk           | 87.60                | Basic  |
| <i>India</i>                  | Medium Risk        | 47.58                | Enhanced   |
| <i>Indonesia</i>              | Medium Risk        | 49.17                | Enhanced   |
| <i>Japan</i>                  | Low Risk           | 89.77                | Basic  |
| <i>Morocco</i>                | Medium Risk        | 41.12                | Enhanced   |
| <i>South Korea</i>            | Low Risk           | 80.45                | Basic  |
| <i>Romania</i>                | Medium Risk        | 58.15                | Basic  |
| <i>Sri Lanka</i>              | Medium Risk        | 38.23                | Enhanced   |
| <i>Thailand</i>               | Medium Risk        | 46.78                | Enhanced   |
| <i>Turkey</i>                 | Medium Risk        | 31.92                | Enhanced   |
| <i>Vietnam</i>                | Medium Risk        | 40.62                | Enhanced   |

*\*Based on amfori ESG Compass under Worldwide Governance Indicator*

The disclosure of Finished Goods suppliers (Tier 1) and core and strategic Raw Material suppliers (Tier 2) on our corporate website (<https://www.triumph.com/corporate/our-products/production>) demonstrates

our transparency and delegation in monitoring and assessing human rights risk within the Triumph Group supply chain. This supplier list is updated annually.

## APPROACH TO REMEDIATION AND REPORTING

### SEEK REMEDIATION AND ESCALATION

Suppliers must follow up on and remediate issues raised by the third-party auditor in a timely manner. We collaborate with suppliers to create an action plan to resolve the issues within a given timeframe. Besides, Triumph has also developed a process of escalation to track and push forward appropriate follow-up work in case a critical violation is identified. If relevant suppliers fail to follow the measures within the given timeframe, a warning letter will be issued. Other business consequences, such as suspension or being permanently prohibited from producing our merchandise, could also take place.

Through amfori BSCI audits and other equivalent social compliance audit schemes, we have not identified any case of modern slavery in the supply chain. However, if an incident of modern slavery is identified (whether suspected or actual), immediate attention and remediation are required. We expect the third-party auditor and/or amfori secretariat (when applicable) to report the case within 24 hours and initiate a conference call within 72 hours to discuss necessary actions for remediate.

### GRIEVANCE MECHANISM AND INDUSTRIAL COLLABORATION

Triumph has established an effective grievance and whistleblowing mechanism following the amfori BSCI's Code of Conduct. This mechanism serves both internal and external stakeholders who may be negatively affected by Triumph's operations, including instances of potential or confirmed forced labour.

An integrity hotline ([integrity@triumph.com](mailto:integrity@triumph.com)) has been instituted as an independent and confidential channel for reporting information about inappropriate business practices. This hotline is accessible to Triumph employees and third parties alike.

Moreover, as a participant in amfori BSCI, any third party has the opportunity to file a grievance regarding our BSCI implementation

activities through the amfori BSCI Grievance Mechanism (system@amfori.org).

## APPROACH TO CONTINUOUS IMPROVEMENT

### MITIGATION STRATEGY

Given Triumph's extensive global supply chain presence, the implementation of a dynamic mitigation plan becomes essential for identifying potential risks and formulating strategies. Establishing enduring partnerships with key suppliers and maintaining a diversified supply base are viable approaches. The critical task of monitoring and assessing supplier performance is pivotal in guaranteeing adherence to our quality, ethical, and environmental standards.

### AWARENESS-RAISING AND CAPACITY BUILDING

At Triumph, we place a strong emphasis on the comprehensive onboarding process for new employees. They are not only introduced to our CoC but also undergo extensive training on our values. This process ensures that they are well-equipped to acquaint themselves with our corporate policies, fostering a culture of ethical practices from the very beginning. Triumph defines overall goals and targets to assess our progress in achieving them. With regards to combating Modern Slavery, we recognize the following key targets to be monitored:

OUR OWN STAFF  
increased awareness of  
forced labour and human  
rights risks,

OUR SUPPLY CHAINS' BUSINESS  
partners show continuous  
improvement, particularly with  
regard to the areas in relation to

Assessing the effectiveness of our measures regularly helps Triumph maintain efforts that have proven successful and allows the exploration of innovative solutions when needed. Our commitment to transparency is further reinforced through regular internal reporting of risk assessment findings, including those related to operations and supply chains. This practice not only aids in understanding the underlying causes but also keeps all stakeholders well-informed and involved in our continuous improvement efforts.



## TRAINING AND FURTHER STEPS

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

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

Training sessions on Social Compliance and Modern Slavery have also been provided this year by our global sourcing team within the Group.

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

## APPROVAL OF THIS STATEMENT

This statement has been approved by the Global Management Board and signed on its behalf by the Global Head of Supply Chain on 2025.05 and constitutes Triumph Group's commitments to avoid slavery and human trafficking for the financial year ending 2024.

A handwritten signature in grey ink, appearing to read 'Kemmler', followed by a vertical line.

**Martin Kemmler**  
Global Head of Supply Chain