# **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT 2024**

Samsonite Group is the world's best known and largest travel luggage company and a leader in global lifestyle bags. We own and operate a portfolio of customer-centric and iconic brands, led by *Samsonite®*, *TUMI®*, and *American Tourister®*, that empower our customers' journeys with globally trusted, innovative and increasingly sustainable products. Building on our long history of industry leadership, our vision is to create a path towards a more sustainable future for our industry.

We are committed to conducting business in a way that is consistent with our traditional values – acting responsibly, honestly and ethically at all times and complying with the laws of the various countries where we do business.

This statement is made pursuant to Section 54 of the UK Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (SB 657) and constitutes the Group's Modern Slavery Statement for the financial year ended December 31, 2024.

This statement sets out the steps we are taking to identify and mitigate risks of modern slavery in our business operations and supply chains.

# **Business Structure, Activities & Supply Chain**

The Group is principally engaged in the design, manufacture, sourcing and distribution of luggage, business and computer bags, outdoor and casual bags and travel accessories throughout the world, primarily under the Samsonite®, Tumi®, American Tourister®, Gregory®, High Sierra®, Lipault® and Hartmann® brand names as well as other owned and licensed brand names.

As of December 31, 2024, the Group's products were sold in more than 100 countries.

The Company operates using a primarily decentralized structure across four key regions: Asia, North America, Europe and Latin America. We sell our products through two primary distribution channels: wholesale and direct to consumer (DTC), which includes company-operated retail stores and e-commerce.

The Company owns and operates manufacturing facilities in Oudenaarde, Belgium; Szekszárd, Hungary; and Nashik, India. The remainder of our products are manufactured by independently owned and operated facilities. Most of the Company's third-party manufacturers are located in Asia, including China, Thailand, Vietnam, Cambodia, India, the Philippines, Indonesia, Myanmar, Bangladesh and Taiwan, and the Dominican Republic.

To find out more about our company, please see: <a href="https://corporate.samsonite.com">https://corporate.samsonite.com</a>.

## **Our Commitment**

Modern slavery in any of its forms – whether as forced, bonded, or compulsory labor, or as human trafficking – represents some of the gravest forms of human rights abuse. The Group has a zero-tolerance approach to these illegal activities.

## **Our Policies**

Our efforts to assess and address risks of modern slavery across our operations and supply chains are anchored in our policies, in addition to our governance process which is supported by our leadership team. We regularly review our policies to identify opportunities for improvement, based on evolving international human rights standards, regulations and industry best practices.

The Company's Code of Conduct is mandatory and extends to every person working at the Group. Included in it is the Company's corporate commitment to legal compliance and ethical behavior. The Code aligns with our commitment to the International Labor Organization (ILO) Labor Standards and outlines the Company's support for the organization's goal that people throughout the world should be able to undertake decent and productive work in conditions of freedom, equality, security and human dignity. The Company's policies explicitly include a prohibition on the use of forced or other compulsory labor across our business, as well as our supply chain. Employees who fail to abide by the Group's policies are subject to discipline and dismissal, if warranted.

We work to ensure that our global supply chain partners follow socially responsible and ethically acceptable practices. The <u>Samsonite Ethical Charter</u> guides our approach to minimum standards in the supply chain. Samsonite requires all finished goods suppliers and certain raw material and component suppliers and their subcontractors to accept this commitment. The first clause of this charter states:

"The use of forced labor is forbidden, and employees shall not be kept in locked premises nor shall their freedom be restricted in any other way. No compulsory deposits of money or identity cards etc. shall be demanded from employees as security against work, and they shall be free to resign their employment within a reasonable term. (ILO Conventions 29 and 105)"

We also have an **Implementation Guide** for suppliers that accompanies our Ethical Charter.

Collectively, these documents set forth the vision for acceptable business practices related to workers' rights, working conditions, terms of employment, decent work, supplier systems, and worker protections. They are consistent with the ILO Conventions, such as prohibitions against forced labor and child labor. The Company uses these documents as an integral component of our sourcing strategies, including how we evaluate supplier performance, and determine with which factories we will continue to engage and grow our business.

## **Governance and Accountability**

Overall accountability for the Modern Slavery Statement is held by the VP, Global Head of Sustainability. The Statement is also reviewed by the CEO and EVP and General Counsel, and ultimately approved by the Board of Directors.

## **Training and Embedding**

Employees and workers across our value chain are trained on our standards in the following ways:

- Our Code of Conduct is distributed to employees annually, and employees are required to acknowledge receipt of, and to certify compliance with, the Code of Conduct.
- We communicate with our suppliers about our standards, including the
  prohibition of human trafficking and child labor, by requiring adherence to our
  Ethical Charter, providing an Ethical Charter Supplier Implementation Guide and
  through on-site monitoring and verification process as part of our Global Social
  Compliance Program.
- Our Social Compliance team conducts various activities (e.g., training/seminars, review of audit status, post-audit debrief) with internal stakeholders and suppliers throughout the year to raise further awareness and reinforce key requirements of our Ethical Charter. These activities are intended to promote a greater understanding of social compliance issues and improve supplier performance in subsequent certification and audits.

# **Due Diligence Processes & Risk Management**

#### Context

The Group does not support or knowingly maintain relationships with any business involved or connected in any way with modern slavery. Nevertheless, the Group understands that the greatest risk of modern slavery is in our product supply chain; as such, we have undertaken activities to identify and minimize those risks with our finished goods suppliers, and with certain raw material and component suppliers.

# Assessment and Prioritization of Impacts

The Company conducts due diligence checks of new and existing suppliers within the scope outlined above in the form of either self-assessment questionnaires or a compliance audit conducted by or on behalf of the Company.

## **Tracking and Monitoring**

The Group seeks to ensure that all new and existing third-party finished goods and certain raw material and component suppliers abide by the Company's policies. Supply

contracts require compliance, and the Group's social compliance audit personnel regularly visit suppliers to audit their compliance with these policies. Failure to remedy violations of the policy may result in termination of the relationship with the supplier. Monitoring and verification activities, conducted by a team of trained professionals based in China, Hong Kong, India and Singapore, ensure ongoing compliance.

- Audit Results: In 2024, we audited 164 finished goods factories across the Group, with a further 66 achieving Worldwide Responsible Accredited Production (WRAP) certification. We also audited 86 of our key raw material and component factories (those that make raw materials for our finished goods suppliers and owned factories), with an additional 32 obtaining WRAP certification. No egregious human rights issues or indicators of modern slavery were identified in these audits.
- Ongoing Monitoring: All our supply chain partners, internal stakeholders, and suppliers receive regular feedback on their compliance with minimum standards and areas for improvement such as excessive work hours, workplace safety and health, and longer-term welfare of their workers.

#### Remediation

If evidence of modern slavery is found, the Group will examine the circumstances and develop the best possible strategy for resolution. The Group may act against those suppliers that do not demonstrate sufficient commitment to the supplier codes of conduct or are in breach of it; subsequent actions can include terminating the supplier.

#### **Grievance Mechanisms**

The Group maintains and enforces internal accountability procedures for employees and suppliers who fail to meet our standards to prevent the incidence of modern slavery in our operations and/or supply chain.

We provide accessible and confidential channels for employees, business partners, and other stakeholders to report any concerns or violations of our Commitment through an hotline and website reporting service. We do not tolerate retaliation against those that, in good faith, raise concerns. We review grievances in accordance with the procedures outlined in our **Global Whistleblower Policy**, which includes members of the Group's management team in the finance, legal, human resources and internal audit departments reviewing any information that is submitted via the hotline. The hotline is available toll-free and is publicized to employees electronically, in our Code of Conduct, and through posters and in worker handbooks throughout our operations.

#### **Program Evaluation**

Evaluation of the effectiveness of our efforts to ensure that no human trafficking or modern slavery is present in the Company or in our supply chain rests with the country

and regional management for employees, and with sourcing and production staff in the supply chain; this process is reviewed periodically by the internal audit team.

We know that our work to ensure we are appropriately tackling the issue of modern slavery requires our ongoing commitment and we remain committed to playing our part in identifying and tackling any issues of modern slavery that touch our business.

Approved by the Board of Directors on March 12, 2025.

Signed on behalf of the Board of SAMSONITE GROUP S.A.

Kyle Francis Gendreau Chief Executive Officer

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