

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Under Armour
Sector Apparel (supply chain only)
Overall score 31.5 out of 100

| Theme score | Out of | For theme |
|-------------|--------|---|
| 5.2 | 10 | A. Governance and Policy Commitments |
| 8.7 | 25 | B. Embedding Respect and Human Rights Due Diligence |
| 6.5 | 20 | C. Remedies and Grievance Mechanisms |
| 4.9 | 25 | D. Performance: Company Human Rights Practices |
| 6.3 | 20 | E. Performance: Responses to Serious Allegations |

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| A.1.1 | Commitment to respect human rights | 2 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: International Bill of Human Rights: The Company’s Human Rights Commitments indicates: ‘We are committed to respecting the rights under the International Bill of Rights’. [Human Rights Commitment, N/A: about.underarmour.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to OECD MNE Guidelines: The Company’s Human Rights Commitments indicates: ‘we adhere to the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises’. [Human Rights Commitment, N/A: about.underarmour.com] |
| A.1.2.a | Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: The Company’s Human Rights Commitments indicates: ‘We are committed to respecting workers' rights under the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work’. [Human Rights Commitment, N/A: about.underarmour.com] Not Met: Explicitly lists all four ILO core principles: The Code of Conduct has provisions on non-discrimination. However, no statement found explicitly including commitments to respect: freedom of association and the right to collective bargaining and the rights not to be subject to forced labour, child labour. The Supplier Code of Conduct has provisions on: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. However, it seems to apply to suppliers rather than for its own operations. The |

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| | | | <p>Human Rights Commitment states: ‘We are committed to respecting workers’ rights under the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO’s fundamental conventions’. On it footnote, it further explains: ‘ILO’s fundamental—also known as “core”—conventions include: Freedom of Association and the effective recognition of the right to Collective Bargaining; Elimination of all forms of forced or compulsory labour; Effective abolition of child labour; and Elimination of discrimination in respect of employment and occupation’. However, although the Company explains what the ILO core is, it is not clear it commits to each of them as they only appear on the footnote. The subindicator looks for an explicit commitment of respect each of the ILO core in the body of the policy. [Code of Conduct, 2022: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The supplier code has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. • Met: Explicitly lists all four ILO core principles for suppliers: The supplier code has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'Under Armour suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining. Employers must develop and implement effective industrial relations systems and mechanisms to resolve internal disputes, including employee grievances and ensure effective communication with employees'. The Human Rights Commitment reaffirms these expectations. [Supplier Code of Conduct, N/A: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com] |
| A.1.2.b | Commitment to respect the human rights of workers: Health and safety and working hours | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to respect H&S of workers: The Company’s Human Rights Commitments indicates: ‘We are also committed to respecting our teammates’ health and safety’. [Human Rights Commitment, N/A: about.underarmour.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The Company’s Human Rights Commitments indicates: ‘We are also committed to respecting our teammates’ health and safety, including maintaining limitations on working hours’. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. It also has expresses its suppliers expectations, including: ‘We seek to do business with suppliers, including manufacturers, licensees, agents, and subcontractors, that comply with our Supplier Code of Conduct. This code reflects the ILO’s fundamental conventions and sets forth expectations for workers’ protection, including provisions on [...] hours of work [...], fair compensation [...]’. The Supplier Code of Conduct has provisions on working hours, however, it is not clear the Supplier Code also applies to its own operations. This subindicator looks for Company level commitments. [Human Rights Commitment, N/A: about.underarmour.com] & [Supplier Code of Conduct, N/A: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and their subcontractors must provide their employees with a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employer facilities’. [Supplier Code of Conduct, N/A: about.underarmour.com] • Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and their subcontractors 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. Under Armour suppliers and their subcontractors shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Under Armour suppliers and their subcontractors shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours’. [Supplier Code of Conduct, N/A: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| A.1.3.AP | Commitment to respect human rights particularly relevant to the sector – vulnerable groups (AP) | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to women's rights: See below. Commitment to the Women's Empowerment Principles [WEP] is a proxy for 'respecting women's rights'. [Human Rights Commitment, N/A: about.underarmour.com] • Met: Expects suppliers to respect these rights: The Migrant Worker Policy Standards indicates: 'At a minimum, suppliers are further subject to all applicable laws, rules, regulations on migrant workers [...]. They must also meet the expectations of the International Labor Organization (ILO) Conventions on Forced Labor, the UN International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Dhaka Principles for Migration with Dignity, current guidance of the International Organization for Migration (IOM), and any other relevant standards adopted by UA in the future'. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment refers to CEDAW/Women's Empowerment Principles: The Company's Human Rights Commitments indicates: 'we adhere to the UN Convention on the Rights of the Child, the Children's Rights and Business Principles, the UN Convention on the Elimination of Discrimination Against Women, [...] and the Women's Empowerment Principles'. [Human Rights Commitment, N/A: about.underarmour.com] • Met: Commitment refers to Child Rights Convention/Business Principles: The Company's Human Rights Commitments indicates: 'we adhere to the UN Convention on the Rights of the Child, the Children's Rights and Business Principles, the UN Convention on the Elimination of Discrimination Against Women, [...] and the Women's Empowerment Principles'. [Human Rights Commitment, N/A: about.underarmour.com] • Met: Expects suppliers to respect these rights: The Migrant Worker Policy Standards indicates: 'At a minimum, suppliers are further subject to all applicable laws, rules, regulations on migrant workers [...]. They must also meet the expectations of the International Labor Organization (ILO) Conventions on Forced Labor, the UN International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Dhaka Principles for Migration with Dignity, current guidance of the International Organization for Migration (IOM), and any other relevant standards adopted by UA in the future'. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] |
| A.1.4 | Commitment to remedy | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to remedy adverse HRs impacts: The Company's Human Rights Commitments include: 'We seek to avoid unsuspecting complicity in human rights abuses or impacts against individuals, workers, and communities; and we are committed to cooperating and working with our teammates, vendors, suppliers, contractors, licensees, agents, and other relevant parties to remedy adverse impacts that we may have caused, to which we may have contributed, or to which we may be directly linked. This includes promoting dialogue and implementing sustainable solutions, such as capability building initiatives, as needed or necessary. We are committed to providing access to effective remedy' [Human Rights Commitment, N/A: about.underarmour.com] • Not Met: Expects suppliers to make this commitment: The Supplier Code of Conduct indicates: 'Suppliers shall collaborate with Under Armour and their subcontractors to assess current practices, identify opportunities for improvement, and implement improvement plans'. However, no evidence found that it expects its suppliers to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Supplier Code of Conduct, N/A: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Company's Human Rights Commitments indicates: 'We also will not obstruct access to judicial and non-judicial, third-party mechanisms'. However, although the Company commits to not obstruct judicial and non-judicial third-party mechanisms, no commitment to collaborating with these mechanisms to provide access to remedy found. • Met: Commitment to work with suppliers on remedy: As indicated above, the Human Rights Commitment include: 'We seek to avoid unsuspecting complicity in human rights abuses or impacts against individuals, workers, and communities; and we are committed to cooperating and working with our teammates, vendors, suppliers, contractors, licensees, agents, and other relevant parties to remedy adverse impacts that we may have caused, to which we may have contributed, or |

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|----------------|--|------------------|---|
| | | | to which we may be directly linked. This includes promoting dialogue and implementing sustainable solutions, such as capability building initiatives, as needed or necessary'. [Human Rights Commitment, N/A: about.underarmour.com] |
| A.1.5 | Commitment to respect the rights of human rights defenders | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Zero tolerance of threats/attacks on HRDs: The Company's Human Rights Commitments indicates: 'we respect the lawful exercise of rights by human rights defenders and will neither tolerate nor contribute to threats, intimidation, or attacks against human rights defenders'. [Human Rights Commitment, N/A: about.underarmour.com] Met: Expects suppliers to make this commitment: See above, it adds: 'We expect our suppliers to make the same commitment'. [Human Rights Commitment, N/A: about.underarmour.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to working with HRDs to create safe and enabling environment |

A.2 Board Level Accountability (5% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|---|
| A.2.1 | Commitment from the top | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: The Company's Human Rights Commitments indicates: 'The Corporate Governance and Sustainability Committee of Under Armour, Inc.'s Board of Directors provides board-level oversight of effective strategies, programs, policies, and practices related to sustainability, including human rights'. [Human Rights Commitment, N/A: about.underarmour.com] Not Met: Describes HRs expertise of Board member: See above. The Company has provided comments to CHRB regarding this indicator, further explaining its Corporate Governance and Sustainability Committee. It includes information on its duties and responsibilities regarding sustainability and its mission. However, this subindicator looks for a description of the human rights expertise of the Board member or Board committee tasked with that governance oversight. [Human Rights Commitment, N/A: about.underarmour.com] & [Corporate Governance and Sustainability Committee Charter, 02/2023: about.underarmour.com] Score 2 <ul style="list-style-type: none"> Not Met: Board member/CEO signal importance of HRs in their communications: In the Q2 2023 Earnings Call, the Chief Financial Officer, David Eric Bergman, indicates: 'I want to highlight the significant event that occurred during the second quarter. In September, we published our new sustainability and impact report. From how we create our products, to our workplace interaction with suppliers and key relationships with stakeholders worldwide, we are proud of this work. With this strategy in place, the next phase of our journey has begun and I am inspired every day by the work our team is doing to reach our targets while being transparent about our progress and challenges'. The Company has provided comments to CHRB regarding this indicator, including information where the Company explains: health and safety in COVID-19 pandemic; the key milestones in its supply chain in relation to transparency and due diligence; fair compensation for supply chain workers; human rights due diligence; meeting human rights and migrant supplier worker commitment; its human rights commitment; among other issues. However, no communication found where Board members or the CEO clearly signal the Company's commitment to human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [Q2 2023 Earnings Call, 03/11/2022: underarmourinc.gcs-web.com] & [2021 Sustainability Impact Report, 2022: about.underarmour.com] |
| A.2.2 | Board responsibility | 1 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Process to review HRs strategy at board level: The Company's Human Rights Commitments indicates: 'The Corporate Governance and Sustainability Committee receives regular updates from our Chief Sustainability Officer on these matters. The Committee also reviews and approves significant sustainability and corporate responsibility policies and reports, including this Global Human Rights Commitment'. The Corporate Governance and Sustainability Committee charter adds: 'The Committee shall meet as often as it determines necessary to meet its objectives, but no less frequently than quarterly'. [Human Rights Commitment, N/A: about.underarmour.com] & [Corporate Governance and Sustainability Committee Charter, 02/2023: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • Not Met: Example of HRs issues/trends discussed in last reporting period: The 2022 Proxy Statement indicates: ‘Our Board of Directors has delegated to our Corporate Governance and Sustainability Committee oversight of our significant sustainability strategies, programs, policies and practices. The committee receives regular updates from our Chief Sustainability Officer on these matters, and reviews and approves significant sustainability and corporate responsibility policies and reports. Our corporate strategy is based on responsible business practices, including a commitment to sustainability and human rights and addressing related opportunities and risks’. However, no example of discussion found. The 2021 Impact Report notes: ‘The Corporate Governance and Sustainability Committee of the Board of Directors has reviewed and approved the publication of this report’. The Report has information on the Company’s human rights performance. However, although the Committee has reviewed and approved it, no example of specific human rights issue discussed found. It also indicates that its materiality issues includes: ‘Supply Chain Transparency – provide detail for the names, addresses, and other important information about UA’s key suppliers manufacturing UA branded products, workforce/labor composition, and related health and safety standards’. However, no evidence found of specific human rights topics discussed in last reporting year. This subindicator looks for specific human rights topics covered last reporting year. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions: The Human Rights Commitment states: ‘Our President and Chief Executive Officer, Executive Leadership Team, and Sustainability Leadership Council—which is composed of our Chief Operating Officer, Chief Product Officer, Executive Vice-President, General Counsel, and Corporate Secretary, and Chief Sustainability Officer—are responsible for approving Under Armour’s strategies and goals related to sustainability, including human rights and related due diligence. Our sustainability team, led by our Chief Sustainability Officer, is responsible for directing the implementation and day-to-day management of our human rights program, including reporting to, and regularly engaging with, internal and external stakeholders to improve continuously our human rights policies and practices’. However, no description found of how the experiences of affected stakeholders or external human rights experts informed human rights related Board level discussions. [Human Rights Commitment, N/A: about.underarmour.com] |
| A.2.3 | Incentives and performance management | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: At least one board member incentive linked to HRs commitments: The 2021 Sustainability Impact Report notes: ‘DE&I goals are embedded into the annual incentive plan for all teammates, including executives’. The 2022 Proxy Statement explains its 2021 executive compensation program, which is composed of base salaries, Annual Equity Award Mix and Value and Annual Cash Incentive Awards. The latter the key includes: ‘Maintaining two diversity, equity and inclusion metrics to provide increased incentives to advance our efforts of improving the diversity, equity and inclusion of our organization’. The description of Diversity, Equity and Inclusion is: ‘Required accountability for completion of specified training and education requirements by corporate employees’ and ‘Required improvement of representation metrics for women and underrepresented minorities in the U.S. corporate employee population’, for which the target is: ‘90% training completion by corporate employees based on program and level within the organization’ and ‘100% of specified target improvements at various levels within the organization’. The weighting of the incentive is 20%. The President and Chief Executive Officer and the Executive Chair and Brand Chief are Board members. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] • Met: Incentive scheme linked to key HRs risks beyond employee H&S: See above. According to the 2022 Modern Slavery Statement ‘Non-Discrimination, Diversity and Equal Opportunity’ is included into the Company’s risks. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: See above. The Company discloses the criteria linking Board remuneration to human rights performance. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| A.2.4 | Business model strategy and risks | 0 | <ul style="list-style-type: none"> • Not Met: Review of other board incentives for coherence with HRs policies <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks: The 2022 Proxy Statement indicates: ‘Our Purpose and Values, including Act Sustainably and Stand for Equality, steer the ambitions we set as an organization, the questions we ask to guide our strategy and planning, the decisions we make for our culture and brand and the actions we take, including with respect to environmental and social issues and how we engage in related governance. [...] Our Board of Directors has delegated to our Corporate Governance and Sustainability Committee oversight of our significant sustainability strategies, programs, policies and practices. The committee receives regular updates from our Chief Sustainability Officer on these matters, and reviews and approves significant sustainability and corporate responsibility policies and reports’. The webpage section Governance Guidelines adds: ‘The Board of Directors shall meet at least 4 times a year, generally at 3 month intervals. Additional meetings may be scheduled as necessary or appropriate in light of circumstances. [...] Certain matters shall be addressed by the Board of Directors at least annually. These matters shall include a review of the Company’s (i) strategic plan and the principal current and future risk exposures; (ii) strategic objectives; (iii) business and financial performance for the prior year, including a review of the achievement of strategic objectives; [...]’. The Company has provided additional comments to CHRB regarding this indicator, including information on its Sustainability Leadership Council (SLC). However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] & [Governance Guidelines_web, N/A: about.underarmour.com] • Not Met: Describes frequency and triggers for reviewing business model: See above. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. No further evidence found. [Governance Guidelines_web, N/A: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews |

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| B.1.1 | Responsibility and resources for day-to-day human rights functions | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: This subindicator is the result of A.1.2.a. assessment. • Met: Senior responsibility for HRs implementation and decision making: The Company’s Human Rights Commitments indicates: ‘Our President and Chief Executive Officer, Executive Leadership Team, and Sustainability Leadership Council—which is composed of our Chief Operating Officer, Chief Product Officer, Executive Vice-President, General Counsel, and Corporate Secretary, and Chief Sustainability Officer—are responsible for approving Under Armour’s strategies and goals related to sustainability, including human rights and related due diligence’. [Human Rights Commitment, N/A: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The Company’s Human Rights Commitments indicates: ‘Our sustainability team, led by our Chief Sustainability Officer, is responsible for directing the implementation and day-to-day management of our human rights program, including reporting to, and regularly engaging with, internal and external stakeholders to improve continuously our human rights policies and practices’. [Human Rights Commitment, N/A: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Met: Day-to-day resources and expertise allocation in own operations: In addition, to the sustainability team, The 2021 Sustainability Impact Report indicates: 'Our Environmental, Social and Governance (ESG) Task Force, which includes leaders from environmental, social and governance teams across the company, was created to ensure that we holistically consider, and are accountable for, sustainability and ESG at UA. The ESG Task Force meets regularly to discuss and collaborate on key issues and initiatives related to the environment; social and labor; DE&I [diversity, equity and inclusion]; community impact and other ESG topics'. Also: 'Our DE&I operating model ensures DE&I is integrated into every level of the organization, and our DE&I team is led by the vice president of diversity, equity and inclusion'. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Resources and expertise allocation in supply chain: The 2022 Proxy Statement indicates: 'Our Sustainability team, led by our Chief Sustainability Officer, is responsible for the implementation and day-to-day management of our sustainability program, which addresses environmental (including climate change) and human rights issues and impacts and leads engagement regarding related due diligence and business integration'. The Human Rights Commitment reaffirms it: 'Our sustainability team, [...] is responsible for directing the implementation and day-to-day management of our human rights program, including reporting to, and regularly engaging with, internal and external stakeholders to improve continuously our human rights policies and practices'. The Company has provided additional comments to CHRB regarding this indicator, where it further explains its supply chain commitments and management. However, no description found of how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its supply chain. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] & [Human Rights Commitment, N/A: about.underarmour.com] |
| B.1.2 | Incentives and performance management | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives linked to HRs commitments: The 2021 Sustainability Impact Report notes: 'DE&I goals are embedded into the annual incentive plan for all teammates, including executives'. The 2022 Proxy Statement explains its 2021 executive compensation program, which is composed of base salaries, Annual Equity Award Mix and Value and Annual Cash Incentive Awards. The latter the key includes: 'Maintaining two diversity, equity and inclusion metrics to provide increased incentives to advance our efforts of improving the diversity, equity and inclusion of our organization'. The description of Diversity, Equity and Inclusion is: 'Required accountability for completion of specified training and education requirements by corporate employees' and 'Required improvement of representation metrics for women and underrepresented minorities in the U.S. corporate employee population', for which the target is: '90% training completion by corporate employees based on program and level within the organization' and '100% of specified target improvements at various levels within the organization'. The weighting of the incentive is 20%. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] • Met: Incentive scheme linked to key HRs risks beyond employee H&S: See above. According to the 2022 Modern Slavery Statement 'Non-Discrimination, Diversity and Equal Opportunity' is included into the Company's risks. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: See above. The Company discloses the criteria linking Board remuneration to human rights performance. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] • Not Met: Review of other senior management incentives for coherence with HRs policies |
| B.1.3 | Integration with enterprise risk management | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs risks integrated as part of enterprise risk system: The Company discloses its Risk Factors (included in risk management), including: 'The value of our brand and sales of our products could be diminished if we are associated with negative publicity: Our business could be adversely impacted if negative publicity regarding our brand, our company or our business partners diminishes the appeal of our brand to consumers. For example, while we require our suppliers, manufacturers and licensees of our products to operate their businesses in compliance with applicable laws and regulations as well as the social and other standards and policies we impose on them, including our code of conduct, we do |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <p>not control the conduct of these third parties. A violation, or alleged violation of our policies, labor laws or other laws could interrupt or otherwise disrupt our sourcing or damage our brand image. Negative publicity regarding production methods, alleged practices or workplace or related conditions of any of our suppliers, manufacturers or licensees could adversely affect our reputation and sales and force us to locate alternative suppliers, manufacturers or licensees. The risk that our business partners may not act in accordance with our expectations may be exacerbated in markets where our direct sales, supply chain or logistics operations are not as widespread'. [2021 Annual Report, 24/03/2022: underarmourinc.gcs-web.com]</p> <ul style="list-style-type: none"> • Not Met: Provides an example: The 2022 Proxy Statement indicates: 'In 2021, we created an internal Environmental, Social and Governance ("ESG") Task Force to ensure holistic oversight, consideration, analysis and progress of sustainability across our company, and to further support ownership and accountability of sustainability at Under Armour. The ESG Task Force consists of leaders from an array of cross-functional teams, including Enterprise Risk Management, and meets regularly to discuss and collaborate on key ESG issues and initiatives, such as those related to the environment, social and labor, community impact and diversity, equity and inclusion'. However, no details found of an example of how it handles a specific human rights risk(s) in this context. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: Regarding the Audit Committee, the 2022 Proxy Statement indicates: 'the Audit Committee's responsibilities include inquiring of management and our independent registered public accounting firm about significant financial risks or exposures, the company's processes and policies for risk assessment and the steps management has taken to mitigate these risks to the company. The committee receives periodic reports from management on our enterprise risk management program and our risk mitigation efforts. The committee also oversees our legal and regulatory compliance programs and our internal audit function, as well as cybersecurity risks, as described in more detail below'. However, this subindicator looks for a description of how it (the Audit Committee) oversees the assessment of the adequacy of the enterprise risk management system specifically in managing human rights, in specific, during the Company's last reporting year. [2022 Proxy Statement, 11/16/2022: underarmourinc.gcs-web.com] |
| B.1.4.a | Communication /dissemination of policy commitment(s) to workers and external stakeholders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: This subindicator is the result of A.1.2.a. assessment. • Not Met: Communicates HRs policies to all workers in own operations: The Company's Human Rights Commitments indicates: 'We will regularly communicate our Global Human Rights Commitment to all significant parties across our operations and value chain [...] to increase awareness and understanding of our human rights commitments. This will include communicating our commitment through forms accessible to our stakeholders, such as posting our commitment on our global website, our intranet, and inserting references to our approach in our contracts with business partners, suppliers, and other third parties, including athletes and teams who wear and promote our products. We will also regularly communicate updates on our human rights performance through our sustainability website and annual Modern Slavery Statement. Functional leads will be responsible for developing and implementing Global Human Rights Commitment training and awareness-raising activities on human rights risks relevant to their respective functional areas. All Under Armour teammates will be required to read and comply with our Global Human Rights Commitment'. It adds: 'This policy is available in multiple languages, and we take extra steps to respect children's data privacy rights'. However, this evidence refers to a commitment. No evidence found of how these measures are actually being implemented. The 2021 Sustainability Impact Report notes: 'In response to anticipated and realized U.S. trade enforcement actions targeting forced labor in global textile and apparel supply chains, we have proactively communicated with our suppliers since 2018 to ensure our policy on forced labor is well understood and followed [...]. Since 2017, we have published an annual modern slavery statement to summarize the policies and actions taken to address risks of forced labor, modern slavery and human trafficking in our business and supply chain, pursuant to the U.K. Modern Slavery Act 2015, the California Transparency in Supply Chain Act of 2010, and, beginning in 2022, the Australian Modern Slavery Act 2018'. The 2022 Modern Slavery Statement adds: 'The FLA Code and Benchmarks, the UA Code, and the FLA Code must be posted and |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>communicated with factory employees in all facilities that make UA products. Our auditing program verifies that our suppliers comply with this requirement'. Finally, the Migrant Worker Policy and Standards states: 'UA will communicate the MWPS to all direct suppliers in their Native Languages. At a minimum, all direct UA suppliers must, in turn, require their next tier suppliers to provide written acknowledgement and evidence of implementation of the MWPS. These next tier suppliers, in turn, are required to have their sub-tier suppliers provide written acknowledgement and evidence of implementation of the MWPS'. However, although the Company indicates it communicates its commitments to suppliers, no evidence found of how it proactively communicates its policy commitments on human rights concerning its own employees to all its workers, including in local languages where necessary. [Human Rights Commitment, N/A: about.underarmour.com] & [2021 Sustainability Impact Report, 2022: about.underarmour.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The Company's Human Rights Commitments indicates: 'We will regularly communicate our Global Human Rights Commitment to all significant parties across our operations and value chain—including local communities and potentially affected stakeholders—to increase awareness and understanding of our human rights commitments. This will include communicating our commitment through forms accessible to our stakeholders, such as posting our commitment on our global website [...]. We will also regularly communicate updates on our human rights performance through our sustainability website and annual Modern Slavery Statement'. However, this evidence refers to planned actions. No evidence found of how these measures are actually being implemented. The Company has provided comments to CHRB regarding this indicator where it describes its communication with suppliers. However, no description found of how it communicates its policy commitments to affected stakeholders, including local communities and other groups. [Human Rights Commitment, N/A: about.underarmour.com] • Not Met: Example of how HRs policies are accessible for intended audience |
| B.1.4.b | Communication /dissemination of policy commitment(s) to business relationships | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Met: Requires suppliers to communicate HRs policies: The Company's Human Rights Commitments indicates it communicates its Global Human Rights Commitment 'through forms accessible to our stakeholders, such as [...] inserting references to our approach in our contracts with business partners, suppliers, and other third parties'. The 2022 Modern Slavery Statement indicates: 'The UA Code is included in our manufacturing agreements that our suppliers must acknowledge and sign'. It adds: 'The UA Supplier Code of Conduct (the "UA Code") reflects core ILO Conventions'. However, no evidence found of a requirement to communicate the code down the supply chain. The Migrant Worker Policy and Standards states: 'UA will communicate the MWPS to all direct suppliers in their Native Languages. At a minimum, all direct UA suppliers must, in turn, require their next tier suppliers to provide written acknowledgement and evidence of implementation of the MWPS. These next tier suppliers, in turn, are required to have their sub-tier suppliers provide written acknowledgement and evidence of implementation of the MWPS'. The 2021 Sustainability Impact Report notes: 'Every new Tier 1 supplier must complete our Global Ethics and Compliance Questionnaire and undergo a social compliance audit. The audit evaluates the potential supplier's practices and workplace conditions against our Supplier Code of Conduct, the FLA Workplace Code of Conduct and Compliance Benchmarks, and applicable laws, as well as other applicable UA policies, standards and commitments they agree to comply with when they sign our manufacturing agreement. Our product licensees and their suppliers also agree to comply with these requirements and their Tier 1 suppliers undergo such audits'. [Human Rights Commitment, N/A: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The 2022 Modern Slavery Statement indicates: 'The UA Code is included in our manufacturing agreements that our suppliers must acknowledge and sign'. It adds: 'The UA Supplier Code of Conduct (the "UA Code") reflects core ILO Conventions'. The Company has provided further comments regarding this subindicator, but core information was already in use. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The 2021 Sustainability Impact Report notes: 'Every new Tier 1 supplier |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>must complete our Global Ethics and Compliance Questionnaire and undergo a social compliance audit. The audit evaluates the potential supplier’s practices and workplace conditions against our Supplier Code of Conduct, the FLA Workplace Code of Conduct and Compliance Benchmarks, and applicable laws, as well as other applicable UA policies, standards and commitments they agree to comply with when they sign our manufacturing agreement. Our product licensees and their suppliers also agree to comply with these requirements and their Tier 1 suppliers undergo such audits’. [2021 Sustainability Impact Report, 2022: about.underarmour.com]</p> |
| B.1.5 | Training on Human Rights | 0.5 | <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a: This subindicator is the result of A.1.2.a. assessment. • Not Met: Describes how workers are trained on HRs policy commitments: The Company’s Human Rights Commitments indicates: ‘We will regularly communicate our Global Human Rights Commitment to all significant parties across our operations and value chain [...] to increase awareness and understanding of our human rights commitments. [...] Functional leads will be responsible for developing and implementing Global Human Rights Commitment training and awareness-raising activities on human rights risks relevant to their respective functional areas’. However, this evidence refers to plans and no actual actions conducted. The 2022 Modern Slavery Statement adds: ‘In 2018, we provided in-person trainings on the UA Code and our RSP [Responsible Sourcing Policy] to approximately 500 supply chain teammates in strategic sourcing units around the globe. In 2020, we expanded the training on the UA Code to include all corporate and distribution house (“DH”) teammates. In 2020, approximately 98 percent of all DH teammates and approximately 89 percent of corporate teammates took this training. In 2021, all corporate and DH teammates that had not received the training in the previous year were asked to complete the training’. The 2021 Sustainability Impact Report notes: ‘All teammates receive Code of Conduct training when they join UA and complete a refresher training every other year, with additional specialized training required for some teammate roles and responsibilities’. The Code provides some information on the Company’s Human Rights commitments. The RSP could not be found in the public domain. However, training seems to focus in responsible sourcing. This subindicator looks for evidence that Company’s employees are trained on the Company’s human rights commitments towards them. The Company has provided comments to CHRB regarding this indicator, including information on different types of training programmes it offers, including: unconscious bias training for all corporate teammates; director-level positions and above complete frequent trainings on cultural competency and building inclusive environments; training on our Supplier Code of Conduct, which was mandatory for all corporate and distribution house teammates; Responsible Sourcing Policy training for supply chain leaders; different training programmes that the sustainability team regularly participates; additional teammate and auditor training focused on conducting human rights due diligence and identifying forced labor, modern slavery, and human trafficking risks and indicators, and human rights and legal compliance issues. It adds that UASATR assessments, auditors evaluate whether suppliers provide training to their management teams and workers. However, although the Company indicates it trains different aspects that are related to human rights, it is not clear that it trains its workers generally in relation to their own rights (policy commitments to respect UA’s employees rights) [Human Rights Commitment, N/A: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Met: Trains relevant managers including procurement on HRs: The 2021 Sustainability Impact Report indicates: ‘We provide ongoing training programs on responsible sourcing for our global product supply and sustainability teams. For instance, our sustainability team has conducted Responsible Sourcing Policy training for supply chain leaders and teammates in the Asia-Pacific and Latin America regions. In addition, the sustainability team regularly participates in industry and NGO-led training on a range of topics, including responsible sourcing and purchasing practices, living wages, modern slavery, forced labor, integrating the UN Sustainable Development Goals into supply chains, responsible recruitment and COVID-19’s impact on sourcing practices’. The 2022 Modern Slavery Statement adds: ‘We have previously provided our teammates and management, who have direct responsibility for supply chain management, with training on modern slavery, particularly with respect to mitigating related risks within the direct suppliers of products. [...] In 2020, more than 75 percent of the UA sustainability team attended modern slavery trainings conducted by Impactt, a leading modern slavery expert. |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>These sessions included training on the ILO’s Forced Labor Indicators, updates on modern slavery legislation and reporting requirements, nuanced information on the relevant risks and impacts associated with modern slavery and recommended actions to identify and eliminate modern slavery within our supply chain’. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: This subindicator is the result of A.1.2.a. assessment. • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet HRs commitments: The 2022 Modern Slavery Statement indicates: ‘In 2021, we partnered with Quizrr to launch a series of digital trainings to two suppliers in Jordan through the Worker Voice Pilot Program with an aim to further build capacity among our suppliers of high migratory labor risks. [...] Specifically, two digital training modules covered topics related to involuntary works and responsible recruitment practices that are adapted based on the International Organization for Migration CREST Migrant Worker Guidelines and Suppliers Guidelines. During the year, over 4,500 factory workers and nearly 400 factory management team members received such trainings’. However, although the Company indicates it has held specific supplier trainings on migratory labor risks, no evidence found of general human rights training conducted for suppliers. Current evidence seems to focus in two specific suppliers and specific training. The 2021 Sustainability Impact Report notes: ‘During UASATR assessments, auditors evaluate whether suppliers provide training to their management teams and workers on workplace standards and the nature of the training. If we learn that a supplier does not provide such training, then we engage them to establish it’. The Company has provided comments to CHRB regarding this indicator, pointing out at stakeholder engagement, in specific, it makes reference to engagement with suppliers through training. However, no description found of the general training it provides to suppliers to help them meet its human rights expectations towards suppliers. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Discloses % suppliers trained |
| B.1.6 | Monitoring and corrective actions | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs policy commitments across global ops and supply chain: The 2021 Sustainability Impact Report indicates: ‘We engage third parties to conduct regular audits as part of our efforts to measure and safeguard the well-being, and respect the human rights, of our suppliers’ workers who make our products, while aiming to reduce negative social and environmental impacts from the manufacturing of our products. [...] Every new Tier 1 supplier must complete our Global Ethics and Compliance Questionnaire and undergo a social compliance audit. The audit evaluates the potential supplier’s practices and workplace conditions against our Supplier Code of Conduct, the FLA Workplace Code of Conduct and Compliance Benchmarks, and applicable laws, as well as other applicable UA policies, standards and commitments they agree to comply with when they sign our manufacturing agreement. [...] In 2021, we expanded our program to include Better Work Tier 1 audits and audits of some key Tier 2 suppliers. [...] We continue to use the UASATR as a core audit tool [...]. The UASATR now includes more than 800 potential audit findings, which measure our suppliers’ performance in 10 social and environmental categories. [...] For each finding in the UASATR, auditors are expected to note the following: The pervasiveness of the issue (classified as isolated, frequent or systemic). The severity of the issue (classified as minor, major or egregious). Whether the finding is new or repeated. Suppliers’ audit performance is scored’. However, although the Company explains in details its supply chain audit system, it is not clear how it monitors Human Rights compliance within its own operations. The Company has provided comments to CHRB regarding this indicator, including information on: its grievance mechanism; subjects that the Human Capital and Compensation Committee was briefed on and discussed it carried out; and further explanation on its supply chain monitoring. However, no evidence found in relation to how it actively monitors compliance with human rights within its own operations. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com] • Met: Discloses % of supply chain monitored: The 2021 Sustainability Impact Report indicates: ‘We conducted audits of Tier 2 suppliers that collectively represented about 50% of our business by materials volume. Despite ongoing |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>logistical challenges related to the COVID-19 pandemic, we were able to conduct audits for almost 90% (by volume) of our Tier 1 suppliers’. [2021Sustainability Impact Report, 2022: about.underarmour.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Met: Describes corrective actions process: The 2022 Modern Slavery Statement indicates: ‘We expect our suppliers’ factories to work to remediate issues raised during assessments or verifications and submit timelines and plans for how they propose to improve continuously conditions and work toward achieving sustainable compliance. For example, to ensure this occurs with respect to UASATR audits, auditors generate a Management Action Plan (“MAP”) for factory management that is discussed along with assessment findings as a part of a closing meeting. Utilizing MAPs, we engage with suppliers through a cloud-based platform to track recommendations for improvement and related progress. Once findings and recommendations are uploaded into the platform, UA’s sustainability team reaches out to management to support remediation’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Discloses findings and number of correction action processes: The 2021 Sustainability Impact Report discloses the UASATR Noncompliance Findings from 2018 to 2021. However, the number of corrective action processes as a result of the monitoring was not found. [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| B.1.7 | Engaging and terminating business relationships | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HRs performance affects selection suppliers: The 2022 Modern Slavery Statement indicates: ‘We use the Under Armour Sustainability Assessment Tool and Report (“UASATR”) to evaluate active T1 suppliers and onboard suppliers prior to them being authorized to make our products’. The 2021 Sustainability Impact Report states: ‘We continue to use the UASATR as a core audit tool to evaluate supplier performance against our Supplier Code of Conduct and compliance with other codes, laws and standards’. The Code includes Human Rights provisions. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] • Met: HRs performance affects continuation supplier relationships: The Supplier Code of Conduct indicates: ‘Any violation of these laws or the Code may be viewed as a breach of the Manufacturing Agreement and could lead to the termination of the business relationship between Under Armour and the supplier’. It contains the Company’s Human Rights requirements. [Supplier Code of Conduct, N/A: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Works with suppliers to meet HRs requirements: The 2022 Modern Slavery Statement indicates: ‘In 2021, we partnered with Quizrr to launch a series of digital trainings to two suppliers in Jordan through the Worker Voice Pilot Program with an aim to further build capacity among our suppliers of high migratory labor risks. [...] Specifically, two digital training modules covered topics related to involuntary works and responsible recruitment practices that are adapted based on the International Organization for Migration CREST Migrant Worker Guidelines and Suppliers Guidelines. During the year, over 4,500 factory workers and nearly 400 factory management team members received such trainings’. Moreover, ‘We hold summits to train our Tier 1 suppliers on the UASATR process and address topics including transparency, accountability and root cause analysis’. The 2021 Sustainability Impact Report states: ‘We continue to use the UASATR as a core audit tool to evaluate supplier performance against our Supplier Code of Conduct and compliance with other codes, laws and standards’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| B.1.8 | Approach to engagement with affected stakeholders | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes how workers and communities identified and engaged in the last two years: The 2021 Sustainability Impact Report indicates: ‘Our stakeholders include our athletes, teammates, shareholders, communities, suppliers, business partners, customers, consumers and more. We value all our stakeholders' insights, ideas and feedback, and we seek their input to strengthen our approach and make sure we are covering the whole field. [...] We continually engage with our stakeholders through conversations, focus groups, interviews, surveys, social media and our investor relations website—striving to proactively share information that matters to them in addition to providing information by request’. It also discloses |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>Examples of Engagement Methods and Examples of Key Topics Raised in relation to each stakeholder group'. The Company has provided comments to CHRB regarding this indicator, including information on: its partnership with the Fair Labor Association (FLA); ILO's Working Group Members of the Garment Industry Call to Action, in which UA was part of as an employer organisation; a remediation case study in Malaysia, to address non-compliance, training was part of its remediation programme. However, no description found of how it has identified affected stakeholders, including workers or local communities in its supply chain This subindicator looks for evidence of the steps that companies follow to identify the specific stakeholders with whom to engage in dialogue in relation to human rights. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: The Company has provided comments to CHRB regarding this indicator, including information on: its partnership with the Fair Labor Association (FLA); ILO's Working Group Members of the Garment Industry Call to Action, in which UA was part of as an employer organisation. However, although the Company provides evidence of stakeholder engagement, the subindicator focuses specific on affected or potentially affected stakeholders. The Company is expected to provide at least two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. [Working Group Members of the Garment Industry Call to Action - ILO, N/A: ilo.org] & [Board of Directors FLA_web, N/A: fairlabor.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues: The Migrant Worker Policy and Standards indicates: 'While developing this MWPS, Under Armour's Sustainability team consulted with experts in the field of migrant workers' and human rights, including Impactt, The Mekong Club, Verité and Article One Advisors. We received valuable guidance from these organizations as well as from a range of publicly available sources, which we have listed below and in footnotes'. However, the Company is expected to provide a summary analysis of the input/views given by affected stakeholders on human rights issues during engagements. No further evidence found. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] • Not Met: Describes how stakeholders views influenced company's HRs approach: The Company has provided comments to CHRB regarding this indicator further explaining how it handles global health crisis, as a footnote of Migrant Worker Policy and Standards. However, this subindicator looks for a description of how stakeholders views on human rights issues [from stakeholder engagement] have influenced the development or monitoring of its human rights approach. No further evidence found. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] |

B.2 Human Rights Due Diligence (15% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| B.2.1 | Identifying human rights risks and impacts | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes process of identifying risks in own operations: The webpage section Reporting and Governance indicates: ‘The purpose of our Human Rights Due Diligence model is to identify conditions within countries that may expose Under Armour to greater risk of violating human rights. It is part of the impact assessment portion of the Human Rights Due Diligence process, as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs). [...] model organizes data into three broad thematic categories: General governance capacity, which aims to gauge the state’s capacity for good governance; Protect, which aims to measure the degree to which the rights contained in the International Bill of Human Rights are protected in a given country; Respect, which aims to examine the degree to which the ILO’s eight core conventions are respected in a given country. Based on this assessment we engage with suppliers, civil society organizations, and other third party stakeholders to focus on specific issues and risks to ensure FLA and Under Armour Codes are met and embody core labor standards, and related conventions, of the ILO. Only after these requirements are met do we approve our suppliers to start production for Under Armour in that specific country’. The Company has provided additional comments to CHRB regarding this indicator, including information on its grievance mechanism. However, it is not clear the proactive process the Company has to identify potential risks it faces across its own operations. [Reporting & Governance_web, N/A: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com] • Met: Describes process for identifying risks in business relationships: The 2022 Modern Slavery Statement indicates: ‘We remain committed to improving the systems we have in place to identify and address human rights related risks, including those related to modern slavery. We periodically update these systems based on findings from third-party assessments and engagements with suppliers, external stakeholders, and third-party experts. Updates are also based on information from organizations like the FLA, knowledgeable stakeholders, and organizations, and are based upon the results from risk mapping exercises that focus on salient human rights risks, the presence of vulnerable groups, and/or sourcing location risks. [...] Our questionnaire-based assessment tool is based on the FLA Code and Benchmarks and the FLA’s Sustainable Compliance Initiative (SCI) tool helps us identify and manage risks that are salient to the apparel and footwear industry. Within the area of Forced and Compulsory Labor, the tool has questions related to the IHRB Dhaka Principles and the FLA/AFA Principles of Responsible Recruitment’. The 2021 Sustainability Impact Report adds: ‘In addition to the human rights due diligence outlined in the Under Armour Inc. Global Human Rights Commitment, we conduct regular human rights due diligence in line with the UNGP and other key standards through our social audits of our Tier 1 suppliers. We also conduct specific forced-labor due diligence on our Tier 1, 2 and 3 suppliers based on current issues facing the industry’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation: See above. Although the Company indicates it used Human Rights experts to carry out its risk identification, it is not clear affected stakeholders are also involved in the process. The webpage section Reporting and Governance indicates: ‘Based on this [impact] assessment we engage with suppliers, civil society organizations, and other third party stakeholders to focus on specific issues and risks to ensure FLA and Under Armour Codes are met and embody core labor standards, and related conventions, of the ILO. Only after these requirements are met do we approve our suppliers to start production for Under Armour in that specific country’. The Company has provided comments to CHRB regarding this indicator, including information on: responsibility on day-to-day management of our human rights program; the role of the Audit Committee and the Corporate Governance and Sustainability Committee. However, not further evidence found of how affected stakeholders are also involved in the process. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <ul style="list-style-type: none"> • Met: Describes how risk identification system is triggered by new circumstances: The 2021 Sustainability Impact Report indicates: ‘If we are sourcing from a new country, our sustainability team conducts a country-level human rights due diligence analysis’. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Describes risks identified in relation to new circumstances: The 2022 Modern Slavery Statement indicates: ‘It has also been used to enhance the company’s ability to engage with suppliers about related potential risks. Higher-risk countries where we have previously conducted further focused due diligence assessments include Egypt, Jordan, and Malaysia’. The Company has provided comments to CHRB regarding this indicator further explaining how it handles global health crisis, as a footnote of Migrant Worker Policy and Standards. However, this indicator looks for a description of their risks identified when its global system to identify human rights risks is triggered by new country operations, relationships, human rights challenges or conflict affecting particular locations. No further evidence found. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] |
| B.2.2 | Assessing human rights risks and impacts | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The 2021 Sustainability Impact Report describes its Sustainability Materiality Assessment Approach: ‘In 2021, we completed a sustainability materiality assessment aligned with the Global Reporting Initiative (GRI) to identify and prioritize the sustainability and ESG issues important to our business and key internal and external stakeholders. [...] We then worked to rank, weight and normalize interview results, allowing us to group issues according to their relative priority. [...] The 2021 sustainability materiality assessment took place in three phases: Phase 1: we conducted a comprehensive peer analysis and reviewed our internal materials, policies and reports. Phase 2: we conducted in-depth interviews with internal and external stakeholders. Internal stakeholders included teammates from 18 areas across the organization, including sustainability, sourcing, product and materials innovation, people, community impact, [...] and others. External stakeholder interviews included leaders and experts in environmental, social and governance (ESG), sustainability, and the apparel and footwear industry, representing six organizations—Ceres, the Fair Labor Association, the Sustainable Apparel Coalition, Global Fashion Agenda, Better Buying Institute, and Leadership & Sustainability. Phase 3: we analyzed the findings and developed our top 10 priority issues’. However, it is not clear the process it has in place to assess saliency of their potential human rights risks. This description should include how relevant factors are taken into account, such as geographical, economic, social and other factors. This subindicator looks for saliency rather than materiality. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Met: Describes how process applies to supply chain: The 2022 Modern Slavery Statement indicates: ‘Our human rights due diligence process includes a country-level risk model for new sourcing countries. This tool scores countries against factors including perceived general governance capacity, protection of fundamental human rights as outlined in the International Bill of Rights, and with respect to the ILO’s Eight Core Conventions. [...] Our questionnaire-based assessment tool is based on the FLA Code and Benchmarks and the FLA’s Sustainable Compliance Initiative (SCI) tool helps us identify and manage risks that are salient to the apparel and footwear industry’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Met: Public disclosure of results of HRs risk assessment: The 2022 Modern Slavery Statement indicates its list of risks: ‘Forced or Compulsory Labor; Child Labor; Freedom of Association and Collective Bargaining; Occupational Health and Safety; Fair Compensation (including Working Hours); and Non-Discrimination, Diversity and Equal Opportunity’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1: See above. • Not Met: Describes how assessment involved affected stakeholders: The Company has provided comments to CHRB regarding this indicator, including information on: its materiality matrix, and how it engages with internal and external stakeholders during the Sustainability Materiality Assessment; how experts in the field of migrant workers’ and human rights were consulted during the development of the Migrant Worker Policy & Standards; migrant worker assessments of suppliers in high-risk sourcing locations; a remediation case related |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | to migrant labor in Malaysia. However, this subindicator looks for a description of its system to involve affected stakeholders in the assessment processes of due diligence. No further evidence found. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [2021 Sustainability Impact Report, 2022: about.underarmour.com] |
| B.2.3 | Integrating and acting on human rights risks and impact assessments | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to supply chain: The 2022 Modern Slavery Statement indicates: ‘We expect our suppliers’ factories to work to remediate issues raised during assessments or verifications and submit timelines and plans for how they propose to improve continuously conditions and work toward achieving sustainable compliance. For example, to ensure this occurs with respect to UASATR audits, auditors generate a Management Action Plan (“MAP”) for factory management that is discussed along with assessment findings as a part of a closing meeting. Utilizing MAPs, we engage with suppliers through a cloud-based platform to track recommendations for improvement and related progress. Once findings and recommendations are uploaded into the platform, UA’s sustainability team reaches out to management to support remediation [...]’. However, this seem to make reference to action to correct wrong doing, rather than to proactively prevent, mitigate or remediate its salient human rights issues. No description found of how it integrates and acts on human rights risks as a result of its risk assessments process. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Met: Example of actions decided on at least 1 salient HRs issue: The 2021 Sustainability Impact Report indicates: ‘Together with other brands in our industry and the Swedish International Development Cooperation Agency, we are driving collective action for gender equality by working with the Empower@Work initiative. Building on the expertise of organizations such as Business for Social Responsibility, CARE International and ILO Better Work, and supported by brand collaboration, Empower@Work facilitates programs that promote equality for women who work in global supply chains, aiming to benefit approximately 190 million women’. [2021 Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken |
| B.2.4 | Tracking the effectiveness of actions to respond to human rights risks and impacts | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system for evaluation effectiveness of actions: In the context of a specific remediation process, the 2022 Modern Slavery Statement indicates: ‘In June 2021, an FLA-accredited assessment firm visited the facility and confirmed that all outstanding and previously identified recruitment fees have been reimbursed to migrant workers, and that it had successfully addressed other issues identified, which included worker training on harassment or abuse, wage calculation, and sustained improvements in fire safety competencies. The facility has continued implementing management systems to ensure worker rights are respected, and additional due diligence is conducted when hiring new foreign migrant workers. We will continue monitoring workplace conditions at this facility’. However, although the Company provides an example of monitoring an action taken, this seem to be in the context of monitoring corrective actions of a non-compliance. This subindicator focuses on how it monitors actions taken as a response to human rights risks and impacts identified. Moreover, it looks for a system rather than an example. The Company has provided comments to CHRB regarding this indicator, including information on: how it proceeds in global health crisis and on its Worker Protection & Infection Control Self-Assessment & Management Action Plan (WPICSA-MAP), which provides guidance to supply chain partners. No description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] • Not Met: Example of lessons learned from evaluation effectiveness of actions: Regarding its Responsible Sourcing Policy, the 2021 Sustainability Impact Report notes: ‘Since formalizing our Responsible Sourcing Policy in 2018, we have engaged in several initiatives to assess our responsible sourcing performance, including applying responsible sourcing principles to address supply chain conditions amid the COVID-19 pandemic. In 2020, we revised our policy to incorporate lessons from |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---------------------------------------|------------------|---|
| | | | <p>the prior two years of assessments and engagements with peers and stakeholders. [...] Our Responsible Sourcing Policy reflects collaboration among our sustainability, supply chain and other teams, which work closely on our efforts around responsible sourcing and addressing workplace conditions in our global supply chain. For example, we embedded additional ratings related to key labor and suppliers' workers' rights indicators into our supplier scorecard, a tool our global product supply team uses to evaluate supplier performance. This update has allowed us to better track how our suppliers perform against these important metrics and ensure that we are considering these factors in our sourcing decisions'. However, the examples found are not salient Human Rights risks identified during its Human Rights assessments. No example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [2021Sustainability Impact Report, 2022: about.underarmour.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions: The 2022 Modern Slavery Statement indicates: 'Our teammates, factories, suppliers, business partners, and manufacturers are all expected to meet company standards and procedures regarding and prohibiting modern slavery – including those in the UA Code, the FLA Code and our MWPS – and may be held accountable for failing to comply with such standards and procedures. Effectiveness in meeting these standards and procedures is measured primarily through our previously described assessment process. Follow-up data analysis and remediation engagements between partner facility management and the UA sustainability and/or sourcing teams are also critical for ensuring continuous progress and improvement'. However, it is not clear how it involves affected stakeholders in evaluation of whether the actions taken [in the context of a due diligence process, to address Human Rights risks and impacts] have been effective. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] |
| B.2.5 | Communicating on human rights impacts | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided comments to CHRB regarding this indicator, including information on: its grievance mechanisms, encompassing workers grievance systems as well as worker voice for its suppliers, FLA third-party complaint procedure and data on the mechanisms. However, although the Company discloses information on its grievance mechanisms, this subindicator looks for evidence on how it ensures meaningful information reaching affected stakeholders: how it responds, in communication terms, to issues raised by stakeholders, and about their access to those communications. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: The Company has provided comments to CHRB regarding this indicator, including information on: possible consequences of not remediating a issue identified in through its grievance mechanisms and FLA third-party complaint procedure. However, this subindicator looks for description of any challenge to effective communication it has identified and how it is working to address them. [2021Sustainability Impact Report, 2022: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] |

C. Remedies and Grievance Mechanisms (20% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|------------------------------------|------------------|---|
| C.1 | Grievance mechanism(s) for workers | 2 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The 2022 Modern Slavery Statement indicates: 'The hotline mechanism featured in the UA Code is monitored 24 hours a day, seven days a week, and available to our teammates and external stakeholders and provides an option to report anonymously and in local language depending on the location'. The Code of Conduct discloses different reporting channels. [Code of Conduct, 2022: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> Met: Grievance mechanism available in appropriate languages and workers made aware: See above. The Hotline is available in multiple languages. The 2021 Sustainability Impact Report notes: ‘All teammates receive Code of Conduct training when they join UA and complete a refresher training every other year, with additional specialized training required for some teammate roles and responsibilities’. The Code contains information on the grievance mechanism. [2021 Sustainability Impact Report, 2022: about.underarmour.com] Met: Describes how workers in supply chain access grievance mechanism: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and subcontractors and their employees may report violations of this Code to Under Armour’s Hotline electronically’. It then provides a webpage and an email address. It adds: ‘The Hotline is monitored 24 hours a day, seven days a week. The Hotline allows for the option to report anonymously, depending on location. Suppliers and subcontractors must provide reasonable’. [Supplier Code of Conduct, N/A: about.underarmour.com] Met: Expects suppliers to convey expectation to their suppliers: See above. [Supplier Code of Conduct, N/A: about.underarmour.com] |
| C.2 | Grievance mechanism(s) for external individuals and communities | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism accessible to all external individuals and communities: The 2022 Modern Slavery Statement indicates: ‘The hotline mechanism featured in the UA Code is monitored 24 hours a day, seven days a week, and available to our teammates and external stakeholders and provides an option to report anonymously and in local language depending on the location’. The Code of Conduct discloses different reporting channels. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [Code of Conduct, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: See above. The Hotline is available in multiple languages. However, it is not clear how the Company ensures all affected external stakeholders at its own operations are made aware of it. The Company has provided comments to CHRB regarding this indicator, where it indicates that the Code of Conduct and the Human Rights Commitment are available online, and that the Code [which contains information on the channels] is translated into 19 different languages. However, the subindicator looks for evidence of how the Company proactively conveys information on its grievance mechanisms to affected external stakeholders [beyond having both documents on their webpage]. [Hotline_web, N/A: app.convercent.com] & [Human Rights Commitment, N/A: about.underarmour.com] Not Met: Describes how external individuals/communities access grievance mechanism: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and subcontractors and their employees may report violations of this Code to Under Armour’s Hotline electronically’. It then provides a webpage and an email address. It adds: ‘The Hotline is monitored 24 hours a day, seven days a week. The Hotline allows for the option to report anonymously, depending on location. Suppliers and subcontractors must provide reasonable’. The Company has provided comments to CHRB regarding this indicator, where it notes that the Supplier Code of Conduct and the Human Rights Commitment are available online, and that the Code [which contains information on the channels] is translated into 35 different languages. However, it is not clear that external individuals and communities at supplier level have access to it, in order to raise Complaints or concerns about human rights issues at the Company’s suppliers. [Supplier Code of Conduct, N/A: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com] Not Met: Expects supplier to convey expectation to their suppliers: The Migrant Worker Policy & Standards indicates: ‘UA will communicate the MWPS to all direct suppliers in their Native Languages. At a minimum, all direct UA suppliers must, in turn, require their next tier suppliers to provide written acknowledgement and evidence of implementation of the MWPS. These next tier suppliers, in turn, are required to have their sub-tier suppliers provide written acknowledgement and evidence of implementation of the MWPS’. It provides further information on the grievance channels available: ‘As indicated in the UA Supplier Code of Conduct’s Non-Retaliation and Reporting Potential Misconduct provisions, supplier staff, subcontractors, and workers, including migrant workers, are expected to know, be trained on, and report breaches of the MWPS, as well as actual or potential related risks and legal compliance issues to the UA Sustainability team at |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| | | | sustainability@underarmour.com'. However, it is not clear the Company expects its suppliers to convey expectations [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company's suppliers] on access to grievance mechanism(s) to their suppliers. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] |
| C.3 | Users are involved in the design and performance of the mechanism(s) | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on improvement of mechanism • Not Met: Provides user engagement examples (at least two) on improvement |
| C.4 | Procedures related to the mechanism(s) are equitable, publicly available and explained | 0 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes procedure and timescales for managing complaints or concerns: The infographic What Happens When I Contact the Helpline indicates that once the investigation begins: 'The investigator will contact you by email or phone if you've provided that information or through the Hotline system if you've chosen to remain anonymous. They may ask questions to make sure they understand your concerns, so make sure that they have a way to get in touch with you. If you've chosen to remain anonymous, check back into the Hotline system frequently to check for status updates and messages from the investigator. [...]' When the investigation is concluded, if the reporting party is known, the investigation team will provide the closing status of the investigation. To preserve the investigations process, the investigation team may be unable to provide details around any actions that were taken'. The Company has provided comments to CHRB regarding this indicator, including information on its grievance mechanism. However, no further description found of timescales. [What Happens When I Contact the Helpline, N/A: underarmour.convercentde.acsifactory.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Describes technical, financial, advisory support to enable equal access: The 2022 Modern Slavery Statement indicates: 'we have a strict non-retaliation policy prohibiting retaliation against any teammate for raising an ethical concern, question, or complaint in good faith. Should the identity of the teammate making the complaint be known, we will monitor any disciplinary action against the teammate to determine if it is retaliatory'. However, this subindicator looks for the technical, financial or advisory support available to complainants to enable equal access to and participation in the grievance process [it could be for instance, could be training, access to a fund, etc]. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: The Company has provided comments to CHRB regarding this indicator, including information on its non-retaliation policy and that it will not obstruct access to judicial and non-judicial, third-party mechanisms. However, this subindicator looks for an explanation of the type of outcome to the complainant through use of the grievance mechanisms. [Supplier Code of Conduct, N/A: about.underarmour.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The Company has provided comments to CHRB regarding this indicator, including information on its non-retaliation policy and that it will not obstruct access to judicial and non-judicial, third-party mechanisms. However, this subindicator looks for a description of how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [Human Rights Commitment, N/A: about.underarmour.com] |
| C.5 | Prohibition of retaliation for raising complaints or concerns | 0.5 | The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation against workers/stakeholders: The infographic What Happens When I Contact the Helpline indicates: 'We have zero tolerance for retaliation. If you think anyone is taking any kind of action against you for raising your concern, contact the Global Ethics and Compliance team to let them know'. [What Happens When I Contact the Helpline, N/A: underarmour.convercentde.acsifactory.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| | | | <ul style="list-style-type: none"> • Not Met: Describes practical measures to prevent retaliation: The 2021 Sustainability Impact Report indicates: ‘The hotline is monitored 24 hours a day, seven days a week. It allows for anonymous reporting, depending on location’. However, it is not clear what alternative measures to prevent retaliation are in place in locations where anonymous reporting is not allowed (i.e. training people on disciplinary measures derived from retaliation). [2021 Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and subcontractors must effectively implement a non-retaliation policy, procedures and reporting channels that enable workers to express anonymously and safely their concerns about workplace conditions directly to factory management and to other parties without fear of retribution, retaliation or any other adverse action’. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at supplier level, as it is not clear the mechanism is open to them. [Supplier Code of Conduct, N/A: about.underarmour.com] |
| C.6 | Company involvement with state-based judicial and non-judicial grievance mechanisms | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable) |
| C.7 | Remedying adverse impacts | 1.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes approach taken to remedy adverse HRs impacts: The 2022 Modern Slavery Statement indicates its process of remediation in a case study involving migrant labor in Malaysia: ‘Since 2019, we and other brands have continued partnering with the facility in Malaysia to address areas of noncompliance found initially in an assessment by Verité. This was followed by a verification visit by Impactt in 2019, and a follow-up visit in 2020 by a FLA-accredited assessment firm. In June 2021, an FLA-accredited assessment firm visited the facility and confirmed that all outstanding and previously identified recruitment fees have been reimbursed to migrant workers, and that it had successfully addressed other issues identified, which included worker training on harassment or abuse, wage calculation, and sustained improvements in fire safety competencies. The facility has continued implementing management systems to ensure worker rights are respected, and additional due diligence is conducted when hiring new foreign migrant workers. We will continue monitoring workplace conditions at this facility’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes changes to systems, processes and practices to prevent future impacts: The 2022 Modern Slavery Statement indicates: ‘Based on engagements with vendors and facilities employing migrant workers, and engagements and learnings cultivated from extensive work with migrant labor experts around the world, we have built on the pre-existing requirement that suppliers comply with the Institute for Human Rights and Business’ Dhaka Principles for Migration with Dignity (the “IHRB Dhaka Principles”). At the center of this work is the development and deployment of our Migrant Worker Policy & Standards (“MWPS”) that requires our suppliers to practice responsible recruitment, including ensuring that migrant workers obtain work free of coercion, deception, fees, and debt’. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: The 2022 Modern Slavery Statement indicates: ‘Our teammates, factories, suppliers, business partners, and manufacturers are all expected to meet company standards and procedures regarding and prohibiting modern slavery – including those in the UA Code, the FLA Code and our MWPS – and may be held accountable for failing to comply with such standards and procedures. Effectiveness in meeting these standards and procedures is measured primarily through our previously described assessment process. Follow-up data analysis and remediation engagements between partner facility management and the UA sustainability and/or sourcing teams are also critical for ensuring continuous progress and improvement’. The |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
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| | | | <p>Company has provided comments to CHRB regarding this indicator, making reference to its assessment for accreditation for FLA where it includes information on its monitoring process: Pre-Sourcing Factory Assessments, Assessing Factory Conditions, Audit Observations. It also includes information on its grievance mechanisms. However, no description found of its approach to monitoring implementation of the agreed remedy for people affected. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] & [Under Armour Accreditation Report FLA, 02/2019: fairlabor.org]</p> <ul style="list-style-type: none"> • Not Met: Describes approach to learning from incidents if no adverse impacts identified |
| C.8 | Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 Modern Slavery Statement discloses its ‘Current Remediated Case Tracker’. In 2021 the number of ‘annual grievances received’ was five. There was one open case and four closed cases. It adds: ‘Data represents all grievances lodged by year, not solely those related to modern slavery issues’. However, no information found specifically on the number of human rights related grievances filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders |

D. Performance: Company Human Rights Practices (25% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-----------------------------------|------------------|---|
| D.2.1.b | Living wage (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on living wage in supplier codes and contracts: The Supplier Code of Conduct indicates: ‘Every worker has a right to compensation for a regular work week that is sufficient to meet the worker’s basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers’ basic needs and provide some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does’. However, in order to be awarded, evidence is needed that the wage required is also sufficient to cover for family/dependents. The Fair Compensation Commitment Statement indicates: ‘We remain steadfast in our commitment to ensure that suppliers take the appropriate actions to realize progressively a fair compensation level for their workers. We will continue to support workers in our supply chains earning fair compensation during a regular workweek, as stated in the Under Armour Supplier Code of Conduct and the FLA Workplace Code of Conduct and as detailed in the FLA Workplace Code Benchmarks’. The statement also discloses the Company’s efforts to it. However, no evidence found of a timebound target for requiring its suppliers to pay all workers a living wage [including a reference to family and/or dependents] or that the Company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. [Supplier Code of Conduct, N/A: about.underarmour.com] & [Fair Compensation Commitment, 12/2021: about.underarmour.com] • Met: Describes work with suppliers on living wage: The Fair Compensation Commitment states: ‘In 2021, we worked with the FLA to develop a “Fair Compensation Blueprint,” which serves as our operational workplan to drive progress on fair compensation, detailing how we (1) collect and analyze wage data, (2) gather feedback, (3) set goals, (4) communicate and engage, (5) plan and execute operations, (6) measure progress, (7) report, and (8) improve and adjust. [...] We continue to expand the FLA’s Fair Compensation Wage Tool application to collect baseline wage data at all of our strategic vendors in the coming years’. [Fair Compensation Commitment, 12/2021: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|--|
| | | | <ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The 2021 Sustainability Impact Report discloses its Noncompliance Findings from 2018 to 2021. It includes information on wages& benefits. However, no analysis of trends found demonstrating progress on living wages. [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| D.2.2 | Aligning purchasing decisions with human rights | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2021 Sustainability Impact Report notes: ‘Since formalizing our Responsible Sourcing Policy in 2018, we have engaged in several initiatives to assess our responsible sourcing performance [...]. To gain additional understanding of our sourcing practices, in 2018, we joined the Better Buying Institute, a third-party initiative enabling suppliers to provide anonymous, confidential feedback about our purchasing practices. [...] we embedded additional ratings related to key labor and suppliers’ workers’ rights indicators into our supplier scorecard, a tool our global product supply team uses to evaluate supplier performance. This update has allowed us to better track how our suppliers perform against these important metrics and ensure that we are considering these factors in our sourcing decisions’. It provides additional information on Responsible Sourcing training. The Fair Compensation Commitment states: ‘In 2018, we issued an enhanced formalized Responsible Sourcing Policy (RSP), acknowledging that our purchasing practices may affect the social compliance performance of our supplier business partners. We continue to train internal leaders and teammates on the RSP and how their actions may impact our supplier partners’ working conditions. [...] Understanding potential impacts on our manufacturing partners’ compensation to workers, we focus heavily on ever-improving Responsible Purchasing Practices through policy review and updates, training to internal leaders and teammates, feedback from suppliers via Better Buying, learning through ACT, annual management systems assessments with FLA’s annual evaluation and SAC’s BRM, learning through Better Buying’s Learning Loops program, and engaging cross-functionally in regular meetings of an internal executive-level Responsible Sourcing Working Group’. However, no description found of specific practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights. [Fair Compensation Commitment, 12/2021: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices: As indicated above, the Fair Compensation Commitment states that ‘we focus heavily on ever-improving Responsible Purchasing Practices through policy review and updates, training to internal leaders and teammates, feedback from suppliers via Better Buying, learning through ACT, annual management systems assessments with FLA’s annual evaluation and SAC’s BRM, learning through Better Buying’s Learning Loops program, and engaging cross-functionally in regular meetings of an internal executive-level Responsible Sourcing Working Group’. The 2021 Sustainability Impact Report notes: ‘To gain additional understanding of our sourcing practices, in 2018, we joined the Better Buying Institute, a third-party initiative enabling suppliers to provide anonymous, confidential feedback about our purchasing practices. [...] we embedded additional ratings related to key labor and suppliers’ workers’ rights indicators into our supplier scorecard, a tool our global product supply team uses to evaluate supplier performance. This update has allowed us to better track how our suppliers perform against these important metrics and ensure that we are considering these factors in our sourcing decisions’. However, no details found in relation to what does these reviews entail in terms of mitigating impacts of practices in planning, merchandising and costing. [Fair Compensation Commitment, 12/2021: about.underarmour.com] & [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|---|
| D.2.3 | Mapping and disclosing the supply chain | 1 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifies direct and indirect suppliers including manufacturing sites: The 2021 Sustainability Impact Report indicates: 'In keeping with our commitment to supply chain transparency, we have published our supplier list since 2017 with a commitment to expand our disclosure over time. Currently, we publicly disclose 100% of our Tier 1 suppliers, which account for approximately 90% of our business volume; licensees account for the remainder. Suppliers contracted by an authorized UA licensee are held to the same standards and requirements as our Tier 1 suppliers. We are working toward disclosing our Tier 2 and 3 suppliers in the future. In 2021, we made progress in mapping suppliers in our footwear supply chain, resulting in greater visibility into which of our Tier 2 suppliers provide footwear components to Tier 1 factories that specifically assemble shoes. For example, we nominated about 99% of our footwear supply chain from Tier 2 purchased by Tier 1. Our work in mapping the Tier 2 suppliers to our Tier 1 suppliers is ongoing'. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of supply chain and how significance was defined: The Company discloses a list of suppliers including suppliers' names and specific locations. It indicates: 'This list includes Tiers1 (assembly locations) suppliers that are estimated to account for over 90% of our business'. However, no further information on it disclosing indirect suppliers found. The Company has provided additional comments to this subindicator, however, core information was already in use. [Supply chain list 2023, 2023: about.underarmour.com] • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities |
| D.2.4.b | Prohibition of child labour: Age verification and corrective actions (in the supply chain) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on child labour in supplier codes and contracts: The Supplier Code of Conduct indicates: 'Under Armour suppliers and their subcontractors shall not employ persons under the age of 15 or under the age for completing compulsory education, whichever is higher'. The FLA Code adds: 'Employers shall collect and maintain all documentation necessary to confirm and verify date of birth of all workers, such as birth certificates'. The 2021 Sustainability Impact Report notes: 'The audit evaluates the potential supplier's practices and workplace conditions against our Supplier Code of Conduct, the FLA Workplace Code of Conduct [...]'. The Company has provided comments to CHRB regarding this indicator on its FLA accreditation. However, no evidence found that the Company includes expectations for suppliers to have remediation programmes in place specifically for cases of child labour within its contractual agreements or Supplier Code. [Supplier Code of Conduct, N/A: about.underarmour.com] & [FLA Workplace Code of Conduct and Compliance Benchmarks, 28/10/2020: fairlabor.org] • Not Met: Describes work with suppliers on eliminating child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| D.2.5.b | Prohibition of forced labour: Recruitment fees and costs (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Requirements on debt/fees in supplier codes and contracts: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and their subcontractors shall not use forced labor, whether in the form of prison labor, indentured labor or bonded labor, or other forms of forced labor to make or perform work on Under Armour products or their components or materials or permit their suppliers to do so’. The Migrant Worker Policy and Standards, which also applies to suppliers, states: ‘Suppliers must practice, responsible recruitment including ensuring that migrant workers obtain work free of coercion, deception, fees, and debt. [...] Suppliers and Labor Agents shall engage in and maintain documentation of contracts stipulating that no potential candidate, candidate, or hired worker will be required to pay a fee in order to participate in the Recruitment or hiring process. [...] No worker shall pay for their job, whether by paying a recruitment fee, lodging a deposit, or otherwise expending, leveraging, or borrowing assets in order to attain employment with a UA supplier. Suppliers must have a process to verify prior to their departure from the Sending Country and upon arrival to the Receiving Country that Migrant Workers have not been required to pay for their employment. Suppliers must also implement a mechanism to continuously monitor that Migrant Workers are not being charged for the job secured. UA requires employers to be responsible for direct fees and related costs associated with the Recruitment, placement, hire, and employment of Migrant Workers. The employer is responsible for payment of all recruitment or processing fees related to the recruitment of workers. Workers shall not have to pay any fees or charges for their placement, recruitment, or mobilization. The FLA Code states: ‘Fees and other costs associated with the employment of workers, including migrant/contingent/contract/temporary workers, shall be the sole responsibility of the employer’. Suppliers are required to comply with the FLA Code. [Supplier Code of Conduct, N/A: about.underarmour.com] & [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describes work with suppliers on debt/fees for job seekers/workers: The Migrant Worker Policy & Standards discloses information on reimbursement of workers and other aspects of remediation of recruitment costs charged to migrant workers. The 2022 Modern Slavery Statement explains a case study in Malaysia where a remediation took place, elaborating on each step taken, including: engagement with the suppliers and requirement to supplier to provide individual lockers to each migrant worker [2015], UA supporting suppliers to calculate amount of fee paid [2017], monitoring the repayment and capacity building [including includes labor agent oversight training and a sending country due diligence trip] with Verité [2018], top sourcing site visit [2019], follow up visit by FLA to check on reimbursement [2020], FLA visit to confirm the remediation was accomplished [2021]. It provides two more examples of remediation in Malaysia. However, this subindicator looks for evidence of how Companies proactively work with suppliers to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant, as the examples given seem to be part of correcting non-compliances. [Migrant Worker Policy Standards, 12/01/2021: about.underarmour.com] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment scope of payment of recruitment fees in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category including on Migratory Workers and Recruitment, Hiring & Personnel Development. However, no assessment of the number affected by (scope of) the payment of recruitment fees or related costs in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] Not Met: Analysis of trends demonstrating progress: The Company discloses data from 2018 to 2021 on noncompliance findings by category including on Migratory Workers and Recruitment, Hiring & Personnel Development. However, no analysis of trends demonstrating progress found specifically in the topic of recruitment fees/financial costs. [2021Sustainability Impact Report, 2022: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|---|------------------|---|
| D.2.5.d | Prohibition of forced labour: Wage practices (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on paying in full and on time in supplier codes and contracts: The FLA Code states: ‘All wages, including payment for overtime, shall be paid directly and in full within legally defined time limits. When no time limits are defined by law, compensation shall be paid at least once a month’. The 2022 Modern Slavery Statement indicates: ‘At UA, we use the FLA’s Sustainable Compliance Initiative (SCI) methodology in our sustainability program as part of our efforts to advance workers’ rights through a continuous improvement model that applies to employment practices and working conditions. We expect our product supply chain business partners [...] to comply with our UA Code, the FLA Workplace Code of Conduct and Compliance Benchmarks (the “FLA Code”)’. The Company has provided additional comments to this subindicator, however, core information was already in use. [FLA Workplace Code of Conduct and Compliance Benchmarks, 28/10/2020: fairlabor.org] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time: The Company has provided comments to CHRB regarding this indicator, including information on its Supplier Assessment Program and how it manages audit finding, including how it works to support suppliers to remediate issues found in general. However, the Company is expected to describe how proactively it works with supply chain to pay workers regularly, in full and on time, rather than how it helps to correct non-compliances. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Wages & Benefits. However, no assessment of the number affected by (scope of) the failure to pay directly, in full and on time in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Analysis of trends demonstrating progress: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Wages & Benefits. However, no analysis of trends demonstrating progress found specifically in the topic covered by this subindicator. [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| D.2.5.f | Prohibition of forced labour: Restrictions on workers (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on free movement in supplier codes and contracts: The FLA Code states: ‘Employers shall not restrain the freedom of movement of workers, including movement in canteens, during breaks, using toilets, accessing water, or accessing necessary medical attention, as a means to maintain labor discipline’. The 2022 Modern Slavery Statement indicates: ‘At UA, we use the FLA’s Sustainable Compliance Initiative (SCI) methodology in our sustainability program as part of our efforts to advance workers’ rights through a continuous improvement model that applies to employment practices and working conditions. We expect our product supply chain business partners [...] to comply with our UA Code, the FLA Workplace Code of Conduct and Compliance Benchmarks (the “FLA Code”)’. [FLA Workplace Code of Conduct and Compliance Benchmarks, 28/10/2020: fairlabor.org] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Describes working with suppliers on free movement of workers: The Company has provided comments to CHRB regarding this indicator, including information on its Supplier Assessment Program and how it manages audit finding, including how it works to support suppliers to remediate issues found in general. However, current evidence seems to be corrective actions in response to non-compliance. It is not clear how it proactively works with suppliers to eliminate retention of worker’s documents or other actions to physically restrict movement. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Recruitment, Hiring & Personnel Development and Migratory Workers. However, no assessment of the number affected by (scope of) retaining documents or restricting movement in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--|------------------|--|
| | | | <ul style="list-style-type: none"> • Not Met: Analysis of trends demonstrating progress: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Recruitment, Hiring & Personnel Development and Migratory Workers. However, no analysis of trends demonstrating progress found specifically in the topic of freedom of movement. [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| D.2.6.b | Freedom of association and collective bargaining (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on FoA/CB in suppliers codes and contracts: The Supplier Code of Conduct indicates: ‘Under Armour suppliers and their subcontractors shall recognize and respect the right of employees to freedom of association and collective bargaining. Employers must develop and implement effective industrial relations systems and mechanisms to resolve industrial disputes, including employee grievances and ensure effective communication with employees’. The FLA Code adds: ‘Employers shall not use any form of physical or psychological violence, threats, intimidation, retaliation, harassment or abuse against union representatives and workers seeking to form, in the process of forming, or who have joined an organization of their own choosing. [...] Employers shall not engage in any acts of anti-union discrimination or retaliation, i.e. shall not make any employment decisions which negatively affect workers based wholly or in part on a workers’ union membership or participation in union activity, including the formation of a union, previous employment in a unionized facility, participation in collective bargaining efforts or participation in a legal strike’. The 2022 Modern Slavery Statement indicates: ‘At UA, we use the FLA’s Sustainable Compliance Initiative (SCI) methodology in our sustainability program as part of our efforts to advance workers’ rights through a continuous improvement model that applies to employment practices and working conditions. We expect our product supply chain business partners [...] to comply with our UA Code, the FLA Workplace Code of Conduct and Compliance Benchmarks (the “FLA Code”)’. [Supplier Code of Conduct, N/A: about.underarmour.com] & [FLA Workplace Code of Conduct and Compliance Benchmarks, 28/10/2020: fairlabor.org] • Not Met: Describes work with suppliers on FoA/CB: The Company has provided comments to CHRB regarding this indicator, including information on its Supplier Assessment Program and how it manages audit finding, including how it works to support suppliers to remediate issues found in general. However, current evidence seems to be corrective actions in response to non-compliance. It is not clear how it proactively works with suppliers to support the practices of its suppliers in relation to freedom of association and collective bargaining. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Industrial Relations. However, no assessment of the number affected by (scope of) restrictions to freedom of association or collective bargaining in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Met: Analysis of trends demonstrating progress: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Industrial Relations. [2021Sustainability Impact Report, 2022: about.underarmour.com] |
| D.2.7.b | Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on H&S in supplier codes and contracts: The code for suppliers includes explicit guidelines on health and safety. These include complying with rules and laws, to have policies and procedures, train employees, residential housing, etc. [Supplier Code of Conduct, N/A: about.underarmour.com] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|--------------------------------------|------------------|---|
| | | | <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S: The Company has provided comments to CHRB regarding this indicator, including information on its Supplier Assessment Program and how it manages audit finding, including how it works to support suppliers to remediate issues found in general. However, current evidence seems to be corrective actions in response to non-compliance. It is not clear how it proactively works with its supply chain to improve their practices in relation to health and safety. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Not Met: Assessment of scope of H&S issues in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Health & Safety. However, no assessment of the number affected by (scope of) health and safety issues in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Met: Analysis of trends demonstrating progress: The 2021 Sustainability Impact Report discloses its Noncompliance Findings from 2018 to 2021. It includes health and safety. [2021 Annual Report, 24/03/2022: underarmourinc.gcs-web.com] |
| D.2.8.b | Women's rights (in the supply chain) | 0 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Requirements on women's rights in contracts/codes with suppliers: The FLA Code states: 'Employers shall not require pregnancy testing of workers, except as required by national law. [...] Employers shall abide by all protective provisions in national laws and regulations benefitting pregnant workers and new mothers, including provisions concerning maternity leave and other benefits; prohibitions regarding night work, temporary reassignments away from work stations and work environments that may pose a risk to the health of pregnant women and their unborn children or new mothers and their new born children, temporary adjustment of working hours during and after pregnancy, and the provision of breast-feeding breaks and facilities. [...] There shall be no differences in compensation for workers for work of equal value on the basis of gender [...]'. The 2022 Modern Slavery Statement indicates: 'At UA, we use the FLA's Sustainable Compliance Initiative (SCI) methodology in our sustainability program as part of our efforts to advance workers' rights through a continuous improvement model that applies to employment practices and working conditions. We expect our product supply chain business partners [...] to comply with our UA Code, the FLA Workplace Code of Conduct and Compliance Benchmarks (the "FLA Code")'. However, no provisions related to the introductions of measures to ensure equal opportunities throughout all levels of employment found. [FLA Workplace Code of Conduct and Compliance Benchmarks, 28/10/2020: fairlabor.org] & [2022 Modern Slavery Statement, 27/06/2022: about.underarmour.com] • Not Met: Describes work with suppliers on women's rights: The 2021 Sustainability Impact Report indicates: 'Women represent the majority of workers at many of our suppliers. Together with other brands in our industry and the Swedish International Development Cooperation Agency, we are driving collective action for gender equality by working with the Empower@Work initiative. Building on the expertise of organizations such as Business for Social Responsibility, CARE International and ILO Better Work, and supported by brand collaboration, Empower@Work facilitates programs that promote equality for women who work in global supply chains, aiming to benefit approximately 190 million women'. However, it is not clear what specific actions are carried out in the Company's supply chain in the context of these projects. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: Analysis of trends demonstrating progress |

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------------------|------------------|---|
| D.2.9.b | Working hours (in the supply chain) | 0.5 | <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on working hours in codes/contracts with suppliers: The Supplier Code of Conduct indicates: 'Under Armour suppliers and their subcontractors 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. Under Armour suppliers and their subcontractors shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Under Armour suppliers and their subcontractors shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours'. [Supplier Code of Conduct, N/A: about.underarmour.com] • Not Met: Describes work with suppliers on working hours: The Company has provided comments to CHRB regarding this indicator, including information on its Supplier Assessment Program and how it manages audit finding, including how it works to support suppliers to remediate issues found in general. However, current evidence seems to be corrective actions in response to non-compliance. It is not clear how it proactively works with suppliers to improve their practices in relation to working hours. [2021Sustainability Impact Report, 2022: about.underarmour.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain: The Company discloses data from 2018 to 2021 on noncompliance findings by category. It includes data on Hours of Work. However, no assessment of the number affected by (scope of) excessive working hours in its supply chain found. [2021Sustainability Impact Report, 2022: about.underarmour.com] • Met: Analysis of trends demonstrating progress: The 2021 Sustainability Impact Report discloses its Noncompliance Findings from 2018 to 2021. It includes Hours of Work. In 2018, there were 255 non-compliances; in 2019 300; in 2020 877; finally, 2021 there were 365 cases of non-compliance related to hours of work. [2021Sustainability Impact Report, 2022: about.underarmour.com] |

E. Performance: Responses to Serious Allegations (20% of Total)

| Indicator Code | Indicator name | Score (out of 2) | Explanation |
|----------------|-------------------------|------------------|--|
| E(1).0 | Serious allegation No 1 | | No allegations meeting the CHRB severity threshold were found, and so the score of 25.21 out of 80 points scored in themes A-D has been applied to produce a score of 6.30 out of 20 points for theme E. |

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