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sent via Email to:  
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To:  
Beatriz Balbin  
Chief  
Special Procedures Branch  
OHCHR

Dante Pesce  
Chair-Rapporteur of the Working  
Group on the issue of human rights  
and transnational corporations and  
other business enterprises

Palais des Nations  
1211 Geneva 10

Switzerland

07.05.2021

Re: HUMAN RIGHTS DUE DILLIGENCE / PUMA

Dear Ms. Balbin,

Dear Mr. Pesce,

We are writing to you today in response to your letter dated March 12 to Bjørn Gulden, CEO PUMA SE.

We would like to stress at the outset that PUMA is fully committed to respecting human rights and the company has a zero-tolerance policy on forced labor. A thorough review of our supply

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chain has confirmed that the allegations made against our brand regarding forced labor in Western China are incorrect, since PUMA has no business relationship with factories located in Xinjiang.

PUMA's sustainability policies are aligned with the United Nations' Declaration of Human Rights, the International Labor Organization's Core Labor Conventions, and the ten principles of the United Nations Global Compact.

The observance of human rights was part of our first Code of Conduct developed in 1993 and has guided our business ethics ever since. As specified in PUMA's Code of Conduct, compliance with human rights, labor rights and environmental standards is of critical importance to the PUMA brand, as evidenced by our various initiatives over the past twenty years. All PUMA employees, vendors and their subcontractors are contractually required to comply in full with the Code of Conduct, which prohibits the use of "any form of forced labor" and provides for minimum rights and conditions for workers, minimum age requirements, freedom of association and collective bargaining, and protection from discrimination.

Our products are manufactured in supplier factories in several regions of the world and we have implemented a robust compliance program to ensure that our brand and our suppliers comply with all applicable laws. Our team of experts regularly audits our suppliers, initiates training and requires reporting on current sustainability and compliance issues. Every manufacturer seeking to work with the PUMA brand is required to successfully complete a full and lengthy compliance audit regarding social and environmental standards, before becoming an authorized PUMA supplier.

Only those manufacturers who pass such an audit are included in our supplier base. Thereafter, our manufacturers are re-audited annually for compliance with our standards. If material deviations from our Code of Conduct or applicable laws are discovered, the supplier is required to remedy them immediately or the relationship is terminated.

Our right to conduct human rights due diligence (social compliance audits) at our vendors' facilities is guaranteed in our purchasing agreements. Therefore, our compliance teams have full access to the factories that make PUMA products. We work closely with our manufacturing partners to ensure that these audits are carried out regularly and thoroughly. Code of Conduct posters must be displayed at all PUMA suppliers, which include the contact information for our supply chain team so that all employees of PUMA suppliers have a channel to raise complaints and report violations of the Code of Conduct and other PUMA policies.

PUMA's manufacturing audit program was established in 1999 and was first accredited by the Fair Labor Association in 2007. The most recent accreditation occurred in 2019. Last year, we

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completed 490 audits of our direct contractual partners, or tier 1 suppliers, and our core tier 2 suppliers. Irrespective of tier level, all breaches of our Code of Conduct are fully investigated.

In addition, we have been steadily increasing the proportion of materials from more sustainable sources, such as cotton, polyester or leather. Last year, we obtained 99.5% of our polyester, 98% of our leather and 100% of our cotton fabrics from certified / more sustainable sources. For 2021, we required again that all of our suppliers exclusively source cotton from more sustainable sources for PUMA products.

Once we became aware of the ASPI report “Uyghurs for Sale” and allegations around forced labor in our supply chain, we immediately reviewed our supply chain in China for such forced labor issues. Our research has indicated that the allegations concerning PUMA, as outlined in the report, are incorrect. PUMA is in no way engaged in forced labor.

To be clear: PUMA has no business relationships with manufacturers located in the Xinjiang region and our research has revealed that there are also no signs of indirect involvement of Xinjiang forced labor in the manufacturing of our products.

Please refer also to our public statement on the allegations:

<https://about.puma.com/en/sustainability/social/pumasresponsetoaspi>

Please find below our answers to the specific questions in your letter:

1. Please provide any additional information and/or comments you may have on the above mentioned allegations.

As an ongoing process, we have been engaged with our suppliers to map the facilities upstream of our supply chain, which also include the origin of the raw materials. Our four largest sources of cotton are the USA, Australia, India and Brazil. Together they account for 92% of all cotton used in PUMA products. Of the 2% coming from China, none of the cotton originates from sourcing partners in Xinjiang.

PUMA also maintains data on our suppliers' workforce, including the number and composition of workers at each facility (migrant workers). Factory management must train individuals involved in the workforce recruitment process on local laws and PUMA's standards for labor compliance. Additionally, to the extent that factories engage recruitment agencies, they are contractually required to engage and work only with legally and universally authorized

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agencies. Costs related to recruitment must be paid by factories and not passed on to job applicants or workers.

Furthermore, we are currently sourcing our cotton from sustainable sources and have achieved our target of using 100% more sustainable cotton fabric at the end of 2020. We have required our suppliers to source only from sustainable cotton, grown in farms which are licensed or certified as having good farming and human rights standards, or recycled cotton.

2. Please provide information as to whether your company has undertaken Human Rights Due Diligence steps, as set out in the United Nations Guiding Principles on Business and Human Rights, to identify, prevent, mitigate, and account for human rights abuses caused by our contributed through your own activities, or directly linked to your operations, products or services by your business relationships. This includes the exercise of adequate oversight and human rights due diligence across your supply chains in order to prevent and mitigate impact on the enjoyment of human rights of Uyghur and other minority workers, including the right to freedom of movement and protection from forced labour, trafficking in persons and other contemporary forms of slavery.

At PUMA, we have conducted one human rights screening and two human rights risk assessments in recent years. All three exercises were coordinated by external human rights expert organizations and we communicated the results in our Annual Reports. The most salient risks to human rights are forced or bonded labor in our supply chain and, at the farm level, child labor.

The results of these assessments were taken into consideration for the further development of our human rights policies, targets and programs.

PUMA has been engaged with the Fair Labor Association and International Labor Organization Better Work program for many years. This has helped us retain a global overview of potential risks of human rights abuse and a local overview of risks.

For example, we extended our supply chain compliance auditing program to cover also our major tier 2 suppliers and setup a responsible sourcing policy.

In addition, PUMA participates in UN Global Compact.

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<https://www.unglobalcompact.org/what-is-gc/participants/7794-PUMA-SE>

We conduct yearly trainings for all of our staff and suppliers on our ethical standards. Our sustainability team is integrated within PUMA's global product sourcing team, allowing for a coordinated implementation of responsible purchasing practices.

We also conduct regular trainings for our suppliers as part of the onboarding processes and throughout our business relationship regarding our code of conduct standards. Our guidelines and standards for suppliers can be found on our website:

<https://about.puma.com/en/sustainability/codes-and-handbooks>

Furthermore, we strengthened our hotline for our suppliers' workers as well as our whistleblower hotline for our own PUMA employees, thereby providing effective complaint mechanisms to those workers and employees who are directly linked to PUMA or the production of PUMA goods.

We engaged with external organizations like Amander Kotha and Microbenefits to optimize the effectiveness of our workers' hotline. The workers grievance mechanism in our supply chain has been reviewed regularly by the Fair Labor Association through our accreditations since 2007.

We report audit results annually and social KPIs from our suppliers through our Annual Report. These data are reviewed by third parties.

Since 2003, we have invited representatives from NGOs, industry, suppliers and universities to our stakeholder meetings, where human rights and labor rights topics were frequently on the agenda.

We are aware of an increased Human Rights risk in various sourcing countries for the apparel and footwear industries. We have, for example, banned cotton from Uzbekistan and Turkmenistan from our supply chain due to human rights concerns.

For further information, please refer also to our public statement on modern slavery and human trafficking:

[PUMA Modern Slavery and Human Trafficking Statement 2019 \(1\).pdf](#)

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3. Please explain what monitoring and evaluation systems your company has in place to ensure the effectiveness of human rights due diligence steps taken to mitigate and prevent human rights abuses, including forced labour, trafficking in persons or other contemporary forms of slavery as described in this letter and other related human rights violations, throughout your business operations. In particular, please provide information on whether your company has put in place “cascading” requirements that reach down to your suppliers, such as human rights risk assessments that would cover all tiers of suppliers as recommended in the 2018 report of the Working Group of the General Assembly.

Our Code of Conduct and Code of Ethics clearly reference the observance of human rights as a core element of both codes. Forced labor in any form (including modern slavery) is defined as a zero-tolerance issue within our Sustainability Handbook for Social Standards, which is publicly available on our website.

<https://about.puma.com/en/sustainability/codes-and-handbooks>

We conduct annual trainings for all of our staff and our suppliers on our ethical standards.

We also conduct regular trainings for our suppliers within the onboarding process and throughout our business relationship on our code of conduct standards.

Specifically with respect to forced labor, Section 11 of PUMA’s Sustainability Handbook mandates that factories have a written policy stating that all employees must accept their employment voluntarily and comply with all laws, regulations, and procedures concerning the prohibition of forced labor, modern slavery, and human trafficking.

Employees must be free to leave the factory premises during non-working hours and must also be free to terminate their employment after reasonable notice. Factories may not grant employees large credits or salary advances which may result in any form of bonded labor, and all wages and benefits must be paid directly to workers and not to any other person on their behalf.

PUMA also requires that supplier employees have unrestricted access to basic needs, including toilet and bathroom facilities, drinking water, canteens, and medical clinics, as well as departments where they may address grievances or concerns. Factories must also provide employees a copy of their labor contracts containing all the terms and conditions of employment as required by law and shall not impose fees of any kind on any person applying for employment at the factory. Factories may only keep photocopies of personal identification documents and other qualifications on file for employees and are prohibited from retaining originals. If payment

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of wages is by bank transfer, PUMA requires factory employees to have their own individual accounts free from any kind of interference by the factory. Factories must also ensure that only voluntary overtime is performed. Workers who do not agree to work overtime voluntarily should be able to decline the request without any fear of negative consequences or retaliation/retribution.

PUMA furthermore requires its suppliers to implement internal policies and control mechanisms that detect any potential noncompliance with PUMA's standards at an early stage and work towards remediation wherever needed. Each supplier must also appoint a Sustainability Compliance Officer ("SCO") as the main point of contact between the supplier and the PUMA Sustainability Team. The SCO promotes the internal development of vendor compliance programs and monitors their effectiveness to ensure full compliance with the PUMA Sustainability Handbooks.

Our Code of Conduct as well as our Social Standards Handbook provides for a "cascading requirement", as it refers to the fact that "All PUMA factories are contractually bound to pursue business relationships only with subcontractors that are also in compliance with this handbook."

PUMA's audit scoring system ensures that only factories with a passing grade are authorized for production. Factories that receive middling scores are given specific timeframes to resolve identified issues; if successful, they may be authorized to begin production. Factories that fail audits are considered unprepared for compliance with PUMA standards and will not be authorized for production unless they can, in the future, provide PUMA credible evidence that their practices have improved and that a higher compliance status has been permanently achieved.

As a long-term accredited member of the Fair Labor Association, we carry out or commission frequent social compliance audits at all PUMA supplier factories worldwide. These audits cover specifically compliance to labor law and human rights.

In the year 2020, for example, our audit program covered audits in 406 factories. Should we identify non-compliance issues during those audits, our team of local compliance experts works with the supplier in question to rectify the issues. Should the issues not be rectified within an appropriate time, we reserve the right to cease the business relationship with the supplier. In 2020, this applied to 7 factories.

In addition, we organize annual supplier round table meetings in all major sourcing regions. During these meetings, we train our suppliers on selected sustainability topics. During the last

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two years, we also trained our suppliers on forced labor, for example with the help of the International Organization of Migration.

Documents referenced as supporting evidence:

- [PUMA Annual Report 2019](#)
- [PUMA® - Annual Sustainability Reports](#)
- [PUMA Code of Conduct](#)
- [PUMA Code of Ethics](#)
- [PUMA partnership with the ILO Better Work Program](#)
- [PUMA partnership with and accreditation by the Fair Labor Association](#)
- [PUMA Handbook on Social Standards](#)
- [Deloitte Assurance Statement](#)
- [PUMA® - Audits and code of conduct at PUMA factories](#)

4. Please explain what measures have been adopted to ensure that staff of your company as well as your business partners have adequate awareness, knowledge and tools to identify and report human rights abuses, including those alleged in this letter, throughout your operations.

We conduct annual trainings for all of our staff and our suppliers on our ethical standards. We also conduct regular trainings for our suppliers within the onboarding process and throughout our business relationship on our Code of Conduct standards.

Both our Code of Conduct and our Code of Ethics provide for a complaint procedure / whistle blower hotline.

Over the last years, PUMA employees were required to complete an annual e-learning Code of Ethics training. Available in eleven languages, this training sets out the ethical ground rules in place and presents case studies and ethical dilemmas that help employees ask themselves the right questions. It is updated annually and covers all the major ethics principles upheld by PUMA's Code of Ethics. Topics covered include anti-corruption, diversity and respect for human rights. In 2020, 98,7% of PUMA employees were trained on our Code of Ethics.

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In 2020, our Sustainability team held three virtual meetings with our suppliers to share best practices and guidelines on social distancing, hygiene measures, and on-time and full payment to workers and PUMA's Code of Ethics. Close to 700 people from more than 300 factories attended each session. Also in 2019, we trained 600 PUMA supplier representatives at our annual supplier Round Table Meetings on different topics including potential forced-labor issues in the supply chain, particularly for migrant workers and PUMA's Code of Ethics.

Furthermore, we strengthened our hotline for our suppliers' workers as well as our whistleblower hotline for PUMA employees, thereby providing effective complaint mechanisms for those workers and employees who are directly linked to PUMA or the production of PUMA goods.

We engaged with external organizations like Amander Kotha and Microbenefits to optimize the effectiveness of factory workers' hotline. The workers grievance mechanism in our supply chain has been reviewed regularly by the Fair Labor Association through our accreditations since 2007.

We report audit results and social KPIs from our suppliers annually through our annual report, including average payments vs. minimum wage payments, overtime hours, worker coverage by collective bargaining agreements, injury rate, turnover rate, insurance coverage, and other metrics. These data are reviewed by independent third parties.

Since 2003, we have invited representatives from NGOs, industry, suppliers and universities to our stakeholder meetings, where human rights and labor rights topics were frequently on the agenda.

5. Please explain what concrete steps have been taken by your company to exercise leverage, in line with the UN Guiding Principles, in your business relationships to prevent and mitigate human rights abuses committed by businesses employing workers belonging to Uyghur and other minorities.

PUMA pursues and maintains contractual relationships only with those factories and licensees that have agreed to comply with our Code of Conduct and Handbook for Social Standards, who reference adherence to human rights and a zero-tolerance policy on forced labor.

The provisions of our Code of Conduct and Social Standards Handbook include the protection of minorities and migrant workers.

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Our Handbook for Social Standards includes a section on Migrant Workers, which clearly states that:

“Migrant workers shall be treated fairly and equitably as local workers without discrimination at workplace”, “Withholding of migrant workers' travel documents (such as passport or visa) is prohibited” and “Migrant workers shall not be forced to live in the Factory’s dormitories or hostels. Outside of working hours, all (migrant) workers shall be allowed secure and free exercise of movement between the area of accommodation, the host community, and the place of employment.”

During social compliance audits, which are carried out frequently at all manufacturers of PUMA goods, the special needs of migrant workers and other vulnerable groups are taken into consideration.

Should human rights violations or other violations of our standards be identified during an audit, the factory is required to rectify the violation and provide evidence of the improvement.

As a last resort, factories who are unable to improve their performance will be removed from our active supplier base. In 2020, this applied to 7 factories. None of the underlying reasons for removal is related to forced labor.

Based on our investigations, our audits and our whistle blowing hotlines, there is no evidence that Uyghur forced labor occurs at factories used to manufacture PUMA products.

In addition, we have advised our suppliers to source only from sustainable cotton grown in farms licensed or certified for having good farming and human rights standards or recycled cotton.

6. Please provide information on whether your company has reported any such alleged human rights abuses in the present letter to relevant authorities, including in countries where your company is incorporated or domiciled. Moreover, what steps has your company taken, or is considering to take, to avoid potential complicity in such alleged business related human rights abuses.

We have not identified any human rights violations within PUMA or our suppliers in relation to Uyghur minorities. Therefore, we have not had to report such matters to any authorities. However, we have responded in writing to related enquires by the British Parliament as well as members of the European and German Parliaments.

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PUMA has no direct or indirect business relationship with any manufacturer in Xinjiang, the native region of the Uyghurs in Western China and has no indication of involvement of Xinjiang forced labor in the manufacturing of our products. As an ongoing process, we have been engaged with our suppliers to map the facilities upstream of our supply chain, which also include the origin of the raw materials.

PUMA is an active member of the Fair Labor Association. Every company in the FLA has a code element prohibiting forced labor.

Furthermore, we are currently sourcing our cotton from more sustainable sources and have achieved 100% more sustainable cotton fabrics usage.

7. Please advise how your company provides for, or cooperates in, the remediation of adverse impact on human rights of Uyghur and other minority workers through legitimate processes if it has caused or contributed to such impact. This may include establishing or participating in effective operational-level grievance mechanisms. Please provide specific information about any procedures in place to ensure participation of workers and their representatives in the establishment and operationalization of such mechanisms.

PUMA has no business relationships with manufacturers located in the Xinjiang region and our research has revealed that there are also no signs of indirect involvement of Xinjiang forced labor in the manufacturing of our products. This leads us to the conclusion, that PUMA neither causes nor contributes to human rights violations of Uyghur workers.

Both our Conduct and our Code of Ethics provide for a grievance mechanism. We strengthened our hotline for our suppliers' workers as well as our whistle-blower hotline for our own PUMA employees, thereby providing effective complaint mechanisms to those workers and employees who are directly linked to PUMA or the production of PUMA goods.

We engaged with external organizations like Amanda Kother and Microbenefits to optimize the effectiveness of factory workers' hotline. The workers grievance mechanism in our supply chain has been reviewed regularly by the Fair Labor Association through our accreditations since 2007.

For more information, please refer to our public statement against modern slavery and human trafficking:

[PUMA® - Against modern Slavery and Human Trafficking](#)

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8. Please provide information, if any, on cooperation your company may have had with local civil society actors and/or relevant state authorities to ensure that your company's grievance mechanism are aligned with the national mechanism to address such human rights violations.

As mentioned above, we carry out regular compliance assessments at all factories producing PUMA goods globally. In doing so, we collaborate with the Better Work Program set up by the International Labor Organization and the International Finance Cooperation. In addition, our compliance program is accredited by the Fair Labor Association and we are in close contact with our industry peers and other stakeholders on labor rights and forced labor issues. For example, we cooperated with the British online retailer ASOS and several other brands to eliminate the risk of recruitment fees in Mauritius.

For many years, PUMA has focused on the transparency of our efforts to respect human rights, labor rights and the environment. We are listed in the top ten companies of the Fashion Revolution Transparency Index and have published our 2020 Annual Report which includes a detailed sustainability section.

[Home | PUMA AR 2020](#)

More information regarding our policies and procedures can be found online:

[PUMA® - Sustainability handbook and codes of conduct](#)

In conclusion, we share your concerns regarding human rights and we diligently work to ensure that our suppliers comply with applicable laws and our Code of Conduct. We disagree with the allegations made against PUMA. For decades we have adopted a zero-tolerance policy, conducted audits, publicly reported our standards, verified our efforts through external reputable parties, interviewed workers of our suppliers, and conducted other relevant reviews.

Compliance with human rights, labor rights and environmental standards is a critical part of our core values. We appreciate the increased focus on this important issue, and we are ready to play a constructive and responsible role in this important conversation.

Sincerely,

Stefan Seidel  
Head of Corporate Sustainability

Veronique Rochet  
Senior Head of Sustainability

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