



Supply Chain Transparency Statement

2026

Brooks Sports, Inc.'s Statement on Australia Modern Slavery Act, California Transparency in Supply Chains Act, UK Modern Slavery Act, the USA Tariff Act, and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act

We are committed to continually improving our practices to ensure there is no slavery, forced labour, child labour, or human trafficking in our supply chain. The following outlines Brooks' efforts to identify and eliminate forced labour, in all its forms, from our business and supply chain. It is reviewed annually and updated as needed.

California Transparency in Supply Chains Act

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 (SB 657) requires companies that sell goods in California to make certain disclosures regarding their efforts to address slavery and human trafficking within their supply chain.

Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canadian Supply Chains Act or S-211)

Effective January 1, 2024, S-211 requires companies that do business in Canada and have at least 250 employees, generate at least CAN\$40 million in global revenue, and have at least CAN\$20 million in global assets to report on the steps they have taken to reduce forced labour and child labour in their supply chains.

UK Modern Slavery Act

Effective October 29, 2015, the UK Modern Slavery Act of 2015 requires companies that sell goods in the UK and have an annual turnover of over £36 million to make certain disclosures regarding their efforts to address slavery and human trafficking within their supply chain.

Australia Modern Slavery Act

Effective January 1, 2019, the Australia Modern Slavery Act of 2018 requires companies with annual sales over AU\$100 million to make certain disclosures regarding their efforts to address slavery and human trafficking within their supply chain.



USA Tariff Act

Section 307 of the Tariff Act of 1930 (19 U.S.C. § 1307) prohibits the importation of merchandise mined, produced, or manufactured, wholly or in part, in any foreign country by forced or indentured child labour—including forced child labour. Such merchandise is subject to exclusion and/or seizure, and may lead to criminal investigation of the importer(s).



Introduction

Here at Brooks, as stewards of the running community and as global citizens, we are committed to creating positive change and being transparent about areas where we can do better.

We continually evolve our Running Responsibly program to deliver on social and environmental commitments, especially pertaining to fair, safe and equitable working conditions throughout our supply chain.

The following supply chain transparency statement details many of the initiatives we've put in place to support our belief that there is no place for forced labour, child labour, modern slavery, or human trafficking in our business or supply chain. For Brooks, when it comes to such topics and their impact on people, vigilance and clear policies are imperative.

This statement has been approved by the officers of the corporate entity of Brooks Sports, Inc. (Brooks) and signed on behalf of Brooks by Dan Sheridan, CEO. This confirms the CEO is legally authorized to bind the company and that the officers of the corporate entity for Brooks have considered and approved the statement for fiscal year 2026.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Sheridan". The signature is fluid and cursive, with a large initial "D" and "S".

Dan Sheridan
CEO, Brooks Sports, Inc.

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Introduction to Our Business

Brooks Running creates market-leading performance running footwear, apparel, sports bras, and accessories distributed worldwide. Brooks exists to awaken the runner in everyone through its innovative running gear, tools, and experiences. Founded 1914, Brooks is a subsidiary of Berkshire Hathaway Inc. and is headquartered in Seattle, Washington, with subsidiaries in Canada, Europe, and Asia.

Brooks contracts the manufacturing of its best-in-class footwear and apparel products to a small number of select suppliers around the globe. Our [Global Factory List](#) can be found on our website. The length of our relationship with our Tier 1 footwear suppliers averages more than 15 years.

Policies

We ground ourselves in the Universal Declaration of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work. We also align our policies and standards with international best practices including the [Fair Labor Association](#) (FLA), the [Ethical Trading Initiative](#) base code and the [Business Social Compliance Initiative](#) (BSCI).

The Brooks [Supplier Code of Conduct](#) is the foundation of Brooks' Corporate Responsibility program. Together with local law and international labour standards, it sets the standards for all factories in our manufacturing supply chain.

The Brooks Supplier Code of Conduct is part of the purchase agreement and must be signed by all suppliers manufacturing Brooks products and materials to ensure a common vision, accountability, and transparency.

Brooks' Supplier Code of Conduct bans suppliers from charging "any employment eligibility fees for migrant workers, including recruitment fees" and calls for suppliers to "adopt policies and procedures to ensure there is no forced labor or human trafficking in the Brooks supply chain".

Additionally, in 2018 Brooks was a founding signatory to the [American Apparel and Footwear Association](#) and FLA's [Commitment to Responsible Recruitment](#), and in 2023, we signed the updated commitment. This commitment aims to unify the footwear and apparel industry around the following tenets of responsible recruitment:

- No worker pays for their job.
- Workers receive a timely refund of fees and costs paid to obtain or maintain their job.
- Workers retain control of their travel documents and have full freedom of movement.
- All workers are informed of the basic terms of their employment before leaving home.

Evaluating and Managing Risks

Visibility into the factories, none of which we own or operate, that manufacture Brooks products, materials, and raw materials is critical to ensure the standards outlined in our Supplier Code of Conduct are upheld. In 2022, we invested in a software solution called [TrusTrace](#) to help us continuously discover and trace factories throughout the Brooks manufacturing supply chain.

Brooks requests Tier 1 and Tier 2 suppliers to disclose upstream suppliers and collect documentation to substantiate their disclosures. This visibility helps enable Brooks to identify, assess, and mitigate forced labour and other social compliance risks across our supply chain. We regularly screen known suppliers using risk intelligence tools and collaborate with suppliers to remediate identified issues. Where significant risks cannot be effectively remediated, Brooks may discontinue the business relationship.

Supply Chain Due Diligence and Verification

Through our Social Compliance program, the following steps are taken to enforce our Supplier Code of Conduct across the supply chain so that working conditions are fair, safe and equitable.

Code of Conduct Compliance

As part of our new supplier onboarding process, Brooks requires all factories to sign the Brooks Supplier Code of Conduct, certifying that:

- they meet or exceed the requirements in the Brooks Supplier Code of Conduct;
- they will maintain current and detailed records to substantiate compliance with the Brooks Supplier Code of Conduct;
- they will be transparent with Brooks in all respects, including all documents, such as accurate working hours and payroll records;
- any Brooks merchandise will be produced in compliance with the wage and working hours laws of the country of manufacture and without the use of child, prison, or forced labour; and
- they understand that failure to comply with the Brooks Supplier Code of Conduct may result in termination of business with Brooks.

Additionally, Brooks requires all prospective factories to complete a verified social compliance assessment to evaluate social and labour practices and verify compliance with our Code.

Once factories are successfully onboarded, we evaluate 100% of our Tier 1 final assembly factories' continued compliance with our Supplier Code of Conduct and local law through the use of a verified social compliance assessment. We use a risk-based approach to determine our engagement level with Tier 2 material suppliers, prioritizing our engagement with factories that account for at least 80% of our materials volume by spend.



Worker Grievance Investigation

Workers in Brooks' supply chain have access to grievance mechanisms that enable concerns to be raised without fear of retaliation. Brooks requires factories to maintain effective grievance mechanisms aligned with our Supplier Code of Conduct, and workers may also raise concerns directly with Brooks through our established grievance channels. Brooks investigates reported grievances and works with suppliers to remediate confirmed violations of local law or the Supplier Code of Conduct. Suppliers are required to communicate remediation outcomes to affected workers, and Brooks follows up as appropriate to confirm resolution.

Measurement Tools

Brooks uses third-party risk management software and industry tools, including the Social Labor Convergence Program (SLCP) Converged Assessment Framework (CAF), Better Work, Higg Index Facility Social Labor Module (Higg FSLM), and Higg Index Facility Environmental Module (Higg FEM) to measure compliance with our Supplier Code of Conduct.

Remediation Process

Following completion of a verified social compliance assessment, we work closely with factories on a Corrective Action Plan (CAP) to remediate any identified issues that do not meet our standards. If a critical issue is found, Brooks will immediately set up a meeting with the factory to discuss the issue, understand the root cause, and work together to implement a solution to quickly remediate the issue and prevent it from occurring in the future. Factories who refuse or fail to remediate any critical issues found risk termination of business with Brooks.

Accountability

Brooks has a dedicated team responsible for our Social Compliance program. Senior leaders at Brooks have direct involvement and accountability in supporting our commitment to human rights. The Social Compliance team briefs the relevant sourcing team leader after each social compliance assessment.

The Brooks Social Compliance team participates in seasonal business reviews with all footwear factories. During these reviews, Brooks evaluates a factory's corporate responsibility performance, as well as other business metrics, such as development and commercialization. The Social Compliance team uses this process to engage both Brooks and factory leadership about any ongoing remediation efforts.

Training

Internal Training

Our Social Compliance team receives regular training on the subject of migrant labour, forced labour, child labour, and human trafficking. This training includes a review of the U.S. Customs and Border Protection Forced Labor webpage, the Department of Labor's "List of Goods



Produced by Child Labor or Forced Labor” and “Reducing Child Labor & Forced Labor Toolkit” webpage, and the International Labour Organization’s “Indicators of Forced Labour” booklet.

Additionally, to educate other Brooks employees on the importance of monitoring labour conditions throughout the year, we require employees who frequently interact with and/or visit our supply chain factories to complete a forced labour course. This course, “Human Trafficking: Forced Labor Training for Global Supply Chains”, was created by the International Trade Administration and aims to educate employees on human rights laws and regulations, and how to identify and report signs of forced labour.

Supplier Training

Brooks or third-party specialists perform in-person trainings for our suppliers on topics relevant to each individual supplier. Each new supplier is trained on our Supplier Code of Conduct and Responsible Sourcing Standards. Our Supplier Code of Conduct has been translated into eleven languages to make it more accessible to workers within our supply chain.

Assessment of Effectiveness

In 2025, Brooks identified non-compliances, such as minor health and safety issues, at final assembly factories and materials suppliers, and has successfully remediated or closed CAPs for 100 percent of the factories. None of these instances of non-compliance were related to forced labour, modern slavery, human trafficking, or child labour.

Further Steps

For more information regarding our Corporate Responsibility Program, please see the Running Responsibly page on www.brooksrunning.com and our current [Corporate Responsibility Performance Report](#). We invite you to send comments, questions, and suggestions to: runningresponsibly@brooksrunning.com.

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