ANTI-TRAFFICKING STATEMENT

The following document discloses L.L.Bean’s policies and actions relating to slavery and human trafficking in business and the supply chain.

As detailed below, L.L.Bean has developed and issued a code of conduct that states that we do not accept or condone/that we prohibit human trafficking and slavery in our supply chain. L.L.Bean defines slavery per the ILO Declaration on Human Rights. L.L.Bean defines human trafficking as the action or practice of illegally transporting people from one country or area to another, typically for the purpose of forced labor.

1. L.L.Bean is a commercial (retailer/manufacturer/brand) doing business in California and in the UK. L.L.Bean provides a good or service; brings in annual, worldwide, “gross receipts” that exceed $100M; and has an annual turnover of £36M. L.L.Bean is classified as a private company. L.L.Bean does business in the retail industry, producing and selling apparel and hard goods geared for the outdoor lifestyle.

2. L.L.Bean practices risk assessment in our supply chain. All factories that make L.L.Bean product are audited for human and environmental rights before they can begin production. We further audit factories based on a factory risk assessment. Risks include: country of manufacture, last audit rating, time since last audit, type of product, World Bank Governance Indicators and more.

L.L.Bean conducts audits of direct suppliers to evaluate compliance with our company standards to prevent trafficking and slavery in supply chains. Our audits are both unannounced and announced, and are performed by a qualified third party or by L.L.Bean employees.

3. L.L.Bean does not believe that slavery or human trafficking currently exists in our supply chain.

4. L.L.Bean has set forth policies to address human trafficking and slavery in our supply chain. We have developed and issued a code of conduct to our direct suppliers that states that we do not accept or condone/that we prohibit human trafficking and slavery in our supply chain. (Hyperlink to our CEO-approved policy and code of conduct)

   a. If evidence of human trafficking or slavery is found, we respond immediately by contacting local organizations to assist those workers. Then we inform our vendor and immediately terminate all L.L.Bean production at that factory or at any other factory we use with that vendor.

   b. In the case where noncompliance might exist but is not certain, L.L.Bean reserves the right to examine the specific situation and develop the best possible strategy for resolution. If cases of noncompliance are not resolved within a timely manner, we might terminate the business relationship. While L.L.Bean wishes to aid in the resolution of incidences of human trafficking and slavery within our supply chain, it is not possible to effectively solve the issue of noncompliance without the cooperation of the supplier.

5. L.L.Bean communicates with direct suppliers that materials must comply with the slavery and human trafficking laws of the countries in which they are doing business. Our direct suppliers sign a contract that includes, among other things, the requirement to follow not only local laws but also
L.L.Bean factory standards. We verify compliance with those laws and standards with the audit program described above.

6. L.L.Bean maintains and enforces internal accountability procedures for employees and contractors who fail to meet company standards in preventing the incidence of slavery and human trafficking in its supply chain. L.L.Bean practices due diligence in maintaining these standards. In addition to the factory audit process described above, L.L.Bean employees who regularly visit factories are asked to report, via any method available, anything they think might violate L.L.Bean standards, including suspected human trafficking.

7. L.L.Bean conducts internal training on L.L.Bean’s code of conduct to ensure the necessary participants in supply chain management are knowledgeable and aware of the issues and concerns surrounding the supply chain, including human trafficking and slavery, with a particular focus on mitigating risks. L.L.Bean also encourages employees involved in our supply chain to participate in external training programs and seminars on social compliance issues, human trafficking and slavery. L.L.Bean employees who regularly visit factories engage in a training program based on the factory code of conduct, so that they can identify when any risk to workers might exist.

8. L.L.Bean continues to evaluate the effectiveness of our human trafficking and slavery eradication efforts. We do this for our entire human rights and environmental auditing program on an ongoing basis.

Jim Ditzel
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