

ANTI-HUMAN TRAFFICKING AND TRANSPARENCY IN SUPPLY CHAIN STATEMENT

One of our core values is to “Do the Right Thing – Always.” Wolverine, including its UK subsidiaries Sweaty Betty Limited (“Sweaty Betty”) and Wolverine Europe Limited, maintains high standards of business ethics and holds a deep regard for human rights. We recognize the importance of responsibly sourced products and are committed to working with supply chain business partners that are dedicated to safe, humane, and ethical working conditions that comply with international labor standards. We have established guidelines to assist in our efforts to select partners who share our ethical commitments. Wolverine has zero tolerance for forced labor, human trafficking, and slavery or involuntary work of any kind in our subsidiaries or anywhere in our supply chain.

Pursuant to the requirements of the **Modern Slavery Act of 2015** and the **California Transparency in Supply Chain Act of 2010**, Wolverine and Sweaty Betty make the following joint statement, including disclosures of our efforts to ensure that slavery and human trafficking do not occur in our supply chain.

In this statement, unless expressly mentioned otherwise, references to “Wolverine”, the “Company”, “we”, “us” and “our” refer to the Wolverine World Wide, Inc. group, including Sweaty Betty and Wolverine Europe Limited.

OUR COMPANY

With a commitment to service and product excellence, Wolverine is one of the world’s leading marketers and licensors of branded casual, active lifestyle, work, outdoor sport, athletic, children’s and uniform footwear and apparel. The Company’s portfolio includes the highly recognized Merrell®, Saucony®, Wolverine®, Sweaty Betty®, Chaco®, Bates® and HYTEST® brands, and is the global licensor of the Hush Puppies® brand. The Company is also the global footwear licensee of the popular Cat® Footwear and Harley-Davidson® Footwear brands. Wolverine’s products are carried by leading retailers in the U.S. and globally in approximately 170 countries and territories.

Sweaty Betty, which was acquired by Wolverine in 2021, is a global activewear and lifestyle brand, operating globally across retail, ecommerce and wholesale channels. It is headquartered in the UK and has over 800 employees across the UK, US and China. Sweaty Betty manufactures its products in 11 countries, using its own factories and suppliers (“Sweaty Betty Suppliers”).

OUR POLICIES

There are a number of different policies or codes of conduct which are relevant to our approach and efforts in tackling modern slavery and human trafficking as summarized below.

Wolverine requires that our manufacturers, factories, and suppliers (collectively “Production Partners”) comply with our Production Code of Conduct, an abbreviated version of which can be found at <https://www.wolverineworldwide.com/about-us/responsibility/responsible-sourcing/>. The Production Code of Conduct is made available to all Production Partners and encapsulates Wolverine’s commitment to human rights. This commitment includes upholding the human rights of workers by treating them with dignity, respect, and seeking to improve, where practicable, working

conditions within our supply chain. The use of child labor, the use of labor from victims of human trafficking, and the use of labor from enslaved persons are all strictly prohibited under our Production Code of Conduct. Wolverine's Production Partners must also ensure that our Production Code of Conduct is followed by their respective suppliers, contractors, and subcontractors.

Sweaty Betty Suppliers are also required to comply with Sweaty Betty's Supply Chain Code of Conduct (the "SB Supply Chain Code of Conduct") in addition to the Wolverine Production Code of Conduct. The SB Supply Chain Code of Conduct states Sweaty Betty's zero-tolerance approach to modern slavery, which requires that employment is freely chosen, living wages (or the international equivalent) are paid, working hours are not excessive, and prohibits child labour and harsh or inhumane treatment. It aims to drive more socially and environmentally responsible production management processes. The SB Supply Chain Code of Conduct also includes risk management guidelines for mitigating and remediating violations.

We seek to identify non-compliance with the Production Code of Conduct or the SB Supply Chain Code of Conduct through our ongoing due diligence, including by our audit procedures (which are discussed in more detail in the "Auditing and Verification" section below).

Wolverine is committed to providing a work environment in which every employee is treated fairly and with dignity and respect. Wolverine's employees are guided by the Code of Business Conduct which sets out the behaviors expected of all our employees and reiterates our zero-tolerance approach to retaliation, harassment, bullying, child, forced, or involuntary labor.

DUE DILIGENCE

- **Risk Assessment**

Wolverine utilizes internal and external audit information as well as international labor resources to assess the risk of potential new Production Partners and Sweaty Betty Suppliers. In particular, all new factory partners and Sweaty Betty Suppliers are risk-assessed prior to onboarding and must be approved by Wolverine Social Compliance Team. Once onboarded, factory partners are subject to ongoing risk assessments as part of Wolverine's auditing and verification procedures (which are discussed in more detail in the "Auditing and Verification" section below). Additionally, suppliers which operate in, or source directly from conflict affected areas are required to perform human rights due diligence to assess the heightened risks of adverse human rights impacts.

- **Auditing and Verification**

Wolverine's factory partners receive a copy of our Production Code of Conduct and new factory orientation manual, including our Social Compliance Program requirements and auditing processes. Wolverine's factory partners are generally subject to annual audits, with our core Production Partners being audited at least annually. To conduct these audits,

Wolverine utilizes a combination of internal auditors (based in China and Vietnam) and external auditors (reputable third-party audit firms), both of whom are guided by our standard operating procedure and our social compliance assessment tool. Our assessment tool provides a framework for assessing a factory partner's overall social compliance performance, including in relation to slavery, trafficking, child and forced labor, working conditions, and grievance mechanisms. Our social compliance audits use the SA8000 standard for human rights, and our internal auditors are certified by Bureau Veritas.

For Sweaty Betty Suppliers, we accept recently completed external audit reports, and which satisfy Sweaty Betty's minimum audit requirements.

Wolverine also reserves the right to conduct unannounced inspections of its factory partners where appropriate.

Where an audit or inspection identifies a material issue, the Production Partner or Sweaty Betty Supplier must work with the auditor and/or Wolverine to devise and implement a corrective action plan to remedy the issue within an agreed timeframe. Depending on the severity of the issue or the partner's unwillingness to address it, Wolverine reserves the right to terminate the relationship.

In 2023, we audited 156 factories, which is 100% of our high-risk Tier 1 factory partners, with approximately 80% of those audits being conducted internally and 20% externally, and were also able to confirm that 100% of Sweaty Betty Suppliers had up-to-date audits in place.

ACCOUNTABILITY

Wolverine maintains internal accountability procedures to ensure compliance with Company standards on slavery and human trafficking. Furthermore, decisions regarding where and what direct suppliers engage in our supply chain, do not occur at the local level. Instead, those decisions are made by the Wolverine World Wide, Inc. Sourcing Department, with appropriate input from our global Product Integrity Department, our Social Compliance Team, brands, auditors, and others as appropriate, to avoid actual or apparent conflicts of interests and to ensure appropriate review and audit of direct supplier operations.

Wolverine requires compliance with its Production Code of Conduct (and, for Sweaty Betty Suppliers, the Supply Chain Code of Conduct), and we maintain a zero-tolerance policy with respect to human rights violations including slavery and human trafficking, forced labor, child labor, life-threatening health and safety conditions, harassment, and discrimination. Wolverine reserves the right to terminate any factory relationship where any of these zero-tolerance violations are confirmed.

TRAINING

Wolverine trains its employees, who are directly responsible for sourcing finished goods, on mitigating the risk of slavery and human trafficking in our supply chain. Audit guidelines are provided to our internal and external auditors when visiting Production Partner facilities. Audit results are reviewed by the Social Compliance Team and any material findings of non-compliance are reviewed by the Company's Legal Department.

Wolverine also provides training to our factory partners to ensure understanding of our requirements and provide an opportunity to share best practices. An annual Social Compliance Summit is held with all factory partners, and targeted training in local language assists in continuous improvement of specific areas of the Production Code of Conduct.

REPORTING VIOLATIONS

Wolverine maintains the Wolverine Reportline so that employees, as well as employees of our contracted factories and suppliers, may always ask any question or raise any concern confidentially, and anonymously if desired. The Reportline number operates 24 hours a day and is available anywhere in the world in multiple languages via local toll-free numbers or online at <http://WolverineReportLine.com>. The Company strictly prohibits any form of retaliatory action being taken against employees who report known or suspected violations.

This statement covers January 1, 2023 to December 31, 2023, and was approved by the Board of Directors of Wolverine World Wide, Inc. on May 1, 2024.



Christopher Hufnagel
President and Chief Executive Officer



David Latchana
Vice President, Chief Legal Officer and Secretary