

Human Rights Policy

I. Introduction

As a responsible corporate citizen, Gildan (the “Company”)¹, promotes the fair and ethical treatment of all its employees as well as those of its business partners² throughout our supply chains. Gildan is committed to adopting labour practices and working conditions that ensure that the human rights and dignity of all our employees and those of our business partners are respected. These commitments are in accordance with a comprehensive ESG strategy embedded into our long-term business plan and embodied in our [Code of Conduct](#), [Code of Ethics](#), [Global Environmental & Energy Policy](#), [Restricted Substances Code of Practice](#), and the guidelines set forth in our [Social & Sustainable Compliance Guidebook](#).

II. Purpose & Scope

Through this Policy, **Gildan commits to upholding and respecting internationally recognized human rights** as established in the United Nation’s (UN) *International Bill of Human Rights* (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) as well as the *UN Guiding Principles on Business and Human Rights*.

Gildan is committed to adopting labour practices and working conditions that ensure that the human rights and dignity of all our employees and those of our business partners are respected.

In all regions where it operates, Gildan and its business partners are required to safeguard employees’ human rights by adopting and adhering to Gildan’s Code of

Conduct. The Code of Conduct encompasses the standards set forth by the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the OECD’s Guidelines for Multinational Enterprises. The Code of Conduct unequivocally asserts our position on key industry topics such as child labour, forced labour, compensation, hours of work/overtime, health and safety, environment, freedom of association/collective bargaining, harassment and violence, grievance and communication mechanisms, as well as non-discrimination. In addition, we ensure that our Code of Conduct adheres to the latest principles and standards of the Fair Labor Association (FLA).

III. Embedding Human Rights

At Gildan we embed human rights throughout our policies, governance, and management systems. Through our actions and policies, we work to uphold and respect human rights.

Our Corporate Governance and Social Responsibility Committee (CGSRC) of our Board of Directors has overall responsibility for monitoring and reviewing the Company’s ESG practices, performance, risks and

¹ In this document *we, us, our, Company*, and *Gildan* mean Gildan Activewear Inc. and its subsidiaries.

² Entities that engage in a business relationship with Gildan. These partners may include but are not limited to manufacturing contractors and their suppliers, procurement suppliers, and licensees.

opportunities, and public reporting. The Committee is composed of independent directors with experience in ESG subject areas.

In addition, our leaders, at all levels of our manufacturing facilities, work on implementing standardized practices around human rights, health and safety, and environmental welfare in their day-to-day actions.

IV. Human Rights Due Diligence

We recognize that due diligence is an ongoing exercise and that risks may change over time as our operations and operating context evolve. At Gildan, the main purpose of human rights due diligence is to prevent and act upon potential and actual adverse human rights impacts on workers in our facilities and those of our finished product contractors. Our due diligence process combines a compliance- and risk-based approach involving the following steps:

A. Identification, Assessment, and Evaluation of Salient Topics

Gildan utilizes materiality assessments, human rights reports from international bodies, and other available resources to identify and address actual or potential human rights harms inherent in our operations, our supply chains, and in our industry at large. These assessments include the involvement of and/or consultation with relevant stakeholders throughout our entire supply chain. As part of this process, the Company maintains an open dialogue with employees, customers, suppliers, non-governmental organizations (NGOs), members of labour movements, and other interested parties. Please refer to Gildan's [Stakeholder Engagement Policy](#) for more information on Gildan's approach to engaging with stakeholders. Interested parties are also invited to contact Gildan directly through any of the channels of communication described in our [Whistleblowing Policy for Employees and External Stakeholders](#).

As a result of our latest materiality assessment process, human rights reports from international bodies, social compliance audits, and other available resources, we identified ten salient human rights topics that are inherent in our operations and supply chain. These are challenging matters due to the nature of our industry, the complexity of the countries where we operate, and situations that are encountered on a day-to-day basis.

The description of these specific topics, as well as our approach to addressing them, are outlined below.

- Freedom of Association and Collective Bargaining

Gildan respects the right of employees to freedom of association and collective bargaining. The Company engages in a constructive and open dialogue process with union representatives as well as with all employees through its established grievance mechanisms and monitors this engagement through its Social Compliance program. Our [Social & Sustainable Compliance Guidebook](#) includes detailed benchmarks on how our finished product contractors must also respect this fundamental right.

Gildan does not tolerate intimidation or attacks on union representatives and other human rights defenders.

- Health and Safety

Health and safety is a top priority at Gildan.

At Gildan, we view health and safety through the lens of prevention and zero harm, for our employees, the employees of our contractors while working on our premises, as well as the employees of our finished product contractors. This includes the adoption of policies and procedures to prevent accidents and illnesses arising out of or occurring while performing work at the Company or finished product facilities. Gildan performs periodic reviews of its health and safety protocols to ensure that we remain at the forefront of industry trends and best practices.

- Harassment and Violence

Gildan is committed to maintaining a work environment that is free from harassment, violence or intimidation, a commitment that is embodied in our Global Anti-Harassment Policy.

Gildan does not tolerate harassment and violence in our operations or throughout our supply chain.

Gildan strives to treat every employee with respect and dignity and makes every reasonable effort to ensure that no employee is subjected to any physical, sexual, psychological, or verbal harassment or violence in the workplace. Gildan will take immediate action if a violation of the Harassment and Violence Principle of our Company's Code of Conduct occurs.

- Hours of Work / Overtime

Gildan's Code of Conduct, which is premised on ILO conventions No. 1 and 14, places strict limits on working hours. Accordingly, no Gildan or finished product contractor will be required to work more than a total of 60 hours per week or the regular and overtime hours permitted by the law of the country where the employee works, whichever is less. In addition, the regular work week shall not exceed 48 hours. Furthermore, employees must be allowed at least 24 consecutive hours of rest in every seven-day period and all overtime work shall be consensual.

Finally, Gildan shall not request overtime on a regular basis and shall compensate for all overtime work at a premium rate.

- Child Labour

Gildan does not tolerate any form of child labour.

Gildan employees across our entire supply chain must be at least 16 years of age or over the age for completion of compulsory education or the legal working age of the country in which they work, whichever is higher. Furthermore, no employee under the age of 18 may be employed in any form of hazardous conditions or be permitted to work overtime or on the night shift. In addition, mechanisms are implemented to prevent job applicants who are under the legal minimum age, or the minimum age of hire specified by the Gildan Code of Conduct.

- Forced Labour

Gildan does not tolerate any form of forced labour and human trafficking, or any type of modern slavery, across its entire supply chain, including prison labour, indentured labour, bonded labour or any other form of forced labour.

In addition, we commit to working with our global supply chain partners to create conditions so that: no workers pay for their job, workers retain control of their travel documents and have full freedom of movement; and all workers are informed, in a language they understand, of the basic terms of their employment before leaving their country of origin. If in any case a worker pays for his/her job, workers must receive a timely refund of fees and costs paid to obtain or maintain their job.

See [Gildan's Modern Slavery Report](#), which describes the steps we take to identify and eradicate modern slavery and human trafficking from our supply chain and our own operations.

- Compensation

Gildan provides its employees with the legal minimum wage or the prevailing industry wage of the countries where they are located, whichever is higher. Employees have the right to compensation for a regular work week that is not only adequate to meet their basic needs, but that also allows for some discretionary income. We support the notion that where compensation does not meet employees' basic needs nor does it provide some discretionary income, employers must take appropriate measures to gradually reach a satisfactory compensation level.

- Environment

Gildan is committed to adopting responsible measures to mitigate the impact that its operations may have on the environment. Gildan is committed to complying with applicable laws and regulations relating to environmental and energy matters. We strive to develop our processes in an environmentally safe and sustainable manner and to implement energy-efficient solutions to mitigate our environmental impacts throughout our supply chain. For more information, please refer to our Environment & Energy Policy and Restricted Substances Code of Practice.

- Grievance and Communication Mechanisms

Gildan provides mechanisms that are openly promoted to ensure confidential and safe communication between the Company and all its stakeholders to guarantee that labour and human rights are respected throughout all levels of the supply chain.

Gildan has a Whistleblowing Policy for Employees and External Stakeholders to provide our external stakeholders, such as community members, finished product manufacturing contractors and their employees, suppliers, non-governmental organizations, among others, clear guidelines on how to communicate or present grievances to the Company. All grievances are addressed in a systematic and confidential manner to ensure employees' privacy and to protect them from reprisals. We take steps to ensure timely and effective remediation wherever human rights impacts occur.

- Discrimination

Gildan is committed to ensuring that no employee is subjected to any discrimination during their employment with the Company, including in connection with their hiring, compensation, access to training, advancement, discipline, termination or retirement, on the basis of gender, pregnancy, race, religion, age, disability, physical appearance, sexual orientation, nationality, HIV/AIDS, political opinion or social or ethnic origin, or any other factor of discrimination protected by applicable law.

Gildan is an equal opportunity employer, and we are committed to fostering a culture that embraces the diversity and inclusion of our employees, where everyone is equally valued and can reach their full potential and contribute to the Company's overall success.

B. Mitigate and remediate human rights risks and impacts in our facilities and our supply chain by working collaboratively with stakeholders to implement programs and initiatives

Gildan is committed to remediating, where legitimate concerns are identified, including concerns relating to adverse human rights impacts, engaging, and cooperating with affected stakeholders and/or their representatives in remediation efforts through legitimate processes. Gildan also commits to not obstructing access to other remedies. Workers can communicate a potential human rights allegation through established grievance mechanisms. A remediation process is followed to ensure affected stakeholders receive appropriate and timely remediation.

C. Monitor and communicate by verifying and validating progress and efficiency

Through our Social Compliance Program, we work collaboratively with our stakeholders to verify, monitor, and validate progress and efficiency of our human rights due diligence in our own and finished product contractor facilities. In addition, we can identify areas of strength and opportunity to better support decision-making processes and establish accountabilities throughout our management teams.

In addition, reporting on human rights is a crucial step in monitoring to keep track of findings, non-compliances, corrective action plans, and recommendations for improvement. These documents serve as supporting evidence when communicating with affected stakeholders during a remediation process.

D. Embrace continuous improvement

We recognize that effective due diligence must be worker-centric, based on employee participation and engagement. Therefore, we are constantly working on learning from our past and current experiences to better assess and make changes to our human rights practices which in turn will create a positive impact for workers.

Approved By the Operational Compliance Committee and the Board of Directors.

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