

2023–2025 Cycle

Principles 1, 2, 3, 4, 5, 6

Summary

In 2023 and 2024, PUMA SE, a Fair Labor Accredited company, has successfully demonstrated alignment with Milestone 5 evaluations for year one and two, which included Fair Labor Principles 1-6: 1 (Top Management Commitment & Workplace Standards), 2 (Responsible Sourcing Practices), 3 (Responsibility and Head Office Training), 4 (Training for Suppliers and Production Staff), 5 (Monitoring), and 6 (Functioning Grievance Mechanism). The remaining four principles will be evaluated in 2025.

PUMA scored over 90% on all six principles evaluated in 2023-2024, representing the highest level of performance on implementation of FLA standards.

PUMA's key strengths:

1. Top management is committed to ethics and human rights.
2. The company maintains a robust factory monitoring program.
3. Its effective responsible purchasing practices highlight a commitment to ethical sourcing and collaboration within the supply chain.
4. It has a comprehensive training system with an effective feedback mechanism for workplace standards and responsible purchasing practices.
5. It has established and maintained effective grievance mechanisms across the supply chain.

PUMA's area for improvements:

1. Monitor the effectiveness of workplace standards training for suppliers and production staff through knowledge checks and behavioral observations (Principle 4).
2. Provide managerial-level training aligned with the updated audit tool to enhance facility grievance mechanism training effectiveness (Principle 6).

About the Fair Labor Association (FLA)

The Fair Labor Association (FLA) promotes human rights at work. It is an international network of companies, universities, and civil society organizations collaborating to ensure that millions of

people working at the world's factories and farms are paid fairly and protected from risks to their health, safety, and well-being.

At the core of FLA's work with agriculture and manufacturing companies is Fair Labor Accreditation, which signifies that an FLA member company has effective systems in place that protect workers in their global supply chain. It is the only comprehensive program of its kind that is based on international standards and frameworks such as the International Labour Organization, the United Nations Guiding Principles and Sustainable Development Goals, and the Organisation for Economic Co-operation and Development.

The systems and frameworks FLA Participating Companies use in their journey toward Fair Labor Accreditation also support **compliance with human rights due diligence requirements and regulations**. Components of FLA's Principles of Responsible Sourcing and Responsible Production overlap with the [OECD's six-step human rights due diligence framework](#).

Milestone 5 Evaluation: PUMA

Fair Labor Accreditation is a rigorous, multi-year process that evaluates a company's systems to improve labor conditions in its Tier One and owned manufacturers based on [five milestones](#): 1) Governance and Internal Alignment; 2) Implementation and Monitoring; 3) Review and Improvement; 4) Full Implementation and Integration; and 5) Maintenance.

Each milestone represents key building blocks of an effective social compliance program that improves working conditions and worker well-being. Once a company is admitted as an FLA member, it is expected to reach Fair Labor Accreditation within five years. Following accreditation, it must continuously work to maintain alignment with FLA's standards. For an overview of outcomes for each milestone, please see Annex 1.

A company achieves Fair Labor Accreditation after fulfilling all requirements of the first four milestones, including annual social compliance audits by independent FLA-approved assessors on a percentage of its Tier One factories; audit field observations; training observations; a three-day headquarters assessment; and approval by the FLA Board of Directors. Being recognized as a Fair Labor Accredited company indicates a company's comprehensive social compliance and demonstrated performance in protecting workers' rights at the time of accreditation.

Following accreditation, a company enters Milestone 5, in which it receives ongoing due diligence training and feedback from FLA, including factory assessments and regular evaluation of headquarters programs. Companies are required to maintain and update social compliance programs as FLA standards are updated.

As part of Milestone 5, Fair Labor Accredited companies are evaluated annually to verify that they are maintaining alignment with [FLA Sourcing and Production Principles](#).

Milestone 5 evaluations follow a three-year cycle, with three principles evaluated each year.¹

The annual Milestone 5 Evaluation Performance Summary highlights the company's overall performance against a set of key performance indicators (KPIs) for each of the FLA principles, which are summarized in Appendix 1. Each KPI is verified and scored accordingly, after which Accredited companies are required to address incomplete scores or gaps.

The Milestone 5 Evaluation: Post-Accreditation Report will be annually updated to cover all FLA principles verified throughout the three-year cycle and reflect progress of the company towards addressing its gaps identified in previous Milestone 5 evaluations.

PUMA 2023-2024 Performance Summary: Principles 1, 2, 3, 4, 5, 6

Fair Labor Accredited companies, such as PUMA, are reevaluated on FLA's 10 principles over a three-year cycle. The 2023-2024 Milestone 5 Evaluation evaluated how PUMA maintained the alignment of its social compliance system with the following set of principles after its accreditation:

- **Principle 1: Top Management Commitment & Workplace Standards:** Commitment to accountability and transparency through established workplace standards;
- **Principle 2: Responsible Purchasing Practices:** Alignment of planning and purchasing practices with commitment to workplace standards;
- **Principle 3: Responsibility and Head Office Training:** Identification of and training for specific staff responsible for implementing workplace standards and responsible purchasing practices, as well as training for all head office staff;
- **Principle 4: Training for Suppliers and Production Staff:** Commitment to train relevant supplier management, or all management staff and employees at owned facilities, on workplace standards and track effectiveness of supplier workforce training;
- **Principle 5: Monitoring:** Commitment to conduct workplace standards compliance monitoring; and
- **Principle 6: Functioning Grievance Mechanisms:** Commitment to ensure workers have, or provide workers with, access to functioning grievance mechanisms, which include multiple reporting channels (of which at least one is confidential).

The chart below highlights PUMA's performance (in percentages) against those six principles at the time of publication. FLA expects companies to continuously work toward reaching and maintaining complete alignment with standards. FLA staff track progress in closing the gaps identified in the Milestone 5 Evaluation, which is reflected in the following year's updated report, along with scores for Principles 7, 8, 9 and 10 (to be published in 2026).

¹ In 2023, FLA started the cycle with **Principle 4: Supplier Training and Commitment to FLA Code Standards**, **Principle 5: Monitoring**, and **Principle 6: Functioning Grievance Mechanisms**. In 2024, FLA evaluated **Principle 1: Top Management Commitment & Workplace Standards**, **Principle 2: Responsible Purchasing Practices**, and **Principle 3: Responsibility & Head Office Training**. The cycle will end in 2025 with evaluation of **Principle 7: Collection & Management of Compliance Information**, **Principle 8: Timely & Preventive Remediation**, **Principle 9: Consultation with Civil Society**, and **Principle 10: Verification Requirements**.

2023-2024 Milestone 5 Evaluation Performance (Principle Average Scores in %)

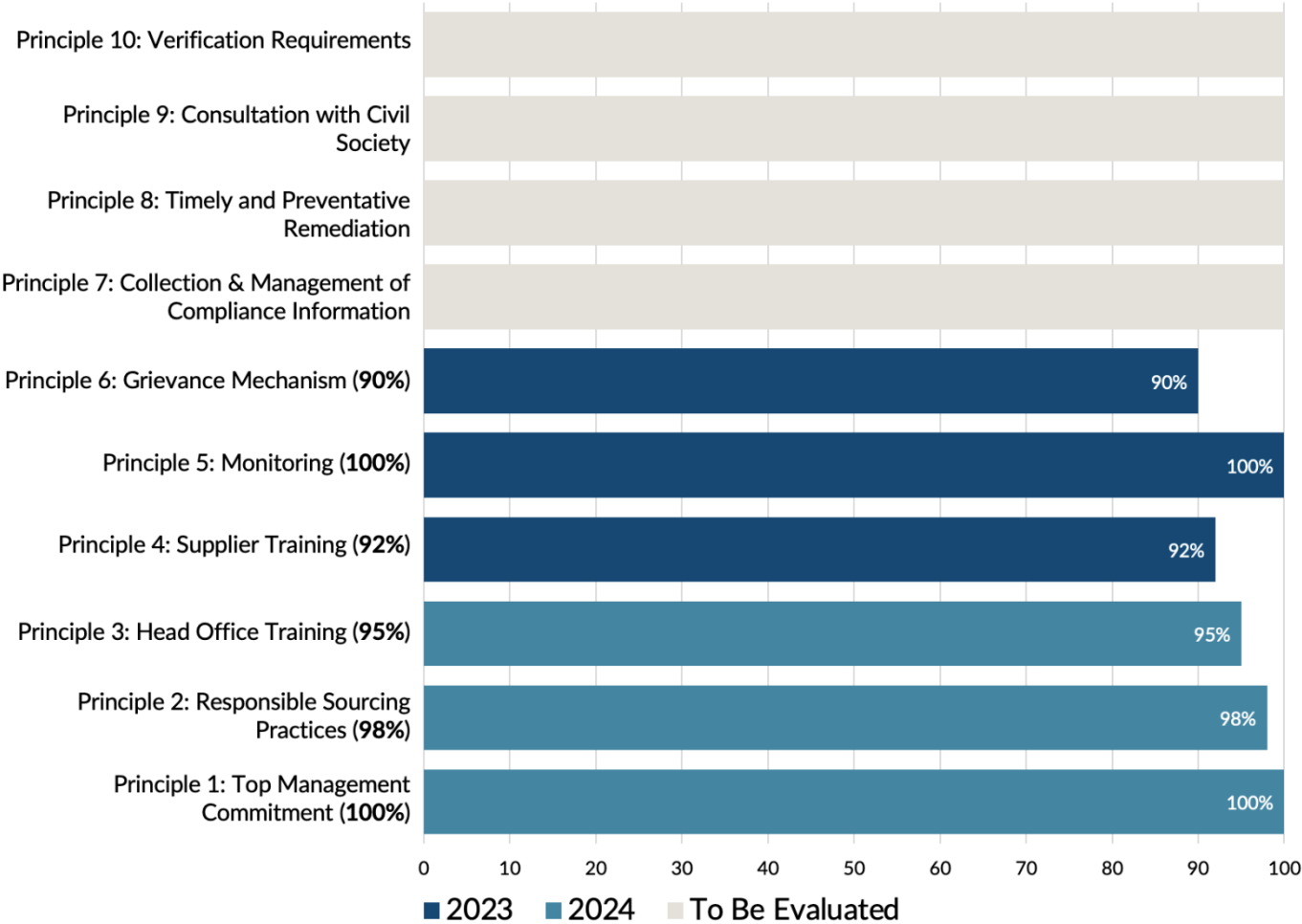


TABLE 1: COMPANY OVERVIEW

Name	PUMA SE
HQ Location	Herzogenaurach, Bavaria, Germany
Category	Manufacturing company, sourcing principles
Product	Apparel, footwear, accessories, and sports equipment
Tier One Applicable Factories and Owned Facilities	499 Factories
FLA Accreditation(s) ²	Accredited since 2007 Reaccredited in 2010 Reaccredited in 2019 Milestone 5 Evaluation in 2023
PUMA's Public Commitment	FLA aligned codes of conduct Public commitment to fair compensation Annual sustainability report Factory list Vision 2030 Targets Modern Slavery and Human Trafficking Statement PUMA Sustainability Handbooks PUMA Sustainability Policies PUMA Complaints Procedure

The following table reflects PUMA's participation in FLA activities, including factory-level assessments, investigations, participation in FLA governance and other projects since its latest reaccreditation (2019). All accreditation reports are available [here](#).

TABLE 2: COMPANY FAIR LABOR ACTIVITIES SINCE LAST ACCREDITATION (2019)

Fair Labor Activities (2019-2025)	Purpose
Headquarters visit (June 2019)	Headquarters visit for reaccreditation.

² Annual Milestone 5 evaluations replace FLA's previous approach of reaccreditation, and verify, on an ongoing basis, that companies are maintaining their alignment with FLA standards post-accreditation.

Fair Labor Activities (2019-2025)	Purpose
Timeline Factory-Level Assessments³ (14 assessments: Bangladesh, Cambodia, India, Indonesia, Pakistan, Türkiye, and Vietnam)	Identify any labor violations, assess root causes, and track remediation efforts over time. All factory-level assessment reports and CAPs are available here .
Completed Fair Labor Investigations Madagascar (2023)	Investigate supplier for alleged non-compliance, report follow-up on remediation, and engagement with the union. All ongoing and completed investigations reports are available here .
Participation in FLA's Governing Body and Advisory	N/A
Participation in FLA Special Projects	<ul style="list-style-type: none"> • Rubber mapping project in Vietnam • Improving Employment Practices in the Turkish Cotton Sector • Piloting Strategies to Support Workers Beyond Tier One • Living Wage Pilot (current)
Joint Advocacy	<ul style="list-style-type: none"> • Responsible Recruitment in Taiwan • Apparel brands urge Cambodia to cancel audit of CENTRAL • FLA at the 2025 OECD Forum on Due Diligence in the Garment and Footwear Sector – PUMA Speaker • PUMA's Support of Bangladesh Minimum Wage Letter of Appeal

³ FLA conducts annual independent external assessments, also called Social Compliance Initiatives (SCIs), in 1% of the accredited company's Tier One supply chain. All assessment reports are available [here](#).

Annex 1: Manufacturing Milestones Toward Accreditation

Milestone 1: Governance and Internal Alignment
<p>The company receives FLA training on standards, tools, and initial recommendations for meeting subsequent milestones.</p> <p>Outcomes:</p> <ul style="list-style-type: none"> • Alignment of the company's commitment to workplace standards with FLA's Code of Conduct and Benchmarks; and • Development of headquarters-level systems for factory monitoring, grievance mechanisms and remediation.
Milestone 2: Implementation and Monitoring
<p>Outcomes:</p> <ul style="list-style-type: none"> • Implementation of headquarters-level systems for factory monitoring, grievance mechanisms, and remediation; • Development of systems for staff training, responsible retrenchment, and remediation • Collection and analysis of wage data; and • Assessments at sample factories.
Milestone 3: Review and Improvement
<p>Outcomes:</p> <ul style="list-style-type: none"> • Ongoing improvement of a company's monitoring and training systems; • Formalized systems for responsible purchasing and production and civil society engagement; • Implementation of feedback and recommendations from FLA to improve monitoring, remediation, and business practices; • Development of a fair compensation blueprint to improve wages in the supply chain; and • Ongoing assessments at sample factories, as well as assessments of audits and trainings.
Milestone 4: Full Implementation and Integration
<p>Outcomes:</p> <ul style="list-style-type: none"> • Confirmation that the company's daily business processes and decisions uphold FLA standards; • Public company commitment to uphold fair compensation in its factories; • Final assessment of company headquarters by FLA; and • Ongoing assessments and evaluation of remediation activities.
<p>Accreditation:</p> <p><i>After fulfilling all requirements, the company's progress is reviewed by FLA's Board of Directors. If a company is fully aligned, the board will vote to grant the company Fair Labor Accreditation, indicating comprehensive social compliance and demonstrated performance in protecting workers' rights.</i></p>
Milestone 5: Maintenance

- The company moves to ongoing maintenance of the systems developed and verified in Milestones 1 to 4.
- The company receives ongoing due diligence training and feedback from FLA, including factory assessments and regular evaluation of headquarters programs.
- The company is expected to maintain and revise its programs as FLA standards are updated.

Annex 2.1: 2023-2024 Milestone 5 Evaluation KPIs — Sourcing Principles 1-6

Principles of Fair Labor and Responsible Sourcing

In 2023-2024, FLA evaluated Fair Labor Accredited companies against a set of more than 130 KPIs for **Principle 1: Top Management Commitment & Workplace Standards**, **Principle 2: Responsible Purchasing Practices**, **Principle 3: Responsibility & Head Office Training**, **Principle 4: Supplier Training**, **Principle 5: Monitoring**, and **Principle 6: Functioning Grievance Mechanisms** of the [Principles of Fair Labor and Responsible Sourcing](#). Those KPIs are summarized [here](#).

Annex 2.2: 2023-2024 Milestone 5 Evaluation KPIs— Production Principles 1-6

Principles of Fair Labor and Responsible Production

In 2023-2024, FLA evaluated Fair Labor Accredited companies against a set of more than 180 KPIs for **Principle 1: Top Management Commitment & Workplace Standards**, **Principle 2: Responsible Production Practices**, **Principle 3: Responsibility & Head Office Training**, **Principle 4: Production Staff Training**, **Principle 5: Monitoring**, and **Principle 6: Functioning Grievance Mechanisms** of the [Principles of Fair Labor and Responsible Production](#). Those KPIs are summarized [here](#).