

# NIKE, INC. STATEMENT ON MODERN SLAVERY AND CHILD LABOR FOR FISCAL YEAR 2025

## I. BACKGROUND

NIKE supports human rights as defined by the Universal Declaration of Human Rights, which recognizes that “all human beings are born free and equal in dignity and rights.” We work to elevate human potential through our products, partnerships and operations, something that cannot be accomplished without a fundamental respect for human rights. We expect the same from direct suppliers, hereinafter referred to as “suppliers”. We focus on working with long-term, strategic suppliers that demonstrate a commitment to engaging their workers, providing safe working conditions and advancing environmental responsibility in accordance with NIKE’s [Code of Conduct](#) and [Code Leadership Standards](#). Our expectations include working to combat risks of forced labor and child labor.

We furnish this statement pursuant to the UK Modern Slavery Act, the Australian Modern Slavery Act, the California Transparency in Supply Chains Act, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. This statement discusses NIKE’s global business practices to address forced labor and child labor. It encompasses NIKE, Inc., and its consolidated subsidiaries because we take a global approach to human rights and compliance, including forced labor and child labor. However, not all of our consolidated subsidiaries are subject to one or more of the foregoing Acts. This statement is provided only by the entity specifically covered by the respective act.

As used in this statement, forced labor includes modern slavery, prison labor, indentured labor, bonded labor, human trafficking, or other similar conduct. For more information on NIKE’s commitments, please see the [Nike website](#).

This statement covers the period from June 1, 2024 to May 31, 2025. All references to websites, reports or other documents in this statement are for information only. The content of such websites, reports or other documents (or any other information they refer to) is not incorporated by reference into this statement.

## II. NIKE OVERVIEW AND SUPPLY CHAIN STRUCTURE

NIKE is the largest seller of athletic footwear and apparel in the world. We sell our products through NIKE-owned retail stores and through digital platforms, to retail accounts and through a mix of independent distributors, licensees and sales representatives in nearly all countries and regions around the world. Virtually all of our products are manufactured by independent contract suppliers. To learn more about NIKE, view our annual and quarterly reports on the [NIKE Investor website](#).

Our business is built upon long-term relationships with suppliers that are committed to our standards of sustainability and human rights, product excellence and compliance with local laws. Our sourcing strategy prioritizes demonstrable leadership in corporate responsibility and sustainability, seeking to move beyond minimum standards. As part of our growth strategy, we seek suppliers that drive sustainable business growth by minimizing their environmental impacts, fostering a strong culture of safety and developing an engaged and valued workforce.

NIKE discloses the independent finished goods and material suppliers used to manufacture NIKE products on the [NIKE Manufacturing Map](#), an interactive tool designed for transparency.

NIKE’s commitment to ethical practices in our own operations and our supply chain begins at the highest level – from our CEO and Board of Directors. NIKE, Inc.’s Corporate Responsibility, Sustainability & Governance Committee of the Board of Directors reviews and evaluates NIKE’s strategies, activities, policies, investments and programs regarding corporate purpose, including corporate responsibility, environmental sustainability, human rights, global social and community impact, and diversity and inclusion; and provides oversight of management’s efforts to ensure that NIKE’s dedication to this work is reflected in its business operations. NIKE’s executive leadership team reviews and confirms all company-wide sustainability policies, goals and targets, reviews performance toward them, receives updates on key issues and emerging trends, and provides oversight for efforts to improve.

More information can be found on the [NIKE website](#).

### III. NIKE'S CODE OF CONDUCT & STANDARDS TO ADDRESS FORCED LABOR AND CHILD LABOR

NIKE takes seriously and fully supports national and international efforts to end forced labor and child labor. NIKE's requirements for suppliers are contained in our [Code of Conduct](#) and [Code Leadership Standards](#). The Code of Conduct lays out the required minimum standards we expect each supplier to meet in producing NIKE products and includes strict requirements that prohibit forced labor and enforce policies around the minimum age of workers, excessive overtime, compensation, and freedom of association among other requirements. The Code Leadership Standards specify how the Code of Conduct should be implemented. This document also articulates how we measure suppliers' compliance efforts and progress against our Code of Conduct, including specific requirements on the management of key forced labor and child labor risks.

We have progressively raised expectations for our suppliers through the evolution of our Code of Conduct and Code Leadership Standards. NIKE's Code of Conduct and Code Leadership Standards include specific requirements to address key risks of forced labor and child labor. NIKE regularly reviews and updates NIKE's Code of Conduct and Code Leadership Standards.

NIKE's Code Leadership Standards also includes a requirement for suppliers to develop and share their own internal Code of Conduct.

### IV. SUPPLIERS' CERTIFICATION OF MATERIALS

NIKE requires its finished goods suppliers to verify they are sourcing materials from vendors that are compliant with NIKE's Restricted Substances List (RSL) and NIKE's Code of Conduct. NIKE also requires that suppliers comply with all local labor laws and NIKE's Code of Conduct and Code Leadership Standards.

### V. DUE DILIGENCE, RISK ASSESSMENT & MONITORING

NIKE regularly evaluates and updates our systems to identify and address risks in our supply chain, including those related to forced labor and child labor. We do this by leveraging information from suppliers' specific risks identified through NIKE's own programs and external sources. NIKE is working to map forced labor and child labor related risks further up the supply chain and is expanding engagement with Tier 2 material suppliers.

As part of this work, we continue to focus on suppliers employing foreign migrant workers as an area of heightened risk. NIKE uses the CUMULUS Forced Labor Screen™, a due diligence tool to help identify risks related to the recruitment of foreign migrant workers by suppliers, including a feature for verification of recruitment fee payment and reimbursement. This tool is utilized for all Tier 1 finished goods and strategic Tier 2 material suppliers hiring foreign migrant workers. This work helps NIKE better understand current recruitment practices and allows us to map overlaps in recruitment agents at both the facility and country or region level. It also helps us identify risks and opportunities to further support our suppliers and their recruiting agents in implementing best practices and serves as an ongoing tool to monitor the effectiveness of programs in addressing and minimizing risks related to forced labor.

NIKE uses both internal and external third-party audits to assess compliance with our requirements and local laws. These assessments take the form of audit visits, both announced and unannounced, to measure supplier conformance to NIKE's Code of Conduct, Code Leadership Standards and local laws. NIKE audits assess forced labor risks – including the employment of vulnerable worker groups such as foreign migrants, interns and temporary workers, and high-risk practices such as payment of recruitment fees and restrictions on freedom of movement – and child labor risks. Suppliers are monitored on a schedule based on their performance. More information on NIKE's audit program can be found on the [NIKE website](#).

We also monitor conditions at suppliers through audits and assessments by independent organizations, including the Fair Labor Association (FLA) and the Better Work Programme, a joint project of the International Labour Organization (ILO) and International Finance Corporation (IFC). Overall, beyond finished goods suppliers our monitoring program includes our materials supply chain and distribution centers.

NIKE runs a Foreign Migrant Worker Enhanced Due Diligence program that adds a specialized approach to identify issues related to foreign migrant workers and forced labor beyond regular Labor, Health and Safety, and Environment assessments. As part of that program, we partnered with civil society organizations (CSOs) to deploy a pilot of the Specialty, a program focused on identifying the risk of forced labor at employment sites and with labor providers, with selected suppliers across chosen countries and regions. Since the program's implementation in FY23, the program has assessed selected suppliers that together employ over 44% of foreign migrant workers in the NIKE supply chain, consisting of both Tier 1 finished goods suppliers and Tier 2 material suppliers. NIKE's remediation efforts

arising out of these assessments is discussed in the section below.

NIKE works to provide safe, confidential and easily accessible channels to enable anyone to report on potential adverse impacts and grievances. The *Speak Up Portal* is available to NIKE employees and individuals in and outside the supply chain who experience or observe conduct they suspect to be inconsistent with NIKE human rights and environmental expectations, as articulated through the Code of Conduct and Code Leadership Standards. NIKE treats all reports seriously, respects confidentiality throughout the grievance process, and does not tolerate retaliation in any form in response to submissions.

## VI. REMEDIATION AND EFFECTIVENESS

Working with a wide range of organizations and experts, NIKE regularly evaluates its approach to understanding working conditions in the supply chain and working with suppliers to enhance their capabilities. NIKE works with internal, external, and independent monitoring organizations to carry out audits and help with remediation and capability-building efforts. If we are provided with evidence of an issue of non-compliance with a supplier, we investigate promptly. Where improvements are required, we seek to drive ownership by supplier management to identify and correct issues and improve systems to address root causes in order to prevent recurrence.

Remediation for identified instances of recruitment or other fees paid by employees includes reimbursement of fees paid by workers that are in violation of NIKE's 'Employer Pays Principle.' Should a supplier fail to adequately remediate these issues, according to NIKE's requirements, it would be subject to review and sanctions including potential termination of the relationship.

In FY25, NIKE continued to evolve our remediation program, originally implemented in FY24, as a part of the Foreign Migrant Worker Enhanced Due Diligence program. We worked with third-party experts from the Responsible Business Alliance (RBA) to support supplier efforts to address findings identified by the initial assessments, including those related to recruitment agents and fees, dormitory management and worker contract practices. The RBA experts follow-up with these suppliers on specific findings and remediation measures. Of the others who were assessed in FY25, all are on track to complete remediation in FY26.

Requirements to monitor, identify, and remediate instances of child labor, described in detail in NIKE's Code Leadership Standards, are grounded in the overall best interests of the child, international norms and local laws. Remedial actions required by the Code Leadership Standards to be taken by the supplier include removing the child from the workplace, providing adequate financial support to enable the child to attend and finish school or a vocational training program, and offering the opportunity to be fully employed after graduation.

## VII. TRAINING AND ACCOUNTABILITY

NIKE believes suppliers that prioritize the well-being of their workers, by engaging with them to understand their needs, have better supplier performance. We also know that our ability to influence suppliers is dependent, in part, on the right incentives and sanctions in our business relationships. Our Manufacturing Index, introduced in 2012, scores finished goods suppliers on sustainability, including labor practices, on par with traditional metrics of cost, quality and service, of which on-time delivery is one component.

To more fully integrate our compliance and sustainability criteria into sourcing and purchasing decisions, NIKE provides required training to employees with responsibility for supply chain management. The training advances enhanced understanding and compliance with our sustainability policies, our Code of Conduct and Code Leadership Standards, that include our expectations on ethical recruitment, with a specific highlight on our requirements to prevent risks of forced labor and child labor.

NIKE offers voluntary capability building programs for suppliers – to more responsibly employ foreign migrant workers and mitigate against the risk of forced labor – and the recruitment agents used by suppliers. We continue to work with multiple organizations to develop and deploy trainings on responsible recruitment and forced labor prevention. We continue to organize and expand in-person trainings in suppliers' countries and regions. Nike developed, in partnership with the Responsible Labor Initiative (RLI), a Responsible Recruitment capability building program. This two-phase program was built as a layer over RLI's existing Responsible Recruitment Due Diligence Toolkit training. Previously, we launched the program in selected locations in Asia for both suppliers and recruitment agents used by suppliers. In FY25, this program was expanded to additional selected Tier 1 finished goods and Tier 2 material suppliers who employ foreign migrant workers. These suppliers participated in a training equipping them with tools to identify and address gaps in their foreign migrant worker recruitment processes. After the training, suppliers were invited to join the first phase of the capability building program where they applied these learnings to identify gaps in their foreign migrant worker recruitment systems. During this first phase, the suppliers identified gaps and areas of improvements in the recruitment process of their foreign migrant workers. During the second phase of the program, these suppliers focused on leveraging the provided third-party consultation service to address

these gaps and strengthen their systems.

In addition to location-specific programs, NIKE frequently convenes supplier events, or learning communities, designed to share information on NIKE expectations, local policy and legislative developments, and other sustainability and labor best practices. These learning communities include topics related to management of migrant workers. For example, in FY25, we organized multiple local learning community meetings for selected Asian and Middle Eastern suppliers who employ foreign migrant workers. Suppliers discussed various topics in these meetings, including overall human rights due diligence, new legal requirement updates and emerging risks related to the employment of foreign migrant workers from key hiring corridors. They also shared learnings gained from the ongoing responsible recruitment programs mentioned in the previous paragraph. The learnings from the discussion will be incorporated in the supplier-maintained foreign migrant workers management handbook. The International Labour Organization and International Finance Corporation's Better Work Programme and recruitment agents attended one of these events, focusing on a comprehensive awareness of foreign migrant worker management and post-recruitment support for both workers and suppliers.

## COLLABORATIVE SOLUTIONS

NIKE believes addressing the complexity of critical human rights risks, such as forced labor and child labor, often requires precompetitive collaboration across suppliers, CSOs, and governments. We engage with multi-stakeholder working groups to assess industry solutions that will help preserve the integrity of global supply chains. NIKE has long partnered with multi-stakeholder and external organizations such as the Fair Labor Association, the International Labour Organization and International Finance Corporation's Better Work Programme to address labor risks in our supply chain.

NIKE is a founding signatory to the American Apparel and Footwear Association & Fair Labor Association's Apparel & Footwear Commitment on Responsible Recruitment. The principles of the Commitment, center on addressing risks for forced labor are aligned with NIKE's standards and the work we have been doing with our supply chain for more than a decade. We believe this builds on the focus by several other sectors to drive change in the dynamics of how workers are recruited, including cross-border employment. NIKE is also a member of the Leadership Group for Responsible Recruitment (LGRR), an initiative of the Institute for Human Rights and Business and is a member of the Responsible Labor Initiative (RLI), an initiative of the Responsible Business Alliance (RBA) to further our work and goals on eliminating forced labor risks in our supply chain. Each organization helps us advance core aspects of our strategy.

NIKE works collaboratively with a number of CSOs to address forced labor. As appropriate, NIKE forms strategic partnerships with select CSOs to provide location-specific resources to suppliers. For example, through one strategic partnership, all applicable Tier 1 finished goods and Tier 2 material suppliers employing foreign migrant workers have access to a program enabling on-site support, expert consultation and ongoing engagement with workers and supplier management. We continue to collaborate with industry experts, partners, industry associations, stakeholders and other organizations to understand, evaluate and address matters related to forced labor and child labor. We also continue to expand and evolve our work with other industry peers and CSOs to increase respect for human rights and to accelerate positive impact in the countries and regions where we and our suppliers operate. For more information about our work, please see the Responsible Sourcing section of our [NIKE website](#).

## VIII. ASSESSING THE EFFECTIVENESS OF OUR PROGRAM

To assess the effectiveness of the policies and procedures we have in place to address the risk of forced labor and child labor, we regularly review the results of our due diligence efforts, third-party audits, remediation measures, and the number and type of complaints received through NIKE's Speak Up Portal and other reporting mechanisms. NIKE regularly reports on the status of our work addressing the risks of forced labor and child labor through the [NIKE website](#).

### **UK Modern Slavery Act**

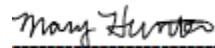
NIKE Retail B.V. (Nike UK), a subsidiary of NIKE, Inc., is required to publish a statement pursuant to the UK Modern Slavery Act. This statement was approved by the Board of Directors of Nike UK on November 04, 2025 and signed by the undersigned, a director of Nike UK, on November 04, 2025.



Milou Meijer, Director, NIKE Retail B.V.

### **Australian Modern Slavery Act**

Nike Australia Pty Ltd (Nike Australia), a subsidiary of NIKE, Inc., is required to submit a statement pursuant to the Australian Modern Slavery Act. Nike Australia has its headquarters in Melbourne and distributes, sells and markets NIKE athletic footwear and apparel. Nike Australia operates retail outlets in Australia and sells on wholesale basis in Australia and in the Pacific Islands. Nike Australia has approximately 600 employees engaged in administrative functions and retail sales. It does not engage in manufacturing and its supply chains are largely the same as for NIKE as a whole and principally managed as part of NIKE's global sourcing and manufacturing process. Accordingly, the policies and procedures described earlier in this statement apply on a global basis unless otherwise indicated, including to Nike Australia. We do not believe there are modern slavery risks unique to Nike Australia. Nike Australia does not own or control any other entities. This statement was approved by the Board of Directors of NIKE Australia on November 4, 2025 and the undersigned, who is a member of that Board, has been authorized to sign this statement.



Mary I. Hunter, Director, Nike Australia Pty. Ltd.

### **Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act**

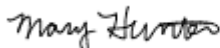
NIKE Canada Corp. (NIKE Canada), a subsidiary of NIKE, Inc., is required to submit a report pursuant to the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. NIKE Canada distributes and sells NIKE athletic footwear and apparel in Canada. NIKE Canada has approximately 1,350 employees engaged in wholesale, retail sales and working at distribution centers. NIKE Canada's supply chains are largely the same as for NIKE as a whole and principally managed as part of NIKE's global sourcing and manufacturing process.

The policies and procedures described earlier in this statement apply on a global basis unless otherwise indicated, including to NIKE Canada. We do not believe there are forced or child labor risks unique to NIKE Canada. NIKE Canada does not own or control any other entities.

This report was approved by the Board of Directors of NIKE Canada on November 4, 2025.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind NIKE Canada Corp.



Mary I. Hunter, Director, NIKE Canada Corp.  
November 4, 2025