California Transparency in Supply Chains Act of 2010 (SB 657) and UK Modern Slavery Act 2015 Disclosure Statement

For Fiscal Year ending December 31, 2020, as approved by the Board and signed by Fanatics, Inc.’s CEO, Doug Mack, on April 9, 2021

Fanatics, Inc. (“Fanatics”) is committed to improving fair labor practices throughout its business and supply chain, and to ensuring that it complies with all applicable laws related to slavery and human trafficking. We refer to both California’s Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act 2015 together as (the “Acts”). This statement discusses Fanatics’ global business practices to address forced labor. However, not all of our consolidated subsidiaries are subject to the Acts.

California’s Transparency in Supply Chains Act of 2010 requires certain retailers and manufacturers to provide increased visibility into their efforts to address the global issues of slavery and human trafficking to allow consumers to make more informed choices regarding their purchasing decisions.

The UK Modern Slavery Act 2015 requires certain commercial organizations to set out the steps they have taken to ensure that slavery and human trafficking are not taking place in their supply chains or any parts of their business.

Fanatics’ Business and Supply Chain

As the global leader in licensed sports merchandise, Fanatics is changing the way fans purchase their favorite team apparel and jerseys through an innovative, tech-infused approach to making and selling fan gear in today’s on-demand culture. Powering multi-channel commerce for the world’s biggest sports brands, Fanatics offers the largest collection of timeless and timely merchandise whether online, in stores, in stadiums or on-site at the world’s biggest sporting events. Fanatics operates from various global locations across the USA, Europe (including the UK) and Asia. Fanatics grows its business both organically and inorganically, through acquisitions of other companies and assets. Fanatics’ Sustainability team works to integrate acquired businesses into our global policies and processes over time.

Fanatics uses the services of third parties to manufacture apparel, headwear, accessories and other products (“Private Label Suppliers”). Fanatics publishes and regularly updates its Global Supplier List, which can be found here: https://fanaticsinc.com/wp-content/uploads/2021/02/Fanatics-Brands-Supplier-List-2020-1.pdf

Fanatics employs an internal Sustainability team, which reports into Fanatics leadership. The Sustainability team develops labor goals and targets in alignment with guidance from Fanatics’ key partners and suppliers. On a regular cadence, Fanatics leadership reviews progress toward key labor goals and targets.

Fanatics’ Workplace Code of Conduct and Related Policies

Fanatics is committed to supporting the aims of the Acts and sets high standards in acting ethically and with integrity in its business and commercial relationships.
Fanatics has taken steps in updating, maintaining and promoting our internal conduct policy, which requires our employees to uphold high ethical standards and to act with integrity in our business relationships.

Private Label Suppliers are obligated to comply with Fanatics’ Workplace Code of Conduct, which aligns with the Fair Labor Association Workplace Code of Conduct, a set of global factory working condition standards developed by the International Labor Organization (ILO). These standards are designed to protect workers’ rights and prohibit, amongst other things, forced labor. Certain Fanatics subsidiaries are affiliated with the Fair Labor Association as Participating Companies and/or Collegiate Licensees.

Identification and Management of Risks

Fanatics has taken steps to monitor potential risk areas of our business and supply chains as part of our ongoing business-wide practices. Fanatics conducts a risk assessment for any potential Private Label Suppliers that will be manufacturing apparel, headwear or other products on behalf of Fanatics before approving production of any products by such party.

The COVID-19 pandemic has had widespread health and economic impacts across the globe. During these unprecedented times, Fanatics is committed to working closely with our Private Label Suppliers, not only to identify ways to promote business continuity, but also to lessen negative impacts on workers. Additionally, we are tracking national health and safety directives, as well as compensation requirements regarding COVID-19, within our countries of manufacture. In this process, we are engaging with our Private Label Suppliers both to reinforce an understanding of, and adherence to, these directives and requirements, so that the health and safety of workers, as well as legally mandated compensation and benefits, are prioritized.

Verification, Due Diligence Processes and Assessment of our Supply Chain

Prior to being on-boarded by Fanatics, new Private Label Suppliers are required to undergo an audit by Fanatics, which, among other things, assesses whether the proposed Private Label Supplier is in compliance with Fanatics’ requirements, including the Workplace Code of Conduct, and looks for evidence of forced labor.

Certification

Private Label Suppliers are required to sign an Annual Compliance Commitment Certification, certifying compliance with the Workplace Code of Conduct, and to maintain records that are sufficiently detailed to substantiate its compliance with applicable anti-slavery and human trafficking laws and produce such records upon request. In addition, contracts between Fanatics’ and its Private Label Suppliers require compliance with our Code and all applicable laws, rules and regulations. Appropriate anti-slavery and human trafficking language is included in relevant contracts.

As a general matter, Fanatics has the right to terminate relationships with suppliers if Fanatics believes such third parties are in violation of the Workplace Code of Conduct (if applicable) or applicable law.

Audits, Monitoring and Key Performance Indicators

Fanatics has taken steps for continued monitoring of the business and supply chains operated by Fanatics.

Once engaged, Private Label Suppliers are periodically, and at least annually, assessed against the Workplace Code of Conduct through announced and/or unannounced audits by both the Sustainability team as well as independent third-party monitors that are retained by the Sustainability team. As part
of these audits, Private Label Suppliers are expected to provide relevant records demonstrating compliance and to allow the Sustainability team and/or independent monitors to interview the Private Label Suppliers’ personnel. The Sustainability team works with Private Label Suppliers to remEDIATE issues identified as part of such audits; if such issues cannot be remediated in a satisfactory and/or timely manner or if the Private Label Supplier fails to submit to the audit, then Fanatics may take action, up to and including termination of the relationship with the Private Label Supplier.

On an annual basis, the Fair Labor Association (FLA) conducts a comprehensive, programmatic evaluation, including an evaluation of Fanatics’ supplier monitoring program, and provides feedback to Fanatics on areas for improvement. Fanatics strives to incorporate the FLA’s feedback into our Sustainability team’s work.

Training

The Sustainability team is trained on human trafficking and slavery laws and related matters. In addition, selected associates and management directly involved in the Fanatics supply chain and procurement functions receive training on the Workplace Code of Conduct, which includes a review of the forced labor code element and benchmarks, the characteristics of forced labor and human trafficking, and actions to take in response to a suspicion of the presence of forced labor at a Private Label Supplier facility. Fanatics conducts training on an annual basis.

Fanatics conducts training on our Workplace Code of Conduct during the Private Label Suppliers onboarding process as well as annually in conjunction with our auditing process. The Sustainability team deploys additional training to third-party agents and other partners along our supply chain as needed.

Accountability and Reporting

All Fanatics employees are expected to conduct business in a legal and ethical manner. In addition, employees and management who support Fanatics’ supply chain and procurement functions are expected to follow procedures regarding notification of suspected slavery and human trafficking. Failure to comply with these requirements may result in disciplinary action.

The Sustainability team provides Fanatics’ employees and supplier partners with a grievance channel email address for reporting of any violations of Fanatics’ Workplace Code of Conduct, inclusive of forced labor. Any reports submitted via this grievance channel are received and appropriately addressed directly by the Sustainability team.