	Governance and Policy Commitments			
Awareness and Commitment				
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response	
A.1.2	Commitment to respect the human rights of workers	Has your company made a formal commitment (e.g. adopted a policy) to address human trafficking and forced labor?  Please include a link to the commitment.	Yes. Under Armour has joined the Fair Labor Association (FLA) as a Participating Company and currently is in the initial implementation period of that membership. As part of that membership, Under Armour requires the independent third-party manufacturers (hereinafter "manufacturers" or "suppliers") that assemble its products to comply with the FLA's Workplace Code of Conduct (the "FLA Code" (http://www.fairlabor.org/our-work/code-of-conduct) and meet its associated compliance benchmarks (http://www.fairlabor.org/sites/default/files/fla_complete_code_and_benchmarks.pdf), which among other things, prohibits the use of forced labor, including prison labor, indentured labor, bonded labor, and other forms of forced labor. This subminision and the individual responses contained within it summarizes aspects of Under Armour's Sustainability and Corporate Social Responsibility (CSR) (collectively, hereinafter "Sustainability") program, efforts and initiatives. Other summary information about Sustainability may be found on other pages of the Corporate Responsibility section of the uabiz.com web site, which will be amended in the future.  Under Armour's Supplier Code of Conduct also states that Under Armour will not purchase products or components thereof from suppliers that use forced labor, whether in the form of prison labor, indentured labor or bonded labor, or otherwise, or permit their suppliers to do so. (http://www.uabiz.com/company/corpResponsibility.cfm). Finally, Under Armour's Sustainability Program's leader is a member of the the FLA's Monitoring Committee, which plays an important role in operationalizing the work of the FLA and addressing ongoing core work, and emerging and changing, issues, trends and risks.	
Supply Chain Standards				
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response	
A.1.2	Commitment to respect the human rights of workers	Does your company have a supply chain standard that requires suppliers to uphold workers' fundamental rights and freedoms, including the elimination of forced labor?  Please include a link to the standard, and provide information on how frequently the standard is updated.	The FLA Code and UA Code reflect and embody the International Labor Organisation's Core Labour Standards and related conventions and through them we seek to require manufacturers to respect workers' rights. Additionally, manufacturers are expected to sign a Manufacturing Agreement requiring them to adhere to these two codes of conduct including compliance with applicable benchmarks. Under Armour's Manufacturing Agreement also requires compliance with all applicable local, state, federal, national and international laws, rules and regulations including those relating to workers' fundamental rights and freedoms and forced labor. The FLA and Under Armour Codes are periodically reviewed including presently, which should result in the revision of the Under Armour Code in the near future based upon the foregoing and other information.  (http://www.uabiz.com/company/corpResponsibility.cfm)  Under Armour's Sustainability Council, which is cross-functional committee comprised of senior and operationally responsible Business Unit leaders, including those from Sourcing, Supply Chain and Materials, meets periodically and is, among other things, charged with periodic reviews of issues, risks, findings and trends from and related to assessments of manufacturers for compliance with laws, the Codes and the benchmarks and seeking to incorporate process and operational improvements based upon the results of its Sustainability program and related due diligence efforts.	
Management CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response	
B.1.1	Responsibility and resources for day-to-day human rights functions	Who within your company is responsible for the implementation of your company's supply chain policies and standards relevant to human trafficking and forced labor?  Please indicate the committee, team or officer, and describe the scope or their responsibility and how they interact with other internal teams, groups or departments	At Under Armour, the Sustainability team is primarily responsible for the implementation of policies and standards related to human trafficking and forced labor. The team is led by the Vice President of Sustainability and Corporate Social Responsibility and Managing Counsel, who reports to Under Armour's General Counsel, who is a Senior Vice President and the head of Under Armour's Legal Team. The Sustainability team has staff based in Central America, South-East Asia, and in the United States including those based in Under Armour's global corporate headquarters in Baltimore, Maryland.  While the Sustainability team leads Under Armour's efforts to ensure that human rights are upheld throughout its supply chain, the team also works closely and/or in partnership with many business units and their leadership including with our Supply Chain, Strategic Sourcing, Materials, Planning, Finance, Logistics, Corporate Facilities teams, among others, to discuss and address current issues and risks including those related to Sustainability, forced labor and human trafficking.	
Training				
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response	

B.1.5, B.1.7	Training on human rights, Engaging business relationships	Does your company conduct training programs for internal decision-makers and suppliers' management teams on risks, policies and standards related to human trafficking and forced labor (this may include training on elements such as passport retention, payment of wages, and vulnerable groups such as migrant workers)?  Please describe.	Members of the Sustainability team attend trainings and webinarsincluding those held by industry leaders on topics related to current industry related labor issuesand risks — including those related to human trafficking and forced labor.  Under Armour audits suppliers in accordance with the FLA's Sustainable Compliance Initiative, uses FLA audit instruments and assessment tools which feature questions regarding the employment of migrant workers and assess forced labor human trafficking and other risks, policies, standards, and noncompliance. Under Armour's Sustainability team conducts biannual trainings on its assessment methodology for all auditors who conduct Under Armour's supplier assessments. The Sustainability team also sends its auditors materials on region-specific labor issues for individual areas where the assessed facilities are based. We are currently developing training for other departments at Under Armour that have close working relationships with the supply chain on how to recognize risks in select areas.
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
A.1.4	Commitment to engage with stakeholders	In the last three years, has your company engaged on human trafficking and forced labor, especially as it relates to the supply chain a) with local stakeholders such as NGOs, trade unions or policy makers or b) in multistakeholder initiatives?  Please describe with whom your company has engaged, the purpose of the engagement and how it relates to forced labor and human trafficking in the supply chain, and your company's role and level of engagement.	In 2014, Under Armour became a Participating Company member of the Fair Labor Association, a key multi-stakeholder initiative. Under Armour uses the FLA's Sustainable Compliance Initiative assessment methodology to further strengthen its approach to assessing and supporting suppliers in implementing sustainable improvements. These improvements cover a broad range of issues, including forced labor and human trafficking.  Under Armour instructs the third-party assessment firms that conduct manufacturer assessments to engage, where possible for them, with relevant regional and national NGOs prior to conducting assessments of manufacturers. This approach is aimed at providing our third-party assessment firms with additional local context for their assessments, including information about any special or specific regional risks or history related to forced labor and human trafficking.

Traceability and Risk Assessment			
Traceability and Risk Assessment			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
D.2.3	Mapping and disclosing the supply chain	Please describe your company's supply chain tracing processes.  Does your company publicly disclose a) the names and locations of first-tier suppliers, and b) some information on suppliers beyond the first tier?  If yes, please provide a URL	Under Armour maintains a tier one supply chain list for both direct production locations and licensee production facilities, as well asinformation about suppliers in other supply chain tiers and processes. Suppliers, including those that assemble products, are assessed using the Fair Labor Association's Sustainable Compliance Initiative's assessment methodology. Under Armour's supplier names and locations are not currently publicly available, but applicable facilities are disclosed to the Fair Labor Association.
Risk Assessment			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	Please describe your companies' risk assessment processes.  Please include specific examples of when your company has conducted of forced labor risk or impact assessments focused on a particular commodity, region or group (e.g. migrant workers in a specific context), as well as the forced labor risks identified through these risk assessment processes (e.g. high risk commodities or high risk sourcing countries).	Under Armour is in the process of finalizing enhancements of its due diligence and impact assessment processes including a focus on the United Nations Guiding Principles on Business and Human Rights. These enhancements will draw upon on a diverse set of qualitative and quantitative sources to seek to systematically identify key country-level human rights risk areas as well as micro-level risk assessments. The results of this process will help inform the Sustainability program's community- and factory-level due diligence efforts. These enhancements will give increased attention to risks including to forced labor risks. Under Armour is also analyzing its historical assessment trends as well as endeavoring to better understand, and to continue to address, projected labor practices risks, including forced labor and human trafficking risks, across its supply chain, with particular emphasis on assessed or audited facilities. This work is expected to provide further insights on how Under Armour can continue to better proactively manage risks in the future for particular issues, regions, countries, and types of suppliers.  Under Armour manufacturers that indicate that they employ migrant workers undergo specific assessments concerning risks related to the employment of migrant workers.

Purchasing Practices			
Purchasing Practices CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
CHRB Beliciillark	Benchmark Description	reporting request	Under Affiliati Response
D.2.2	Aligning purchasing decisions with human rights	Does your company make an effort to avoid purchasing practices that increase the risk of human trafficking and forced labor in the supply chain (e.g. short-term contracts, excessive downward pressure on pricing, sudden changes of workload?)  Please elaborate.	As part of its FLA membership, Under Armour continues work aimed at implementing the FLA's Principles of Fair Labor and Responsible Sourcing and Production. Under Armour's Sustainability department's headquarter team members are deliberately located on, and within, the same floor and same area, as key supply chain and sourcing team leaders and members. The Sustainability team provides up-to-date information about suppliers' social and environmental compliance to corresponding sourcing personnel and seeks to work with them and new facility onboarding personnel as part of an integrated and cross-functional effort to avoid purchasing practices that increase the risk of human trafficking and forced labor in the supply chain (e.g. short-term contracts, excessive downward pressure on pricing, sudden changes of workload: among other instances, these issues are addressed in the Sustainability council meetings and meetings with other internal and external Under Armour employees, manufacturers and licensees, among others. This enables the Sustainability and Sourcing teams to collaborate and to seek to work with manufacturing business partners that over time strive to perform better on key labor and other rights performance indicators.
Supplier Selection			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
B.1.7	Engaging business relationships	Does your company assess risks of forced labor at potential suppliers prior to entering into contracts with them (this may include aspects such as passport retention and payment of wages)?  Please describe.	Under Armour's Sustainability team's practice is to engage a third-party assessment firm or assessors to conduct an initial factory assessment prior to placing production orders. This assessment includes a comprehensive review of supplier practices, including the accurate payment of wages, review of issues and risks of, forced labor, and the Dhaka Principles for Migration with Dignity (the "Dhaka Principles"). Under Armour's assessment tools include FLA assessment tools, the SCI methodology and benchmarks and questions regarding the employment of migrant workers and aspects of the Dhaka Principles.
-		How does your company take into consideration the capacity of suppliers to meet fluctuating demands (to reduce the risk of undeclared subcontracting)?	In substance, and among other things, sourcing and other personnel periodically evaluate order placement relative to observed and stated production capacity. Under Armour prohibits subcontracting without express prior written authorization from Senior Sourcing Personnel, and assessments of subcontractors, including by the companies that directly engage, and work, with them, are expected to be conducted to assess legal and Under Armour/FLA Code of Conduct and benchmark compliance.
Integration into Supplier Contracts			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
B.1.4.b	Communication/dissemination of policy commitments to business relationships	Does your company integrate its supply chain standards addressing forced labor and human trafficking into supplier contracts?	Under Armour's manufacturing agreements include requirements of compliance with all applicable laws and the Under Armour and FLA Codes and benchmarks, which include provisions that prohibit forced labor.
Cascading Standards CHRB Benchmark	Benchmark Description	Describe Describe	Under Armour Response
A.1.2	Commitment to respect the human rights of workers	Reporting Request Does your company have a process to cascade standards on forced labor down the supply chain (e.g. requiring first-tier suppliers to ensure that their own suppliers implement standards that are in line with the company's standards)?	Under Armour seeks to actively promote better practices within its supply chain. It seeks continuous improvement in collaboration with manufacturing partners, requires them to undertake efforts to ensure subcontractor compliance with applicable laws and the codes and benchmarks and is evaluating opportunities to further support first-tier suppliers in managing related risks for other supply chain tiers.
Recruitment		Please describe.	
Recruitment Approach			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
D.2.5.b	Forced Labor - Debt bondage and other unacceptable financial costs (in the supply chain)	Please describe your company's recruitment approach, including  a) whether your company requires recruitment agencies in its supply chain to uphold workers' rights (this may include aspects such as written contracts, access to passports, and regular payment of wages), b) whether it has a policy on direct employment (i.e. a policy prohibiting suppliers in its supply chain from using recruitment agencies), and c) whether it requires suppliers to disclose to the company the recruiters that they use.	The third-party assessment firms that, and assessors who, conduct Under Armour's social and environmental assessments are required to review issues related to the use of recruitment agencies. If the use of a recruitment agency is found, assessment firms are expected to report to Under Armour on risks posed by the agency's practices and Under Armour engages with manufacturers about related issues. The assessment tools and reports address risks related to the employment of migrant workers including passport retention, wage payment, recruitment fees, deductions from pay, expenses, etc. Assessment firms are expected to report all violations of the Under Armour and the FLA code and benchmarks, which Under Armour addresses directly with manufacturers.
Recruitment Fees CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
D.2.5.b	Forced Labor - Debt bondage and other unacceptable financial costs (in the supply chain)	Please describe your company's approach to recruitment fees in the supply chain, including whether your company requires that no fees be charged to supply chain workers during recruitment processes, and whether and how your company ensures that fees paid by workers are reimbursed.	Every Under Armour social and environmental assessment requires assessment firms to review whether, and how, suppliers work with recruitment agencies. If the use of recruitment agencies is found, Under Armour's assessment firms are directed to report on the nature and
Recruitment Audits			
CHRB Benchmark - Worker Voice	Benchmark Description	Reporting Request  Does your company audit recruiters used in its supply chain, to assess risks of forced labor and human trafficking, and/or require suppliers to audit their recruiters?	Under Armour Response  Under Armour recognizes the importance of promoting better practices concerning the employment of migrant workers and to address issues posed by recruiting firms that may work with its contracted factories. We seek continuous improvement by collaborating with our manufacturing partners who may engage directly and/or indirectly with the recruiting firms. We will continue to evaluate and assess additional opportunities for promoting, as needed, improved practices by, recruiting firms.
Communication of policies to workers			

CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
B.1.4.b	Communication/dissemination of policy commitments to business relationships	Please describe how your company communicates its human trafficking and forced labor related policies and standards to workers in its supply chain, and whether your company makes its policies and standards available in the languages of suppliers' workers (including migrant workers).	The FLA Workplace Code of Conduct and Under Armour's Code of Conduct each include a Forced Labor provision. Under Armour contractually requires suppliers to abide by the FLA and Under Armour Codes of Conduct and the FLA's benchmarks, including those that prohibit forced labor. Under Armour provides suppliers with access to the FLA's translation of its code in many languages around the world. Our Management Action Plans (MAP) that are crafted to address issued raised by manufacturer assessments may require that the manufacturers: prominently post the code in the languages spoken by workers and their managers; post them in prominent areas; and send to Under Armour's Sustainability team their plans on how to internalize and adhere to these standards. Under Armour requires all suppliers to translate its Code of Conduct into the languages spoken by its workers, including those of migrant workers. MAP may include specific requirements for manufacturers to periodically train workers, supervisors, and other employees in managerial positions on all of the code's standards. These training sessions are expected to be documented, to include interactive question and answer time, and to be conducted in (and include materials in) applicable dialects. Factories are required to address the FLA and Under Armour's Code of Conduct in meetings with newly hired personnel, with related training documentation to be included within each worker's personnel file.
Worker Empowerment			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	Please explain how your company encourages its suppliers to ensure workplace environments where workers are able to organize, including through alternative forms of organizing, where there are regulatory constraints on freedom of association.	The FLA and Under Armour's Codes of Conduct specifically include provisions on Freedom of Association and Collective Bargaining that are based upon, and reflect Core ILO Labour Standards and related Conventions. Manufacturers are contractually required to abide by our code of conduct and the FLA Code and related benchmarks that require the recognition and respect of workers' legal rights to Freedom of Association and Collective Bargaining. We require manufacturers to post the FLA and Under Armour Codes of Conduct in the languages spoken and understood by their employees and managers. In Management Action Plans, we require manufacturers to develop and improve, as needed and over time, Industrial Relations policies and procedures and systems that are aimed at ensuring compliance with applicable laws, code provisions and benchmarks. Within and/or in connection with, our Management Action Plans for assessments, we encourage manufacturers to ensure a workplace free of interference and retaliation. We also contracturally require manufacturers to abide by the Under Armour Code and the FLA Code and related benchmarks that require the recognition and respect of workers' legal rights to Freedom of Association and Collective Bargaining. We require manufacturers to post versions of the FLA and Under Armour Codes of Conduct in the languages understood by their employees and managers. We encourage manufacturers to ensure a workplace free of interference and retaliation of any form. In certain cases manufacturers may benefit from additional expertise, resources, or structure, so we may require a factory's management to hire a third-party firm to conduct focused, short-term training and capacity building. Finally, we have engaged in a pilot project involving specific and focused procedures, mechanisms and structures aimed at supporting worker feedback to, and participation with, factory management to address possible/reported structural or local issues or challenges.
Crisusana Machanian			
Grievance Mechanism CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
C.1, C.5	Grievance channels/mechanisms to receive complaints or concerns from workers; Commitment to non retallation over concerns/complaints made		Under Armour conducts annual social and environmental compliance assessments in its supplier factories. We require our assessment firms to provide workers who participate in assessment interviews with local contact information that workers can later use and share with others to evoice grievances. Under Armour also receives workers' concerns through assessment firms and our engagement with civil society organizations in manufacturing countries where we employ full-time Sustainability personnel. Workers also have access to the Fair Labor Association's third-party grievance mechanism when they need to raise concerns about violations of the FLA code. Under Armour requires factories to identify the person who will develop and implement comprehensive written grievance policies and procedures. These years must include the means for workers to directly and confidentially report grievances to top management or human resource personnel without supervisors' knowledge and any reprisal or retaliation. Factories must keep a grievance register that covers their date and nature, along with actions taken to address them. We periodically receive grievances directly from workers and/or groups that work with and/or represent them including labor rights organizations and trade unions and/or through the Fair Labor Association and/or other brands with which we collaborate to address issues raised.
Monitoring			
Auditing Process			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response

Under Armour's practice is to strive to conduct annual social and environmental compliance assessments for active manufacturers through

B.1.6	Monitoring and corrective actions	Please describe your company's supplier auditing process including whether the process includes  a) scheduled and non-scheduled visits, b) a review of relevant documents (documents may include wage slips, information on labor recruiters, contracts, etc.), and c) interviews with workers	Under Armour's practice is to strive to conduct annual social and environmental compliance assessments for active manufacturers through third-party assessment firms and assessors, some of which have been accredited by the FLA and at one of this is itself a NGO as well as an assessment firm. Most of our assessments are semi-announced, which means that assessment firms provide suppliers with a two-week window during which the assessment will occur. In factories with identified transparency issues, assessments are not announced. In certain cases, assessments are unannounced, Under Armour's assessment methodology and processes mirror that of the FLA and include:  1) Before the assessment is conducted, we expect our assessment firms to consult, and engage with, where possible for that firm, civil society organizations in the manufacturing country and/or region. This process enables our assessment firms to understand the local challenges and history of issues at the factory.  2) A comprehensive view of the worker lifecycle in the factory from hiring to termination, as well as how it crosses the management and employment functions related to policies and procedures, training; implementation; communication; responsibility/accountability, and review process. Under Armour's assessment process also includes a comprehensive review of records that include worker request forms, application forms, and employment contracts; worker files and payroll records, including timecards and termination documentation.  3) Worker interviews: Our assessment firms strive to sample at least 10% of a factory's worker base, and our process is based on the FLA's worker interviews sample chart that is currently used by the FLA's internal and external assessment firms. Initial Management Action Plans are provided by our assessment firms to factory management for their review and immediate action. Under Armour's Sustainability department then reviews all assessment reports and produces a Management Action Plan (MAP) that formally conveys to suppli
Audit Disclosure			
CHRB Benchmark	Benchmark Description	Reporting Request	Under Armour Response
B.1.6	Monitoring and corrective actions	Does your company disclose a) the percentage of suppliers audited annually b) the percentage of unannounced audits c) information on who carried out the audits (this may include further information on the expertise of auditors such as relevant certifications, in cases where third-party audits are used, the names of the auditors, and in cases where internal auditors are used, details on department/team/grou within which the auditor(s) sits), and d) a summary of findings, including details of any violations revealed? Please provide a URL with the relevant information.	
Remedy			
Corrective Action Plans			
CHRB Benchmark	Benchmark Description		Under Armour Response
B.1.6	Monitoring and corrective actions	Does your company have a process for creating corrective action plans when violations are discovered through an auditing process?  Please describe this process and the elements of a corrective action plan.	After supplier assessments are conducted, Under Armour requires assessment firms to provide factory management with the Initial Management Action Plan. Assessment firms request that suppliers immediately address the issues identified and submit to Under Armour any supporting evidence that is available at the time. Once assessment firms so build their assessment reports to Under Armour, our Sustainability department creates a Management Action Plan based on the findings identified. Corrective Actions are categorized into "Immediate Action Required" and "Sustainable Improvement Required". Factory management has a maximum of seven days to address "immediate Actions Required", which largely relate to issues that can be fixed quickly, For "Sustainable Improvement Required", Under Armour allows a longer timeframe, usually 30-45 days. Actions related to "sustainable Improvement" are generally needed to create a management system that includes the establishment of policies, procedures, training, communication, accountability, and the review/update process. They are intended to instill lasting change. Additionally, we may direct and/or require manufacturers to engage firms to help upport and document their remediation of identified issues and to enhance and/or build sustainable compliance systems, procedures and processes.
Remedy			
CHRB Benchmark	Benchmark Description		Under Armour Response
C.7	Remedying adverse impacts and incorporating lessons learned	Does your company have a process to provide remedy to workers in its supply chain in cases where violations are discovered, including for responding to instances of forced labor and human trafficking? If yes, please provide examples of outcomes.	Under Armour's Sustainability department has an established process that seeks to remedy violations of the FIA code and benchmarks once they are identified during the process of creating supplier Management Action Plans. We seek to use the information gained from assessments, garnered from education, training, meetings and publications to shape and help deliver over time improved guidance and capacity building to manufactures through direct, live engagement, in person, by phone and by webinar, for example, and through training and knowledge building, for example, through provided guidance materials, educational materials and trainings, both web-based, in soft copy and in person.