

SUPPLY CHAIN

Topic Summary

We are committed to working within our global supply chains to foster safe, inclusive, and respectful workplaces. We consider "Suppliers" to include any person or entity engaged in the production or provision of materials, components, products, or services that Disney acquires, authorizes or licenses. We collaborate with Suppliers around the world as part of our efforts to identify, prevent, mitigate, and remedy adverse human rights impacts as well as to reduce the environmental impacts of our operations, products, and services.

We purchase an extensive array of products, materials, and services from thousands of Suppliers to support our operations. In addition, Disney-branded products are produced in over 40,000 facilities in approximately 100 countries, creating a highly complex global network of Suppliers, many of whom are part of our licensees' supply chains or are several degrees removed from Disney's direct operations.

Supply Chain Code of Conduct

We expect our Suppliers to uphold the standards of our <u>Supply Chain Code of Conduct</u> (the Code). The Code sets expectations for Suppliers of The Walt Disney Company and its subsidiaries and their respective brands. The Code is integrated into our business operations, as appropriate, including through a range of specific measures to monitor and assess compliance.

International Labor Standards

The Disney International Labor Standards (ILS) program governs labor standards compliance across the supply chain for Disney-branded consumer products. Established in 1996, the ILS program:

- Establishes requirements for licensees and vendors to monitor their supply chains for compliance with the Code, including local labor and environmental laws
- Specifies where products may be produced and the factories authorized to manufacture Disneybranded products
- Sets standards for when, where, and how social compliance audits assess compliance with ILS program standards

- Reviews audit and assessment reports regularly and issues corrective action plans, as appropriate, to promote improvement in working conditions
- Provides guidance, training, and capacity building to vendors and licensees on how to improve the labor conditions of their facilities

The ILS program requires licensees and vendors involved in the production of Disney-branded goods to source and manufacture products from countries that are on Disney's list of Permitted Sourcing Countries, which is updated on a regular basis. To provide further transparency and promote program compliance, we periodically update our published list of facilities producing Disney-branded products that are sold, distributed, or used in our own retail and wholesale businesses, as well as those used in our internal operations, on Open Supply Hub.

In accordance with the ILS program, licensees and vendors producing Disney-branded products in certain countries must conduct audits and provide audit reports on a regular basis. We use ILS audits as a tool to identify and address potential labor-related issues. Audits are generally conducted by either third-party auditors or Disney staff and findings are reviewed for compliance with ILS program requirements. If an audit reveals non-compliance with the ILS program, corrective action plans may be sent to licensees and vendors, who are expected to review them with the facilities they use and implement steps to promptly remedy any identified compliance violations; failure to do so in a timely manner can result in removal of authorization to produce Disney-branded products.

Requirements for our ILS program are described in our <u>ILS Program Manual</u>, as well as in supplemental guides, including those for <u>forced labor</u> and <u>health & safety</u>. The program is informed by our <u>Human Rights Policy</u>, <u>Supply Chain Code of Conduct</u>, and <u>Standards of Business Conduct</u>, along with a range of other responsible business expectations.

Supply Chain Investment Program

To advance labor standards, we collaborate with outside organizations to help incubate and pilot scalable tools and programs through Disney's Supply Chain Investment Program (SCIP). SCIP works to address issues including forced labor, worker voice, supply chain traceability, child labor, and ethical recruitment. SCIP provides grant funding to nonprofit organizations, social enterprises, and various intergovernmental agencies to support innovative solutions that aim to catalyze sector-wide improvement and help enhance supply chain visibility.

Supplier Diversity

A wide range of suppliers in our sourcing process encourages innovative, cost-effective, and high-quality business solutions across the enterprise.

Our strategy focuses on helping meet the company's sourcing needs, including the need for multiple potential sourcing pipelines; enhancing our supply chain; and engaging with the communities where our teams operate.

Our approach is as follows:

- Identify: We work with a wide range of potential vendors to review relevant business criteria, including capabilities, geographical scope, scale, and capacity
- **Develop:** Working with collaborators, we take part in training, mentorship opportunities, and cultivate relationships
- **Connect:** We nurture productive relationships with segment and business unit stakeholders, community organizations, and even customers and guests

Governance

To promote company-wide integration, our Global Products & Labor Standards function, which reports to our Chief Financial Officer, has responsibility for the ILS program. Additionally, the Global Public Policy and Global Ethics and Compliance Management functions, which report to our Chief Legal & Compliance Officer, oversee ethical and human rights policies. The Audit Committee of the company's Board of Directors oversees compliance with applicable laws, regulations and company policies, including those related to ethics, and conflicts of interest, and receives periodic updates on the performance of the ILS program. The Governance and Nominating Committee of the company's Board of Directors oversees the company's human rights policies and receives updates at least annually. This Committee also receives periodic updates on the performance of labor rights in the supply chain. We also have a Director of Strategic Sourcing who reports into our Worldwide Sourcing function, which reports up to our Chief Executive Officer.

Additional Resources

2030 Environmental Goals White Paper

2024 CDP Survey Response

Conflict Minerals Policy

Environmental Policy

Forced Labor Supplemental Guide

Health & Safety Supplemental Guide

Human Rights Policy

Human Rights Webpage

International Labor Standards Program Manual

As of 5/23/25

Management of Chemicals in Consumer

Products UK Modern Slavery Statement

Australia Modern Slavery Statement

Canada Modern Slavery Statement

Paper Sourcing and Use Policy

Permitted Sourcing Countries

Standards of Business Conduct

Supply Chain Code of Conduct

Supply Chain Investment Program

Supplier Diversity

Vendor Portal / Supplier Log In