

Modern Slavery Transparency Statement

Trek Bicycle Corporation and Trek Bicycle Corporation Ltd. (collectively, "Trek") are committed to ensuring that Trek's products are manufactured, produced and sold under conditions of employment that respect workers and their rights. Trek does not use, and does not permit the use of, human trafficking or slavery in the manufacture, production and retail of any of its products. Trek's commitment to this extends throughout its supply chain and is reflected in its business practices, supplier and retailer agreements, and auditing processes.

This statement reflects Trek's commitment to act ethically, with integrity and to comply with the principles of the Modern Slavery Act 2015.

Organizational Structure

Trek Bicycle Corporation Ltd. is a wholly-owned subsidiary of Trek Bicycle Corporation, a U.S.-based, international manufacturer and distributor that sells bicycles and bicycle-related, parts, goods and accessories through a network of independent retailers, distributors, and direct-owned stores in countries around the world.

Trek's Supply Chains

Trek manufactures products in North America and Europe and has forged a global supply chain of manufacturing partners and retailers.

Policies Related to Modern Slavery and Human Trafficking

Trek is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. Trek's practices and procedures reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking does not take place anywhere in Trek's supply chains.

Supplier adherence to Trek's values

In addition, Trek has established supplier agreements throughout its supply chain explicitly requiring that no violation of any federal, state or local law, statute, rule, regulation, ordinance or order will result from the manufacture, production, sale or shipment of any of Trek's goods and that all such goods will comply in all respects with all such laws, rules, regulations, ordinances and orders. Trek is able to terminate its relationship with suppliers if there is a modern slavery or human trafficking breach by the supplier.

Trek expects its suppliers and retailers to share its values on modern slavery and also carry out their own due diligence on their own supply chains to limit the risk of modern slavery taking place.

Due Diligence Processes for Slavery and Human Trafficking

Trek routinely audits facilities throughout its supply chain to ensure that suppliers manufacturing Trek products are in compliance with local laws, rules, and regulations governing human rights and other corporate responsibility initiatives and considerations. These audits include specific checks for human

trafficking, modern slavery, forced/child labour, and employees' freedom of association, as well as interviews of randomly selected employees of suppliers to ensure fair treatment and compensation commensurate with local regulations. Major suppliers are required to disclose their hiring and labour practices on a regular basis by completing detailed supplier profiles. Trek does not and will not tolerate harassment, abuse, or discrimination in any form in any of its factories or suppliers' factories.

Training

Trek has conducted training of its employees who are most likely to interact with its supply chain and/or be in a position to identify acts of modern slavery, human trafficking, or any adverse labour conditions. Trek will also engage in periodic refresher training. Such training provides these employees with the ability to identify areas of concern and resources to address any concerns that may arise. In connection with Trek's audits of suppliers, Trek verifies if there are written policies or training addressing slavery and human trafficking and makes these available to employees.

Risk Review


Trek regularly evaluates the risks of slavery and human trafficking within its own operations as well as throughout its supply chain. Trek has considered: the roles being performed, the geographic location of the operations, and the socioeconomic conditions of the work environment in regard to potential slavery and human trafficking.

Trek's Effectiveness in combating Modern Slavery and Human Trafficking

Trek uses the results of its risk reviews and audits to measure how effective it has been to ensure that slavery and human trafficking is not taking place in any part of Trek's business or supply chains. As a result of the risk reviews, audits and Trek's continued efforts to address slavery and human trafficking, Trek believes these risks to be low.

Following a review of the effectiveness of the steps Trek has taken this year to ensure that there is no slavery or human trafficking in its supply chains Trek intends to take the following further steps to combat slavery and human trafficking: Establish a formal Ethics Policy addressing these issues.

This statement has been approved by the Board of Trek Bicycle Corporation. It is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Trek's Modern Slavery Transparency Statement for the financial year ending 31 December 2020.



Director
Jennifer Naeger

Date: *March 11, 2021*