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BILL S-211 ANNUAL REPORT FISCAL YEAR 2024 ENDED JUNE 29th, 2024

Follett Higher Education Group, LLC

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FOLLETT

Annual Report on Forced Labor and Child Labor Compliance for Follett Higher Education Group, LLC

Fiscal Year 2024: July 2nd, 2023 – June 29th, 2024 (FY24)

Introduction

Follett Higher Education Group, LLC (Follett) is committed to eradicating forced labor and child labor within its operations and supply chains. This report outlines Follett's steps in the previous financial year to prevent and reduce the risk of such practices in compliance with Canadian Bill S-211.

Entity Information

- **Legal Name:** Follett Higher Education Group, LLC
- **Financial Reporting Year:** July 2023 – June 2024 (FY24)
- **First Submission:** This is not a revised report.
- **Submission:** Joint Report for the following entities:
 - Follett Higher Education Group, LLC
 - Follett On Demand (Advanced Online)
 - Willo Labs
 - Follett of Canada
 - Dyehard Fan Supply

Structure, Activities, and Supply Chains

Follett Higher Education Group, LLC (Follett) is an educational services provider operating retail services within the education sector. The company employs ~5,500 employees annually and operates ~1,000 collegiate retail stores in the United States and Canada. Headquartered in Westchester, IL, USA, Follett focuses on providing educational products and services to academic institutions and students. Follett reaches 6 million students and 500,000 faculty, staff, and campus administrators annually. The company partners with thousands of suppliers globally for educational materials, books, apparel, and other products. These products are packaged and distributed through its logistics network.

Policies and Due Diligence Processes

Follett maintains a comprehensive Vendor Code of Conduct (VLCC), which all vendors are expected to follow. The VLCC outlines standards for fair labor practices, wages, benefits, working hours, and workplace safety. While vendors are not universally required to return signed copies, they are required to acknowledge and comply with the VLCC as a condition of doing business.

Follett reserves the right to audit vendor practices and enforce compliance with its VLCC. While the company did not perform audits during FY24, vendors are expected to uphold Follett's standards as a condition of doing business. Follett may assess compliance and take corrective action, including terminating relationships or removing non-compliant merchandise if violations are discovered or

reported. Additionally, Follett maintains a Corporate & Social Responsibility guide to articulate expectations to suppliers further.

Follett team members must adhere to Follett's Code of Conduct (the "Code"), as Follett is committed to conducting business with integrity, fairness, and transparency. All team members are expected to follow ethical standards, comply with laws and company policies, and speak up about any concerns without fear of retaliation. Follett maintains a confidential ethics and compliance reporting line to report violations.

Follett is a proud member of the Fair Labor Association (FLA) and has been since 1995, thereby supporting Follett's commitment to high labor standards.

Governance Structure

The governance structure includes the involvement of the Executive Committee, the Legal Department, and Human Resources Department to ensure effective policies related to forced labor and child labor. Follett enforces the Code and VLCC through appropriate disciplinary actions, up to and including termination of employment and legal action.

Risk Assessment and Management

Follett did not identify any risks of forced labor or child labor within its supply chain or operations during the FY24 reporting period. Follett manages potential risks through its VLCC and internal controls, which outlines standards and allow for enforcement mechanisms if violations are discovered.

Follett recognizes that product categories such as apparel and branded merchandise may carry inherent supply chain risks and will continue to monitor, assess, and update practices accordingly.

Remediation Measures

Follett has established procedures for remediation in case forced labor or child labor is identified. These measures include corrective actions, working with suppliers to develop and implement remediation plans, and terminating relationships with suppliers that fail to comply with the required standards.

Training

In the reporting year, Follett did not implement company-wide employee training focused specifically on forced labor or child labor. Follett store managers and relevant field leadership are required to complete training on state and federal employment law compliance, including the Family and Medical Leave Act (FMLA), the Fair Labor Standards Act (FLSA), the Americans with Disabilities Act (ADA), I-9 verification, and wage law, as applicable.

In FY24, the ESG Director began formal FLA training to enhance internal understanding of best practices in supply chain human rights compliance, which included modules on supplier engagement, working conditions, grievance mechanisms, and remediation. Additional employee-facing supply chain training is being evaluated for future implementation.

Effectiveness Assessment

Follett is developing methods to assess the effectiveness of its efforts to prevent and mitigate forced labor and child labor throughout its supply chain. These could include periodic internal reviews, possible

supplier engagement attestations, leveraging insights from ESG and legal team leadership, and potential collaboration with external partners (such as FLA) to enhance monitoring.

Environmental, Social, and Governance (ESG)

Follett is deeply committed to leading in environmental excellence, recognizing that this enhances competitive strength and benefits customers, clients, and team members. The company is dedicated to sustainable operations, resource conservation, and minimizing environmental impacts.

Summary

Follett Higher Education Group, LLC remains committed to preventing child labor and forced labor within its operations and supply chains. Follett is dedicated to engaging with employees, suppliers, and stakeholders to reduce risk, uphold human rights, and ensure compliance with applicable labor laws.


The company enforces standards through its Vendor Code of Conduct, new vendor onboarding process, employee code of conduct, and relevant training. While Follett did not identify any risks in FY24, it retains the right to assess vendor compliance and take corrective action when necessary. In FY24, no incidents of forced or child labor were found within Follett's operations or supply chains.

Follett's ESG Director completed training through the Fair Labor Association to strengthen due diligence practices. The company continues to evaluate and refine its internal training and assessment systems to align with leading standards in supply chain human rights.

This report is submitted in compliance with Canadian Bill S-211 and reflects Follett's ongoing commitment to ethical sourcing and transparency. For more information on Follett's Vendor Code of Conduct and applicable policies, please refer to Follett's website[www.follett.com].

Approval and Attestation

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending June 29th, 2024. It has been issued on behalf of Follett Higher Education Group, LLC and approved by Mark Sproat, Chief Legal Officer.

Signed by:

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Chief Legal Officer

Date: 5/30/2025