



October 7, 2026

The Honorable Andrew N. Ferguson
Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington D.C. 20580

Re: Gildan Activewear Inc., FTC File No. 2610116

Dear Chairman Ferguson:

We understand that the Federal Trade Commission (the “Commission”) has closed the above-captioned investigation into whether one component of the sales incentive program offered by Gildan Activewear Inc. (“Gildan”) to one of its wholesale distributor customers, S&S Holdings, LLC (the “Distributor”), violated Section 2(a) of the Robinson-Patman Act, as amended, 15 U.S.C. § 2(a).

Gildan’s 2025 sales incentive agreement with the Distributor (the “Agreement”) included a term, inserted at the request of the Distributor, that prohibited Gildan from providing certain pricing and discounts to any other North American wholesale distributor customer (the “Term”). In connection with the closing of the Commission’s investigation, Gildan and the Distributor have amended the Agreement to remove the Term. In addition, the amended Agreement provides: “Nothing in this Agreement restricts or restrains Gildan’s discretion to set prices or offer partnership support to any other North American wholesale distributor.”

Neither this letter nor Gildan’s decision to amend the Agreement constitutes an admission of liability or wrongdoing by Gildan. Gildan is confident that its sales incentive programs with its customers, including its Agreement with the Distributor, are consistent with all applicable laws and regulations, including the Robinson-Patman Act. It remains Gildan’s position that the Term did not harm competition in violation of the Robinson-Patman Act, because, among other reasons, it did not result in a diversion of sales from Distributor’s competitors to Distributor, and the discounts offered to Distributor in the Term were neither economically substantial nor sustained over time.

Sincerely,

Rob Assal
Executive Vice-President
Chief Legal and Administrative Officer
Gildan Activewear Inc.