

# THE VIVIENNE WESTWOOD GROUP MODERN SLAVERY ACT 2015 STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2023

#### 1. INTRODUCTION

This is our eighth statement published pursuant to section 54 of the Modern Slavery Act 2015. The Modern Slavery Act 2015 ("Act") is a piece of legislation enacted in the United Kingdom which aims to prevent and combat slavery, forced or compulsory labour and human trafficking. The term "modern slavery" is a broad term used to encompass the exploitation of people in present-day society which violates their human rights and the most common forms of include human trafficking, slavery, servitude and forced or compulsory labour, which are all offences under the Act.

This statement provides an overview of our business and supply chain. It also sets out the steps taken by the Vivienne Westwood Group during the financial year ended 31 December 2023 to prevent modern slavery and human trafficking potentially taking place in our business and supply chain. This statement is prepared and published by Vivienne Westwood Limited on behalf of the Vivienne Westwood Group, which is made up of a parent company (Latimo S.A.) and its subsidiaries in the United Kingdom (Vivienne Westwood Limited), Italy (Vivienne Westwood S.r.l.), France (Vivienne Westwood S.a.r.l.), the United States (Rio Bravo Inc.) and China (Vivienne Westwood Asia Ltd), as well as a representative office of Vivienne Westwood Limited in Thailand ("Vivienne Westwood Group").

You can find our previous statements by clicking here:

FY2022 Statement

FY2021 Statement

FY2020 Statement

FY2019 Statement

FY2018 Statement

FY2017 Statement

FY2016 Statement

#### 2. OUR BUSINESS

The Vivienne Westwood Group is an independent global fashion house that designs, develops, manufactures, and sells a range of luxury goods, including womenswear, menswear, footwear, accessories, jewellery and homeware, under the Vivienne Westwood brand. Our supply chain plays an important role in the process of bringing our finished products to our customers.

Vivienne Westwood Ltd.

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#### 3. OUR SUPPLY CHAIN

Our supply chain is split into two main streams:

- (A) Operations (product design, development, manufacturing, packaging, delivery and sales); and
- (B) Administration (procurement of complementary or ancillary services and products that support and facilitate our day-to-day operations).

Supply chain streams (A) and (B) above are multi-tiered, extend across borders, and involve thousands of workers located across the United Kingdom, Europe, Kenya, Tunisia, South Korea, Turkey, Japan, Thailand, Hong Kong, China, and United States.

# A. Operations

The product design process is centralised in our head office in London. Our design teams work independently and in collaboration with our trademark licensees to design and develop the range of products we sell each season. Our design teams also collaborate with other brands to bring to market-limited collections of products.

Raw materials used in the manufacturing of our finished products are selected on a per category and per season basis by the Vivienne Westwood Group, our trademark licensees and external manufacturers. We retain final approval on the selection of raw materials unless, by exception, we are collaborating with another brand in which case approval is a joint decision or we have granted an exclusive trademark licence. Our selection process is driven by environmental sustainability goals that support our modern slavery mission. The same goals drive the selection of the raw materials that are used in our retail packaging (the packaging we offer to our customers) and our transit packaging (the packaging that we use to wrap our goods in transit).

As of 31st December, data reveals that in/during the year 2023 a large proportion of our finished products are manufactured by Tier 1 suppliers located in the following territories:

Italy: 30 (thirty)Thailand: 4 (four)

• Turkey: 2 (two)

• United Kingdom: 5 (five)

Portugal: 4 (four)Kenya: 1 (one)Tunisia: 1 (one)Hong Kong: 1 (one)

The remaining proportion of our finished products, consisting mainly of made-to-measure couture pieces, are manufactured directly by our studio in London with the assistance of select European-based ateliers. Our retail and transit packaging, on the other hand, is manufactured in Europe and China.

Once manufactured, our finished products and packaging are delivered to our warehouses in the United Kingdom and Italy for onward despatch via our global distribution channels. Our finished products are available for sale on a seasonal basis to commercial partners, including franchisees, department stores and independent



retailers. Finished products manufactured by our trademark licensees and by our brand collaborators are sold directly to our commercial partners.

Our finished products are also available for sale directly to consumers. Consumers can purchase our finished products online through the e-commerce website accessible from www.viviennewestwood.com and the e-commerce websites of our commercial partners. They can also be purchased offline by visiting one of our retail stores located in Milan, Fidenza, Paris, Giverny, London, Cardiff, Nottingham, Manchester, Glasgow, Leeds, Bicester, Los Angeles and New York, or the retail stores of our commercial partners. Brand collaboration products can sometimes be found on the e-commerce website and in the retail stores of our brand collaborator (when in season).

Production of our rugs, watches, eyewear categories are manufactured by our trademark licensees based in the UK from premises located in China, Hong Kong and in Nepal. We also work with licensees in Japan and South Korea, who produce special collections of bags, small leather goods, eyewear, lighters, soft accessories and RTW which are distributed in those respective countries. Our team works with our UK licensees to ensure they apply consistent standards which align with those adhered to across the rest of VW's supply chain.

#### B. Administration

To support our day-to-day operations, the Vivienne Westwood Group procures a diverse range of services and products. We procure marketing, IT, legal, logistics and auditing services to support sales and operations. We rely on external logistic hubs and external courier suppliers for the transportation of our finished goods. We outsource trademark protection. We also procure stationery, and other administrative equipment and products, including insurance coverage, payment machines, and retail, office and warehouse fixtures and fittings. These services and products form an integral part of our procurement supply chain, which is managed and overseen by our employees in our head offices in London, Milan, Paris, New York, Los Angeles, China and Thailand.

## 4. MISSION

We believe in protecting the dignity and rights of all workers and recognise that modern slavery is a serious crime resulting in abhorrent abuses of human rights throughout the world. We recognise that global fashion supply chains such as ours involve thousands of workers. Accordingly, our mission is to take steps within our business and supply chains that will prevent any of our operations becoming fertile ground for modern slavery. We aim to support local industry while ensuring that applicable human rights and employment laws are always respected.

We are committed to being a responsible business and if we find that one of our suppliers is involved in any modern slavery offences, or is not adhering to our brand's Labour Code of Practice or modern slavery standards, our primary concern will be to protect the safety of affected workers. We will then act to identify the origin of the offence and remedy any failure. This will involve making preliminary enquiries and deciding whether further investigation is warranted. Once we have determined the cause (or causes) of the offence or failure, we will engage with our supplier to agree a corrective action plan. Repeated failures and egregious abuses of human rights within our supply chain, and within those of our suppliers, will not be tolerated. We expect all



our suppliers to embed respect for human rights within their own operations and supply chains.

#### 5. OUR OBJECTIVES

To this end, our objectives are to:

- 1. Identify and monitor modern slavery risk areas in our business and supply chain and make year-on-year progress to address any risks identified and take action to improve outcomes for workers;
- 2. Highlight the risks and impact of modern slavery on our business and supply chain to our employees and suppliers;
- 3. Support local industries while ensuring that employment laws are respected;
- 4. Continue to seek partnerships with independent organisations to support us in our mission to mitigate modern slavery;
- 5. Continue to provide training to our employees, and guidance to our suppliers, on how to identify, manage and mitigate the risks of modern slavery in our business and supply chain; and
- 6. Continue to promote a whistleblowing mechanism for anonymous reporting of suspected and actual modern slavery offences in our business and supply chain for the benefit of our employees and supply chain workers.

#### 6. OUR TOOLS, POLICIES AND PROCEDURES

We have a set of tools that we deploy to help us achieve our objectives and succeed in our mission to combat modern slavery in our business and supply chains. These tools have been produced to help us ensure a consistent approach to identifying, managing and mitigating the risk of modern slavery in our business and supply chains.

We have produced a Due Diligence Questionnaire and Modern Slavery Pack which we send to all our suppliers and business partners to complete and return to us. The pack consists of a suite of documents, including a Code of Labour practice, a Modern Slavery Policy, a Whistleblowing policy and Modern Slavery Reporting Guidelines which all suppliers and business partners are expected to follow.

This pack is for onboarding all our suppliers and has been designed to:

- Help identify and eliminate any modern slavery risk;
- Communicate our position on modern slavery;
- Clarify what we expect from individuals in our business and supply chain partners regarding fair employment practices and safe working environments.
- Provide workers in our supply chain with a whistleblowing mechanism; and
- Provide guidance on what information to include in annual modern slavery reports. Further information on the above documents can be found below.

We also have a set of contractual modern slavery compliance provisions, which we include in contracts with partners and suppliers using a risk-based approach.

#### A. OUR DUE DILIGENCE QUESTIONNAIRE

Our Due Diligence Questionnaire is a tool we have created to onboard new suppliers and collect information from existing suppliers and partners on their awareness of modern slavery legislation, their employment, and health and safety practices, and the tools they use to mitigate the risk of modern slavery in their own supply chains. The Vivienne Westwood Ltd.

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Due Diligence Questionnaire includes a mixture of targeted open and closed questions regarding topics such as business practices, compliance, supply chain, training, policies and workforce. The information we collect through this questionnaire helps us build initial profiles of suppliers and partners. It also helps us assess whether further action or investigation is warranted.

# B. OUR MODERN SLAVERY PACK

## OUR MODERN SLAVERY POLICY

Our Modern Slavery Policy has been produced to bring the requirements of the Modern Slavery Act 2015 to the attention of our suppliers, in addition to the rights and principles enshrined in the United Nation's Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This policy describes how we expect our suppliers to assist us in combatting modern slavery risks throughout our supply chain by providing guidance on how to identify, assess, manage and monitor modern slavery risks.

## OUR CODE OF LABOUR PRACTICE

Our Code of Labour Practice outlines the behaviours we expect our suppliers to adopt and uphold in relation to their own employees and their own supply chain by imposing obligations to adopt fair employment practices, and guarantee safe working environments free from child labour, discrimination, harassment and abuse. Our Code of Labour Practice also requires suppliers and partners to establish and maintain appropriate procedures to evaluate and select their own suppliers based on their ability to meet the requirements of our Code of Labour Practice.

Since 2022, our Italian operating company has adopted a Code of Labour Practice and Business Conduct for all onboarded suppliers which sets out our brand's standards regarding safe and regular labour conditions in the factories and has been updated with additions of clauses pertaining to ethics and integrity, employment of third party country nationals, anti-corruption, conflict of interest, industrial and intellectual property, protection of competition, anti-money laundering, industry and trade to comply with the Italian legislation Model 231.

# OUR WHISTLEBLOWING POLICY

Our Whistleblowing Policy provides a mechanism that enables individuals employed by our partners and/or suppliers to contact us directly to report any potential concerns or suspicion of wrongdoing, unethical practice or criminal acts within the workplace in our supply chain.

Our Whistleblowing Policy lists examples of concerns or suspicion of wrongdoing, unethical practice or criminal acts that can be reported to us. It also provides a whistleblowing report form that individuals forming part of our supply chain can complete and explains how we will respond to any concern or incident reported to us. In 2022, our Italian operating company has substituted the offline physical paper document with a new online Whistleblowing tool for Modern Slavery to modernise the process, in which our Italian suppliers have now access through a QR code that leads to the main page of the software to proceed with any reporting.

#### OUR LETTER OF UNDERTAKING

Vivienne Westwood Ltd.

Furthermore, we ask our direct manufacturing suppliers to read and undersign a letter of undertaking to acknowledge both our Code of Labour standards and Modern Slavery Policy and most importantly, to undertake that they agree to implement our policies step-by-step within their company. In fact, these are all requirements of working with us to ensure that our policies are observed in all the workplaces where our products are manufactured.

Within the letter, we also ask our suppliers to commit to prepare and submit to us no later than 31 March each year an annual report on Modern Slavery and Human Trafficking outlining the steps they have taken, and continue to take, to ensure that there are no cases of human trafficking and slavery in any of their supply chains and in any part of their activities.

#### OUR MODERN SLAVERY ANNUAL REPORTING GUIDELINES

Our Modern Slavery Annual Reporting Guidelines are issued to partners and suppliers that have agreed to annually report to us on the steps they have taken to ensure modern slavery and human trafficking are not taking place in any of their supply chains or in any part of their business. As anticipated in our previous modern slavery statements, data collected from manufacturers with which we have a direct commercial relationship, revealed potential benefits of sharing guidance with our suppliers on the information to be provided in their annual modern slavery reports.

Our Modern Slavery Annual Reporting Guidelines are issued to partners and suppliers that have agreed to annually report to us on the steps they have taken to ensure modern slavery and human trafficking are not taking place in any of their supply chains or in any part of their business.

## C. OUR RAW MATERIALS SUPPLIER FORM

Our Raw Materials Supplier Form is a tool that has been created in 2021 and adopted in 2022 for assessing raw materials suppliers and collecting standardised data from an early stage of the sourcing process. An internal revision of the document is currently ongoing to adapt it to new organisational requirements and to ensure that the accuracy of traceability data will be enhanced.

# D. OUR CONTRACTUAL MODERN SLAVERY COMPLIANCE PROVISIONS

Our contractual modern slavery compliance provisions are included in partner and supplier contracts wherever possible. At present, the contractual modern slavery compliance and sustainability provisions are included in all agreements with suppliers and partners that manufacture finished products bearing the Vivienne Westwood trademark or consisting of other intellectual property rights, and in selected logistic services agreements and high-risk service providers.

# E. OUR SUBSUPPLIERS LIST PROCEDURE

The Sub-supplier list procedure ('the Procedure') was developed in 2022 and fully adopted starting from 2023 in order to make direct manufacturing suppliers that subcontract any or part of their services more accountable of the production activities they have externalised and to provide improved visibility on sub-suppliers within our supply

The Procedure is articulated in two separate documents: the first inherent to the actual procedures with specified execution methods, timelines and penalties, while the second,

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to be returned seasonally, is the collection of the list of subcontractors with related specific information useful for the risk analysis.

## F. OUR MODEL 231

In order to comply with the requirements of Italian Legislative Decree no. 231 of 8 June 2001 ("Decree"), in 2022 our Italian operating company has validated and adopted the Organization, Management and Control Model ("Model 231"), which describes in an organized form the rules, procedures and behavioural rules aimed at mitigating the possibility of illicit conduct occurring in the company, and in particular the crimes included in the Decree. In the broader framework of Model 231, the company has continued the application of the Code of Ethics, which summarizes the rules of conduct and general ethical principles and which, therefore, constitutes a fundamental reference that suppliers, consultants and all those who have relations with our Italian operating company are called to scrupulously respect.

#### D. SUPPLIER ONBOARDING PLATFORM

Starting from 2023, our Italian operating company has adopted a supplier on-boarding platform, which will allow us to streamline the due diligence workflow, reducing step by step the amount of paperwork for our suppliers. The tool will enable us to increase the traceability and visibility of the company value chain by centralising the information provided by both suppliers and service providers into a centralised up-to-date database. The platform is currently set up to manage production suppliers of finished product-goods and raw materials which meet specific internal commercial and financial requirements defined internally. We are now evaluating to extend the tool to UK-managed suppliers and service providers at a later stage in the upcoming year.

#### 7. OUR EFFECTIVENESS

Our supply chain mapping exercise is the key to identifying the extent of our supply chain and increase transparency of upstream processes. By identifying suppliers and partners in our supply chain, we can effectively engage them in our sustainability initiatives and share our corporate Policies and Due Diligence Questionnaire, which will enable us to assess any risks associated with modern slavery and human trafficking. Therefore, a supplier and sub-supplier mapping was conducted with the aim at assessing first and second tier suppliers, which perform external production activities, and whenever applicable, certifications and relevant documentation to supply chain risk assessment were collected. To date, we have mapped and continue to monitor all of Tier 1 suppliers and also, we are continuing to improve mapping and assessment of key Tier 2 and declared sub-suppliers.

# **DUE DILIGENCE**

Our Modern Slavery Pack and our contractual modern slavery compliance provisions are the first tools we deploy to raise awareness and to hold our suppliers and partners accountable for their own supply chains over which we have no direct control or contractual connection.

Through our Due Diligence Questionnaire and Onboarding Platform, we can assess suppliers and partners, identify the risk areas, recommend improvement actions where appropriate and monitor progress annually. At present, the Due Diligence Questionnaire is deployed to new and existing partners and suppliers of finished Vivienne Westwood Ltd.

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products either during the on-boarding process or whenever a commercial relationship is renewed.

As we continue to progress with our supply chain mapping exercise, we intend to deploy our Due Diligence Questionnaire, Modern Slavery Policies and the Materials Supplier Form to other branches of our supply chain we consider warrant prioritisation and further investigation from a modern slavery perspective, such as components suppliers and contractors who provide property, facilities and logistics services.

## RISK ASSESSMENT AND RISK MANAGEMENT

During 2023, we have continued to progress with our announced Social Audit programme, which can be considered an effective monitoring mechanism to periodically assess our direct supplier base and to gather more visibility of the lowest tiers, as each supplier audited shares their production sub-supplier list with us.

The Audits involve an assessment of the conditions of the workplace at the factories in which we operate and are carried out with the assistance of our external assurance service provider at supplier facilities. The announced audit is designed, by way of example only, to investigate and assess the presence, or indicators, of child labour, forced labour, discrimination, harassment and abuse, as well as assess the adequacy of health and safety measures, and compliance with applicable employment legislation.

Finished product manufacturers we have a direct commercial relationship with have been periodically visited and are seasonally monitored through scheduled quality control inspections, audits, and during contract governance meetings by sourcing, production and CSR teams. It is worth mentioning that our Audit Plan has continued to expand including manufacturing sub-contractors.

A total of 4 (four) direct suppliers, 1(one) sub-supplier were audited by our external assurance service provider during 2023.

In addition to the audit process described herein, the company carries out a mapping of audits that may have already been performed by suppliers on behalf of other customers or to obtain process certification, through which it can assess the risk of direct and indirect suppliers and direct the efforts of internal activities.

In conclusion, any specific risks we identify from the information collected from completed Due Diligence Questionnaires, annual Modern Slavery reports and during scheduled audits are addressed promptly and directly with the relevant supplier either through enhanced due diligence activities, remediation action plans, additional audits and/or, if appropriate, contractually.

#### 8. TRAINING

The Ethical Training Programme, launched in 2021 by Vivienne Westwood LTD, includes the following 4 mandatory online courses which have been deployed to all employees based in the UK: Anti-Bribery, Diversity and Inclusion, GDPR and Modern Slavery. Specifically, the Modern Slavery online course provides employees with a broad overview of modern slavery legislation, explanations and examples of each modern slavery offence, guidance on how to spot warning signs and high-risk situations and a test to maximise information retention. It continues to be fully incorporated in the Learning and Development programme for new starters in the UK that have passed the probation period.

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During this financial year:

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- A total of 23 new employees in the UK completed the course successfully by 31st December 2023 reaching the pass rate of 80%;
- A total of 24 new employees in Italy completed successfully the course provided by our Italian operating company.

Furthermore in 2022, an "Advanced Training on Forced Labour in Global Supply Chains" has been developed by our Italian operating company in collaboration with a US University and continues to be deployed to key departments in Vivienne Westwood who require a deeper understanding of modern slavery to readily identify the related risks in our supply chain. In 2023, a total of 20 employees of different teams in Italy received credentials to complete the course, as well as 2 employees of the CSR team in London. In fact, starting from early 2024, the Advanced course will be extended to the key departments of Vivienne Westwood Ltd and to new employees for our Italian operating company.

As we consider further strategies to raise awareness on modern slavery risks and engage suppliers in our mission, we began the roll-out of Modern Slavery online training course to direct suppliers of our Italian operating company in 2021 and encouraged them to offer it to their employees and managers to equip them with information and skills to manage the modern slavery risk to their own business. So far 53% of production direct suppliers located in Italy have completed the online training supplied by our Italian operating company.

#### 9. LOOKING AHEAD

We remain committed to playing our part in combatting modern slavery and will continue to take steps to prevent the formation of any conditions where modern slavery or human trafficking could occur within our business and supply chain. We will continue to monitor any risks to our operating model, workforce and suppliers and regularly measure the effectiveness of our activities. Below is a list of the activities we will aim to launch, progress and, if possible, complete next year. Based on that, we will devise Key Performance Indicators ("KPIs") that can be used, at individual company and group company level, to benchmark our effectiveness and our progress as we continue to strive to achieve our mission and objectives.

Areas	Objective	Looking Head
OUR TOOLS, POLICIES AND PROCEDURES	Highlight the risks and impact of modern slavery in our business and supply chain to our employees and suppliers;	Continue to deploy our Due Diligence Questionnaire to onboarding suppliers and partners.  Continue to request that other suppliers and partners we identify as presenting a high modern



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	Continue to promote a whistleblowing mechanism for anonymous reporting of suspected and actual modern slavery offences in our business and supply chain for the benefit of our employees and supply chain workers.	slavery risk to our business and supply chain sign up to our Modern Slavery Pack and accept our contractual modern slavery compliance provisions.  Engage our Asian Licensee partners in our modern slavery mission by starting to deploy our Due Diligence Questionnaire and Modern Slavery Suite.  Continue to contractually obligate our suppliers to follow our policies and procedures related to modern slavery in all manufacturing and business agreements.  Evaluate the effectiveness of our current whistleblowing mechanism in the UK and continue to assess how it can be improved.
DUE DILIGENCE	Map and understand our supply chains beyond our direct relationships.	Continue with the mapping of our supply chain and go further to map lower tiers.  Extend the supplier onboarding tool to UK managed suppliers.  Continue with the mapping of our procurement supply chain



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		digitalising the process by extending the on-boarding tool to service providers as well
		Involve our Asian licenses partners in the mapping exercise to gather detailed information about their supply chain.
		Evaluate to introduce a robust system for supply chain mapping and traceability using an eplatform.
		Continue to deploy the sub-supplier list procedure to our manufacturing suppliers globally.
		Ongoing review our Raw Material Supplier form to improve traceability of textile and leather production, as well as gather more information on trims and accessories.
RISK ASSESSMENT AND MANAGEMENT	Identify modern slavery risk areas in our business and supply chain	Continue to progress in auditing direct suppliers and sub-suppliers worldwide.
TRAINING	Continue to provide training to our employees, and guidance to our suppliers, on how to identify, manage and mitigate the risks of	Extend the advanced training to key departments based in the UK, who require a deeper understanding on modern slavery and human
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	modern slavery in our business and supply chain;	trafficking to readily identify the related risks.
MULTISTAKEHOLDER INITIATIVES	Identify an independent organisation with whom we can partner to support us in our modern slavery mission and support local industries while ensuring that local employment laws in that jurisdiction are respected.	Engaging external companies and industry peers in our efforts to deliver best practice at supply chain level, including switching to renewable energy providers.  Continue to seek partnerships with external experts, universities and research centres to develop new awareness initiatives and trainings.

We stand firm in our belief that we must remain flexible in our approach to combatting modern slavery in our business and supply chains as this is the key to adapting to the rapidly changing global landscape in which our supply chain operates. We also believe that a collaborative approach based on trust is essential to build long lasting relationships, to improve stability and best practices, and successfully implement and execute our due diligence strategy.

Approved by the board of directors of Vivienne Westwood Limited and signed on its behalf by:

Carlo D' Amario

Chief Executive Officer

Date 04.06.2024