



MODERN SLAVERY STATEMENT 2025/26

INTRODUCTION

This statement is made pursuant to section 54(1) of UK the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Specsavers International Healthcare Limited and all the relevant Specsavers group entities that are required to report under that Act. References to “Specsavers”, “we”, “us” and “our” in this statement refer to Specsavers International Healthcare Limited and those group entities, unless the context requires otherwise. Some Specsavers entities in other jurisdictions prepare and publish separate modern slavery or forced labour statements in accordance with local legal requirements, including Australia, Norway and Canada.

There is no place for illegal, unethical or unprofessional conduct in Specsavers or Specsavers’ value chain. Specsavers is committed to creating an environment where colleagues feel safe and supported to speak up, and we use training and communications to reinforce the expectation that any concerns about illegal, unethical or unprofessional conduct, including potential modern slavery, exploitation, abuse or harm, should be reported. Since 2011, Specsavers has reported on activity relating to Modern Slavery avoidance, publishing the business’ plans and progress in the Specsavers Annual Review. As part of this reporting and commitment, Specsavers continues to develop practices and procedures to progress and enhance the ethical trading activities and improvement of the transparency of reporting.

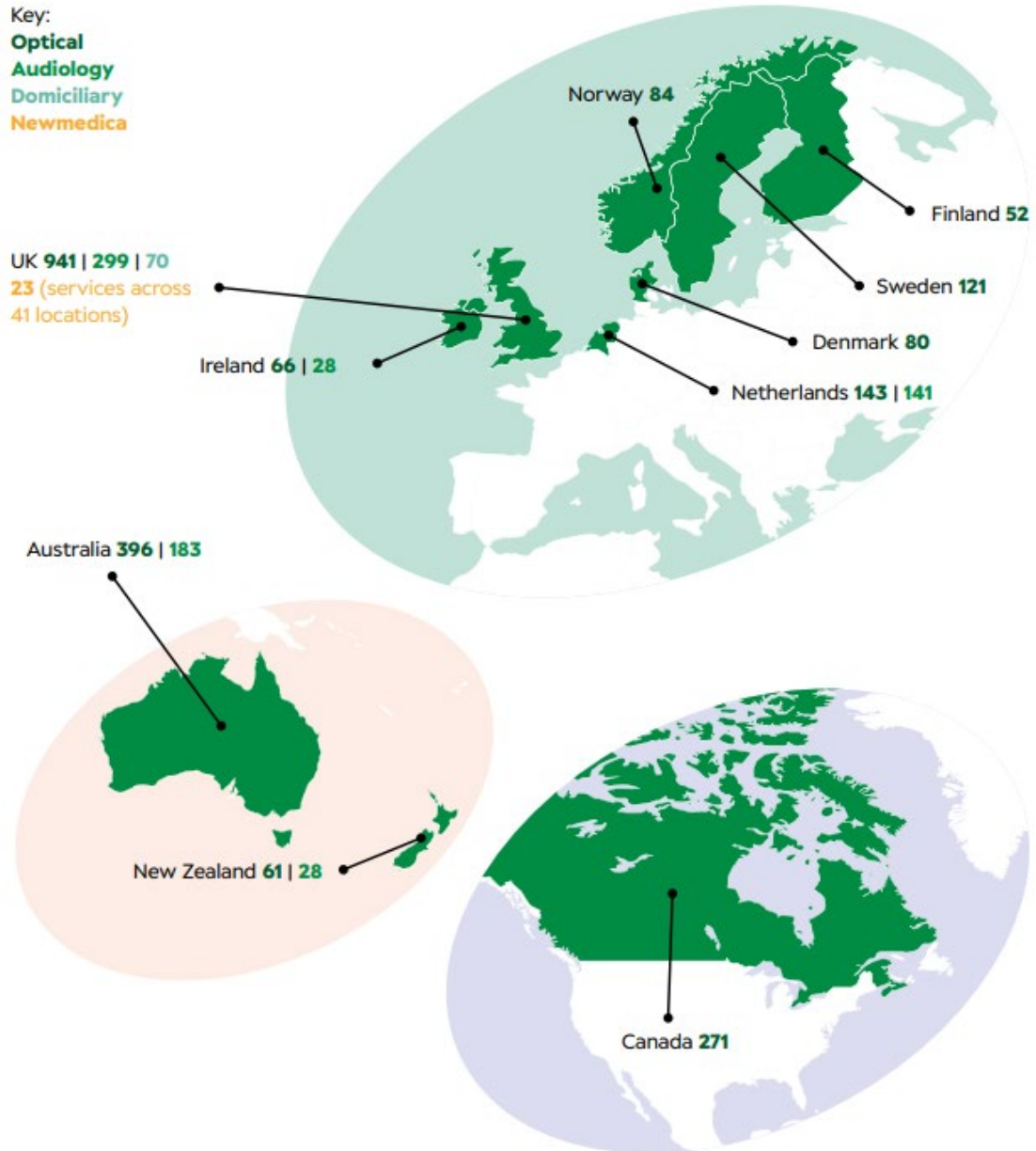
This statement sets out the plans and commitments Specsavers, as a global business, has made to prevent and mitigate the risk of modern slavery across our operations and supply chain.

Our statement is formed using data and reporting gathered through consultation with relevant business functions, counterparts across our jurisdictions and mapped stakeholders, and is supported by a drafting, review and approval process.

1. SPECSAVERS STRUCTURE AND SUPPLY CHAIN

Specsavers International Healthcare Limited is the Guernsey-registered parent company of the Specsavers group. During the reporting period, Specsavers’ stores and clinical operations spanned across the *UK, the Channel Islands, the Isle of Mann, Republic of Ireland, Northern Europe, Canada, Australia and New Zealand.*

Our businesses



Centralised support office functions sit within these same regions, as well as in Hong Kong, where they are well-positioned to provide necessary support to suppliers and supply chain activities across APAC.

Our supply chain is supported by a network of manufacturing and distribution ("**M&D**") facilities located across the UK, Europe, APAC and North America. These sites play an important role in the manufacture, warehousing and distribution of products, supporting their efficient movement from suppliers and manufacturers through to our retail businesses and customers.

Operating within the optical and audiology sectors, Specsavers provides healthcare-led retail services to over 50 million customers globally. Our main products include prescription and non-prescription eyewear, contact lenses, hearing aids and related accessories, supported by professional eye and

hearing care services delivered through our retail optical, audiology, domiciliary and ophthalmology (Newmedica) businesses.

Our facts and figures



2. SPECSAVERS POLICIES

As a people-oriented business, Specsavers takes the welfare of its customers, employees and value chain workers very seriously and is committed to creating positive working environments that place people at the front and centre of its operations.

Our suppliers are integral in helping us protect workers and reduce the risk of exploitation across our supply chain. Our commitment to responsible and ethical business is embedded in the policies which we require all relevant new and existing suppliers to comply with, either through our contractual arrangements or by demonstrating that they have equivalent standards of their own. These policies guide how we operate, procure goods and services, and work with suppliers.

- Our **Supplier Code of Conduct** sets clear expectations for suppliers around freely chosen employment, fair treatment, lawful working hours, safe working conditions and the prohibition of forced labour, child labour and human trafficking. The Code is aligned with internationally recognised standards, including the Ethical Trading Initiative Base Code and relevant International Labour Organization conventions.
- Our **Group Ethical Trading Policy** embeds our minimum expectations into supplier relationships, procurement activity and ongoing supply chain management through contractual commitments to uphold our standards, ways of working and comply with our audit and monitoring requirements.

With over 5,000 store partners across optometry, audiology and ophthalmology and employing over 46,000 colleagues globally, Specsavers has a unique opportunity to change lives through better sight and hearing in a way that's better for our people and our communities. Our expectations of all our colleagues are no less than what we expect from our suppliers, which is reflected within our documents and processes and is reinforced through internal policies such as our **Whistleblowing (Speak Up) Policy** which empowers colleagues to raise concerns safely, confidentially and, if preferred, anonymously. This policy, and the means to speak up, are made accessible to all colleagues and partners and reinforced through relevant communications and training.

Specsavers also has a long-standing collaboration with **Great Place To Work®**. This provides us with an opportunity to conduct annual surveys on all of our people and use the feedback to take action at regional and functional levels, while supporting leaders and managers to develop plans and create targeted change within teams. We are hugely proud that 86% of Specsavers and Newmedica colleagues say that we are a great place to work.

We all have a responsibility to act if we suspect someone may be at risk of modern slavery. Specsavers is committed to helping colleagues identify and escalate signs of abuse, exploitation or harm affecting other colleagues, customers or anyone else we may encounter within or through our business. As an example of this in practice, our **Safeguarding policy** and accompanying training provides our UK store and domiciliary colleagues with tools, resources and knowledge to help identify customer safeguarding concerns or incidents, making it clear how and where these need to be reported. Specsavers also has designated **Safeguarding contacts** within the business who advise and support our colleagues in building their confidence in recognising what to look out for and when something needs to be escalated.

These internal policies are communicated through mandatory compliance training, ongoing communications and awareness-raising activities. Our external policies referenced above are communicated through our supplier onboarding process, within our contractual requirements and through ongoing supplier engagement.

3. DUE DILIGENCE PROCESSES

As a global retailer, Specsavers operates an extensive and international supply chain, sourcing products from more than 20 countries. Understanding where our products, services, technology and equipment are sourced and made, help us to understand the risks and the opportunities across our operations and is an essential part of our due diligence.

Our Sustainability, Quality and Risk & Audit teams help us drive continuous improvement in all areas of our business, including in relation to modern slavery risks and human rights. These teams support supply chain mapping and risk management, and lead on engagement with external providers, such as SEDEX and independent third-party audit providers to improve transparency and address any modern slavery risks across the supply chain.

Specsavers operates a risk-based approach to identifying, assessing and addressing the risk of modern slavery, forced labour and child labour within its supply chain. This approach enables Specsavers to focus its due diligence and monitor activity where risks are most likely to arise.

Risk assessments are carried out on all relevant new suppliers, covering factors such as geography, any known historical human rights risks and exposure to industry-specific risks. The level of due diligence required is aligned to the risks identified and may include supplier self-assessments, independent third-party audits and further checks by relevant Sustainability, Quality and Risk & Audit teams before production or services commence. Any suppliers flagged as high-risk are automatically required to have an independent on-site audit before they can be onboarded as a supplier, and are subject to more rigorous reporting, monitoring and review requirements.

Due diligence is reviewed on an ongoing basis to reflect changes in supplier relationships, geographic exposure and evolving risk profiles. We hold suppliers, as appropriate, to internationally recognised standards, including the ETI Base Code, ILO standards and applicable local laws, across labour practices, health and safety, environmental management and business ethics. Where required, SMETA, or equivalent independent third-party audits, are used to assess compliance with these standards for selected supplier sites based on our risk assessment and due diligence process.

We also recognise that modern slavery and forced labour risks can arise wherever people are recruited, engaged or employed. Specsavers promotes responsible recruitment practices through a combination of pre-employment and pre-engagement checks, policies, guidance and supporting processes. Where recruitment activity is not centrally managed, we support teams with guidance and tools intended to encourage appropriate and consistent checks before employment or engagement begins.

4. ASSESSING AND MANAGING RISK

Assessment and mitigation of supply chain risks

As a business with a global supply chain, Specsavers has a heightened awareness of the importance of supply chain management and having greater visibility of areas of increased risk to ensure that practices, such as modern slavery, don't occur.

Specsavers is focused on increasing transparency across its supply chain, part of which includes gaining a better understanding of our tier 1 and tier 2 suppliers. As part of this process, we work with our suppliers to empower them to adopt and embed equivalent due diligence processes to encourage further cascades upstream, providing indirect protection for those working within our value chain. We

also manage risk through creating and maintaining strong, long-term relationships with suppliers, many of whom we have worked with for decades. Specsavers' preferred approach is to work collaboratively with suppliers to discuss and remediate issues and avoiding a "cut and run" approach wherever appropriate, so that we can ensure that workers are protected. Where concerns are identified through audits, supplier engagement or other due diligence activity, we work with suppliers to implement a tailored Corrective Action Plan within agreed timeframes. Our Product Category teams, together with the relevant Sustainability, Quality and Risk & Audit teams, review the proposed actions to ensure they are appropriate to the nature and seriousness of the issue identified. They then continue to monitor progress of such actions through to closure, supporting in direct engagement where any concerns arise. This allows Specsavers to take a proportionate, risk-based approach to remediation while continuing to work with suppliers to improve standards and protect workers.

This structured engagement gives our teams a clearer understanding of supplier-specific challenges and enables a more informed, proactive and hands-on approach to driving sustained improvement. Where issues are not resolved within the required timeframes, or where concerns are serious or repeated, they are escalated through Specsavers' ethics governance process, including to the Supply Chain Board, where appropriate. This ensures senior oversight and accountability, with Product Directors taking ownership over communications to suppliers about any required improvements.

Where remediation cannot be achieved, Specsavers may reduce, withhold or withdraw business, or ultimately terminate the supplier relationship – a position which is supported within our supplier agreements, and as set out in our Supplier Code of Conduct and Group Ethical Trading Policy.

Assessment and mitigation of wider trends and emerging risks

We recognise that modern slavery risks are rarely isolated. Understanding supplier-specific issues, as well as wider industry, geographic and regulatory trends, helps us identify where risks may be emerging and where more proactive measures may be needed to prevent, deter and address modern slavery risks.

Any significant issues affecting our business, supply chain and people are managed through established governance and risk management processes. Relevant business functions maintain oversight of key risks and provide updates to our regional and group Audit and Risk Committees where appropriate, helping ensure issues are identified, assessed and addressed in a timely manner. Relevant matters are also shared with our Sustainability Governance & Risk Committee to ensure they are considered as part of our broader responsible business and risk management framework.

This governance approach helps us connect individual findings, spot recurring themes and identify areas where coordinated action may be required across our business. These forums provide the opportunity for teams to share insights and take more targeted action to mitigate risks, support suppliers and improve our overall response to modern slavery and human rights concerns.

Assessment and mitigation of HR risks

Specsavers is committed to responsible recruitment and employment practices and seeks to ensure that all colleagues including any employees, workers, locums and contingent workers engaged across our Support Offices, M&D operations, stores and domiciliary businesses are recruited and onboarded through appropriate processes.

Each Specsavers store and domiciliary business is part-owned and managed by its partners, providing them with the ability to identify and recruit the right people for their business. Wherever possible, we support partners through guidance and tools designed to align recruitment practices with those used across our Support Offices and M&D operations, helping to promote consistent standards and candidate experiences.

Where contingent workers or specialist agency support are needed, Specsavers seeks to work with a shortlist of preferred and approved recruitment providers who have completed our supplier due diligence processes and are engaged under contractual arrangements that include our Supplier Code of Conduct. Many of these relationships are long-standing, reflecting our preference to work collaboratively with providers who understand our business, our standards and our commitment to responsible recruitment. Where an agency outside these established arrangements is engaged, guidance, toolkits and HR input are provided to support responsible recruitment practices. Additional support is provided to our Partners where locum support is required through providing access to approved locum platforms through which checks relating to professional registration, identity and other role-specific requirements are carried out.

We support colleagues wishing to raise concerns about modern slavery, exploitation or other forms of inappropriate conduct through a range of internal reporting channels. These include our Speak Up and Whistleblowing policies, as well as Fairness Matters, a dedicated team that specifically supports our retail colleagues by receiving and helping to address concerns raised within our stores and domiciliary businesses. Anonymous reporting is also available through Safecall, an independent third-party whistleblowing service, in operating territories where the service is available.

Specsavers recognises that recruitment practices must continue to evolve as risks, working models and regulatory expectations change. We therefore remain committed to regularly reviewing our approach, identifying areas for improvement and adapting our processes so that we continue to strengthen protections for workers and reduce opportunities for modern slavery or labour exploitation to occur.

5. TRAINING

Specsavers recognises the importance of training, raising awareness and embedding understanding of ethical standards and modern slavery risks across the business. As it can be challenging to identify victims of modern slavery, Specsavers enrolls colleagues on regular mandatory training to ensure that education is shared on potential indicators that may be present in a situation of modern slavery.

During 2025/26, we delivered targeted training and materials to:

- colleagues in our UK central functions, who are closest to supplier oversight and recruitment processes. Strengthening their awareness helps us identify issues earlier, respond more effectively and hold ourselves and our suppliers to the standards we expect.
- all Partners and retail colleagues in UK/ROI, given their direct connection with customers, colleagues and local communities.

In our training modules, we cover key risk indicators and provide clear guidelines on how to raise concerns or suspicions of modern slavery. We recognise that empowering colleagues with the knowledge, confidence and awareness to speak up is one of the most effective ways to combat modern slavery, and we remain committed to evolving how we reach and engage with colleagues on this topic.

6. MONITORING AND EVALUATION

Specsavers has committed to adhering to the following key performance indicators to measure the effectiveness of steps taken to tackle modern slavery and human trafficking in the Specsavers business:

- All scheduled audits completed with Corrective Action Plans in place and actioned within appropriate timeframes.
- Quarterly Supply Chain Board reporting on identified risks of modern slavery and ethical compliance.

During the reporting period, we have recorded:

- 271 non-compliances being closed by suppliers, resulting in improved conditions and tighter processes for individuals who work within supplier environments, specifically around health & safety and working hours.
- a 20% year on year decrease in the number of overdue non-compliances from suppliers, demonstrating that our centralised and collaborative approach with suppliers is effective in addressing areas of concern quickly and effectively.

7. OUR PROGRESS

During the reporting period, Specsavers has:

- **Held a global supplier conference** on ethical standards and responsible labour practices, helping to strengthen supplier awareness and understanding of ethical standards and labour practices, supporting better prevention of modern slavery risks across the supply chain.
- **Delivered modern slavery training**, building awareness and enhancing colleagues' ability to recognise and respond to potential modern slavery risks.
- **Implemented a revised due diligence process for Buying teams**, strengthening controls and reinforcing Specsavers' commitment to protecting workers within its supply chains. This improved early identification and management of labour-related risks by embedding stronger modern slavery controls into sourcing and purchasing decisions.
- **Increased the number of suppliers connected to SEDEX** platform, now covering approximately 70% of goods-for-resale tier 1 suppliers. This has enhanced transparency, improved risk identification and supported more targeted engagement.
- **Conducted independent third-party social and environmental audits for 107 supplier sites** to enhance protection for workers by identifying and addressing labour and environmental non-compliances more quickly, driving sustained improvements in supplier standards.

In 2026/27, we will continue to build on the progress made to date, strengthening our approach across our business and value chain by:

- continuing to evolve and deliver modern slavery training across the organisation, building deeper awareness, practical confidence and capability to identify, escalate and respond to modern slavery risks.

- continuing to increase supplier transparency through SEDEX, supplier engagement and further supply chain mapping.
- continuing to use independent third-party audits for relevant product suppliers, with targeted Corrective Action Plans where required, to drive sustained improvement and greater accountability across our supplier base.
- maintaining open and constructive dialogue with our suppliers, supporting continuous improvement by sharing insights, encouraging best practice and working collaboratively to improve and maintain standards.
- reviewing our Supplier Code of Conduct and Global Ethical Trading Policy to identify practical improvements to ensure they remain fit for purpose as our geographic footprint and supply chain continue to evolve and continue to reflect the standards expected of Specsavers as a responsible global brand across the markets in which we operate.
- exploring opportunities to consolidate our provider base, where appropriate, to support stronger supplier relationships, improved oversight and more consistent responsible business standards.
- evolving our processes and systems to provide greater access to meaningful data to spot trends, improve insight and develop more effective tools to help colleagues identify emerging risks and take timely, informed action.
- keeping our sustainability-related contractual clauses under review so they continue to reflect evolving legal requirements, stakeholder expectations and the standards expected of Specsavers as our geographic footprint expands. This helps to ensure supplier agreements continue to support responsible business conduct, ethical trading and modern slavery risk management across the markets in which we operate.
- monitoring developments in modern slavery and responsible business legislation across the territories in which we operate, so that our approach continues to meet applicable requirements and supports consistent standards across the group.

This Modern Slavery Statement is made in respect of the Specsavers International Healthcare Limited's financial year ending 28 February 2026 and has been approved on behalf of its board of directors.

John Perkins

Group Chief Executive Officer, for and on behalf of **SPECSAVERS INTERNATIONAL HEALTHCARE LIMITED**

Statement No. 10

Dated: August 2026