

STUART PETERS LTD - POLICY STATEMENT REGARDING THE MODERN SLAVERY ACT 2015

Introduction

Stuart Peters Limited ("SPL") is subject to, supports and will adhere to the UK government legislation relating to Modern Slavery and Human Trafficking (*Modern Slavery Act 2015*) ("the Act").

The Act makes provision in relation to slavery, servitude, exploitation, forced or compulsory labour and human trafficking. The Act is applicable to both individuals and commercial organisations.

SPL, its Directors and Employees are committed to take the legislation seriously and comply with the Act to the best of our ability.

SPL are committed to improving our practices to combat slavery and human trafficking, and we believe we have engendered and maintain a strong culture of ethical behaviour and awareness.

Nature of Business & Organisational Structure

SPL is a UK based importer delivering ladieswear, across a range of product categories, to retail customers. SPL operates globally from our offices in London, Hong Kong, and Bangladesh. Garments are imported from Bangladesh, Cambodia and Vietnam.

SPL has a global annual turnover of £[amount].

Supply Chains

SPL understands that our international supply chains hold the highest risk for our business in relation to our compliance with the Act. Our assessment of the risks facing our business has been concluded by undertaking a comparison of our assessment of our supply chain against the guidance and information available from the industry bodies *Sedex* and *Stronger Together*.

We have identified potential risks for non-compliance with the Act in the following areas:

- i. SPL has a global network of suppliers, often from developing world countries who may have lesser compliance standards than SPL or a weaker regulatory and legal framework than in the UK. The direct manufacturers of our products in the countries of Cambodia, Vietnam, and Bangladesh may themselves be less compliant in the normal course of business with the Act or not have the controls and systems in place to monitor compliance with the Act;
- ii. The direct manufacturers themselves may engage sub-contractors (fabric mills, trims and processing plants) who may not be fully compliance with the Act;
- iii. Deeper within our supply chain the producers of raw materials to our manufacturers may not be fully compliance with the Act;

- iv. Globally, including in the United Kingdom we contract a range of ancillary service providers to support the day-to-day running of our business (such as within our own corporate office operations – such as cleaners, drivers, etc.) who may not be fully compliance with the Act

In light of the above, to ensure compliance with the Act we are committed to seeking transparency beyond the suppliers that we directly contract with, and further develop our Risk Assessment of those additional parties involved in the supply chain.

Our Policies Relating to Modern Slavery

SPL is committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in SPL's supply chains.

For our own operations which are primarily based in the United Kingdom, we ensure that:

- i. We provide our own employees with a copy our employee handbook which guides them through our ethical employee code of conduct;
- ii. Our employee induction and on-going training policies address key elements of the Act and creates an awareness of the issues;
- iii. Our recruitment policy is focussed on fair hiring practices;
- iv. Throughout our business we encourage and maintain a culture and awareness of issues in relation to the Act; and
- v. We undertake to ensure that suppliers, service providers and contractors in the UK to SPL are compliant with the Act and have an awareness of the issues involved.

For Our Supply chain which is primarily based overseas, we ensure that:

- i. At a minimum, SPL works to comply with the *Ethical Trading Initiative's* ("ETI") 'Code of Conduct';
- ii. SPL is committed to meeting the specific requirements of our individual customers' own Responsible Sourcing standards;
- iii. When SPL conducts business with a supplier, that supplier is required to sign a declaration to SPL to represent that they have read and understood SPL's approach to Modern Slavery and that they undertake to adhere to it. Furthermore, the supplier is required to pass the SPL approach to Modern Slavery on to their own suppliers and request the same standards are implemented; and
- iv. SPL is committed to seeking transparency beyond the suppliers that we directly contract with.

What are we doing to ensure we eradicate any cases of Modern Slavery

SPL has zero tolerance to slavery. To ensure all those in our supply chain and contractors comply with our ethics we have in place a rigorous supply chain compliance programme. This consists of the following:

- i. Where possible, we build long-standing relationships with our suppliers and establish at the commencement of the business relationship our expectations of their ethical business behaviour – we will only work with suppliers that are committed to meeting these standards.
- ii. On an on-going basis we provide one-to-one support to all of our supplier manufacturing sites and support them to ensure that they work to compliant standards across all elements of the ETI base code.
- iii. We conduct (semi-announced) 3rd party Social Compliance Audits at all of the manufacturing sites from which our products are manufactured. Whilst we recognise that non-compliant and criminal activity is difficult to identify and not always obvious from an Audit Report, we follow up and investigate any non-compliance. We work with our suppliers to address the root cause of any issues identified and further train them on implementing best practice of labour standards. If a supplier is persistently failing to comply with the standards expected of them or is deliberately non-compliant then SPL will resolve not to engage that supplier again.
- iv. We work with our customers, government bodies and observe guidance notes from relevant industry advice groups (*Sedex* and *Stronger Together*) who have access to large data sets and can provide expert advice to SPL on where the highest risks in the supply chain are. Consequently, SPL is better placed to adapt and be responsive to developments as they occur.
- v. SPL representatives whose role involves visiting sites regularly are to be trained on how to spot the indicators of Modern Slavery and breaches of the Act. They will be required to report infringements or concerns and SPL will undertake to deal with breaches effectively and in a timely manner.

How we measure our effectiveness to combating Modern Slavery

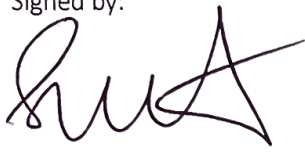
We use the following *key performance indicators* ("KPIs") to measure how effective SPL have been in our goal of being compliant with the Act and ensuring that slavery and human trafficking is not taking place in any part of our business or supply chain:

- i. We ensure that a material portion of suppliers to SPL are independently assessed by 3rd party social compliance auditors who assess the supplier and their manufacturing location against the ETI base code. We quantitatively record how many suppliers per annum are audited. We ensure that the number of audits undertaken represents a material proportion of all SPL suppliers.
- ii. We undertake to have a good level of communication and personal contact with our direct suppliers in the supply chain. From our interaction with suppliers we are able to assess and record what we believe is their understanding of, and compliance with, our expectations.

- iii. SPL monitors the number of incidents and cases referred to us. Cases include issues highlighted by SPL employees, 3rd party social compliance auditors, employees of SPL suppliers or other parties. The incidence of cases we believe is reflective of compliance or non-compliance by a supplier.
- iv. The number of direct employees trained and educated in relation to the material aspects of the Act.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

Signed by:

A handwritten signature in black ink, appearing to read 'JP', written over a horizontal line.

Jason Peters
Joint Managing Director

7/12/21