

## Alfred Dunhill Limited

### The Modern Slavery Act 2015 Slavery and Human Trafficking Statement

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps that Alfred Dunhill Limited has taken during the financial year ending 31 March 2021 to prevent modern slavery and human trafficking in its supply chains or within any part of the business.

Alfred Dunhill Limited has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings. We recognise that no supply chain is without risk of modern slavery, and it is our responsibility to ensure we understand these risks and work together with our suppliers to mitigate them.

#### **Our Business**

Alfred Dunhill Limited engages with carefully selected suppliers to manufacture its products and/or provide relevant services to the company. We sell our branded products either through Alfred Dunhill Limited's own-managed points of sales or through authorised wholesale accounts. As part of the Richemont Group ("Group"), Alfred Dunhill Limited adheres to Group policies, procedures and standards relating to the management of its supply chain and its general business conduct.

#### **Our Supply Chain Relationships**

Alfred Dunhill Limited maintains strong, long-term relationships with suppliers based on the principles of fair, open, and ethical operations whilst ensuring the continued quality of its branded products. We continue to focus resources on building trusting and transparent relationships with key suppliers. Recently, Alfred Dunhill Ltd has undergone a consolidation of its supply chain, centralising our supply chain network in Italy, which increases our ability to manage processes and increases visibility of our supply chain operations.

Alfred Dunhill Limited's CSR & Supply Chain Compliance Manager, reporting directly into the Quality & Technical Director, is responsible for ensuring the continuous development of policies and strategies to tackle modern slavery and labour issues, increasing the scope of work to hidden areas deeper within the supply chain, and creating a more robust governance and accountability framework.

#### **Our Policies and Processes**

When taking on new product suppliers, Alfred Dunhill Limited undertakes due diligence that is carried out by the supply chain and procurement teams within the business. As part of this process, suppliers are required to sign our terms and conditions of purchase and other documents including the Richemont Group Supplier Code of Conduct ("Code of Conduct").

A full copy of our Code of Conduct for the financial year ending 31 March 2021, is available here:

[richemont\\_supplier\\_code\\_of\\_conduct\\_2017.pdf](#)

The Group is currently in the process of revising our Code of Conduct to address further human rights topics, in accordance with the Modern Slavery Act 2015 and the Organisation for Economic Co-operation and Development's due diligence guidelines. The revised version of our Code of Conduct should be finalised and ready to issue to new and current suppliers imminently.

The Group and its Maisons' relationships with all business partners – suppliers, subcontractors, and business partners – are based on fair, honest and mutually rewarding relationships contributing to high quality standards of product and services. The Group therefore requires that all its business partners adhere to robust ethical values and ensure the compliance of their own operations against the Richemont's 39 Principles outlined in the Supplier Code of Conduct.

Alfred Dunhill Limited continues to work in partnership with an accredited compliancy verification company to facilitate a robust social audit programme aimed at monitoring the labour conditions in our product supply chains and ensuring compliance against the Group's Code of Conduct (as above) over a three-year rolling format. Monitoring and verification activities are carried out throughout our finished goods suppliers and where feasible, at their subcontractor sites.

Alfred Dunhill Limited's due diligence processes, including social audits, highlight a risk of slavery and/or human trafficking, or any other non-compliance with the Code of Conduct, we will assess such non-compliance on a case-by-case basis and take appropriate remedial action.

During the financial year ending 31 March 2021, Alfred Dunhill continues to source directly from non-product suppliers. We request these suppliers to adhere to our Group's Code of Conduct and we continue to assess those suppliers who have not returned a signed confirmation of compliance, to ensure they have sufficient processes and policies in place to satisfy us that they are operating to the highest standards.

### **Our Training**

Alfred Dunhill Limited continue to take steps to increase employee awareness and engagement regarding slavery and human trafficking issues. Richemont's Corporate Responsibility Policy ("Policy"), defines the standards the Group expects its managers, employees and suppliers to uphold and specifically articulate the Group's zero-tolerance policy regarding forced labour.

A copy of the Policy can be found at:

[https://www.richemont.com/media/u3shrthu/richemont\\_cr\\_policy\\_16052019.pdf](https://www.richemont.com/media/u3shrthu/richemont_cr_policy_16052019.pdf)

### **Our Employees**

Alfred Dunhill Limited and the Group have a whistleblowing policy and a hotline for employees to voice any concerns they may have including concerns about any part of the Alfred Dunhill Limited business. Alfred Dunhill Limited is committed to maintaining and improving systems and processes to eliminate all forms of forced and compulsory labour within its supply chain and its business. Alfred Dunhill Limited will continue to review its policies and processes to ensure the highest standards in its supply chain, as expected by customers, the companies with which it works and in accordance with the requirements of its Group.

### **Impact of the Coronavirus Pandemic ("Covid-19")**

Alfred Dunhill Limited has taken appropriate precautions to ensure the safety and protection of all its employees and external third parties encountering its employees, in accordance with Government guidelines. Some of these precautions include encouraging employees to work from home (unless the nature of their work meant that they were unable to do so), controlling movement of employees to and from the office, temperature checking employees upon arrival at the office and wearing PPE and social distancing when working in the office. Alfred Dunhill Limited's cleaning service providers were

also required to implement a more rigorous cleaning routine within the office to ensure cleanliness and hygiene remains at a high standard.

Covid-19 has caused some disruption to Alfred Dunhill Limited's Social Audit Programme annual plan. However, Alfred Dunhill Limited looks to resume normal levels in 2022 and is confident that an appropriate level of due diligence will be achieved.

Alfred Dunhill Limited continues to review the changing Covid-19 landscape to ensure that the measures taken remain appropriate for the health and safety of its employees and third-party organisations within our supply chain, to avoid the risk of exposing them to conditions that make them vulnerable to modern slavery.

**Approval by Alfred Dunhill Limited's Board of Directors**

I certify that the information contained in the above statement has been approved by Alfred Dunhill Limited's Board of Directors.

Signed.....*Gary Stevenson*....., Finance Officer, on behalf of Alfred Dunhill Limited

