Ann Summers Ltd Modern Slavery Statement 2025/2026

Introduction

Ann Summers Limited ("**Ann Summers**" or "**we**") is committed to prioritising and improving our practices to combat slavery and human trafficking in our business and supply chain. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year ending 30 June 2026 to assess, prevent and address modern slavery risks in our operations and supply chains.

Key Focus Areas

We recognise that the activities we undertake can impact the livelihoods of a significant number of people. To ensure that we can continue to protect the welfare and rights of employees in our organisation, and the workers throughout our supply chain, our focus this year has been across the following areas:

- Continuing to strengthen our relationships with existing Tier 1 product suppliers focusing on own-brand products, while enhancing transparency through consistent, annual due diligence reviews.
- Reviewing and improving due diligence procedures for new suppliers, including assessing their controls on modern slavery and human trafficking, and incorporating their responses as a key factor in supplier approval decisions.
- Initiating efforts to strengthen engagement with Tier 2 suppliers to enhance supply chain transparency and support our goal of expanding visibility over the next four years.
- We continue to improve our approach to the risks of modern slavery to enhance our Modern Slavery Policy, which is approved by our board and cascaded across our organisation and supply chain.
- We have added our training on how to spot the signs of Modern Slavery to our employee onboarding pack and made reading the full policy a mandatory requirement.

Organisation structure, business, and supply chains

Ann Summers (UK) Holdings Limited is the immediate and ultimate parent company of Ann Summers Limited, and parent of a group of companies whose principal activities are supporting the business activities of Ann Summers Limited. Ann Summers Limited trades through two key brands: 'Ann Summers' and 'Knickerbox.com'.

The principal business activity of Ann Summers is the retail, wholesale and marketing of lingerie, apparel, adult toys, and related accessories. We sell through around 67 physical stores in the UK and Republic of Ireland, a UK based web channel that serves both UK and international customers and a well-established third-party sales channel.

The principal business activity of Knickerbox.com is the online retail and marketing of lingerie and apparel.

Ann Summers' head office is based in Whyteleafe, Surrey, where we select, design, source and create our product range. We employ around 950 people across the UK and Republic of Ireland. Our main distribution centre is based alongside our head office in Whyteleafe, and our goods-in warehouse is at a separate location in Paddock Wood.

We work with around 40 suppliers across 74 factories to design and manufacture Ann Summers own-branded products. We also source and sell third party-branded products from around 19 branded suppliers. Our product supply chain is global, with factories based across Asia and Europe, as well as the UK.

Policies and controls

As a responsible retailer and employer, we have appropriate measures in place to address risks of modern slavery in our supply chain. We review these regularly to ensure we are constantly developing our processes and avoiding any gaps in compliance.

- **Integrated Compliance and Legal Team** – In order to improve governance and avoid any conflicts of interest, our Compliance Function is independent from our Buying Function and sits within an integrated Legal and Compliance Function with clear responsibilities and escalation routes in place. This structure helps to identify and manage potential conflicts of interest, supports independent oversight and challenge and strengthens governance across the business.

- **Continued partnership with SEDEX** – We became a SEDEX member in 2023 to provide us with comprehensive ethical audit information of the factories that form part of our product supply chain, including information on wages, working hours, and ethical practices. We continue to use SEDEX to help us assess and manage modern-slavery risks within our supply chain. Each year, more of our Tier 1 suppliers join the platform, improving the accuracy and coverage of data across the majority of our supply base.

- **Closer monitoring of product suppliers** – We conduct annual visits to priority suppliers to observe working practices, strengthen relationships with local teams and address any areas of concern. Our internal teams are trained to spot possible signs of modern slavery, and these visits are used to assess possible risks and consider any mitigation opportunities.

- **Contractual Controls** – All of our product suppliers are contractually obliged to comply with the requirements of the Modern Slavery Act, and Ann Summers has the right to terminate its relationship with its suppliers if they are found to be non-compliant.

- **Modern Slavery Policy** - In December 2024 we published a new Modern Slavery Policy and distributed this throughout our business and supply chain. This policy expressly prohibits any form of forced labour, child labour and slavery, educates on the signs of spotting modern slavery within the workplace, and outlines a procedure for reporting any concerns of a possible breach of this policy. A training pack was also distributed to equip our teams with the knowledge to identify potential warning signs and help mitigate associated risks. This training is reviewed and updated annually.

- **Product Supplier Code of Conduct** – We review and update our Supplier Code of Conduct annually, to ensure it remains current and relevant. The Code expressly prohibits forced labour, child labour and slavery; requires lawful, safe and healthy conditions; and supports fair wages, employment security, respectful treatment, freedom of association and collective bargaining. All product suppliers are required to adhere to the Code as part of their product supply contract and is referenced within our terms and conditions.

- **Awareness and training** – We identified our UK Warehouses as an area of our business that could be vulnerable to modern slavery risks. We delivered training to warehouse colleagues on recognising potential indicators of exploitation and reporting concerns through our whistleblowing service so that colleagues understand the risks connected with their work and the action they should take if concerns arise.

- **Whistleblowing service** – We provide an independent Whistleblowing hotline through which both our employees and the workers throughout our supply chain may report suspected human rights violations, including slavery and people trafficking. Reports can be raised confidentially and are directed to a designated member of the Board for appropriate review, investigation and escalation.

- **Whistleblowing Policy** – Use of the whistleblowing service is encouraged by a Whistleblowing Policy that provides a clear and practical reminder to employees and workers of their right and responsibility to raise concerns they may have around perceived wrongdoings. This Policy expressly provides for the protection of such whistleblowers.

Due diligence of suppliers

We recognise that it is within our product supply chain where we have the highest risk of encountering practices that could amount to modern slavery.
Our modern slavery risk assessment considers the countries in which suppliers and factories operate, the nature of the products being produced, the use of temporary, migrant or agency labour, the presence and quality of independent social audits, supplier policies and management systems, whistleblowing arrangements, and any identified indicators of forced labour, recruitment-fee charging, restriction of movement or worker vulnerability. Findings inform supplier risk ratings, the frequency and depth of due diligence, and the escalation or corrective action required.

As part of our initiative to identify and mitigate this risk we undertake due diligence on our product suppliers. We predominantly sell own-branded products, manufactured and marketed under the 'Ann Summers' and 'Knickerbox' brands. Our relationships with our Supply Base are built on trust and shared goals.

- **New suppliers** – Our sourcing and onboarding procedure enables relevant teams to assess a prospective supplier's practices before approval and identify measures required to mitigate risk. Due diligence includes desk-based research, independent audit review, supplier self-assessment forms, financial checks, and review and acceptance of our manuals, policies, and terms and conditions. This process helps ensure that suppliers understand and agree to meet the business standards and legal requirements that apply to them, before we engage them to supply any products.

- **Existing suppliers** – We conduct annual risk assessments of our product suppliers and their factories to identify, investigate and address areas of concern. These assessments draw on desk-based research, supply-chain mapping, independent audit information and supplier self-assessment forms supported by evidence of practices, processes and procedures. We review and update the self-assessment form annually to reflect relevant developments in standards and legislative. Where concerns are identified, we determine proportionate corrective actions, responsibilities and timescales and monitor progress through the supplier review process.

- **Communication and escalation** – Audit and due diligence findings are assessed using a red, amber and green methodology and communicated to relevant internal stakeholders. Serious concerns are escalated to the appropriate Board member so they can be managed in accordance with our internal Policies.

- **Supply chain mapping** – We have conclusively mapped our Tier 1 Supply Chain and have started to map our Tier 2 (Material Production) Suppliers. We aim to continue to expand this visibility on Tier 2 and include Tier 3 (Raw Material Processing) within the next four years.

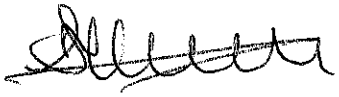
Assessment of effectiveness in preventing modern slavery

We have an established Governance Board which, includes the CEO, that meets quarterly to identify and discuss risks which affect our business. We recognise the need to keep modern slavery risks under review on the Risk Committee's agenda and will continually assess our policies, controls, and training (both internally and in conjunction with our suppliers) to ensure that this risk is effectively mitigated.

Priorities for the next financial year – We will continue expanding visibility beyond Tier 1 of the product supply chain, increase supplier engagement with SEDEX, strengthen the recording and monitoring of corrective actions, review modern slavery training, and use the results of annual due diligence to refine our risk assessment and supplier controls.

This statement was approved by the Board of Directors of Ann Summers Limited.

Signed



Maria Hollins
CEO

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