Modern Slavery Act 2015

Statement for Fiscal Year Ended 3 February 2024

Build-A-Bear Workshop® is pleased to issue this modern slavery and human trafficking statement in compliance with Section 54 of the United Kingdom's Modern Slavery Act 2015. The statement is issued for the fiscal year that ended 3 February 2024.

At Build-A-Bear Workshop, we are committed to conducting business in a lawful, ethical and responsible manner. We expect our suppliers to do the same. Our products adhere to the highest standards of toy safety and will only be made in factories certified to follow ethical labour practices.

The Modern Slavery Act 2015 requires certain commercial organisations to disclose their efforts (if any) to ensure that slavery and human trafficking is not taking place in its supply chains or in any part of its own business.

Our supply chain procedures have been designed to further our commitment to ensure that the products we sell are produced without the use of child, involuntary, or slave labour and in compliance with all other laws and regulations. All of our employees are required to certify compliance with our Business Conduct Policy which includes a requirement that employees respect and obey the laws of the jurisdictions in which we operate, including prohibitions against forced labour and human trafficking.

We verify ethical practices in our supply chain through our Quality Assurance Manual and social compliance certification requirements such as the International Council of Toy Industries (ICTI) Ethical Toy Program or similar third-party social compliance assessments. All of our product suppliers are required to review, sign and comply with our Quality Assurance Manual which details our expectations for the manufacturing and packaging of our merchandise. Among these expectations is a zero tolerance policy toward the use of child labour and forced labour. Forced labour includes human trafficking, prison labour, indentured labour, bonded labour, slave labour or any other forms of forced labour. The required compliance with this Manual includes a commitment by direct suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or countries in which they do business. Our policy mandates termination of contracts and dismissal of any supplier found to use human trafficking, slavery or child labour in the production of products or components of products for Build-A-Bear Workshop.

In order to help ensure compliance with these policies, we require all factories that produce our products to be compliant with the ICTI Ethical Toy Program or similar third-party social compliance assessment certification. ICTI and similar third-party social compliance organizations are committed, on behalf of their member companies to the operation of toy factories in a lawful, safe, and healthful manner. They uphold the principles that no underage, forced, or prison labour should be employed; that no one is denied a job because of gender, ethnic origin, religion, affiliation or association, and that factories comply with laws protecting the environment. Each of these organizations require periodic recertification by our suppliers. In addition, Build-A-Bear Workshop employees periodically visit factories to inspect the facility, review production, and observe working conditions. Inspections by third-party social compliance organizations, Build-A-Bear Workshop or other audit companies are announced to the factories in advance. In the fiscal year that ended 3 February 2024, 100% of the factories that produce our products met the requirements of ICTI or similar social compliance.

Internal accountability is an important aspect of these procedures. Employees who violate the Business Conduct Policy are subject to disciplinary action, which may include termination of employment. Suppliers

who violate any term of the Quality Assurance Manual are subject to sanction, which may include termination of the relationship.

Since the company was founded in 1997, Build-A-Bear Workshop has trained its employees who are involved with sourcing our products with the aim of raising awareness regarding human trafficking, slavery and child labour. All of our employees are required to certify compliance with our Business Conduct Policy which includes a requirement that employees respect and obey the laws of the jurisdictions in which we operate, including prohibitions against forced labour and human trafficking. In addition, as part of their job responsibilities, all employees who participate in the procurement of our products are trained concerning our requirement that they ensure that all factories producing our products (i) are compliant with the ICTI Ethical Toy Program or similar third-party social compliance assessment certifications, and (ii) certify compliance with our Quality Assurance Manual.

This statement was approved by the Board of Directors of Build-A-Bear UK Holdings Limited and the Board of Directors of Build-A-Bear Workshop UK Limited on XX February 2024.



Sharon Price John
Director
XX February 2024