CAMPER

MODERN SLAVERY STATEMENT

2022/23



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INTRODUCTION

This is our updated Modern Slavery Statement for the year 2022/23, published in compliance with the UK Modern Slavery Act 2015 (MSA), the California Transparency in Supply Chains Act 2010 (CTA), and the Australian Modern Slavery Act 2018.

According to the latest report from the International Labour Organisation (ILO), more than 40 million individuals worldwide continue to suffer as victims of modern slavery. Although there is no specific legal definition for modern slavery, it serves as a comprehensive term encompassing various exploitative practices. These practices include:

1. **Human trafficking:** This involves the process of ensnaring individuals into situations of exploitation through deceptive recruitment and coercion.
2. **Forced and compulsory labour:** It refers to any work or services performed under duress, where individuals are compelled to participate under the threat of punishment.
3. **Bonded labour:** This type of exploitation occurs when individuals are forced to work or provide services as a means to repay a debt or loan.
4. **Slavery:** Slavery occurs when one person exercises a (perceived) power of ownership over another individual, exerting control and dominance.

In essence, modern slavery refers to situations of exploitation where individuals are unable to refuse or escape due to threats, violence, coercion, deception, and/or abuse of power.

We remain committed to combating modern slavery in all its forms and take proactive measures to ensure that our business operations and supply chains are free from such practices. Through ongoing diligence and collaboration with our stakeholders, we strive to create an environment that upholds human rights, dignity, and fair treatment for all.



CEO LETTER OF COMMITMENT



Miquel Fluxá

I cherish our identity as a family business, where the wellbeing of our people, and all those connected to us, is at the heart of everything we do. Last year, we proudly achieved certification as a B Corporation (B Corp), reflecting our strong commitment towards accountability, and signifying the great steps our teams have made on our sustainability journey - socially and environmentally. Being a B Corp aligns with our belief that companies can be successful while also promoting greater social welfare. With dedication and humility, we approach each day with the aim of making a positive impact in the world.

Whilst we are on an island, we are not alone in our vision. The long-lasting relationships we hold with our partners are built on shared values and a commitment towards continuous improvement. Together we strive to create something unique - by enhancing efficiencies, applying leading practices, and upholding exemplary human rights standards.

We wholeheartedly support legislative measures to combat modern slavery and human trafficking. Understanding the complexities of this issue, we take decisive actions to identify potential risks and implement rigorous checks to eliminate any possibility of modern slavery both in our operations and supply chain. Our unwavering stance is one of zero tolerance, as we remain fully committed to eradicating slavery and human trafficking from our sphere of influence.

Our passion for creating a positive impact drives us forward on this journey of making our Camper world continually better.

This statement represents our modern slavery statement for the financial year 2022/23. It has been approved by the Camper Executive Committee on September 2023.

Miguel Fluxá, *CEO*



1 ABOUT CAMPER

1 ABOUT CAMPER

Camper has been a family business since 1877 when Antonio Fluxá, an artisan shoemaker, gathered a group of craftsmen together in Inca, Mallorca and introduced the first shoe-making machines. Founded in 1975 by Antonio's grandson, Lorenzo Fluxá, Camper´s contemporary footwear design embodies quality, imagination, irony, and innovation.

Camper means 'peasant' in Mallorcan. The austerity, simplicity, and discretion of the rural world in combination with its own history, culture, and the Mediterranean landscape inspire the brand's aesthetics and values.

Respect for tradition, arts, and crafts reinforces our promise: to create timeless, quality products, with consideration for their social and environmental impact.

Today, operating in more than 100 countries, Miguel Fluxá, CEO, and now the fourth generation to enter the family business, remains committed to preserving the values that have defined the brand since its inception.



1.1 MISSION AND VALUES

Human Rights are an absolute and universal requirement and they are embedded within our mission and our values. We are committed to following the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises:

WALKING WITH PURPOSE

Delighting people with a playful, sustainable, and responsible walking experience



REAL

We have been shoemakers for over 140 years. Quality and craftsmanship remain at the heart of what we do.

IMAGINATIVE

Camper thinks differently, and we want to be seen as different, but not in a loud and showy way. We add a twist of understated imagination to everything we do: in product, retail, and communication.

PLAYFUL

Camper is from the Mediterranean. We are serious about what we do but we don't take ourselves too seriously. We walk, we don't run, and we will always try to add a smile to life.

CARING

Camper is about people with local values and global horizons. We will do the right thing for people and the environment wherever we work.

2 OUR VALUE CHAIN

OUR VALUE CHAIN



1. DESIGN

Beginning in Inca, Mallorca, our team of designers and technicians work hand-in-hand to create around 600 models per season.

People

13 designers and 29 product developers create our collections, out of a total of 239 people working at our headquarters in different departments.

Sustainability Approach

Sustainability is at the core of our product design.

Key KPIs

79% of our Designers have been trained on our ESG approach to social and environmental innovation.

RISK OF MODERN SLAVERY: LOW



2. RAW MATERIALS

The selection of the Better Materials comes from Tier 2 and Tier 3 partners who adhere to our Supplier Code of Conduct and have the certifications we seek to ensure responsible sourcing.

People

Five employees work at our headquarters and two based at our office in Guangzhou, China, close to our suppliers.

Sustainability Approach

Renewable, recycled, or innovative natural sources are our material selection preference.

Key KPIs

One third of our Tier 2 suppliers are members of the Sustainable Apparel Coalition.

RISK OF MODERN SLAVERY: MEDIUM



3. MANUFACTURING

Our products are manufactured to exceptional standards in factories in Europe and Asia. We ensure that our Tier 1 suppliers meet social and environmental standards through our quality technicians.

People

Nine employees work on-site in Vietnam and Cambodia to supervise production and work with our partners. In our factories, approximately 10,000 workers are employed by our partners.

Sustainability Approach

We have mechanisms in place to ensure compliance with social and environmental standards at our factories.

Key KPIs

100% of Tier 1 suppliers signed our Code of Conduct.

RISK OF MODERN SLAVERY: MEDIUM

OUR VALUE CHAIN



4. LOGISTICS

Our distribution process consists of strategically distributed warehouses, logistics centres, and carriers.

People

We have a team of 32 direct Camper staff and a further 49 people employed by our logistics partner at our main warehouse in Barcelona, Spain, and at our distribution centres in the USA and China. Our main partner for transport is DHL..

Sustainability Approach

We work to reduce the extent of our carbon footprint on an ongoing basis by selecting more sustainable logistics and distribution alternatives.

Key KPIs

100% of our key suppliers have signed up to the Code of Conduct.

RISK OF MODERN SLAVERY: UNKNOWN



5. SALES

We are present worldwide through various sales channels:

- Our own Camper stores
- Camper online
- Distributors, multi-brand retail, and online platforms.

People

115 employees in offices around the world oversee commercial aspects and we have a team of around 600 people working in retail.

Sustainability Approach

Sustainability is incorporated into all areas of sales, from our innovative stores to sustainable packaging.

Key KPIs

Around 60% of our global workforce is trained on our ESG strategy.

RISK OF MODERN SLAVERY: LOW



6. AFTER SALES

We have multiple customer service mechanisms in place to ensure the best possible experience during and after the sale of our products.

People

Two dedicated teams: our Customer Service and our Customer Operations department, comprising 42 people.

Sustainability Approach

We offer lifetime warranties on certain models, encourage the care and repair of our shoes, and provide our customers with shoe collection points.

Key KPIs

Customer rating of our service achieved a 4.51 score out of 5 (above target).

RISK OF MODERN SLAVERY: LOW

3 OUR GOVERNANCE

3 OUR GOVERNANCE

In line with our mission-driven approach, we firmly uphold the belief that creating value centered on profit, people, and the planet is the key to ensuring long-term sustainability and achieving a triple bottom line. This means not only attaining economic profitability but also actively embracing social and environmental responsibility.

To reinforce this commitment, we have established a robust Corporate Management System. Its core responsibility is to ensure efficient management practices while diligently safeguarding the interests of our shareholders and wider stakeholders.

Our Human Rights strategy is crafted, regularly reviewed, and vigilantly overseen by the ESG and Compliance Committees, both directly reporting to the Executive Committee.

Camper's approach to Human Rights is firmly established in our Human Rights Policy. This commitment is also deeply embedded in our Code of Conduct & Ethics, Code of Conduct for Suppliers, and Procurement Policy. Our Modern Slavery Statement, a part of this framework, has received full approval from the Executive Committee.

To ensure the well-being of workers along our value chain, we maintain a formal escalation process for addressing serious issues affecting working conditions. This process includes briefing the Operations Committee, which endeavours to remediate the situation. If necessary, matters are elevated to the Executive Committee, complete with a proposed action plan and agreed-upon timelines for remediation.



3.1 GOVERNANCE MODEL

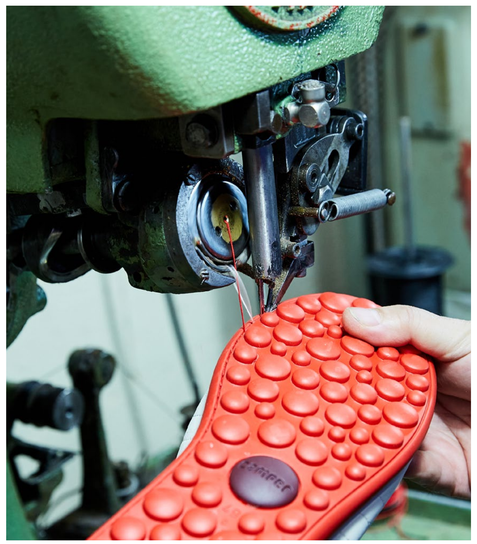
TRANSPARENCY, BUSINESS ETHICS, AND RIGOROUS DECISION-MAKING are the founding principles of our governance model, which is **based on the following FIVE PILLARS**



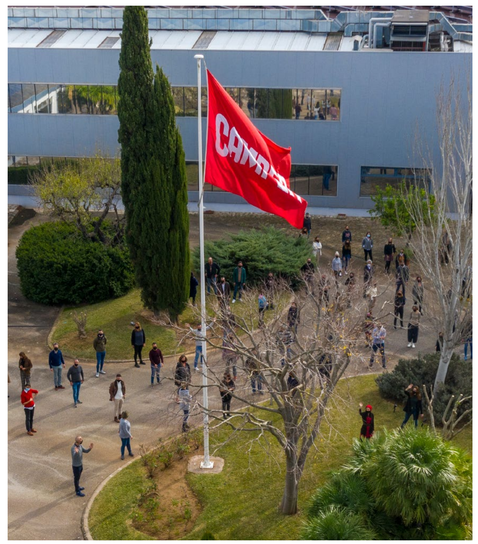
CODE OF CONDUCT AND ETHICS



CORPORATE POLICIES



RISK MANAGEMENT SYSTEM



ORGANISATIONAL MANAGEMENT SYSTEM



COMPLIANCE SYSTEM

3.2 RISK MANAGEMENT SYSTEM

A Risk Management System helps us define, identify, manage, and control all internal and external risks in the overall context of the organisation. Our model consists of three lines of defence based on best practices in risk management and control, which integrates, coordinates, and aligns all support and assurance functions to manage in the most efficient way all present and potential risks that may affect us.

In 2020, we conducted a comprehensive materiality assessment as a key component of our risk analysis. This assessment involved rating both existing and potential risks based on their severity and the likelihood of occurrence within our direct and indirect operations using the Global Reporting Initiative (GRI) standards as a reference.

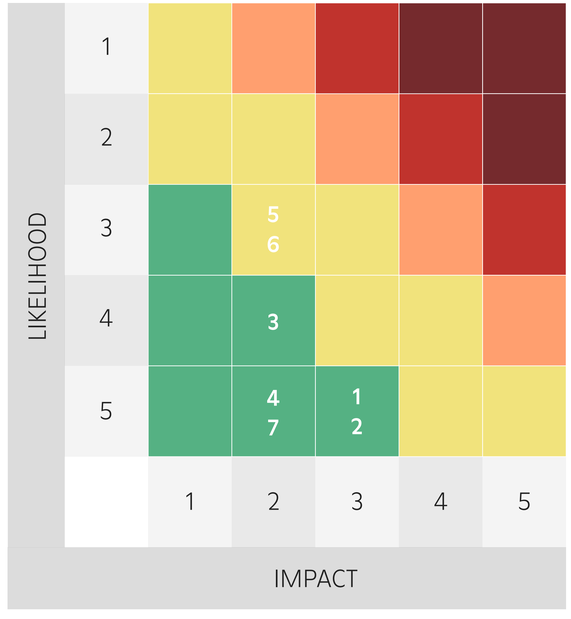
The objective was to pinpoint areas with the most inherent risk, guiding us towards prioritising specific focus areas. Social Conditions and Human Rights in the value chain emerged as a matter of high priority during this assessment.

During 2022, we conducted a strategic prioritisation exercise to update and create a new sustainability performance framework. We conducted an analysis of sector trends and forces to identify potential new issues and ensure that we cover all relevant issues in the current global context. As a result of the strategic reflection carried out, we integrated two new commitments into our ESG Strategy for 2023-26, and we refined five additional relevant topics to commit to these issues including Health, Welfare and Safety at Work and Human Rights.

In 2023/early 2024 we will be updating our Risk Analysis and conducting a Double Materiality to ensure ongoing vigilance and progress in addressing these critical issues.

Social and Human Rights Risk Map

RISK / OPPORTUNITY TYPE	RISK DESCRIPTION	IMPACT (1-5)	LIKELIHOOD (1-5)	TOTAL RISK (1-25)
1. Forced Labor	Risk of finding forms of forced labor or modern slavery in the supply chain	3	1	3
2. Child Labor	Risk of finding forms of child labor in the supply chain	3	1	3
3. Working hours	Risk to excess of overtime hours due to peaks in production/office/distribution center activity; incapability to guarantee work life balance	2	2	4
4. Freedom of association and collective bargaining	Incapacity of guaranteeing freedom of association and workers' representation at the facility level (interference or discriminatory practices).	2	1	2
5. Health and Safety	Risk for all workers ifrom the exposure to short and long- term hazards at work and incapability to reduce workplace injuries and illnesses	2	3	6
6. Discrimination, Harassment and Abuse	Risk of discimination, violence and harassment, including gender-based violence and harassment.	2	3	6
7. Bribery and Corruption	Offering, promising, agreeing to receive or giving of a financial or other advantage to induce or reward improper functions or activities and/or the request or receipt of such an advantage.	2	1	2



3.3 OUR POLICIES

Camper´s corporate policies are shaped by a series of policies, tools, and mechanisms that help us to ensure strong governance and compliance across a number of different areas.

Our people related policies are designed to ensure that all our stakeholders are treated with dignity and respect. They are based on internationally recognised human rights principles and indicators encompassed in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The policies relevant to human rights and modern slavery are:

OUR COMMITMENTS	KEY CORPORATE POLICIES, MECHANISMS AND MANAGEMENT TOOLS		SUPPORT POLICIES	
Creation of Lasting Value	· Organisational Management System · Camper Group Privacy Policy · Compliance Policy · Prevention of Money Laundering Policy	· **Risk Management Policy** · Anti-Corruption and Bribery Policy		
Commitment to Our Team	· **Personnel Policy** · **Health Promotion at Work Policy** · **Occupational Risk Prevention Policy**	· **Equality, Diversity, and Inclusion Policy** · **Anti-Harassment Policy**	· **Employee Handbook** · Performance Evaluation Process · Recruitment and Talent Loyalty Policy · **Disciplinary Regime**	· Bonus Policy – Headquarters and Offices · Bonus Policy – Retail · Time and Leave Policy · Internal Communication and Participation Policy
Strong and Solid Relationships	· Ethical Marketing Policy · Camper Group Privacy Policy · **Supplier Code of Conduct**	· **Purchasing Policy** · **Procurement and Purchasing Guides**	· **Whistleblowing Policy**	
Duty in Society	· Conflict of Interest Policy · **ESG Policy** · **Human Rights Policy** · **Personnel Policy**	· **Supplier Code of Conduct** · **Declaration on Modern Slavery (UK – Australia – USA)** · Donations and Sponsorship Policy		
Promise to the Planet	· ESG Policy · Environmental Policy		· Transport Policy	

Key: Policies in bold have high relevance to Modern Slavery
We review and update these policies and practices regularly as we learn from our experiences.

4 COLLABORATION

4 COLLABORATION

We firmly believe that fostering cooperation and partnership is the cornerstone of creating shared value while combating modern slavery. Our unwavering objective is to cultivate and sustain enduring relationships with stakeholders through continuous communication, ensuring transparency and trust guide our every action.

By adhering to strict measurement and evaluation standards, we not only bolster our commitment to shared value but also establish a robust system to prevent and detect modern slavery within our operations and supply chains.

As a result we connect, use resources, guidance and best practice from the following organisations:

Sustainable Apparel Coalition (SAC) – has a membership of over 250 leading apparel, footwear, and textile brands, retailers, suppliers, service providers, non-profit organisations (NGOs), and others. The SAC is a global alliance that joins forces to work towards reducing environmental impact and promoting social justice throughout the global value chain.

The Coalition provides industry with the Higg Index, a toolkit for measuring social and environmental impacts across the value chain, to help identify areas for improvement of current practices, strengthen sustainability performance, and promote the transparency demanded by consumers.

Better Work (BW) - is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect of labour rights for workers by advising factories, and collaborating with governments and brands to improve conditions. A collaboration between the ILO and the International Finance Corporation (IFC), a member of the World Bank Group.

United Nations Global Compact (UNGC) - we signed the United Nations Global Compact in 2021, becoming proud partners of the Spanish Global Compact Network to further promote and contribute to the Sustainable Development Goals (SDGs) in our sector. During the year, we published our first UN Global Compact Progress Report, highlighting Camper's support. Last year, we extended our efforts outlined in the Sustainability Report with a short self-diagnosis provided by the Global Compact to declare our contributions to the UN SDGs.

5 DUE DILIGENCE

5.1 WITHIN CAMPER

At Camper, we give utmost priority to the well-being and rights of our employees by benchmarking and adopting leading business practices. We strive to surpass legal standards in areas such as working conditions, people's rights, health, welfare, and safety.

By doing so, our goal is not only to contribute to the highest level of satisfaction among our teams, fostering a positive and supportive work environment, but also to proactively work towards preventing and eradicating human rights risk, including any instances of modern slavery.

- **Onboarding**

We review the employment of any new team member as part of our onboarding process. This includes a person's right-to-work regarding any visas required for the country of employment. During the onboarding process, new starters are also trained on key governance aspects required for their role, including the Code of Conduct and Ethics.

- **Health & Safety**

Through assessments, one-to-one meetings and through our regular Psychosocial Risk Questionnaire*, our Health and Safety department identifies any risks to Camper people, including gender violence, modern slavery or other organisational related health issues.

* Spain only



5.2 WITHIN THE SUPPLY CHAIN

At the core of our operations lies a robust Sustainable Procurement Model that exemplifies our commitment to addressing environmental, social, and governance concerns throughout our supply chain. This model serves as a guide to establish stringent control and monitoring guidelines, fostering responsible manufacturing and distribution practices, while also promoting awareness among our valued partners and suppliers.

Our Sustainable Procurement Model is built on five pillars:

1 . Ethical Sourcing

We prioritise supplier selection based on stringent ethical criteria, ensuring that our partners share our commitment to sustainability, fair labour practices, and responsible resource management. By selecting suppliers who adhere to strict ethical standards, we actively contribute to the prevention of modern slavery in the supply chain.

2 . Stakeholder Engagement

We actively engage with our suppliers, encouraging open communication and collaboration to foster continuous improvement and adherence to sustainable practices. Through this engagement, we can raise awareness about the risks and implications of modern slavery, encouraging our partners to implement robust safeguards against such practices.

3 . Performance Monitoring

We diligently monitor supplier performance, conducting regular evaluations and audits to ensure compliance with our sustainability standards and swiftly address any deviations. Through this vigilant monitoring, we proactively detect and mitigate any signs of potential modern slavery within our supply chain, taking immediate actions to prevent and eliminate such risks. As a long-term approach we also urge our partners to be transparent through shared collaborative sources such as Better Work or the SAC's FSLM, to help avoid duplication and tackle challenges collectively.

ESG assessment of suppliers

Before selecting our suppliers, we evaluate them on ESG issues.

Adherence to the Supplier Code of Conduct

We ask our suppliers to comply with our ESG commitments.

ESG questionnaire designed by Camper

We assess supplier performance through our ESG questionnaire.

ESG platforms and audits

We encourage our suppliers to join ESG audit platforms, along with external audits.

4 . Non-Conformity Management

Incidents and non-conformities are graded and, depending on their severity, resolved within specified timeframes. In cases where issues cannot be satisfactorily resolved, or if the issue is severe, we adopt a zero-tolerance approach, leading to the immediate termination of the contract. All incidents and related reports are carefully reviewed by the Operations Committee and the ESG Committee.

5 . Whistleblowing Channel:

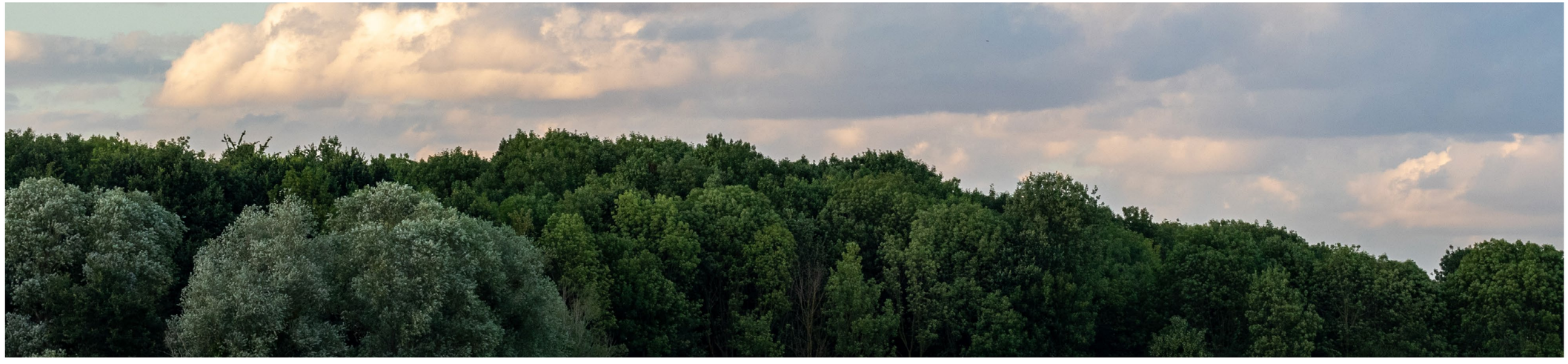
We have a dedicated whistleblowing channel accessible to all stakeholders, irrespective of their category, enabling them to report irregular or unethical conduct that goes against Camper's codes, corporate policies, as well as local and international regulations. To ensure the anonymity, confidentiality, and security of the entire complaint process, the management of any complaint via the Whistleblower Channel is handled by an external company. A designated committee is responsible for managing whistleblowing incidents, ensuring transparency and fair resolution.

Through these five interconnected pillars, we remain committed to sustainability, responsible practices, and the protection of human rights, driving positive change within our organisation and across the broader supply chain.

5.2 WITHIN THE SUPPLY CHAIN

Overview of Tier 1 Forced Labour & Modern Slavery Due Diligence

MANUFACTURER'S NAME	TIER 1 FACTORY	2022							SEDEX AUDITS
		% OF PRODUCTION	EMPLOYEES	ADHERENCE TO CODE OF CONDUCT	CAMPER'S ESG QUESTIONAIRE	MEMBER OF SAC	FEM	FMSL	
Golden Top	GL	49.6%	5,270	OK	2022	Yes	Verified	BetterWork	2022
Stella Group	GS	38.4%	3,610	OK	2022	Yes	Verified	No	2022
Novi Group	GPS	6.4%	1,382	OK	2022		No	No	2021
Jefar	JA	1.9%	300	OK	2022		No	No	2021
Novi Group	DDS	1.6%		OK	2022		No	No	No
Gomes & Leite	GM	0%	80	OK	2022		No	No	No



6 ACTION AND MEASUREMENT

6 ACTION AND MEASUREMENT

Throughout 2022, we have remained vigilant in monitoring any potential allegations of human trafficking or slavery activities, both within our own business and among our suppliers. We are pleased to report that during this period, no critical allegations have come to our attention. We publicly report all updates in our Sustainability Report.

However, our commitment to ethical conduct and responsible practices demands swift action should any such allegations arise. In the event that we become aware of any concerning activities, we will not hesitate to take immediate action against the involved supplier. Additionally, we will promptly report the matter to the appropriate authorities, ensuring that the necessary measures are taken to address the situation effectively and uphold our values of integrity and human rights.

SCOPE	KPI	2022	2023
COMMITMENT & EMBEDDING	Strengthen Code of Conduct and Ethics	No updates	Major updates to be published in Q4
COMMITMENT & EMBEDDING	100% of employees trained on Human Rights related issues including Modern Slavery	63% trained on our integrated ESG Strategy	Goal to train 100% of employees on enhanced Code of Conduct and Ethics
COMMITMENT & EMBEDDING	100% of Middle & Top Management have ESG related goals and KPIs and are evaluated on them in their Annual Development Review.	100%	100%
COMMITMENT & EMBEDDING	Whistleblower Policy and Procedure compliant with regulation.	No official regulation available in Spain	Policy and Procedure to be updated to make them compliant with Spanish regulation.
COMMITMENT & EMBEDDING	Strengthen Supplier's Code of Conduct	No updates	To be updated in Q4
COMMITMENT & EMBEDDING	>65% of purchases to be made from Suppliers who have adhered to our Code of Conduct	61%	Goal to increase to 65%
COMMITMENT & EMBEDDING	>50% of purchases to be made from Suppliers who have completed Camper's ESG Questionnaire	48%	Goal to increase to 50%
ASSESS AND TRACK	Keep Risk Map Updated	No updates	Major updates to be published in Q4
ASSES AND TRACK	Business Impact Model Scoring (B Corp Certification) >80 pts	87.5 points for the B Corp Certification	Maintain or increase scoring despite augmented requirements due to the company's evolution.
ASSES AND TRACK	Sustainability Report published and verified by an independent third-party	Published and Verified	Publishing and verification pending
ASSES AND TRACK	UN's Global Compact Communication on Progress	Published	Publishing pending
ASSES AND TRACK	>50% of production done by a supplier with a Better Work or FSLM assessment verified.	46% of production with Better Work	Goal to increase to 50%
ASSES AND TRACK	Have more than 80% of the production undergo External Social Audits at least every other year with no evidences of Forced Labour reported	96.3% of production audited No incidences on Forced Labour	
REMEDY AND GRIEVANCE	Publicly report on cases received through the Whistleblower Channel and their remedy	No cases reported in 2021	8 cases reported in 2022 that will be published in the Sustainability Report on Q4 - None on Modern Slavery.

More information on Modern Slavery can be requested at esg@camper.com
Any reports or concerns regarding this topic can also be directed via our
Whistleblower Channel https://report.whistleb.com/en/camper