ANNUAL STATEMENT ON MODERN SLAVERY

MAY 2025

WILLIAM LAMB GROUP | SINCE 1887

The William Lamb Group publishes this statement under the provisions of the UK Modern Slavery Act 2015 Section 54 (Transparency in Supply Chains). The Act requires Businesses to state the actions they have taken in the previous year to mitigate the risk of acts of slavery and human trafficking from occurring within their supply chains.

This statement relates to the financial year ending 31st December 2024.

Overview

The William Lamb Group and William Lamb Holdings ('we, us') is committed to preventing acts of modern slavery and human trafficking from occurring within its business and imposes the same high standards on its suppliers. As a private family-owned business we believe in honesty and fairness in everything that we do. We remain committed to ensuring that our suppliers, whether new or existing, comply with our code of ethics.

We have always been committed to promoting and upholding human rights and ensuring that no modern slavery or human trafficking takes place within our business or our supply chains. We take pride in trading ethically, sourcing responsibly and undertaking the necessary due diligence to deliver assurances that our suppliers and their factories understand their responsibility and comply with our ethical standards. Through a regular review of policies, procedures and training processes, we ensure that we are alert to any practices that contravene the high standards that we set and understand our responsibilities for upholding human rights.

Modern slavery is unacceptable, and in this statement, we outline our commitment to eradicating it and detail the steps that we have taken to protect workers throughout our business, through education and the implementation of a robust compliance procedure.

Our Business Structure and Supply Chains

The William Lamb Group is a family-owned business, founded in 1887. Its primary activity is the importing and supply of footwear and bags to leading retailers and wholesalers that operate in the UK and Internationally.

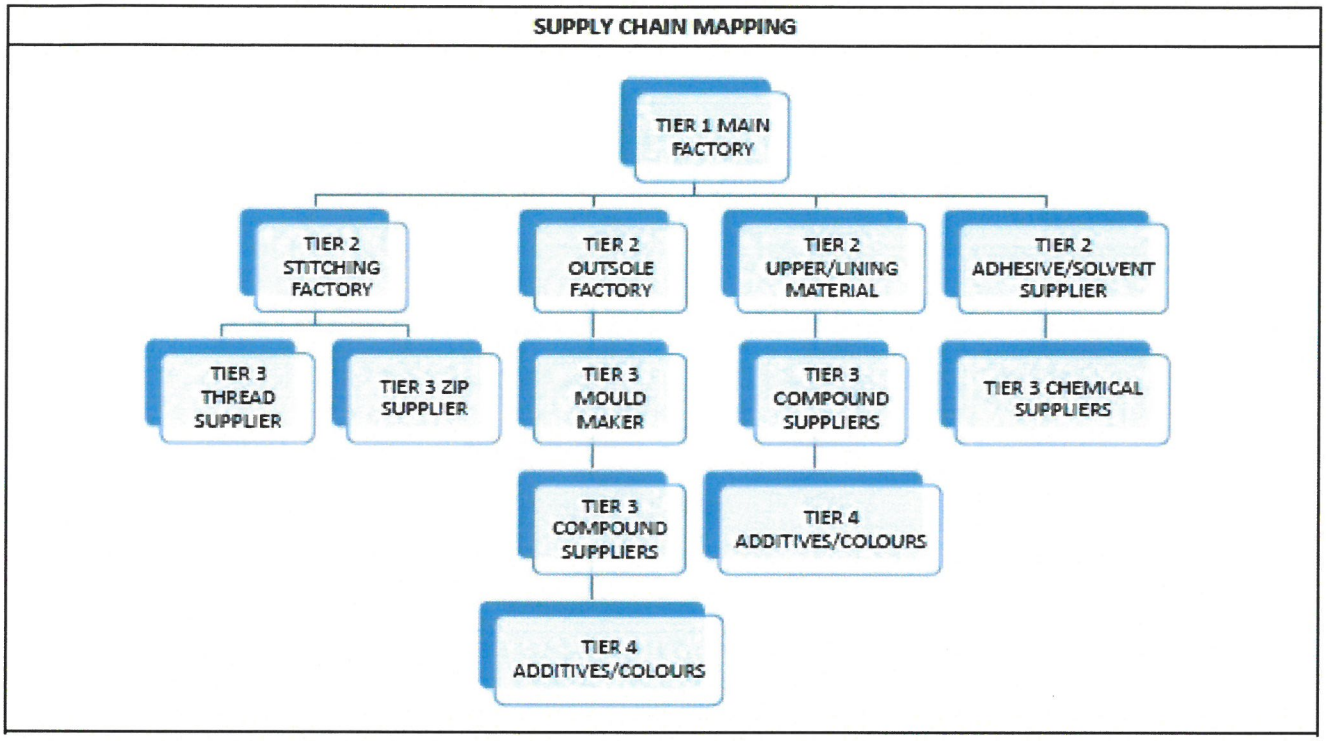
The company has an annual turnover of approximately £27 million, 72% of which is footwear sales and the balance bags and accessories. It is one of the largest children's licence holders in the UK with Disney, BBC and Hasbro amongst the portfolio of licensors. The company's head office is in Wakefield, Yorkshire where approximately 80 people are employed with a further 19 people across 3 offices in the Far East.

The Technical and CSR structure of the organisation is as follows:

- Highly trained inspectors working across China, India, Vietnam and Laos
- Footwear technicians both in UK HO and Asia are responsible for Risk Assessments and full testing programmes
- SATRA trained shoe fitters in UK HO who fit all our products to industry standards
- A dedicated Ethical team in China, India, Vietnam and the UK, working with four external auditing bodies
- A dedicated Global Compliance Manager, with three Corporate Compliance Managers based in China, India and Vietnam

The company operates across 9 source countries: China, which accounts for 80% of business, India, Vietnam, Laos, Pakistan, Portugal, Bangladesh, Sri Lanka and Morocco. We do not manufacture directly but source from preferentially selected third party manufacturing sites, our tier 1 suppliers. These in turn

will source the materials and components that go into the finished products from a variety of suppliers across an international spectrum. We acknowledge that the supply chain is complex and stretches to a number of tiers beyond the 1st level of manufacturing sites.



The products we import cover a wide range of footwear and accessories from adult's leather shoes, sandals and boots to children's school shoes, indoor slippers and rubber rainboots. Additionally, we supply school bags, backpacks, lunch boxes, travel luggage, hats, sunglasses and umbrellas and men's and women's bags.

Our main business involves, the designing and sourcing of product ranges, developing samples, customer sales, order placement and production management, quality control, logistics and warehousing. All source factories are audited to the ETI Base Code of Practice. Employees in the UK and overseas are mostly full time, long service but on occasion we do contract warehouse staff to assist with busy periods.

Our Policies and Practices

We build supplier partnerships which are positive and for the long term and it is important that we and our suppliers encourage a culture of honesty and accountability. The William Lamb Group are totally opposed to any form of slavery within our supply lines. Our Due Diligence Policy on Modern Slavery makes clear that wherever we operate, we will always abide by the law and do everything we can to eliminate any forced labour, human trafficking and slavery practices. The William Lamb Group also expect the same commitment from our suppliers no matter where they operate, in order to ensure that our customers have total trust in the products and services that we provide.

Our guiding principles are defined by the Ethical Trading Initiative Base Code of Practice.

We are Stronger Together Business Partners: www.stronger2gether.org which has enabled the company to develop a series of policies which form the backbone of our current approach to mitigating the risks of modern slavery and human trafficking from occurring within our supply chain:

- Due Diligence Policy on Modern Slavery
- Bribery and Corruption Policy
- Employee Grievance Policy
- Ethical Trading Manual
- Ethical Trade and Human Rights Self-Assessment
- Worker Questionnaire
- Policy on Forced Labour
- Xinjiang Cotton Declaration
- Modern Slavery and Hidden Labour Exploitation Policy
- Re-assignment and Sub-Contracting

In 2024 our policies were updated and shared with new suppliers in all countries. Validation of the effectiveness of our policies is carried out by regular supplier visits from our Corporate Compliance personnel who operate within China, India and Vietnam. The Due Diligence Policy on Modern Slavery, Employee Grievance Policy and Ethical Code of Conduct which is extracted from the Ethical Trading Manual have been translated into local language and displayed in departments and any dormitories. A whistleblower procedure is included to encourage active worker participation.

It is our aim to ensure our suppliers actively integrate our policies within their own organisation and encourage worker participation in reporting any human rights issues and concerns.

Our UK labour provider for warehousing staff is part of the Stronger Together Initiative and a member of Sedex.

Our UK dedicated Global Compliance Manager is the Modern Slavery Champion and completed the "Tracking Modern Slavery in UK Business" online training in June 2021 and June 2024.

Each new starter to William Lamb is introduced to the Modern Slavery Champion who in turn invites them to attend a Modern Slavery and Hidden Labour Exploitation tutorial. This includes an informal discussion, watching 2 videos and receiving handouts which have been downloaded from the Stronger Together website.

Due Diligence and Risk Assessment

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we adopted a robust five step process (detailed further below).

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains

- provide adequate protection for whistleblowers

Our approach to identifying risks within the supply chain has been developed since 2015 through interaction with the Ethical Trade Initiative, Stronger Together Initiative, suppliers, third party auditors and external training programmes.

We have invested significant financial and personnel resources into the implementation of our due diligence programme. The framework we have adopted in mitigating risk is based on five essential steps:

1. Mapping the supply chain to get a global perspective
2. Define priorities through assessing the level of risk
3. Set a course of action
4. Decide upon remediation where necessary
5. Incorporate learnings into future strategies

We begin with a Self-Assessment Questionnaire which allows the supplier to volunteer information about their business and employment practices. We will then follow up with a site visit by one of our highly trained Corporate Compliance personnel in order to validate the information contained in the report. Orders cannot be placed with any supplier until this process has been completed and the supplier's information has been validated by our Corporate Compliance Team.

A risk profile is assigned to each supplier which is based on geographical situation, complexity of product and cost profile and potential number of tiers within the supply chain. Suppliers are contractually obliged to manufacture goods at the factory that has been verified and named on the Purchase Order provided to them, and any change of factory must be pre-approved by us in writing. We do not allow sub-contracting unless the sub-contracted factory has also undertaken a satisfactory audit and their credentials validated. We are able to stamp out unauthorised sub-contracting with unannounced site visits to verify that products have been produced at the agreed location and date. This ensures we can report, measure and risk assess our supply chains without the risk of a supplier attempting to engage in any dishonest activity.

Much of the essential work we carry out is through direct lines of communication with our suppliers and involves visiting the site to carry out verification checks on workers through random interviews and worker questionnaires. We look for risks within the responses to the interviews, the physical conditions of the work environment and any dormitories associated with the workplace. In addition to our own field work we have partnered with external third-party audit companies to assist in areas of potential high risk.

We use these assessments as an opportunity to impart an understanding of Modern Slavery risks to the workers and ask in return that they remain vigilant and communicative if they become aware of any instances of a breach of our Modern Slavery Code.

Risk and Compliance

The William Lamb Group evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain through the five-step approach listed above.

We consider that we operate in high-risk sectors or locations because our suppliers are based in countries where there is an influx of migrant labour, a large child population (risk of child labour) and female workers.

Where we have identified a potential risk through our Self-Assessment Questionnaire and/or site visit, we will ensure corrective action plans are put in place and provide reports with any issue resolution. Our Corporate Compliance Team and auditors combine to conduct a combination of announced and unannounced audits to ensure the true working conditions of supplier factories are documented and appropriate responses or corrective actions are put in place to address any concerns.

Smeta audit reports and corrective action plan reports are uploaded onto SEDEX and evidence is provided to support the closure of non-compliance which are verified by the auditors. Smeta is the world's leading social audit.

We provide all of our suppliers with our policies, and compliance with these policies is incorporated into any binding contract that we enter into with our suppliers. Third party audits are conducted every year to ensure that our suppliers are performing ethically, and our risk assessments remain accurate.

We ensure that all our suppliers adhere to all of our policies. We enforce a strict code of compliance and do not tolerate modern slavery and human trafficking within our supply chains. If we find evidence of a serious failure and/or repeated failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.

We are committed to reviewing and updating our policies every year in line with best practice. Our policies set out what we expect from anyone engaged in our business and are provided to all suppliers and made available to employees via the website – williamlambgroup.com

Training, Capacity Building and KPI's

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our Modern Slavery and Hidden Labour Exploitation policy. Employees are taught the benefits of stringent measures to tackle modern slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Raising awareness of the issues around modern-day slavery and human trafficking within our supply chains is one of the key components of our Social Responsibility Programme. Gaining trust and cooperation from our suppliers is vital if we are to make a significant impact on this issue.

UK employees are encouraged to watch hidden labour exploitation awareness videos and handed leaflets downloaded from the Stronger Together website.

Further Actions and Sign Off

Raising awareness, collaboration and sharing experiences of modern slavery between our internal personnel, suppliers and auditors is the single most effective way of tackling modern slavery. In 2025 and beyond we will continue to focus on educating our supply chain with face-to-face presentations and training and provide support and guidance to all the factories that we enter contracts with. We continue to review and update our policies and update our modern slavery training and awareness-raising. We continue to evaluate the effectiveness of our polices, processes, and training to ensure they evolve with changing social conditions and tackle new issues that arise.

Our future focus will be to continue carrying out annual audits within all suppliers and complete the implementation of our policies and due diligence programme for all new suppliers.

We are also proud to be a member of SEDEX. SEDEX is one of the world's leading ethical trade membership organisations, working with businesses like the Wiliam Lamb Group to improve working conditions for workers globally in supply chains. The measurement criteria for the Smeta audits uploaded onto Sedex is based on the Ethical Trading Initiative ETI Base Code but can be adopted and tailored to use other codes of conduct. The ETI Base Code is based on both international standards and International Labour Organisation (ILO) conventions.

This statement is made in accordance with section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015 and constitutes William Lamb Group's slavery and human trafficking statement for the financial year commencing January 2025 and ending December 2025.

This statement has been approved by the Board of Directors of the William Lamb Group and will be reviewed annually.

Jane Wilson

CEO

William Lamb Group

Date 15th May 2025