

ANNUAL STATEMENT ON MODERN SLAVERY

Financial year ending 31 December 2025



William Lamb Group

This statement is published with reference to section 54 of the Modern Slavery Act 2015 and explains the steps taken during the financial year to prevent modern slavery and human trafficking in our business and supply chains.

1. Introduction and scope

Modern slavery, forced labour and human trafficking are unacceptable. William Lamb Group and William Lamb Holdings (together, "William Lamb", "we", "us" and "our") are committed to acting ethically and responsibly and to improving the systems and controls that help prevent exploitation in our own operations and supply chains.

This statement describes the steps taken during the financial year ending 31 December 2025. It is intended to meet the reporting expectations of section 54 of the Modern Slavery Act 2015 where applicable to the Group and, in any event, is published voluntarily as part of our ethical trading commitments. The Board should confirm the statutory turnover position before final publication.

The statement should be read alongside our supplier requirements, Ethical Trading Manual, Due Diligence Policy on Modern Slavery, Modern Slavery and Hidden Labour Exploitation Policy and related compliance procedures.

2. Our business and supply chains

William Lamb Group is a family-owned business founded in 1887. Its principal activity is the design, sourcing, import and supply of footwear, bags and accessories to leading retailers and wholesalers in the UK and internationally.

The company has annual turnover of approximately £29 million, with around 74% of sales generated from footwear and balance from bags and accessories. We are one of the UK's largest children's licence holders, with Disney, BBC and Hasbro amongst the licensor portfolio.

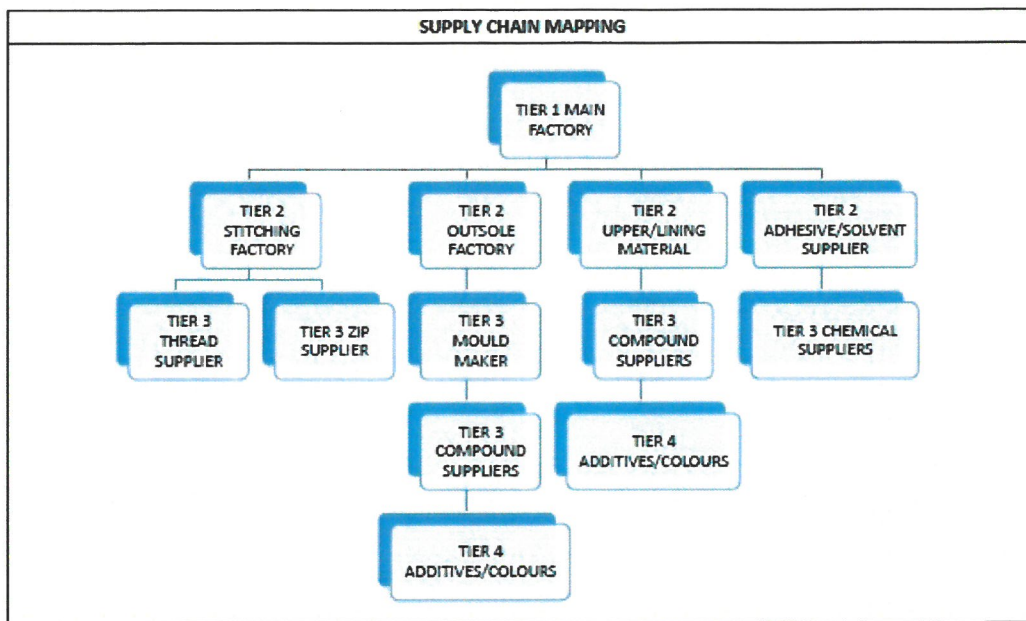
Our head office is in Wakefield, Yorkshire, where approximately 80 people are employed. A further 18 colleagues work across three offices in the Far East. We do not manufacture directly. We source products from selected third-party manufacturing sites, our Tier 1 suppliers, who in turn source materials and components from further tiers of the supply chain.

Products and activities

Our product range includes adult and children's footwear, school shoes, sandals, boots, indoor slippers, rubber rainboots, school bags, backpacks, lunch boxes, travel luggage, hats, sunglasses, umbrellas and men's and women's bags. Our activities include design, range development, sample development, customer sales, order placement, production management, quality control, logistics, warehousing and distribution.

Sourcing countries and supply chain complexity

During the year, we sourced from six countries: China, India, Vietnam, Laos, Sri Lanka and Morocco. China accounted for approximately 80% of business. We recognise that footwear and accessories supply chains are complex and can extend beyond Tier 1 into materials, components, chemicals, outsoles, stitching, trims and packaging.



Supply chain mapping illustration: Tier 1 factory through to further-tier material, component and chemical suppliers.

3. Governance and responsibility

Responsibility for modern slavery risk management sits with senior leadership and is supported by our Technical, CSR and Corporate Compliance structure. Our UK-based Global Compliance Manager acts as Modern Slavery Champion and works with Corporate Compliance Managers based in China, India and Vietnam.

Our compliance structure includes:

- trained inspectors working across China, India, Vietnam and Laos;
- footwear technicians in the UK and Asia responsible for risk assessments and testing programmes;
- SATRA-trained shoe fitters in the UK who fit products to industry standards;
- a dedicated ethical compliance team in China, India, Vietnam and the UK;
- four external auditing bodies supporting independent audit activity; and
- a Global Compliance Manager supported by Corporate Compliance Managers in key sourcing regions.

The Board reviews and approves this statement annually. Operational responsibility for day-to-day due diligence, audit follow-up, supplier onboarding and escalation is managed through the compliance team with support from Technical, Sourcing, Merchandising, Sales and senior management.

4. Policies and standards

Our guiding principles are aligned to the Ethical Trading Initiative Base Code and relevant International Labour Organization conventions. We are Stronger Together Business Partners and are members of Sedex. These relationships support our policies, training and due diligence approach.

Our policy framework includes:

- Due Diligence Policy on Modern Slavery;
- Modern Slavery and Hidden Labour Exploitation Policy;
- Policy on Forced Labour;
- Ethical Trading Manual and Ethical Code of Conduct;
- Ethical Trade and Human Rights Self-Assessment;
- Worker Questionnaire;
- Employee Grievance Policy;

- Bribery and Corruption Policy;
- Re-assignment and Sub-Contracting Policy; and
- Xinjiang Cotton Declaration.

In 2025, policies were reviewed, updated and shared with new suppliers in all sourcing countries. Key policies, including the Due Diligence Policy on Modern Slavery, Employee Grievance Policy and Ethical Code of Conduct, have been translated into local languages and displayed in factory departments and dormitories where appropriate. Whistleblowing and grievance routes are included to encourage worker participation and reporting.

Our UK labour provider for warehouse staff is part of the Stronger Together Initiative and a member of Sedex. Our UK cleaning provider writes a Modern Slavery Statement annually.

5. Risk assessment

We assess modern slavery risk by considering country risk, the nature of the product, production process complexity, labour profile, cost profile, audit history, use of migrant labour, age profile, female worker profile, supply chain tiering and the potential for unauthorised subcontracting.

We consider our sector and parts of our sourcing footprint to be higher risk because footwear and accessories production can involve labour-intensive processes, migrant labour, young workers, female workers, seasonal production peaks, multi-tier supply chains and third-party labour providers. We also recognise heightened risks connected with subcontracting, recruitment fees, excessive overtime, document retention, wage deductions, dormitory standards, grievance access and lower-tier material or component sourcing.

Supplier risk profiles are assigned and reviewed as part of onboarding and ongoing monitoring. Suppliers are contractually required to manufacture only at the verified and named factory on the purchase order. Any factory change or subcontracting must be approved by us in writing before production starts.

6. Due diligence and supplier onboarding

Orders cannot be placed with a new supplier until the onboarding process has been completed and the supplier's information has been validated by the Corporate Compliance Team. Our due diligence process is based on five steps:

Step	What this means in practice
1. Map	Map the supply chain to build a global view of factories, production processes and known further-tier risks.
2. Assess	Define priorities by assessing risk by country, product, factory history, labour profile and supply chain complexity.
3. Act	Set an appropriate course of action, including audit, site visit, supplier training or contractual controls.
4. Remediate	Agree corrective action plans where issues are identified and verify closure with evidence.
5. Learn	Incorporate lessons into future sourcing decisions, supplier approval, policy updates and training.

The process begins with a Self-Assessment Questionnaire covering business and employment practices. It is followed by a site visit or validation by trained Corporate Compliance personnel. We use worker interviews, worker questionnaires, site observations and document reviews to check whether stated practices match conditions on site.

7. Monitoring, audit and remediation

All source factories are required to be audited against the ETI Base Code of Practice. We use a combination of announced, semi-announced and unannounced visits, internal compliance checks and third-party audits. SMETA

audit reports and corrective action plans are uploaded onto Sedex where applicable, with evidence used to support closure of non-compliances.

Where risks or non-compliances are identified, we expect suppliers to complete corrective action plans within agreed timescales. Serious or repeated failures are escalated to senior management. Where a supplier fails to engage, fails to remediate or presents an unacceptable risk to workers, we may suspend orders or terminate the relationship.

We seek to avoid causing greater harm to workers through immediate disengagement where remediation is possible. Our priority is to protect workers, support responsible remedy and ensure that future production is only placed where standards are met.

8. Grievance, whistleblowing and worker voice

We expect suppliers to provide workers with accessible ways to raise concerns without fear of retaliation. Our grievance and whistleblowing expectations are included in supplier policies and displayed locally where appropriate. Worker questionnaires and interviews form part of our site verification process and help us identify indicators that may not be visible through document review alone.

Employees are encouraged to report concerns through their manager, HR, the Global Compliance Manager who is also the Modern Slavery Champion. Reports may relate to our own operations, labour providers, suppliers or factories.

9. Training and awareness

We invest in training and awareness so that colleagues and suppliers can recognise indicators of forced labour, human trafficking and hidden labour exploitation. UK employees are encouraged to watch hidden labour exploitation awareness videos and are provided with Stronger Together materials.

Each new starter is introduced to the Modern Slavery Champion and invited to attend a Modern Slavery and Hidden Labour Exploitation tutorial. This includes discussion, videos and supporting materials. Our UK Global Compliance Manager, who acts as Modern Slavery Champion, completed "Tackling Modern Slavery in UK Business" online training in June 2021 and June 2024.

In 2026, we will refresh the training record so completion rates can be reported more clearly in future statements.

10. Measuring effectiveness

We recognise that effective modern slavery reporting should show actions taken and progress over time. We currently monitor effectiveness through supplier onboarding controls, audit completion, corrective action plans, policy updates, training and worker engagement. For future statements, we will strengthen the reporting of measurable outcomes.

Measure	2025 position	2026 improvement
Tier 1 source factories audited to ETI Base Code	Required for all source factories	Continue annual audit cycle and track completion rate
New supplier onboarding	Supplier Self-Assessment Questionnaire and compliance validation required before orders are placed	Maintain a central record of approvals, risk rating and approval date
Policies updated and shared	Policies updated and shared with new suppliers in 2025	Record supplier acknowledgement and translation coverage
Supplier visits	Undertaken by Corporate Compliance personnel in sourcing countries	Record number of visits and the outcome
Training completion	Modern slavery awareness provided to new starters and relevant employees	Introduce annual completion percentage for UK and relevant overseas colleagues
Subcontracting controls	Factory on purchase order must be verified; changes require written approval	Track approvals, refusals and unannounced verification visits

11. 2025 activity and progress

- Reviewed and updated key policies and shared them with new suppliers across all sourcing countries.
- Maintained supplier onboarding controls requiring self-assessment and validation before order placement.
- Continued announced and unannounced site visits by Corporate Compliance personnel.
- Used worker interviews and questionnaires to test conditions and worker understanding.
- Continued to use third-party audits and Sedex/SMETA corrective action plan evidence where applicable.
- Maintained supplier requirements on approved production sites and restrictions on unauthorised subcontracting.
- Continued training and awareness activity through the Modern Slavery Champion and Stronger Together materials.

12. 2026 priorities

During 2026, we will focus on improving the quality, consistency and measurability of our modern slavery controls. Our priorities are to:

- strengthen supplier mapping beyond Tier 1 for higher-risk products and components;
- refresh supplier risk ratings using country, product, workforce and audit history indicators;
- create a clearer annual KPI dashboard covering audit completion, training completion and supplier onboarding;
- improve evidence recording for supplier policy acknowledgement and local-language display;
- review the effectiveness of worker grievance and whistleblowing channels in key sourcing countries;
- continue to review labour providers in the UK and any third-party labour use in the supply chain;
- continue face-to-face supplier engagement and training where practical; and
- review this statement annually against updated government guidance and emerging best practice.

13. Board approval and signature

This statement is made with reference to section 54 of the Modern Slavery Act 2015 and constitutes William Lamb Group's modern slavery and human trafficking statement for the financial year ending 31 December 2025.

This statement was approved by the Board of Directors of William Lamb Group on 22nd May 2026 and will be reviewed annually.

Signed: _____

Jonathan Tillery
Chief Executive Officer
William Lamb Group
Date: 23/06/26

Appendix A - publication checklist

Before publication, confirm the following items:

- Confirm whether the statutory £36m turnover threshold applies to the relevant legal entity/group. If not, retain voluntary wording or amend to suit Board/legal advice.
- Confirm annual turnover, employee numbers and sourcing-country percentages are current for the reporting year.
- Confirm Board approval date and signing date.
- Confirm whether any modern slavery indicators, labour abuse indicators or serious audit findings were identified during the year and add a transparent summary if applicable.
- Publish the final statement on the website with a prominent link from the homepage or appropriate corporate responsibility page.
- Upload the final approved statement to the UK Government Modern Slavery Statement Registry where required or where the business chooses to do so voluntarily.
- Keep evidence behind the statement, including policy issue records, supplier onboarding records, audit reports, corrective action logs and training records.