



MODERN SLAVERY STATEMENT 2022/23

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Specsavers International Healthcare Limited (**Specsavers**) and all its subsidiary companies including but not limited to, the following:

- Specsavers Optical Superstores Limited
- Specsavers UK Holdings Limited
- Specsavers Procurement UK Limited
- Vision Labs Limited
- International Glazing Services Limited
- Lens-Online Limited
- NLRX Services Limited

Specsavers is committed to acting responsibly and trading ethically, and ensuring that the people who make our products are safe, healthy and free from human right abuses.

This Modern Slavery statement outlines the upcoming plans and commitments that Specsavers as a global business has made towards preventing and mitigating risks of modern slavery throughout the business and Specsavers supply chain. Specsavers continues to broaden its' understanding of modern slavery risks, strengthening due diligence processes and increasing transparency of reporting, whilst also embedding knowledge and understanding of human rights across the Specsavers teams. Specsavers continues to focus and continually advances the business efforts in tackling Modern Slavery.

OUR APPROACH

Specsavers is committed to global ethical trading objectives, and to ensuring that regular, independent audits of all major suppliers who do not operate in globally recognised regulatory environments are undertaken and monitored.

Wherever possible, Specsavers has, and continues to develop strong, long-term relationships with suppliers so that Specsavers can work in partnership with the suppliers and provide best value eyecare and hearing care to everyone. operations

Amongst other things, the Specsavers audit program is designed to identify, monitor and assess that employment is freely chosen, working hours are not excessive, conditions are safe and hygienic, child labor is not used and there are no other occurrences of discriminatory or illegal practices which violate the rights of individuals working anywhere within the Specsavers business, including its supply chain.

There is no place for illegal, unethical or unprofessional conduct in Specsavers. Specsavers as a business, makes it clear that colleagues must speak up and report, if they become aware of any activity that is not consistent with the Specsavers trading vision and values. Since 2011, Specsavers has reported on activity relating to Modern Slavery avoidance, the business plans and progress in the

Specsavers Annual Review. As part of this reporting and commitment, Specsavers continues to develop practices and procedures to progress and enhance the ethical trading activities and improvement of the transparency of reporting.

OUR BUSINESS AND SUPPLY CHAIN

Specsavers International Healthcare Limited is the Guernsey registered parent company of the Specsavers Group. The Specsavers Group includes subsidiaries which are or support optical retail outlets, audiology stores and domiciliary partnerships throughout the UK, Republic of Ireland, Northern Europe, Spain, Canada, Australia and New Zealand as well as Specsavers group owned manufacturing and distribution sites.

Specsavers has more than 40,000 employees across Guernsey, UK, Republic of Ireland, Netherlands, Denmark, Finland, Sweden, Norway, Spain, Hungary, Canada, Australia, New Zealand, Shanghai and Hong Kong.

As a retailer, the product supply chains are extensive and global; Specsavers source in excess of 3,500 products from more than 20 countries. The global Specsavers business, takes the obligations to combat modern slavery and to trade ethically very seriously, with a dedicated team of experts supporting risk assessment and due diligence activities.

IDENTIFYING AND MANAGING RISKS

POLICIES AND CONTROLS

The Specsavers Regulatory and Compliance teams continue to focus on combatting unethical practices within all areas of the Specsavers business and our plans for the next 12 months echo this. As some of Specsavers suppliers are in medium-risk countries, procedures are in place that actively monitor the treatment of employees and adherence to associated regulations within those medium-risk regions.

All suppliers are required to adhere to Specsavers Global Ethical Trading Policy or have their own equivalent standard and checks in place. Specsavers have the right to independently audit this adherence where required. New suppliers are subject to an approval process, which includes an audit and several compliance checks which the supplier must pass before orders are placed for product. A successful audit result is a prerequisite of the vendor selection process. Throughout the relationship with the supplier and purchase of product from them, functional leaders are supported by the Regulatory and Compliance teams to embed compliance activity into their commercial decisions and supplier performance discussions.

The audits focus on risks associated with modern slavery and human trafficking, including the occurrence of passport retention, illegal documentation, the right to work, illegal deduction of wages, child labour, forced labour, excessive hours of work and illegal subcontracting. Where any of the Specsavers suppliers outsource major components to a second-tier supplier, it is paramount that the suppliers pass the Specsavers policy to them, and that monitoring is ensued.

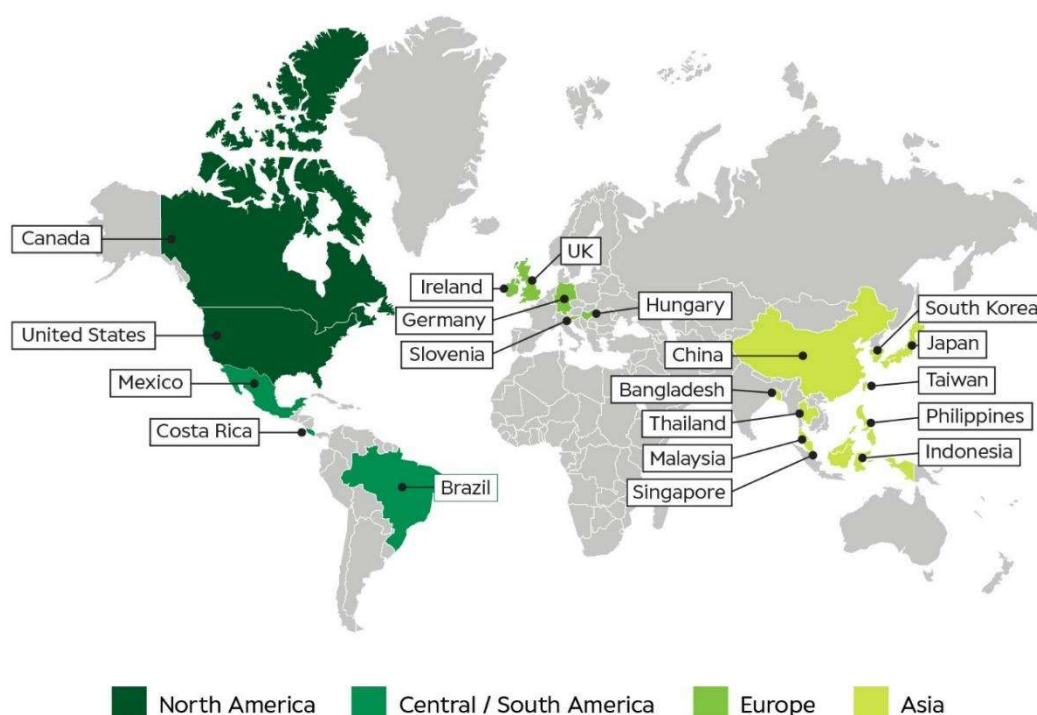
After an initial audit, new suppliers join the Specsavers monitoring programme and are each independently audited every two years (as a minimum).

Where there is a concern as a result of an audit, the supplier is immediately given a corrective action plan and a timetable within which to take remedial action. If the supplier fails to take the required remedial action, Specsavers has the right to activate a withdrawal and withhold working with this supplier.

INCREASING TRANSPARENCY

Specsavers is focused on increasing transparency across its supply chain and overall business. Specsavers works with over 70 suppliers and 200 factories in 20 countries and is committed to delivering the highest standard of products to every single Specsavers customer. Therefore, understanding where products are sourced and made, and the risks inherent across the supply chain operations, is an essential part of due diligence undertaken.

The product origins for Specsavers are represented on the sourcing map below. Primarily the products come from globally recognised regulatory environments or factories situated in low and medium-risk countries. The activity in the countries which Specsavers source product from is continually monitored to ensure that slavery and human trafficking does not exist in the Specsavers supply chain.



GOVERNANCE

As part of the Specsavers approach to global supply chain governance, Specsavers has developed and begun to implement monthly monitoring and reporting tools, which enables Directors to review results and identify risks in relation to modern slavery and ethical compliance, and to support continuous improvement activity.

In addition to formal audits, key members of the Specsavers supply chain team are regularly undertaking onsite factory visits. During 2023 Specsavers has over 250 planned visits into China and Asia collectively, and any action required by the suppliers visited, shall be immediately reported to the Supply Chain Operating Board. This reporting is an opportunity to reinforce agreed due diligence processes, review progress against Specsavers commitments, escalate risks within and between categories and drive Specsavers vision to ensure the business remains committed to protecting and preserving the rights of all workers across our supply chain.

SUSTAINABILITY: SOURCING RESPONSIBLY

Sourcing responsibly is integral to the way we operate. We work to ensure that the people who make our products have safe and healthy workplaces, where human and civil rights are respected. We also require our suppliers to take the necessary steps to protect the environment.

We have been committed to our Global Ethical Trading Policy to ensure regular, independent audits of all our major suppliers who do not operate in globally recognised regulatory environments. However, we recognise a need to continuously evolve and enhance how we manage ethical and sustainability risks in our supply chain. As such, In the first half of 2023 Specsavers shared its Supplier Code of Conduct with the top 25 Goods Not For Resale (GNFR) suppliers and all Goods For Resale (GFR) suppliers. The GNFR suppliers represent 37% of the total indirect spend within the business and all of these suppliers have confirmed they can meet the code of conduct. By the end of 2023 the survey will be extended to the top 50 GNFR suppliers representing approximately 50% of the total indirect spend and it's expected that close to 100% of the GFR suppliers will be compliant by the end of 2023.

TRAINING AND AWARENESS RAISING

Specsavers recognises the importance of training, raising awareness and embedding knowledge and understanding of human rights, ethical standards and risks across all the Specsavers business functions. In each of its retail outlets, whether optical or audiology, reinforcement of the risks of modern slavery is given to all employees and partners. Through forming strong relationships and partnerships with suppliers, Specsavers continues to raise awareness and undertake discussions as to the continued implementation of preventative measures including audit processes, improved policies and agreeing on the standards expected.

OUR PROGRESS

During 2022/23 we continued to invest in, and develop, the Specsavers entire global team to ensure we have the appropriate skills and resources to deliver the Strategic Plans in relation to regulation and compliance. We have grown the global team across the regions and recruited subject matter experts dedicated to each element of the long term plan. The teams have all provided expertise and support with progress, in particular:

- The Specsavers team completed 66 supplier audits, for suppliers across our product categories. These audits ensure compliance with our social and environmental standards and adherence to regulatory requirements, enabling long-lasting improvements to be achieved.
- We consulted with our key suppliers to better understand which ethical and sustainable standards and practices they have in place.
- We worked on sustainability related contractual clauses which will be included in all new agreements with suppliers. These will enable the implementation of measurements and reporting on our environmental targets.
- We finalised our new supplier code of conduct and have established a plan for a full roll out with our suppliers as detailed previously in the statement.
- We continued our approach to managing sustainability with our suppliers and we developed a global process for measuring the volume, and understanding the composition of all product packaging within our supply chain.

OUR PLANS

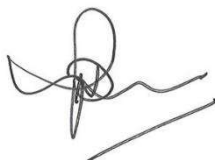
In 2023/24, we will remain committed to being ethical and sustainable across our business, and making a positive difference by:

- Continuing to build on the roll out of our Supplier Code of Conduct.
- Conduct 62 audits for suppliers across our product categories. These audits ensure compliance with our social and environmental standards and adherence to regulatory requirements, enabling long-lasting improvements to be achieved.
- Running communication events with our key suppliers to ensure they understand our expectations regarding the ambitions we have towards our people, communities and planet.
- Working collaboratively with our suppliers to identify opportunities to share best practice and to drive improvements.
- Introducing a suite of tools to help our suppliers build capability to further improve the way they manage and promote sustainability issues within our supply chain.
- Providing clarity within our supplier contracts, not only about how we require them to operate in accordance with internationally- recognised standards, but also the actions that will be taken in the event of non compliance.
- Completing compliance renewal audits to ensure suppliers making our products meet our social and environmental standards in addition to audits for new suppliers.
- Driving improvements within our supply chain by assessing the requirement for, and subsequent provision of, any additional support to help our suppliers adhere to even higher standards and best practices.

MEASURING OUR PROGRESS

Specsavers has committed to adhering to the following key performance indicators to measure the effectiveness of steps taken to tackle modern slavery and human trafficking in the Specsavers business:

- All scheduled audits completed.
- Declarations of conformity held for all core suppliers of goods for resale based in recognised regulatory environments.
- Regular board reporting on identified risks of modern slavery and ethical compliance.



John Perkins For and on behalf of **SPECSAVERS INTERNATIONAL HEALTHCARE LIMITED**

Chief Financial and Commercial Officer - Dated: August 2023

Statement No. 7