What is Modern Slavery?

The term 'modern slavery' refers to various types of abuse where workers are treated as a commodity, forced to work under threat of punishment or violence or forced to provide services without the freedom to leave (such as employers retaining passports).

Modern slavery is not only a developing world issue but an increasingly global concern with the rise in migratory workers. Slavery includes child labour, debt bondage (working to repay a loan or debt), forced labour or domestic servitude (being forced to work, often under threat of violence, for little or no compensation), human trafficking and sexual exploitation.

Migrants, minorities, women, children, and those who are illiterate are more vulnerable to becoming victims of slavery and trafficking. Although there is a higher prevalence of modern slavery in regions such as Africa and Asia, it is present in more developed economies as vulnerable people are trafficked from abroad and forced into work.

What are the key risk areas faced by Dunlop Golf Europe Ltd (DGE)?

We only employ staff and sell our products and services to golf retailers in Europe, or through third party distributors on a business-to-business model (i.e. not directly to end customers). We acknowledge that modern slavery can exist in our society, but we nonetheless believe that our market approach reduces the risk of our business being affected.

We are an organisation that values trust and integrity in everything we do, and we ensure our people have the right training and opportunities to raise concerns at all levels of the business. We therefore think that the likelihood of modern slavery or human trafficking taking place within our business is very low.

A large proportion of our products are bought from our parent company Sumitomo Rubber Industries (SRI), a Japanese public company, where we have a high degree of confidence that the systems and processes in place to mitigate the risk of modern slavery or human trafficking meet or exceed our own. Other parts suppliers are also vetted and approved by SRI. In 2022, SRI signed the United Nations Global Compact which included the following principals:

Human Rights:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour:

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining
- Principle 4: the elimination of all forms of forced and compulsory labor
- Principle 5: the effective abolition of child labor
- Principle 6: the elimination of discrimination in respect of employment and occupation

Furthermore, SRI's own procurement guidelines (last updated in 2021) include statements relating to:

- Considerations for Human Rights & Labor Rights
- Prohibition Against Forced Labor
- Prohibition Against Child Labor

SRI are committed going forwards to disclose efforts for the prevention of slavery and human trafficking within the entire SRI Group of companies and supply chain on the basis of Article 54 of the UK Modern Slavery Act.

The greatest risk in the supply chain relates to purchasing from several smaller manufacturers, outside of the EU, where there is less assurance that systems and processes in place are as robust as we would expect.

For the procurement of office supplies and services (e.g., cleaning services, stationery etc.) we typically use smaller local suppliers in UK and France which represent a lower risk, or source from Amazon who have their own policies around supply chain and human rights topics.

What does DGE do to address the risk of modern slavery or human trafficking being present in its business or supply chain?

- Core supplier is internal: as mentioned above, we predominantly procure parts and products from our parent company, who follow good practices and have strong ethical principles.
- Other (smaller) suppliers: if we have concerns, we request confirmation from suppliers that their business is free from modern slavery.
- Promoting Awareness & Training: we conduct training to ensure general awareness of these issues and practical steps our people can take to detect and report any issues.
- Whistleblowing Policy & Hotline: we have a whistleblowing hotline for staff to report any issues that arise in a safe and confidential manner. Any concerns relating to modern slavery would be reported to the applicable UK Government department.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the financial year ending 31 December 2026.

Lionel Caron, Chief Executive Officer

January 2026