

MODERN SLAVERY POLICY

Introduction

The Modern Slavery Act 2015 is an Act of the United Kingdom Parliament designed to combat slavery and consolidate previous offenses relating to human trafficking and slavery.

Modern slavery is a broad term used to include the concepts of slavery, servitude, forced or compulsory labor and human trafficking. It includes slavery-like practices such as debt bondage, sale or exploitation of children, and servile or forced marriage. The underlying theme common to all these crimes concerns the deprivation by one person of the freedom of another in order to exploit it for personal or commercial gain.

The International Labor Organization (ILO) estimates that there are 20.9 million people in forced labor worldwide, with 14.2 million in private sectors of the economy. Slavery is also an economic activity that generates significant income for those responsible for the exploitation and trafficking of human beings. Slavery and human trafficking are also estimated to be one of the fastest growing criminal sectors in the world today.

The Vivienne Westwood Group (or "we") recognizes and applies the Modern Slavery Act 2015 within the framework of the following international statements and standards:

- The United Nations Universal Declaration of Human Rights.
- The Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work.
- The United Nations Guiding Principles on Business and Human Rights.

The Vivienne Westwood Group Modern Slavery Policy will be used as a guide for all partners, and we expect all partners to review and comply with this Policy

1. Risk Assessment

1.1 Due Diligence Process

The Vivienne Westwood Group sources and produces goods in Italy and also in the United Kingdom, Peru, Thailand, Tunisia, Kenya, Brazil, Switzerland, Hong Kong, Germany, China, Sri Lanka, Japan and Korea. When selecting suppliers, we evaluate their integrity and reputation.

To promote Human Rights along the supply chain, all Vivienne Westwood Group suppliers are required to comply with the Code of Labor and Business Conduct by signing a Letter of Commitment.

Compliance with the Code of Labor and Business Conduct is assessed through a specific Due Diligence Questionnaire on Modern Slavery and Human Trafficking which suppliers are asked to complete, together with an on-site inspection conducted by independent specialist auditors. The Vivienne Westwood Group may take action against those who do not show sufficient commitment to the Code or who violate it.

Vivienne Westwood Group suppliers are also provided with a Reporting Policy to ensure a safe and transparent working environment and to provide workers with a means to report wrongs or misconduct.

All Vivienne Westwood Group suppliers are required to conduct a due diligence process within their supply chain mapping Vivienne Westwood's different production levels (raw material suppliers, subcontractors, employment agencies, home workers, etc. .), sharing the Vivienne Westwood Group Code of Labor and Business Conduct and ensuring that the Due Diligence Questionnaire is completed by every level of their supply chain.

1.2 Risk Assessment

The ILO has identified eleven indicators for modern slavery and forced labor:

- Abuse of workers' vulnerability (immigrant status, language barriers, debt settlement, etc.);
- Deception (false promises, misleading information, etc.);
- Movement restriction (surveillance, blocked workers, no exit visas, etc.);
- Isolation of workers (workers are isolated in rural areas or are not allowed to interact with the community);
- Physical or sexual violence;
- Intimidation or threats (threats to report to the authorities, verbal and psychological abuse);
- Withholding of identity documents (where the employer retains the original copies of employees' private documents such as identity cards and passports);
- Salary withholding (delayed payments, no checks on bank accounts, etc.);
- Debt bondage (debts created by an employer for a loan, excessive interest, etc.);
- Abusive living and working conditions;
- Excessive overtime as required by specific national regulations and the Code of Work and Commercial Conduct.

Based on previous ILO indicators and the Vivienne Westwood Group Code of Conduct, we have identified potential high-risk situations relating to human rights and modern slavery.

Vivienne Westwood Group will evaluate all suppliers according to these indicators and their responses to the Due Diligence Questionnaire. We expect suppliers to conduct the same due diligence within their supply chain by following the guidelines outlined below:

- All suppliers are required to carry out a due diligence process to ensure that their supply chain does not exhibit the ILO indicators mentioned above.
- Subcontractors and labor agency workers are high-risk categories with regards to forced labor due to less monitoring and visibility within the supply chain. The Vivienne Westwood Group accepts subcontracting and employment agency workers; however, suppliers are required to map subcontractors to identify possible risks of modern slavery and human rights violations. Details of the subcontractors and the due diligence process carried out by the supplier will need to be shared with the Vivienne Westwood Group upon request. Vivienne Westwood Group suppliers are expected to apply the same due diligence process to employment agency workers as they apply internally; this means that hiring practices will need to be monitored to ensure that a case of exploitation is not taking place. The supplier is responsible for employment standards and compensation will always be given when employment agency workers are employed on production related to the Vivienne Westwood Group.
- When working with intermediaries (contractors or cooperatives) the supplier must verify the employment and payment practices to exclude the risk of exploitation. Fees that include deposits or prepaid visa fees will never apply. Workers should not be asked to sign dismissal letters when they start work, and temporary/seasonal contracts should be minimised.
- Immigrant workers will not suffer any form of discrimination in relation to employment practices and compensation. The supplier is responsible for ensuring the absence of discrimination in the supply chain by sharing the Code of Labor and Commercial Conduct and applying the Due Diligence process. Immigrant workers will need to be eligible to work in the place where they are employed, and suppliers will need to ensure that the worker's personal documentation (passport, visa) has been verified. Language barriers can be indicators of modern slavery, and suppliers are responsible for ensuring that migrant workers understand their rights, terms of employment and pay. If necessary, employment contracts and pay slips will need to be translated.
- Minimum wages are essential to reduce the risk of modern slavery. The Vivienne Westwood Group expects all suppliers to pay the minimum industry standard compensation or collective bargaining agreement wages, when applicable. Suppliers will need to identify the risk of low-paid work, temporary/seasonal work within their supply chain and ensure that cases of modern slavery and exploitation do not arise. Wages must always

be paid on time and must not be withheld (without a legal basis). Wages will have to be paid directly to workers.

- Working hours must be carried out in accordance with local regulations and the Vivienne Westwood Group Code of Conduct. Workers will be free to leave when their regular working hours have been completed, and overtime should never be compulsory.

2. Risk Management

2.1 Training and Capacity Building

Adequate training must be provided internally to strategic business areas (as necessary) on this Policy and on the risk to which the Vivienne Westwood Group is exposed, in carrying out its commercial activities, in the context of modern slavery in its supply chains. The Vivienne Westwood Group expects all its suppliers to carry out regular training sessions with their staff to ensure that they are aware of the risks of modern slavery, and also that they know how to respond if they suspect that there is a case of modern slavery or any conflict with this Policy.

2.2 Review and Monitoring Program

Upon receipt of supplier responses to the Due Diligence Questionnaire, Vivienne Westwood Group will carry out an internal risk assessment to identify potential risks relating to human rights violations or modern slavery. For those suppliers who present a high risk we reserve the right, periodically, to conduct at our expense audits of the supplier's operational processes, facilities and working conditions focusing on ethical, health and safety procedures and systems, to ensure that the supplier has the appropriate facilities, procedures, systems and personnel required for the supplier to supply the goods in accordance with the Vivienne Westwood Group Modern Slavery Policy or any other internal policy. For this purpose, we will have the right to have access to the supplier's premises and any premises of the supplier's subcontractors or agents where the goods are produced during normal working hours by giving reasonable notice to the supplier.

Suppliers are expected to apply the same investigation and monitoring methodology in situations where high risk areas are identified during the due diligence and risk assessment process within the supply chain.

3. Compliance

Vivienne Westwood Group suppliers must comply with this Policy by signing it and returning it to us with the Letter of Engagement and the completed Due Diligence Questionnaire.

Suppliers will have to demonstrate the adoption of procedures and methodologies to apply the same due diligence process throughout their supply chain, and will have to demonstrate that they have an effective corrective system.

Vivienne Westwood Group expects all suppliers to promptly communicate any high-risk situations within the supply chain and share the corrective activities implemented.