



ANNEX A - Modern Slavery Policy 2022

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1.0 - Introduction

International Brands Group, hereby referred to as 'the Company' not only employ individuals directly, but also maintain relationship with many different organisations in its supply chain and customer base. This statement and policy are made pursuant to Section 54(1) of the Modern Slavery Act 2015 ('the Act') and sets out International Brands Group (the 'Company's') actions to understand all potential modern slavery and human trafficking risks related to our business, to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

Our six core values provide the foundations for everything we do at International Brands Group and differentiates us from our competitors. We believe that how we act is just as important as what we do. Our values underpin International Brands Group commitment to run our business in a way that makes a positive contribution to our colleagues, customers and communities, including playing our part in eradicating Modern Slavery.

We have a responsibility to be alert to the risks of modern slavery, forced and bonded labour, human trafficking, and hidden exploitation both within our business and in the wider supply chain. As a global leading footwear manufacturer based in The Netherlands, International Brands Group recognises that it has a responsibility to take a robust approach to modern slavery and human trafficking, and is committed to prevent, respond towards and remediate any such activity.

International Brands Group adopt a zero tolerance approach to modern slavery. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. Modern slavery encompasses (but is not limited to) slavery, servitude, human trafficking and forced labour. We demand all who work for us, and all who have, or seek to have, a business relationship with the Company and/or any member of our Group to familiarise themselves with our Modern Slavery Policy, and to act in a way which is consistent with our tolerance and values.

2.0 - The Company

International Brands Group was established in 2017 and is a global leading supplier of Military, Tactical, Safety and Athletic Footwear, our Head Office is located in Naarden, The Netherlands and our factories are currently situated in China, Bangladesh and Cambodia (correct at the time of writing). International Brands Group actively encourages our suppliers to engage in good practice in understanding how modern slavery occurs and how to deter and deal with worker exploitation.

We require that all our 1st tier factories have annual Ethical audits conducted by accredited organisations. These audits can be BSCI audits or SEDEX SMETA audits who use Base Codes that follow the most relevant conventions of the International Labour Organisation.

3.0 - Purpose of this Policy

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. We will not tolerate the deprivation of a person's being by another to exploit them for personal or commercial gain. We always work to the highest professional standards and comply with all laws, regulations, legislation, rules and best practice relevant to our business and operations. We are committed to acting ethically and with integrity in all our business operations and relationships, whether through direct employment, with suppliers or with contractors, and we are committed to implementing and enforcing measures, process and controls to ensure that modern slavery is not occurring anywhere in our own business or those of our suppliers or contractors. This policy sets out our risk and identification processes and the

measures and controls which we are and will be taking to effectively implement our zero-tolerance commitment.

4.0 - Processes for the Prevention of Modern Slavery

4.1 Recruitment

Most of our recruitment is done directly, through our own departmental / hiring managers. We do on occasion supplement our own recruitment with agency support where necessary, but this is purely in the introduction of candidates – all interviewing, assessment and screening is conducted in house and in the same way as direct recruitment.

We operate a robust recruitment process, following Recruitment Compliance Principles and RTW checks, analysing worker records for modern Slavery red flags.

4.2 Supply Chains

We are committed to ensuring that there is complete transparency in our organisation and in our approach to tackling modern slavery throughout our supply chains. We expect all our suppliers, contractors or those with whom we have a business relationship, to work to the same high standards and with zero tolerance. We also expect them to ensure such tolerance and standards are implemented and maintained by their own suppliers. We are working to ensure that we have transparency within our supply chain and are currently in the process of mapping our supply chain to minimise the possibility of modern slavery occurring within our supply chains / contractors.

We will be undertaking the following measures:

1. Conducting risk assessments to establish the areas of our business and supply chains which are most at risk of modern slavery.
2. Communicate and ensure that all our suppliers and contractors understand and are committed to our Anti-Slavery and Human Trafficking Policy, and work to uphold our strong values.
3. Understand the steps they have taken to eradicate modern slavery within their business.
4. Develop and implement specific screening processes for suppliers/contractors before commencing business relationships.
5. Develop contracts with suppliers and contractors which enable us to audit and scrutinise activities and their own supplier relationships to satisfy our commitment to reduce Modern Slavery.
6. When possible, work with suppliers to resolve any issues they may encounter in relation to Modern Slavery.

4.3 Employees

The Company's Modern Slavery Policy will be communicated across the organisation through direct communication, use of the workplace community platform and workplace posters. Induction training for new workers includes a section on recognising potential exploitation and how to report it. The Modern Slavery Policy will form part of the employee welcome pack issued to all new starters with effect from 1st January 2022. Training will be provided for Departmental Managers and Team Leaders to enable them to recognise the hidden exploitation and forced labour risks sign of Modern Slavery and how to respond and report on this. These trained staff will also then pass this information on to all their direct reports, targeting all employees. Departmental Managers and Team Leaders are responsible for ensuring that all those who report to them are familiar with, understand and comply with the Antislavery and Human Trafficking Policy and are given refresher training as and when required.

5.0 - Reporting Modern Slavery

The safety, welfare and confidentiality of the at-risk persons is our priority. We have a response plan detailing how supervisors and managers will respond immediately on being alerted to potential exploitation. Relevant Managers and Team leaders understand the options available to potential victims through our training. All staff are also aware of how to contact the Modern Slavery Help Line on +44 (0) 8000 121 700 and/or the police. The Company has a specific Whistle-blowing Policy which also provides guidance on how to raise concerns, whether these be in relation to employees, suppliers, contractors, or those seeking to establish a business relationship with us. The Whistle-blowing Policy is available within the Employee Welcome Pack. Individuals are encouraged to raise concerns confidentially via a dedicated email address, in writing or verbally with colleagues.

We recognise that some employees may not feel comfortable to raise concerns internally. 'Protect', the independent whistle-blowing charity) provides a confidential helpline on telephone +44 020 3117 2520. Website www.protect-advice.org.uk

Modern Slavery help line posters will also be displayed within the workplace to enable potential victims of Modern Slavery to contact external support. These posters will be displayed in multi-language Format.

6.0 - Responsibility for the Policy

Ultimate responsibility for the commitment and prevention of modern slavery sits with the Board of Directors, who have overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations. This policy will be reviewed on an annual basis, at the end of each financial year.