



MODERN SLAVERY ACT STATEMENT 2020

## INTRODUCTION

This statement is made pursuant to the Modern Slavery Act 2015 and reports on the actions we have taken to address modern slavery in our business during the financial periods ending 1 February 2020 and 30 January 2021. This statement has been finalised during the Covid-19 global pandemic. The UK Government acknowledged the impact of COVID-19 events on modern slavery reporting requirements and allowed businesses to delay publication of their statement. This was welcomed by us as we experienced constraints on HR capacity and other issues caused by the pandemic in relation to our supply chain activities. We have taken the opportunity to report on two financial periods in this statement given the permitted extension and the timing of our financial year end. Whilst we have been prevented from meeting certain goals that we set ourselves in our 2018/19 statement, we are pleased with the steps we have taken particularly in relation to becoming a member of SEDEX and re-issuing our Code of Conduct to all suppliers.

## OUR BUSINESS

The Dune Group is proud of the products it designs and sells and of its longstanding relationships with the majority of its own label suppliers. During the pandemic, we worked in partnership with our suppliers to minimise the disruptions to our respective businesses. We recognise that footwear and fashion are complicated businesses which can be impactful on the environment, our communities and on the lives of the people who work in our supply chain. We believe that we must be committed to ethical business practices in all our operations worldwide. Our strategy to address the risks in our supply chain and to ensure compliance with ethical standards is monitored by the Audit Committee which includes members of our Board and key department heads.

## SUPPLY CHAIN

Our shoes are predominantly sourced from specialist footwear manufacturers based in China, Bangladesh, India, Brazil and Europe. In the 2019 financial year,

## SUPPLY CHAIN

we completed a comprehensive map of our Tier I supply chain giving us improved visibility of our production sites. These maps are being used, inter alia, to formalise the audit process so that we can assess and identify any geographies and/or activities that present a hurdle to managing our modern slavery risks. We have substantially reduced the number of suppliers we work with. Our long-term commitment to those suppliers who we continue to work with plays a crucial role in developing open and transparent relationships.

To further enhance visibility of our suppliers and their individual factories, we took the step in 2020 to join Sedex (Supplier Ethical Data Exchange). This enables us to gain sight of our suppliers' social compliance audits undertaken by accredited independent third parties. Additionally, we also request suppliers to periodically complete a self-assessment questionnaire - the results of which are analysed by SEDEX to identify any areas of risk or concern. We are actively encouraging all our suppliers to become SEDEX members, both so they can understand best practice and to provide us with the required audit visibility. However, for those suppliers who are yet to join SEDEX, we will request 3rd party audit results directly. We have in place a programme of visits to supplier factories by our Buying and Design teams and by our QA team that allows us to assess and review suppliers. We are reviewing our in-country QA process to ensure we maintain continuity of reviews despite the current restrictions on international travel.

The Dune Group Supplier Manual constitutes an agreement between The Dune Group and all its own label suppliers and is designed to help our suppliers to achieve Dune standards throughout the whole product process. Our Ethical Trading Code of Conduct is a key tenet of the Supplier Manual. Our recently updated and modernised Code was circulated to all suppliers in 2020 and we are working to ensure all suppliers specifically acknowledge in writing conformance to the standards set out in the revised Code. All new suppliers will be provided with a copy and required to confirm agreement in writing.

## INTERNAL POLICIES

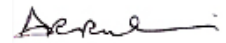
We operate internal policies that enable us to conduct our business in an ethical and transparent manner including bribery, health and safety, grievance procedures and whistleblowing. Upon launch, policies are communicated to all employees and are maintained on our intranet. They also form part of our induction process. The whistleblowing policy, in particular, gives our team members the confidence that they can raise concerns without fear of reprisals. Our anti-bribery policy strengthens our company-wide awareness of the consequences of accepting bribes. We are in the process of updating our policies. These will be actively promoted within our business to facilitate an environment where all team members act ethically and with integrity. We believe it is important that our teams know that there are effective systems and measures in place to address any issues.

## ASSESSMENT OF EFFECTIVENESS

We are committed to increasing the transparency within our supply chain year upon year. We recognise that it is a collaborative approach and that our journey of identifying and minimising the risk of modern slavery is continuous. We have reviewed the effectiveness of the steps taken during the last two financial years and following this review, intend to take the following steps:

- Continue to work in partnership with our suppliers and SEDEX to improve visibility and clarity of our supply chain. We recognise this is vital in identifying any modern slavery challenges.
- Empower our Buying and Logistics teams to understand their roles in the ethical management of our supply chain including by ensuring a rigorous onboarding process for new suppliers.
- Begin the mapping of our Tier 2 suppliers.
- Ensure all Tier 1 suppliers confirm in writing compliance with our Code of Conduct.

This statement has been approved by the Board of Directors of Dune Group Limited on behalf of itself and each member of The Dune Group.

A handwritten signature in black ink, appearing to read "Daniel Rubin".

**Daniel Rubin, CEO**  
Dune Group Limited