# MODERN SLAVERY STATEMENT 2022/23

The Dune Group

This statement is made pursuant to the Modern Slavery Act 2015 and reports on the actions we have taken to prevent modern slavery taking place in our business during the financial period ending 28 January 2023.

## OUR BUSINESS

Dune London celebrated its 30th anniversary in 2022. Starting with a concession on London's Oxford Street, the group has grown to be an iconic global footwear and accessories brand. With operations in over 26 countries, Dune London is distributed through retail, e-commerce, wholesale and franchising. Our unique expertise in footwear and accessories enables us to produce beautifully crafted footwear and accessories that resonate with our customers. This passion for product is shared across our business and with our key suppliers and partners. Alongside this expertise and passion, we're committed to being a responsible business. We act with integrity and treat our customers, partners, colleagues and suppliers with respect and fairness. We seek effective systems to safeguard against the risk of modern slavery occurring in our supply chains and have a zero-tolerance approach to any form of forced labour, modern slavery and exploitation.

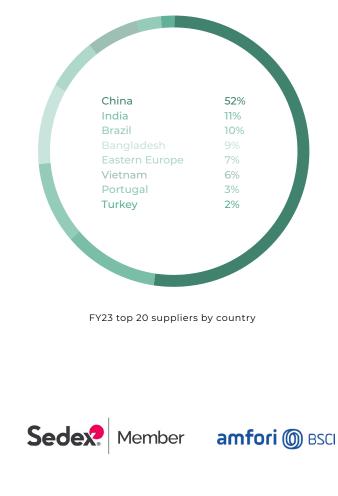
Our strategy to address the risks in our supply chain and to ensure compliance with ethical standards is monitored by the Audit Committee which includes members of our executive team and non-executive directors. We work across departments to implement systems to prevent modern slavery occurring in our operations. In FY23, our compliance, buying, logistics and QC teams worked even more closely together to understand our supply chain and to ensure correct onboarding and continuous monitoring.



#### SUPPLY CHAIN

Our Dune London shoes and accessories are predominantly sourced from specialist manufacturers based in China, India, Europe and Brazil. We do not own the factories that produce our products but we recognise our role in ensuring that workers in these factories are freely employed and work in good conditions. We have built a stable supply chain through partnering with a limited number of suppliers that are expected to uphold our ethical principles. Our top 10 suppliers, most of whom we have known for many years, account for 80% of product intake.

We have been a member of Sedex (Supplier Ethical Data Exchange) since 2020. This platform gives us an overview of suppliers' completed social audits. We have been actively encouraging any supplier not already a member to join Sedex. This year we took the decision to broaden the supplier group covered by industry-accepted ethical trading platforms by also becoming a member of amfori BSCI (an alternative ethical trading company). With this step, we are proud to have committed to achieving maximum visibility of our factories sooner than might otherwise have been possible. We have informed all product suppliers that starting in 2024, all factories that produce Dune London products must have an up to date and satisfactory audit to SMETA (Sedex) or amfori BSCI standards visible to us on these platforms. We encourage open and honest communication with our suppliers and where any aspect of an audit is unsatisfactory, we will invest time in working collaboratively to find resolution.



The audits and assessments on these ethical trading platforms are supported by a programme of in-person factory visits by our buying and QC teams in London and Hong Kong. We also work with a third party in India. With the easing of global travel restrictions, our buying and QC teams were able to resume visits and an on-going programme is planned. Our local QC & sustainability team based in Hong Kong are well-located for visiting our factories in our main sourcing regions of China and South East Asia. This team actively follows up on audits including any compliance issues. Whilst we have not identified any major issues from audits, where any concerns have been raised, we have liaised with the supplier to ensure that corrective action has been taken.

We believe that it is important to engage with product suppliers who are reputable and considered to be ethical. For new suppliers, we know that at the on-boarding stage instilling our ethical trading principles is key. We only engage with suppliers who agree to cooperate with us on any due diligence checks, audits, and inspections that we may undertake to verify their compliance with these commitments. This year a senior buyer's role was expanded to facilitate effective communication between buying, QC and suppliers to embed social compliance more deeply in decision-making. The Dune Group Supplier Manual constitutes an agreement between The Dune Group and all its own label suppliers; it is designed to help our suppliers achieve Dune standards throughout the whole product process. Our Ethical Trading Code of Conduct is a key part of the Supplier Manual. All current suppliers must confirm in writing conformance to the standards set out in the Code. All new suppliers are provided with a copy and are required to confirm agreement in writing as part of the on-boarding process.

We are a member of The Leather Working Group (LWG). Whilst the LWG's principal objective is to promote environmental stewardship in leather manufacturing, the latest version of the LWG audit standard covers the additional element of social responsibility. We are close to our 2025 target of having 90% of leather used in our Dune London shoes and handbags coming from tanneries rated gold or silver by LWG and are pleased that tanneries will now be scored on social audits.





### 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. All policies are maintained and form part of our team induction process. The whistleblowing policy, in particular, gives our team members the confidence that they can raise concerns without fear of reprisal. Our anti-bribery policy strengthens our company-wide awareness of the consequences of accepting bribes. From time to time, we use agency staff in our distribution centre and we expect the agencies we work with to screen and vet agency personnel in line with best practice and relevant legislation and to comply with our agency anti-slavery policy.

## **REVIEW OF EFFECTIVENESS**

We are committed to increasing the transparency within our supply chain year on year. Having reviewed the effectiveness of the steps taken during FY23 as described above, we intend to focus on the following:

- As a new member of Amfori BSCI, we will focus not only on on-boarding the relevant supplier factories but on ensuring that we avail of the range of practical tools offered by Amfori to help us effectively monitor our supply chain and to access the training, workshops and e-learning resources.
- We will create a revised and comprehensive on-boarding guide for new suppliers and factories for our buying team to ensure that our ethical criteria are being met before orders are placed. Key members of the buying, QA, legal and logistics teams will be involved with a view to implementing a more efficient process whilst maintaining our rigorous standards. This will be followed up with internal training for all buyers to ensure the importance of a thorough on-boarding process in minimising the risks of modern slavery in our supply chain is understood.
- We intend to review all policies that impact on the prevention of modern slavery to ensure that they continue to be fit for purpose, reflect current best practice and strengthen our approach to the risks of modern slavery taking place in our operations.
- To ensure we achieve our 2024 goal of all suppliers having an audit visible to us on Sedex or Amfori BSCI, we will improve our tracking and reporting. Updates on activities and progress will be shared with senior members of the operations teams and further actions agreed. A report against progress will be provided to the group's directors bi-annually.

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.

h!;//)~--

Nigel Darwin, CEO Dune Group Limited