PEOPLE

TRANSPARENCY IN THE SUPPLY CHAIN AND MODERN SLAVERY STATEMENT
Respecting human rights is a fundamental part of how Superdry does business.

It continues to be a priority for Superdry plc to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Our FY23 Modern Slavery Statement sets out the steps taken by Superdry plc (which includes its wholly owned subsidiaries C-Retail Limited, DKH Retail Limited, SuperGroup Internet Limited and Superdry EUR Finance Limited) to ensure modern slavery does not take place in any part of our business and supply chain. We have updated our statement with progress made for the full financial year, between May 2022 and April 2023; our overall modern slavery strategy remains on track.

We review our approach on a regular basis and seek to continually improve through ongoing risk assessment, raising awareness of issues and requirements, and by delivering training to our colleagues and working in partnership with our suppliers and partners.

ABOUT SUPERDRY

We design, produce, and sell clothing and accessories globally under the Superdry brand with a focus on high quality, contemporary and sustainable products. Our Group annual turnover was £622.5m.

Our products are:

- Designed at our head office based in the UK.
- Manufactured by 65 third party suppliers, in 89 (Tier 1) factories globally and crafted from raw materials which are increasingly sourced back to farm/source.
- Sold globally through our stores, through Ecommerce sites and through our wholesale customers.

These activities are co-ordinated by a global team of 3,833 employees and a network of trusted suppliers and business partners.

More information about Superdry, our organisational structure, group relationships and sustainability programme is available in our FY23 Annual and Sustainability Reports at corporate.superdry.com.

ABOUT OUR SUPPLY CHAIN

Superdry works with apparel, footwear and accessory suppliers based in China, India, Turkey, Sri Lanka, Vietnam, Cambodia, and Bulgaria.
Our suppliers may choose to use subcontractors (also known as Tier 2) where specialist components are required, or services needed, which cannot be completed in Tier 1 factories. Our suppliers source branded trims and labels through a network of nominated and sourced suppliers (Tier 3).

We also have a network of suppliers throughout our supply chain who provide goods not for resale and services to support day-to-day business operations, examples of which include transportation, warehousing, and store ancillary services.

We operate sourcing offices in key source countries, which function to support our suppliers in manufacturing our apparel, footwear, and accessories in line with our standards – from quality standards, through to compliance with our ethical standards including our Modern Slavery Policy.

Achieving full traceability throughout our supply chain is a core focus for Superdry as we recognise that the visibility of our indirect suppliers reduces as we move down the supply chain.

To tackle this, we work directly with over 96% of our factories, and with farm groups and raw material suppliers globally, who supply fully traceable organic cotton and recycled fibres into our factories. The 4% of factories which we do not work with directly are contracted via an agent, and we maintain the same level of visibility here as our wider supply base. In FY23, 62% of our product volume was certified to industry recognised standards to guarantee supply chain traceability.

Recognising that cotton is our largest and most high-risk raw material, we are committed to ensuring that all 100% pure cotton products will come from fully traced organic sources by 2025. In FY23, we have onboarded 12,787 smallholder farmers in-conversion into our supply chain, with plans to reach 20,000 by 2025. This increases our visibility with our suppliers whilst providing opportunities to ensure our modern slavery policies are being implemented and complied with.

**OUR MODERN SLAVERY COMMITMENT AND POLICY**

*The term modern slavery covers forced and compulsory labour, indentured child labour, servitude, human trafficking, debt bondage, deceptive recruiting for labour or services and similar violations. These are violations of human rights such as the right to be free from slavery, servitude or forced labour and the right to freedom of movement and other human rights, which are upheld by both international and national legislation.*

**Our commitment**

We actively seek to ensure that our business, business partners and all parts of the associated supply chain are free from all forms of slavery and human trafficking. If at any point we suspect or identify any cases of modern slavery, we commit to support the remediation of any victims – working with business partners, other brands, governments, and
NGOs as applicable. We also commit to assisting law enforcement agencies with the investigation, identification and prosecution of any party that knowingly engages in or facilitates slavery or human trafficking.

**Our Modern Slavery Policy**

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This information can be found in our supplier manual, which is provided to each of our suppliers during the onboarding process, and in all contracts from 2016 onwards.

Our Modern Slavery Policy and related policies upholding our commitment to eradicating modern slavery are accessible on our website and are reviewed and updated annually. The policy applies to all colleagues, suppliers, and business partners, and requires all parties to implement effective due diligence processes to enable us to understand and identify the potential risks of slavery and human trafficking so that we can report actual and suspected cases to the appropriate law enforcement agencies.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

1. **WHISTLEBLOWING POLICY** ([/MEDIA/3224/SUPERDRY-WHISTLEBLOWING-POLICY.PDF](/MEDIA/3224/SUPERDRY-WHISTLEBLOWING-POLICY.PDF)) which enables employees to speak up if they believe serious malpractice is taking place, safe in the knowledge that the issue will be investigated independently, with no adverse impact on the individual.


3. **MIGRANT AND CONTRACT WORKER POLICY AND GUIDELINES.** ([/SUSTAINABILITY/REPORTING-POLICIES/PEOPLE/MIGRANT-WORKER-POLICY/](/SUSTAINABILITY/REPORTING-POLICIES/PEOPLE/MIGRANT-WORKER-POLICY/)) which aim to protect vulnerable groups of workers by requiring ethical recruitment practices, appropriate conditions for accommodation, and effective communication of terms and conditions of employment.


All policies have been developed in consultation with organisations including the Ethical Trading Initiative (ETI), global experts in due diligence including Bureau Veritas, The Reassurance Network (India, Sri Lanka, Turkey and the Far East) and Social Compliance Service Asia (Far East). Their ongoing development is managed by our Sustainability and Ethical Trading team, which is overseen by our Executive Committee and Superdry plc Audit Committee.
DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We understand the heightened risk associated with complex supply chains, recognising that the risk of forced labour can go undetected.

As part of our initiative to identify and mitigate risk, we apply the following processes:

Risk assessment

We comprehensively risk assess new markets, only sourcing from approved locations within the immediate purview of our local office teams. This helps us to maintain visibility of the conditions and, risks in our local markets whilst effectively managing due diligence and remediation.

We adapt our programme to ensure issues are addressed and continuously assess the impact on human rights within our business and existing supply chain annually.

We publicly disclose the outcomes of our risk assessment in our Approach to Human Rights. It is important to note that there are several regions which we will not source cotton from, due to increased modern slavery risk.

In FY23 we completed a risk review to ensure all contracts in place with suppliers of services and goods to our UK Head Office included clear wording and mechanisms for accountability on Modern Slavery.

Continued assessment of current business partners

We comprehensively assess our Tier 1, 2 and 3 suppliers before and throughout our relationship. We visit 100% of Tier 1 suppliers prior to commencing our business relationship to ensure they adhere to our Code of Practice, and annually audit 100% of Tier 1 and 2 factories and nominated or preferred trims and label suppliers (Tier 3) on a semi-announced and unannounced basis in all territories.

We will terminate our relationship with any partners in breach of this policy, including any partners that fail to remedy any issues – transparently, sustainably, and in the best interest of impacted victims.

In FY20 we launched our enhanced support "intensive care programme"- established to support factories that have had two repeated ethical audit failures.

In FY23:

50% of factories enrolled made the required improvements, meeting our Code of Practice requirements within 6 months of entry (equating to 4 factories)

50% of factories that failed to make to required progress, either due to poor engagement from management or the progress overall. As a result, these factories have been exited or are in the process of exit in line with our Responsible Exit Process.
We continue our active membership of the Ethical Trading Initiative (ETI), which enables industry collaboration and supports the continued advancement of our Ethical Trading programme. Our programme, objectives and progress received positive feedback in Superdry’s annual ETI Progression Meeting, held in August 2023.

HOW WE ENSURE OUR MODERN SLAVERY POLICY IS ADHERED TO

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. This is achieved through a dedicated compliance team, which consists of involvement from our sustainability, audit and compliance teams.

1. Raising awareness for colleagues, suppliers, and business partners

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff. We also require our business partners to provide training to their staff, suppliers and providers.

To support our cross-business plan to raise awareness of our Modern Slavery Policy, 100% of Superdry colleagues completed Modern Slavery training in FY22. Furthermore, 100% of Superdry suppliers onboarded from 2020 have completed comprehensive induction programmes which include Superdry’s policies related to Modern Slavery. All suppliers onboarded prior to 2020 have received training on Modern Slavery outside of the induction process.

In addition to this, since 2017, it has been Superdry’s policy to ensure that contracts with business partners include our commitment to human rights and our modern slavery policy.

2. Continued engagement with suppliers to actively eliminate modern slavery risk throughout our relationship

Superdry has a well-established global team focused on human rights whilst managing our ethical trading programme.

We have employed dedicated ethical trading experts, working directly with all suppliers across our Sourcing regions, with full global coverage and visibility of factory conditions. This structure allows us to respond to risks quickly as they emerge and is critical in negotiating and facilitating transparent risk assessments with factories by building partnerships locally.

Our dedicated ethical trading experts provide training and support to factories to help remediate issues identified during the risk assessment process. Our enhanced support programme, which is designed to provide the factories who need it with additional support in maintaining compliance with our Code of Practice, has been in place for three years.

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maintaining compliance with our Code of Practice, has been in place for three years.

The programme involves targets and milestones agreed between the supplier and Superdry leadership teams and local experts – additional training is then delivered by third party specialists, with regular visits to monitor improvement.

3. Measuring the effectiveness of our human rights programme

We reported to our Audit Committee in November 2022 to provide oversight of our policies and due diligence programmes. Our risk management process, overseen by our Head of Risk and Internal Audit includes detailed updates on human rights and modern slavery risk – with reviews completed with the Director of Sourcing and Sustainability on a quarterly basis. Further detail on this process is provided in our FY23 Annual Report, as is wider information on our governance processes.

We continue to review the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains and update/set new targets. Please note that the below table includes progress made against targets for FY23, our targets for the coming financial year FY24 and our medium-term goals to FY25. Historic targets are available in our archived statements.

<table>
<thead>
<tr>
<th>Target</th>
<th>FY23</th>
<th>FY24 (Target)</th>
<th>FY25 (Target)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Volume bought contains fully traceable, certified lower impact materials. This includes sourcing from 20,000 farmers enrolled in training to transition to organic cotton.</td>
<td>62%</td>
<td>55%</td>
<td>65%</td>
</tr>
<tr>
<td>Workers enrolled in our Respect programme globally.</td>
<td>27%</td>
<td>35%</td>
<td>50%</td>
</tr>
<tr>
<td>Public disclosure of supply base list to increase transparency.</td>
<td>Complete – Tier 1 factories</td>
<td>Tier 2</td>
<td></td>
</tr>
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<table>
<thead>
<tr>
<th>FY</th>
<th>Target</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>25</td>
<td>65% volume bought contains fully traceable, certified lower impact materials. This includes sourcing from 20,000 farmers enrolled in training to transition to organic cotton.</td>
<td>On track</td>
</tr>
<tr>
<td>25</td>
<td>50% workers enrolled in our Respect programme globally.</td>
<td>On track</td>
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<tr>
<td><strong>25</strong></td>
<td>50% workers enrolled in our Respect programme globally by 2025 – focusing on gender equality, effective grievance mechanisms &amp; empowered worker committees.</td>
<td>27% in FY23 On track</td>
</tr>
<tr>
<td><strong>25</strong></td>
<td>&gt;65% volume converted to fully traceable, certified lower impact materials. This includes sourcing from 20,000 farmers enrolled in training to transition to organic cotton.</td>
<td>12,787 farmers enrolled in FY23 On track</td>
</tr>
<tr>
<td><strong>23</strong></td>
<td>Public disclosure of supply base list to increase transparency.</td>
<td>Complete</td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Public disclosure of average wage benchmark data covering all tier 1 factories.</td>
<td>Complete</td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Launch online Modern Slavery compliance training and roll out to all colleagues – induction and refresher courses.</td>
<td>Complete</td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Equal access to training for Men and Women included in Organic/Transitional Farmer Agronomic training.</td>
<td>Ongoing</td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Review Humans Rights Approach and Migrant Worker policy to account for new and emerging risks.</td>
<td>Complete and ongoing</td>
</tr>
<tr>
<td></td>
<td>Continue to monitor these risks on a local basis with factories and ensure fair and safe conditions.</td>
<td></td>
</tr>
<tr>
<td><strong>23</strong></td>
<td>27% Workers enrolled in our Respect programme globally – launched in Turkey.</td>
<td>Complete</td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Pilot updated Gender Empowerment programme ‘Respect’ in India aligned with the UN'S WOMEN'S EMPOWERMENT PRINCIPLES ([MEDIA/GE5AUXY2/WEB_EMB_BOOKLET.PDF](<a href="https://corporate.superdry.com/governance/reporting-policies/people/transparency-in-the-supply-chain-and-modern-slavery-statement/#:--text=or">https://corporate.superdry.com/governance/reporting-policies/people/transparency-in-the-supply-chain-and-modern-slavery-statement/#:--text=or</a> human traffi...)) - Expand to Turkey and Far East.</td>
<td>Complete, 65% workers in India are covered</td>
</tr>
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The above statement has been made pursuant to the Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), and California Transparency in Supply Chains Act of 2010 (SB657) and has been approved by Superdry Plc's Board of Directors on 20 August 2023.
Transparency in the Supply Chain and Modern Slavery Statement - Superdry

Go to the Superdry website at Superdry.com for more information.

1. Please visit the Superdry store online: Superdry.com

2. Regulators' news:
   - Regulators’ news (Investors/Regulatory-News/

3. Results and presentations:
   - Results and presentations (Investors/Results-and-Presentations/)