This statement has been published in accordance with the Modern Slavery Act 2015 (the “Act’). It sets out the steps that Alfred Dunhill Limited has taken during the financial year ending 31 March 2018 to prevent modern slavery and human trafficking in its supply chains or within any part of the business.

Alfred Dunhill Limited has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings. We recognise that no supply chain is without risk of modern slavery and it is our responsibility to ensure we understand these risks and work together with our suppliers to mitigate them.

OUR BUSINESS

Alfred Dunhill Limited engages with carefully selected suppliers to manufacture its products and/or provide relevant services to the company. We sell our branded products either through Alfred Dunhill Limited’s own-managed points of sales or through authorised wholesale accounts.

As part of the Richemont Group (‘Group’), Alfred Dunhill Limited adheres to Group policies, procedures and standards relating to the management of its supply chain and its general business conduct. Details of the Group’s business governance and corporate social responsibility policies can be found at https://www.richemont.com/corporate-social-responsibility/governanceethics/policies.html

OUR SUPPLY CHAIN RELATIONSHIPS

Alfred Dunhill Limited strives to maintain good relationships with suppliers based on the principles of fair, open, honest and ethical dealings at all times whilst ensuring the continued quality of its branded products.

Alfred Dunhill Limited has an extensive range of global supplier relationships. However, from 1 September 2017, all inventory purchasing and distribution flows were transferred from Alfred Dunhill Limited to a Richemont Group Company based in Switzerland to improve operational efficiencies within the brand. We now indirectly source finished products, through this Richemont Group Company.

OUR POLICIES AND PROCESSES

When taking on new product suppliers, Alfred Dunhill Limited undertakes due diligence that is carried out by the supply chain and procurement teams within the business. As part of this process, suppliers are required to sign our terms and conditions of purchase and other documents including the Richemont Group Supplier Code of Conduct (“Code of Conduct”).
The Code of Conduct covers the following areas:

- No forced employment — not using forced labour and not using employment where terms are not voluntary;
- Healthy and safe working conditions — providing a healthy and safe working environment in accordance with applicable laws and regulations;
- Wages and working hours — complying with local legislation on minimum wages, working hours and employee benefits;
- Freedom of association — allowing workers to associate with lawful and peaceful workers’ associations;
- No discrimination — net subjecting people to discrimination based on factors including ethnicity, age, religion and sexual orientation, amongst others;
- No child labour — net employing people under the age of 15 or younger than the age for completing compulsory education;
- No use of corporal punishment — and not subjecting people to harassment, violence or intimidation;
- Responsible environmental management — fully complying with local legislation, industry regulations and the Richemont Environmental Code of Conduct;
- Grievance Procedure and Whistleblowing — allowing workers to report actual or suspected misconduct without fear of reprisal.


Alfred Dunhill Limited also works in partnership with an accredited compliancy verification company in order to carry out audits of our suppliers. Our suppliers are audited at least every 3 years. The audits cover manufacturing sites including sub-contractors. We audit suppliers according to the SEDEX Member Ethical Trade audit formats which assess the suppliers on Health & Safety, Labour Standards, Environment and Business Ethics in line with our Supplier Code of Conduct.

In the event that Alfred Dunhill Limited’s due diligence processes, including audits, highlight a risk of slavery and/or human trafficking, or any other non-compliance with the Code of Conduct, we will assess such non-compliance on a case by case basis and take appropriate remedial action.

We endeavour to trade only with those suppliers who comply with the Code of Conduct or those who are taking verifiable steps towards compliance. Arrangements with suppliers in material or persistent breach will be terminated.

We also recognise the risk that modern slavery can exist within our non-product supply chain.

During the financial year ending 31 March 2018, Alfred Dunhill continues to source directly from non-product suppliers. We request these suppliers to adhere to our Group’s Code of Conduct and we continue to assess those suppliers who have not returned a signed confirmation of compliance, in order to ensure they have sufficient processes and policies in place to satisfy us that they are operating to the highest standards.

OUR TRAINING

The Group and Alfred Dunhill Limited continue to take steps to increase
employee awareness and engagement regarding slavery and human trafficking issues. Richemont’s Corporate Social Responsibility Guidelines ("Guidelines"), which defines the standards the Group expects its managers, employees and suppliers to uphold, specifically articulate the Group’s zero-tolerance policy regarding forced labour.

A copy of the Guidelines can be found at: https://www.richemont.com/images/csr/2012/extract_corporate_social_responsibilitiy_guidelines_based_on_jul08_version.pdf

As part of our ongoing commitment, this year we launched a new compliance module titled ‘Avoiding Trafficked Labour’. All relevant employees (current and new) working for Richemont Group’s UK subsidiaries are required to complete this module and it is accessible via our learning management system. The module helps to recognize and raise the awareness on human trafficking while also explaining how to avoid the risks in our supply chains through different case scenarios.

OUR EMPLOYEES

Alfred Dunhill Limited and the Group have a whistleblowing policy and a hotline for employees to voice any concerns they may have including concerns about any part of the Alfred Dunhill Limited business.

Alfred Dunhill Limited is committed to maintaining and improving systems and processes in order to eliminate all forms of forced and compulsory labour within its supply chain and its business. Alfred Dunhill Limited will continue to review its policies and processes to ensure the highest standards in its supply chain, as expected by customers, the companies with which it works and in accordance with the requirements of its Group.

APPROVAL BY ALFRED DUNHILL LIMITED’S BOARD OF DIRECTORS

I certify that the information contained in the above statement has been approved by Alfred Dunhill Limited’s Board of Directors.

Approved by the Board on 12 December 2018 and signed on its behalf by Gary Stevenson, Finance Director

ALFRED DUNHILL LIMITED
MODERN SLAVERY ACT STATEMENT – FY17

This statement has been published in accordance with the Modern Slavery Act 2015 (the “Act”). It sets out the steps that Alfred Dunhill Limited has taken during the financial year ending 31 March 2017 to prevent modern slavery and human trafficking in its supply chains or within any part of the business.

This statement has been approved by the Board and signed by Gary Stevenson, Finance Director of Alfred Dunhill Limited.
Alfred Dunhill Limited has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings. We recognise that no supply chain is without risk of modern slavery and it is our responsibility to ensure we understand these risks and work together with our suppliers to mitigate them.

OUR BUSINESS

Alfred Dunhill Limited engages with carefully selected suppliers to manufacture its products and/or provide relevant services to the company. We sell our branded products either through Alfred Dunhill Limited's own-managed points of sales or through authorised wholesale accounts.

As part of the Richemont Group ("Group"), Alfred Dunhill Limited adheres to Group policies, procedures and standards relating to the management of its supply chain and its general business conduct. Details of the Group’s business governance and corporate social responsibility policies can be found at https://www.richemont.com/corporate-social-responsibility/governance-ethics/policies.html.

OUR SUPPLY CHAIN RELATIONSHIPS

Alfred Dunhill Limited strives to maintain good and lengthy relationships with suppliers based on the principle of fair, open, honest and ethical dealings at all times whilst ensuring continued quality of its branded products.

Alfred Dunhill Limited has an extensive range of global supplier relationships. We source finished products from approximately 70 suppliers, of which over 60% have been supplying Alfred Dunhill Limited for more than 3 years; more than 20% of these companies have been supplying Alfred Dunhill Limited for more than 10 years. 85% of our suppliers are based in Western Europe.

OUR POLICIES AND PROCESSES

When taking on new product suppliers, Alfred Dunhill Limited undertakes due diligence that is carried out by the supply chain and procurement teams within the business. As part of this process, suppliers are required to sign our terms and conditions of purchase and other documents including the Richemont Group Supplier Code of Conduct ("Code of Conduct").

The Code of Conduct covers the following areas:

- No forced employment — not using forced labour and not using employment where terms are not voluntary;
- Healthy and safe working conditions — providing a healthy and safe working environment in accordance with applicable laws and regulations;
- Wages and working hours — complying with local legislation on minimum wages, working hours and employee benefits;
- Freedom of association — allowing workers to associate with lawful and peaceful workers’ associations;
- No discrimination — not subjecting people to discrimination based on factors including ethnicity, age, religion and sexual orientation, amongst others;
- No child labour — not employing people under the age of 15 or younger than the age for completing compulsory education;
- No use of corporal punishment — and not subjecting people to harassment, violence or intimidation;
- Responsible environmental management — fully complying with local legislation, industry regulations and the Richemont Environmental Code of Conduct;
- Grievance Procedure and Whistleblowing — allowing workers to report actual or suspected misconduct without fear of reprisal.


Alfred Dunhill Limited also works in partnership with a compliancy verification company who is an AAG member of SEDEX. This company utilises auditors with Social Accountability Certification SA8000 accreditation in order to carry out audits of our suppliers.

We have a rolling auditing plan where our suppliers are audited at least every 3 years. The audits cover manufacturing sites including sub-contractors. We audit suppliers according to the SMETA 4 Pillar audit which assesses the suppliers on Health & Safety, Labour Standards, Environment and Business Ethics in line with our Supplier Code of Conduct.

In the event that Alfred Dunhill Limited’s due diligence processes, including audits, highlight a risk of slavery and/or human trafficking, or any other non-compliance with the Code of Conduct, we will assess such non-compliance on a case by case basis and take appropriate remedial action.

We endeavour to trade only with those suppliers who comply with the Code of Conduct or those who are taking verifiable steps towards compliance. Arrangements with suppliers in material or persistent breach will be terminated.

We also recognise the risk that modern slavery can exist within our non-product supply chain.

During the financial year ending 31 March 2017, we asked all our non-product suppliers to confirm in writing their compliance with the Act, as well as that of their sub-contractors. Out of approximately 100 suppliers contacted, over half have so far returned a signed confirmation of compliance. We will continue to assess whether those suppliers who have not returned a signed confirmation of compliance have sufficient processes and policies in place to satisfy us that they are operating to the highest standards required by us and the Group and in any event in accordance with the requirements of the Act.

During the next financial year we will assess the risk of our non-product supply chain to further understand the risk of modern slavery and to take steps to mitigate this risk where possible.

OUR TRAINING

The Group and Alfred Dunhill Limited continue to take steps to increase employee awareness and engagement regarding slavery and human trafficking issues. Richemont’s Corporate Social Responsibility Guidelines ("Guidelines"), which defines the standards the Group expects its managers, employees and suppliers to uphold, specifically articulate the Group’s zero-tolerance policy regarding forced labour.
A copy of the Guidelines can be found at: https://www.richemont.com/images/csr/2012/extract_corporate_social_responsibility.pdf

As part of our commitment, this year we delivered presentations on supply chain compliance to Supply Chain and Product Development departments. These presentations reinforced the importance of awareness for potential Labour Standards and Health & Safety non-compliance issues when visiting suppliers.

OUR EMPLOYEES

Alfred Dunhill Limited and the Group have a whistleblowing policy and a hotline for employees to voice any concerns they may have including concerns about any part of the Alfred Dunhill Limited business. Alfred Dunhill Limited is committed to maintaining and improving systems and processes in order to eliminate all forms of forced and compulsory labour within its supply chain and its business. Alfred Dunhill Limited will continue to review its policies and processes to ensure the highest standards in its supply chain, as expected by customers, the companies with which it works and in accordance with the requirements of its Group.

APPROVAL BY ALFRED DUNHILL LIMITED’S BOARD OF DIRECTORS

I certify that the information contained in the above statement has been approved by Alfred Dunhill Limited’s Board of Directors.

Approved by the Board on 12 December 2017 and signed on its behalf by Gary Stevenson, Finance Director

ALFRED DUNHILL LIMITED
MODERN SLAVERY ACT STATEMENT – FY16

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 ("Act") and sets out the steps Alfred Dunhill Limited has taken to ensure that slavery and human trafficking is not taking place within its supply chains nor within any part of our business. This statement is for the financial year ended 31 March 2016. Alfred Dunhill Limited has a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings.

OUR BUSINESS

Alfred Dunhill Limited engages with carefully selected suppliers to manufacture its products and/or provide relevant services to the company. We sell our products either through Alfred Dunhill Limited’s own managed points of sales, through authorised wholesale accounts or through the subsidiaries of the

**OUR SUPPLY CHAIN RELATIONSHIPS**

Alfred Dunhill Limited has an extensive range of global supplier relationships. Alfred Dunhill Limited strives to maintain good and lengthy relationships with suppliers based on the principle of fair, open, honest and ethical dealings at all times.

**OUR POLICIES AND PROCESSES**


We are seeking to ensure that all high risk Alfred Dunhill Limited suppliers sign the Code of Conduct and adhere to the requirements set out therein. For those suppliers whom are of lower risk, Alfred Dunhill Limited will be formally reminding them of their obligations under the Act and requesting written undertakings from them of their commitment to eradicate slavery and human trafficking in their own business and supply chain. Alfred Dunhill Limited undertakes due diligence when considering taking on new suppliers. Such due diligence is carried out by the supply chain and procurement teams within the business.

In addition, Alfred Dunhill Limited works in partnership with a company who is an AAG member of SEDEX and utilises auditors with Social Accountability Certification SA8000 accreditation in order to carry out audits of Alfred Dunhill Limited’s suppliers. In the event that Alfred Dunhill Limited’s due diligence or audits highlight a risk of slavery and human trafficking or any other non-compliance with the Code of Conduct, we will assess such non-compliance on a case by case basis and take appropriate remedial action. We endeavour to trade with those suppliers who comply with the Code of Conduct or those who are taking verifiable steps towards compliance. Arrangements with suppliers in material or persistent breach will be terminated.

**OUR TRAINING**

The Group and Alfred Dunhill Limited are undertaking steps to increase employee awareness and compliance regarding slavery and human trafficking issues. Richemont’s Corporate Social Responsibility Guidelines (“Guidelines”), which articulate the standards the Group expects its managers, employees and suppliers to uphold, specifically articulate the Group’s zero-tolerance policy regarding forced labour. A copy of the Guidelines can be found at: [https://www.richemont.com/images/csr/2012/extract_corporate_social_responsibilitiy_guidelines_based_on_jul08_version.pdf](https://www.richemont.com/images/csr/2012/extract_corporate_social_responsibilitiy_guidelines_based_on_jul08_version.pdf)
OUR EMPLOYEES

Alfred Dunhill Limited and the Group have a whistleblowing policy and a hotline for employees to voice any concerns they may have including concerns about slavery and human trafficking within Alfred Dunhill Limited’s supply chain or any part of the Alfred Dunhill Limited business. Alfred Dunhill Limited is committed to maintaining and improving systems and processes in order to eliminate all forms of forced and compulsory labour within its supply chain and its business.

Alfred Dunhill Limited will continue to review its policies and processes to ensure the highest standards in its supply chain, as expected by customers, the companies with which it works and in accordance with the requirements of its Group.

APPROVAL BY ALFRED DUNHILL LIMITED’S BOARD OF DIRECTORS

I certify that the information contained in the above statement has been approved by Alfred Dunhill Limited’s Board of Directors.

Approved by the Board on 14 September 2016 and signed on its behalf by Gary Stevenson, Finance Director