This statement is published in accordance with the Modern Slavery Act 2015 of the United Kingdom and outlines the steps taken by Office Holdings Ltd ("OFFICE") during the financial year ending 1 July 2018 to prevent modern slavery and human trafficking in its business and supply chains.

OFFICE is committed to providing customers with goods that have been produced:

- Lawfully, through fair and honest dealing
- In decent working conditions
- Without exploiting the people who made them

This commitment is upheld through OFFICE’s company policies.

Following on from our statement for the financial year ended on 2 July 2017, we have continued to review our policies and processes, thereby improving our work to combat modern slavery. We have striven to deepen our understanding of risk particularly with our primary suppliers, through further developing our working relationship and involvement within our supply base. We have continued to prioritise visits to our supplier factories based in higher risk areas and are committed to increasing the transparency within our supply chain year upon year. Our key areas of focus in the year under review included:

- Updating and publishing our Supplier Manual to include our Code of Ethics and Good Business Practice as well as further information regarding modern slavery.
- Improving our work aimed at preventing and combatting modern slavery throughout our supply base involved in supplying made-to-order (MTO) product.
- Deepening our understanding of modern slavery risk within our supply chain through increased visits to our MTO factories as well as the review of social audit reports received.

During the course of our periodic review of our supplier documentation, OFFICE updated the MTO Supplier Manual. The update involved the incorporation of The OFFICE Code of Ethics and Good Business Practice and further information about the Modern Slavery Act.

In this Code OFFICE describes the responsibilities our suppliers have to uphold standards required by new legislative developments such as the Modern Slavery Act as well as those derived from core labour conventions of the International Labour Organisation (ILO). The OFFICE Supplier Manual constitutes an agreement between OFFICE and all its MTO suppliers and is designed to help our suppliers to achieve OFFICE standards throughout the whole product process. It is the responsibility of our primary suppliers to inform their sub-contractors and agents of our updated Supplier Manual and its content, and to ensure compliance throughout the lower tiers of the supply chain.

We work with an established footwear supply base and build close relationships with our suppliers and agents. We understand that our biggest exposure to modern slavery is in our MTO product supply chains, where we have undertaken due diligence to minimise this risk. Our shoes are predominantly sourced from specialist footwear manufacturers based in Spain, Italy, Portugal, China, Brazil and India. We have continued to map our factory supply base and have conducted a risk assessment in relation to each production site geographically against the latest version of the Global Slavery Index to identify areas that are at greater risk to modern slavery and human trafficking.

The OFFICE team has a long standing relationship with the large majority of our MTO suppliers. Any new supplier or factory proposed to OFFICE must complete the supplier and factory set-up process before any purchase.
orders are agreed. This process has been developed to ensure that we have appropriate visibility of the factories being used and commitment from the agent and factory representatives to the OFFICE Code of Ethics and Good Business Practice and ethical policies outlined in our Supplier Manual.

We have continued to ensure that for all of our primary factories used for shoe production, approved third party social audits are received annually and graded, along with any corrective action progress reports (CAPR’s) for any non-compliances found. These third party factory audits are undertaken against internationally recognised ethical codes and standards and consist of site tours, document reviews and worker interviews. The OFFICE technical team works with the suppliers and factories to ensure any non-compliance is resolved in a timely manner relative to the associated risk of the matters of concern.

The OFFICE design, buying and technical teams will continue to visit our primary suppliers and factories to further our working relationship and involvement within our supply base. We will continue to prioritise visits to factories based in higher risk areas and are committed to increasing the transparency within our supply chain year upon year.

As a business OFFICE is committed to addressing and minimising the risk of modern slavery and human trafficking within our business and supply chain. We will continue to enhance our policies and processes throughout the next financial year as we are aware there are opportunities for us to effect improvements. Therefore we welcome your feedback. All comments, suggestions and queries should be addressed to the team at csr@office.co.uk.

This statement was approved by the Board of the company on 15 November 2018 and was signed by Lorenzo Moretti (CEO) on its behalf.

London
December 2018