

ORLEBAR BROWN

MODERN SLAVERY STATEMENT 2024

(2023 Financial Year)

Our Modern Slavery Act Statement details the steps taken in the 2023 financial year and articulates how we continue to take action to prevent modern slavery taking place across our business and supply chain.

1 CONTEXT

BUSINESS AND SUPPLY CHAIN

Orlebar Brown is a private company creating, developing, manufacturing, and distributing luxury products (“Orlebar Brown”). Founded by Adam Brown in 2007, Orlebar Brown is dedicated to creating desirable clothing products of the finest quality and to the highest level of craftsmanship. Through its business activities it offers a broad range of high-end creations, including menswear, fashion accessories, eyewear, and children’s clothing.

Orlebar Brown’s core values remain grounded in exceptional creation. Orlebar Brown invests in the excellence of its products and favours a long-term approach to ensure the longevity of the Orlebar Brown brand, promoting our purpose which is – to encourage, excite and inspire everyone to ‘Holiday Better’. Since 2018, Orlebar Brown has been part of CHANEL group. At the end of 2023, Orlebar Brown employed more than 200 people across five countries (UK, US, Australia, France, and Spain).

Orlebar Brown’s supply chain revolves around predominantly finished goods for the manufacture of products; and then all other goods and services used for the promotional, marketing, distribution and operational activities of the company.

Orlebar Brown has approximately 15 Tier 1 (direct) suppliers manufacture of products as well as a number of Tier 2 and 3 for raw materials such as fabric and trims. Orlebar Brown partners with over 500 suppliers globally which cover broad range of activities from promotional, marketing, distribution, printing, boutique construction and general services, to maintenance, information technology contracts, transportation and logistics, meeting and events, professional services, real estate, and equipment.

HUMAN RIGHTS IN THE SUPPLY CHAIN

In line with its commitment to be a human-driven company, Orlebar Brown believes work is a fundamental means of securing and enhancing dignity and respect for the individual. Orlebar Brown is committed to respecting human rights at work across its supply chain, as defined by [the International Labour Organization’s \(ILO\) eleven fundamental conventions](#)¹. This commitment is rooted in its responsible sourcing and procurement decisions and practices..

¹ [ILO International Labour Standards - Fundamental Conventions](#)

2 POLICIES AND GOVERNANCE

POLICIES

In line with Orlebar Brown's commitment to promoting ethical business practices within its organisation and throughout its supply chain, the company has designed and implemented Ethics@Orlebar Brown is the company's internal code of conduct, and provides the global ethical principles to be followed by all Orlebar Brown employees, reflecting the company's core values and expectations. This includes compliance with all applicable labour and employment-related laws, rules and regulations in every location in which it does business and across its supply chain, notably relating to wages and hours worked, equal employment opportunity, non-discrimination, immigration and work authorisation, collective bargaining, health and safety and privacy .

Work is also being undertaken to design a Responsible Procurement Policy, which will reference the minimum requirements of the ILO's eleven fundamental conventions and other relevant reference standards.

Members of the senior management team are in charge of designing the above policies and are supported in their deployment by teams involved in the business and regional activities of Orlebar Brown.

GOVERNANCE ON SUSTAINABILITY ISSUES

Senior leaders at Orlebar Brown are committed to the company's sustainability agenda, which includes a commitment to acting ethically and with integrity in everything we do and to building a resilient and sustainable business.

- To ensure sustainability is truly embedded into Orlebar Brown's core business strategy, it is frequently discussed with the Senior Management Team and the Board of Directors.
- Internal audit and action plan follow-ups are reported to the Directors.
- Senior management team manage the governance of, and any non-compliance with, matters included under Ethics@Orlebar Brown.

3 DUE DILIGENCE PRACTICES

The United Nations Guiding Principles for Business and Human Rights (UNGPs) continue to inform Orlebar Brown's Human Rights Due Diligence approach, through which it monitors and addresses social issues in its supply chain . It includes, but is not limited to, the processes, practices and programmes described below.

INTERNAL COMPLIANCE PROCESSES

- Compliance screening of new suppliers globally by the Finance team for financial stability, sanctions, politically exposed persons, criminal activities such as corruption issues, regulatory enforcement actions and any other reputational/media issues. In the event of an alert, the teams will conduct a deep analysis with support from external experts, where appropriate, to validate the reason for the alert and, if confirmed, a recommendation is

made to restrict or cease the relationship with the supplier or otherwise implement the required mitigation actions.

- Development of compliance clauses as part of the procurement process, requiring third parties to comply with all relevant laws and regulations, and in particular those on wages, working hours, child labour, forced labour, equal employment opportunity, discrimination and harassment, freedom of association, as well as health & safety, anti-corruption or protection of the environment.
- Continuous and regular training of Orlebar Brown employees on the content of Ethics@Orlebar Brown policy since 2023. This is also part of any new employee's onboarding plan.
- Due diligence practices are also implemented directly by the business functions, in order to guarantee their sectorial and geographical relevance.

RESPONSIBLE PROCUREMENT

The business has continued to work on its supply chains, to ensure sustainability standards are achieved. For example, for cotton, silk and cashmere, among others, Orlebar Brown focusses on suppliers who operate to the highest internationally recognised standards.

RAW MATERIAL TRACEABILITY

Traceability is being developed within Orlebar Brown's ability to source materials of exceptional and unique quality, crafted by extraordinary know-how and skills. It is also an essential prerequisite to ensuring fair and sustainable conditions for production, and the first step of the risk management approach Orlebar Brown implements in its supply chain.

In 2023, the company successfully launched its first ZQ Merino capsule that was produced using one yarn, in one colour. The capsule was exclusively with ethical, sustainable ZQ Merino wool in a deep, sleek dark blue with tailoring and sport touches that paired perfectly with other new season styles at the time. The fabric had an unmatched commitment to sustainability. The wool was from carefully selected and managed farms that met strict social, in addition to animal welfare, and environmental social standards.

SUPPLY CHAIN RISK ASSESSMENT

As the external and internal risk landscape continues to evolve, Orlebar Brown continues to strengthen its approach to risk management under the mandate of the Board. Orlebar Brown is developing an integrated risk management framework to identify, assess, manage, and monitor key risks, including labour rights risks in our supply chain, helping to lead the organisation in making well-informed decisions.

Under development is the integrated risk management framework, where Orlebar Brown will conduct complementary sustainability risk mappings using a common set of core criteria, in consideration of:

- External risk by country and sector of activity on criteria such as health and safety, environmental pollution, respect of human rights or corruption; and
- Risks linked to the supplier's activity and to the business relationship.

At present, risk mapping covers all main suppliers with an established business relationship with Orlebar Brown.

SUPPLIER EVALUATION AND AUDITING

To strengthen the monitoring of environmental, social and ethical issues that can occur in its supply chain, Orlebar Brown has continued to evaluate a selection of its suppliers every year since 2016.

The objective of the evaluation is to assess an individual supplier's sustainability practices, including social and labour management issues.

METHODOLOGY

Orlebar Brown's Supply Chain team are responsible for auditing suppliers' compliance with all factors required by supplier evaluation reports.

The supplier evaluations are structured across four pillars:

1. Health and safety: employee well-being and working conditions;
2. Human rights: including, but not limited to, wages and insurance, equality policies and non-discrimination as well as the absence of child labour, forced labour, or prison labour;
3. Environment: water, air or soil pollution prevention, waste management, and impacts on biodiversity.
4. Business ethics and governance: including regulatory compliance, anti-corruption, anti-money laundering and sanctions, data privacy and intellectual property issues.

The methodology is under continuous review to incorporate new themes that have been identified during supplier audits conducted across the year, or in response to new evolving regulations.

The on-site audits include exchanges with the supplier's management teams, documentation reviews, and facility inspections.

All identified non-compliances are shared with the supplier during a closing meeting to support a constructive discussion on the way forward.

The Supply Chain team works in close partnership with the General Management, Administration, and Finance functions in the business.

In very rare cases of unacceptable or non-remediable practices, or in the event that a supplier is not willing to implement the necessary corrective action plans to meet internationally recognised standards, Orlebar Brown can consider implementing a responsible exit for the business relationship; however, this is considered only as a last resort, if no agreement on improvements can be reached.

GOVERNANCE OF SUPPLIER AUDITS

Supplier Chain team meets regularly with Senior Leadership to focus on reviewing the supplier base, supplier audit plan, reviewing all audit results, and the corrective actions plans agreed on with suppliers to mitigate identified risks.

GRIEVANCE MECHANISMS

Orlebar Brown employees are encouraged to make any grievance reports directly to their manager, or Human Resources, fostering open communication without fear of retaliation for reporting in good faith.

There is a long-standing Policy in place, available to all employees on joining the company on a central employee portal and maintained by the HR team. This covers reporting processes for any grievances as well as anti-harassment and disciplinary processes in place.

In addition, in 2023, the Orlebar Brown 'My Voice Anonymous' messaging system was under development to offer all employees the possibility to report any concerns or breaches related to the Ethics@Orlebar Brown policy, at local and global level, including on issues related to working conditions and well-being in the workplace.

A dedicated web page was developed in local languages (currently 15) to be accessible to all employees in a secure and anonymous manner, in accordance with local regulations and practices. This system is administered by the Head of Human Resources for the business.

For any grievance matters, regardless of method used to report, the credibility of each allegation is assessed by the Head of Human Resources and is investigated in accordance with Orlebar Brown's internal investigation policy on a case-by-case basis. Each allegation is investigated and followed up by the HR team. A summary is also reported and discussed at the with the Company Directors. If the investigation confirms the reported allegations, the Senior Management team make a recommendation to the relevant department to take appropriate disciplinary sanctions and/or corrective action.

4 SUMMARY – A PATH FORWARD

Looking forward, Orlebar Brown will continue to refine and strengthen its Human rights Due Diligence approach, methodology, processes, and practices. Below are a few examples of the workstreams the company is focusing on in the upcoming years.

- Updating and further training of our Ethics@Orlebar Brown policy;
- Expanding the usage of its responsible purchasing practices, tools and trainings;
- Developing Orlebar Brown's risk management framework and the integration of human rights and labour rights-related risks
- Continued audit programme for evaluating suppliers

As Orlebar Brown progresses its sustainable business transformation, we will continue to work with suppliers and external expert partners to respect, protect and advance the human rights of workers and improve labour management practices in our supply chain, with the aim that everyone across our business and supply chain is treated with dignity and respect and has the opportunity to thrive.

Paul Donoghue, Chief Executive Officer

Approved by the Board of Orlebar Brown Limited on July 5th, 2024.

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- Internal audit plan is under developing and scheduled to begin in 2023.
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There is a long-standing Policy in place, available to all employees on joining the company on a central employee portal and maintained by the HR team. This covers reporting processes for any grievances as well as anti-harassment and disciplinary processes in place.

In addition, the company is conducting research into options to enhance anonymous messaging services, and to start development in 2023 to offer all employees the possibility to report any concerns or breaches related to the Ethics@Orlebar Brown policy, at local and global level, including on issues related to working conditions and well-being in the workplace.

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