

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps **Aspinal of London** has taken, and continues to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery refers to situations involving slavery, servitude, forced and compulsory labour, bonded labour, child labour, and human trafficking. Human trafficking involves facilitating or arranging travel for the purpose of exploitation. Modern slavery is a serious crime and a violation of fundamental human rights.

Aspinal of London strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We are committed to implementing systems and controls aimed at ensuring that modern slavery does not occur within our organization or supply chains. We also expect our suppliers to hold their own suppliers to the same high standards.

Our Business

Aspinal of London was established in 2004 by British entrepreneur Iain Burton, with the vision of creating a heritage brand based on the best craftsmanship, luxury materials, bold colours, and contemporary design. These qualities form the foundation of the Aspinal brand, beloved by customers worldwide.

We have always been driven by family values and a strong sense of community. With over 120 employees, we prioritize people and are committed to sustainability throughout our organisation. As a family-run, British-owned business, we recognize that our employees are the future generations we work for, and in that spirit, we are dedicated to maintaining an equal, inclusive working environment with representative leadership.

Policies

Aspinal of London has a zero-tolerance policy toward any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings, ensuring effective systems and controls to safeguard against modern slavery within our business and supply chain.

Our suppliers are members of **SEDEX**, working towards it, or with another Internationally recognized Compliance Organization, that promotes a socially conscious and sustainable business framework. Our suppliers are required to undergo audits by independent auditors to assess labour, health and safety, environmental performance, and ethics. These social audits play a crucial role in identifying and addressing forced labour risks.

Through our membership with SEDEX, we can assess key countries of risk using the Risk Assessment tool on the platform.

Suppliers who are not members of SEDEX, are required to undergo equivalent audits, which they must share with us upon completion.

Our tanneries must be members of the **Leather Working Group (LWG)**, which aims to promote supply chain transparency and minimize environmental impact. LWG members are audited and certified according to four levels: Gold, Silver, Bronze, and Audited. These audits cover responsible leather manufacturing, including environmental management, social responsibility, and governance.

Suppliers must adhere to our Code of Conduct which is based on our values and clarifies the principles and expectations for how we work. Our Conduct states our support for the elimination of all forms of modern slavery such as human trafficking, forced labour and child labour

Reporting non-compliances and Whistleblowing

We encourage employees and workers in our supply chain to follow normal procedures to raise issues of concerns of an ethical nature but recognise the importance of providing an impartial and protected route for reporting serious non-compliance. We have a Whistleblowing procedure in place which is set out in our new employee handbook. Our suppliers are expected to have the same policies and procedures in place.

Our Commitment

As a company, we expect all those working with us or on our behalf to adhere to the following principles to safeguard against modern slavery:

- Employment must be freely chosen.
 - Workers have the right to collective bargaining, including the freedom to join and leave unions as they wish.
 - Child labour is strictly prohibited.
 - Employers are prohibited from using inhumane or harsh treatment of workers.
 - Employers must provide employees with at least the minimum wage as determined by local laws.
 - Employers are required to maintain strict health and safety standards, ensuring that working conditions are clean, safe, and free from hazards.
 - Our suppliers are required to adhere to our Code of Conduct.
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Policy Scope

This policy applies to all individuals working for us or on our behalf in any capacity, including directors, officers, agency workers, seconded workers, volunteers, agents, contractors, and suppliers. It is the responsibility of the supplier/signatory to ensure that this policy is applied to everyone within their supply chain without exception.

