

## MANOLO BLAHNIK

### MODERN SLAVERY STATEMENT

#### UK MODERN SLAVERY ACT 2015

Pursuant to the Modern Slavery Act 2015 (the "Act"), companies that supply goods or services, carry on business in the UK and meet the annual turnover threshold of £36m or more are obliged to publish an annual slavery and human trafficking statement setting out the steps taken to eradicate slavery and human trafficking in their supply chain or their business.

#### CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010

Under the California Transparency in Supply Chains Act 2010 (SB – 657) (the "California Act"), qualifying businesses conducting business in the State of California are required to disclose their efforts to eradicate slavery and human trafficking from their direct product supply chains for the goods which they offer for sale.

#### MANOLO BLAHNIK STATEMENT FOR THE 2024/25 REPORTING YEAR

This is the sixth Modern Slavery statement that covers Manolo Blahnik International Limited (the "Company") and its group companies<sup>1</sup> (together, the "Manolo Blahnik Group" or "Manolo Blahnik") and applies with respect to the 2024 financial year. The Act and the California Act requires Manolo Blahnik to publish an annual statement disclosing the steps it is taking to identify and prevent any form of slavery and human trafficking ("Modern Slavery") in its supply chain. Manolo Blahnik is committed to ensuring that Modern Slavery shall not exist within its business or supply chain and is publishing this statement disclosing the steps it is taking for that purpose.

#### ABOUT MANOLO BLAHNIK

*"To nurture and promote people's safety, welfare and development is one of our core impact priorities. Manolo Blahnik recognises that every supply chain at some level may have hidden modern slavery risks. Our company is committed to taking all reasonable steps to be compliant with the Modern Slavery Act through the variety of actions outlined in this document."* - Kristina Blahnik, CEO

Manolo Blahnik is an iconic, independent British brand responsible for the development, manufacture and distribution of luxury footwear and accessories designed by Mr Manolo Blahnik. Mr Manolo Blahnik has been designing for his eponymous brand since 1971, learning the craft of shoemaking directly from artisans in their factories in Italy.

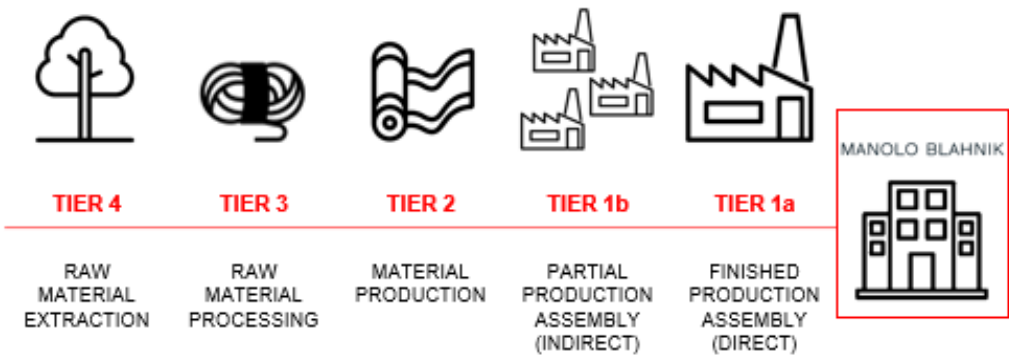
#### THE MANOLO BLAHNIK BUSINESS AND SUPPLY CHAIN

The Blahnik family have owned and operated Manolo Blahnik since 1973. Manolo Blahnik footwear and accessories are currently sold globally through its own store network, online at [www.manoloblahnik.com](http://www.manoloblahnik.com) and via licensed boutiques and selected third party bricks-and-mortar and online retailers. Manolo Blahnik defines its supply chain as shown in the diagram below:

---

<sup>1</sup> MB France SAS, Manolo Blahnik Switzerland SA, Manolo Blahnik Spain SL, Manolo Blahnik Italy S.R.L., MB Product Services S.R.L. Manolo Blahnik Americas (Holdings) Inc., Manolo Blahnik Americas LLC, Calzaturificio Re Marcello S.r.l. and Ma Nuo Luo Trading (Shanghai) Co Ltd.

MANOLO BLAHNIK



Product design and development occurs in London and the majority of manufacturing takes place in Italy at factories that the Company has worked with for over three decades (Tier 1a). Outside of Italy, Manolo Blahnik’s espadrilles are manufactured in Spain and there is one Tier1b supplier in Serbia. In 2019, Manolo Blahnik acquired one of these Italian factories, Calzaturificio Re Marcello SRL ("Re Marcello"), which produces, by volume, the largest proportion of Manolo Blahnik products of all authorised manufacturers. The acquisition of Re Marcello has allowed Manolo Blahnik greater control over its Tier 1a supply chain. Tier 1a also works with subcontractors (Tier 1b) who are not contracted directly by Manolo Blahnik but are known and audited by the Company and factories.

The majority of materials are procured directly by Manolo Blahnik’s authorised manufacturers from nominated and approved suppliers (Tier 2). These nominated and approved suppliers are predominantly located in Italy, with a smaller number located in other parts of the EU and the rest of the world. Manolo Blahnik has a country-level understanding of nominated materials’ country of origin (Tier 4), but limited visibility on raw material processing (Tier 3) at the moment. While most materials are nominated and approved by the Company, some parts for manufacturing are sourced directly by Tier 1a factories. Manolo Blahnik has visibility over the majority of other Tier 2 suppliers, and in 2025 is working to achieve a full map of the remaining small parts suppliers. An audit programme for Tier 1a, Tier 1b and Tier 2 suppliers commenced in 2022 and continues into 2025.

The Manolo Blahnik Group also works with various suppliers for goods required for its business and operations (e.g., stationery, IT equipment, boutique fit out etc).

Overview of the Manolo Blahnik Supply Chain at the end of 2024:

Tiers	Definition	Relationship	Italy		Europe	ROW
Tier 1a	Finished product manufacturing	Contracted directly to Manolo Blahnik.  6 no. of the 9 no. Italian factories have worked with Manolo Blahnik for over 3 decades.	Re Marcello, owned factory, Italy	8 no. partner factories in Italy	1 no. factory in Spain	NA
Tier 1b	Semi-finished product manufacturing	Contracted to Tier 1a.	As of end 2024: 60 no. subcontractors in Italy, 29 contracted to Re Marcello, 10 of which also contracted to other Tier 1a, and 31		1 no. subcontract or in Serbia	NA

## MANOLO BLAHNIK

			contracted to other Tier 1a		
<b>Tier 2</b>	Material production	Contracted to Tier 1a.	135 no. in Italy	9 across 3 countries	3 across 2 countries
<b>Tier 3</b>	Raw material transformation	Directly or indirectly contracted to Tier 2.	Unknown		
<b>Tier 4</b>	Raw material extraction	We have a country level map of our natural raw materials.	Italy is one of our top countries of origin for raw materials.	11 no. countries	20 no. countries

**POLICIES**

The Manolo Blahnik Group is committed to acting responsibly and ethically across its business and operations and ensuring continued compliance with applicable laws and regulations. The Manolo Blahnik Group has developed, and continues to develop and implement, policies and procedures to support its commitment. These documents set out the expectations and values the Manolo Blahnik Group seeks from its employees, business, operations, suppliers and commercial partners (business to business sales).

For many years the Manolo Blahnik Group operated using its Ethical Policy, which addressed key areas of material procurement, employment conditions and includes prohibitions on forced, bonded or trafficked labour. The standards in the Ethical Policy were based on the Conventions of the International Labour Organisation (ILO) and each of the Tier 1a women's manufacturers were contractually required to comply with the Ethical Policy.

In 2021, Manolo Blahnik developed and published its Labour Code (available at [www.manoloblahnik.com/gb/labour-code](http://www.manoloblahnik.com/gb/labour-code)) which was sent to all Tier 1a suppliers (including Re Marcello) and key Tier 2 suppliers. The Labour Code applies to all third-party manufacturers, suppliers and service providers operating on Manolo Blahnik's standard contractual terms. During 2022, manufacturing arrangements were reviewed and by January 2023 all Tier 1a suppliers were bound by contractual obligations to comply with the Labour Code and an undertaking to prevent Modern Slavery. Manolo Blahnik expects, through the signing of the Annual Compliance Declaration, that its Tier 1a suppliers ensure any suppliers they use adhere to the same obligations they agree to.

The Labour Code, which is also based on the Conventions of the International Labour Organisation (ILO), includes provisions on non-compliance, with the ultimate goals of safeguarding the wellbeing of individuals and establishing the circumstances surrounding a breach. The process involves a review of corrective actions and potential improvement measures to remedy any breach and also ongoing monitoring and reporting to ensure standards and safeguards are implemented.

Breaches would also result in further investigations to determine the risk of similar potential breaches within the supply chain.

All policies are applicable to every company in the Manolo Blahnik Group. The Manolo Blahnik Group expects these standards to be in place for all parties it works with or engages, throughout the relationship, including but not limited to manufacturers, manufacturing suppliers, mills, tanneries, component and accessory suppliers, subcontractors and suppliers of goods not for re-sale.

The Manolo Blahnik Group requires employees, suppliers, commercial partners and contractors to comply with applicable local and international laws and regulations and to act with due care, competence and diligence in the performance of their role and in their business generally.

## MANOLO BLAHNIK

In 2022 and 2023 Manolo Blahnik consolidated its mandatory policies, including the Labour Code, and developed a new Supplier Code of Conduct and Non-Compliance Policy, these apply to all suppliers, service providers and third parties that are engaged by or provide goods and services to the Manolo Blahnik Group directly or indirectly. Since 2023 all Tier 1a suppliers are requested to sign an Annual Compliance Declaration agreeing to act upon, and ensure their suppliers act upon, the mandatory Manolo Blahnik policies, including: the Labour Code, Anti-Bribery Policy, Supplier Code of Conduct and Non-Compliance Policy.

### EMPLOYEES AND TRAINING

Employee relationships are governed by English law for all Manolo Blahnik employees and local law for employees of the Manolo Blahnik Group entities in Italy, France, Switzerland, the USA, China and Hong Kong. In 2024 Manolo Blahnik International Limited and Manolo Blahnik Americas became certified under the Great Place to Work scheme. Manolo Blahnik International Limited has been accredited as a Living Wage Employer since 2021, and Manolo Blahnik Americas was certified as a Living Wage Employer in the US in 2023.

Manolo Blahnik Group employees in the UK, USA, Italy, Switzerland and France are given regular training on Modern Slavery and Whistleblowing. The training addresses all levels including senior leadership and senior management and includes training on identifying key risks and signs, safeguarding employee wellbeing and reporting risks and escalation. This training was repeated in 2022, 2023 and 2024 for all employees across the Manolo Blahnik Group and forms part of the induction process for all new employees.

The Manolo Blahnik Whistleblowing Policy provides employees and brand stakeholders with an internal mechanism for reporting, investigating and remedying any wrongdoing and specifically addresses suspected incidents of Modern Slavery.

### DUE DILIGENCE, PROCESSES AND CORRECTIVE ACTION

A key element of Manolo Blahnik's strategy is to gain greater visibility of all levels of its product supply chains, ensuring compliance with policies and implementing new processes for monitoring supply chain standards.

During 2020 and 2021, Manolo Blahnik conducted a survey to understand existing levels of compliance and measures in place amongst Tier 1a suppliers and key Tier 2 material suppliers to prevent conditions that give rise to Modern Slavery. In 2022, the questionnaire and onboarding process were refined to align with best practice and certification frameworks in the industry and in 2024 Manolo Blahnik implemented a formal supplier onboarding process.

The majority of Tier 1a suppliers were audited in 2021, with the remaining audits finishing in early 2022. During 2022, remedial actions raised by these audits were reviewed and remedied, with no material areas of concern identified. The audit of Tier 1b suppliers and Tier 2 material suppliers commenced in 2022 and were continued into 2023 with all Tier 1b completed by the end of 2024. Secondary audits of Tier 1b suppliers were also carried out in 2024 and will continue throughout 2025 and beyond. Secondary audits across Tier 1a and Tier 2 will be assessed and carried out as necessary. The Manolo Blahnik supplier audit framework and audit methodology was finalised during 2023.

All audits carried out across the supply chain so far have been social and ethical audits run by a third-party partner to local laws and regulations and International Standards from SMETA. The audit takes

## MANOLO BLAHNIK

at least half a day and consists of a site tour, document review and worker interviews carried out in workers' native languages. Various standards are assessed, including Health and Safety, Wages and Benefits, Freedom of Association, Working Hours, Employment Practices and Management Systems. First time audits are usually pre-announced, but secondary audits are often unannounced.

Where suppliers fail to meet the standards and expectations of the Manolo Blahnik Group, remedial action will be taken. This ranges from providing a reasonable level of support to improve standards and practices, through to refusing to admit or removing the supplier from the supply chain and/or reporting the supplier to the relevant authorities (where appropriate).

Manolo Blahnik has the right with key commercial partners and all Tier 1a suppliers to review and confirm compliance with policies and the law and to conduct compliance audits. The Manolo Blahnik Group also ensures that Tier 1a suppliers, commercial partners and contractors supply necessary information and grant access to verify such compliance. Any issues or instances of non-compliance are improved and corrected.

### **RISK ASSESSMENTS**

Given the long-standing and close relationship that Manolo Blahnik has with its Tier 1a suppliers, the likelihood of Modern Slavery existing at this level is low. Representatives from Manolo Blahnik visit Tier 1a supplier facilities regularly, both planned and impromptu, ensuring visibility of working conditions and any potential risks. Tier 1a suppliers are attended almost every day. The risk of Modern Slavery existing within Tier 2 suppliers is also considered low due to the location of the suppliers, the size of the businesses and the often long-standing relationships held. Many Tier 2 suppliers are also visited on regular basis by Manolo Blahnik representatives, often with very limited prior notice.

Manolo Blahnik has identified the potential for higher risk within Tier 1b suppliers, who are not directly contracted to Manolo Blahnik, which is why the auditing of Tier 1b commenced in 2022, was prioritised throughout 2023 and 2024, and will be continued annually. Manolo Blahnik acknowledges that there is risk further down the supply chain in Tiers 3 and 4 where visibility is currently limited and more data is needed. In 2024 the business invested in supply chain mapping software to start to gather this data.

Manolo Blahnik has actively identified and engaged external partners and experts in Modern Slavery prevention and labour standards and will continue to do so, to support and guide it in developing awareness, as well as implementing a wider labour standards monitoring programme.

In 2024 Manolo Blahnik finalised a more holistic supplier onboarding process which covers all Mandatory Policies in both English and Italian.

Goods not for re-sale required by the Manolo Blahnik Group are sourced from a wider non-core supplier network. In 2020 the Manolo Blahnik Group sought to reduce the number of these suppliers by using suppliers who have agreed to comply with applicable laws and policies. The Manolo Blahnik Group has identified and prioritised sourcing these goods from certified organisations where possible and introduced additional due diligence and onboarding processes.

### **ACTIONS FROM THE PREVIOUS STATEMENT:**

Key performance indicators for 2024 and actions taken are as follows:

## MANOLO BLAHNIK

1. In order to strengthen the Manolo Blahnik responsibility commitment, appropriate software will be selected to record and measure data in relation to supply chain, compliance (including labour), onboarding and audit results with associated follow up actions. This will in turn enable the Company to track the progress against the KPIs set.

**UPDATE:** In 2024 Manolo Blahnik Group contracted and onboarded an ESG software provider that will facilitate, amongst other things, further mapping of the supply chain, and management of due diligence procedures and compliance controls, such as the signing of the annual compliance declaration, the social audit programme and certifications. Supply chain mapping will concentrate first on ensuring our current knowledge across Tier 1a, Tier 1b and Tier 2 is correct, and in a second phase, allow us to deep dive into Tier 3, where we currently have less visibility, and Tier 4.

2. Manolo Blahnik will complete audits (including social) of its Tier 1b suppliers. Manolo Blahnik will also ensure that all remedial actions from the audits have been carried out during 2024.

**UPDATE:** By the end of 2024 Manolo Blahnik undertook audits on 54 Tier 1b suppliers. All remedial actions on critical and serious non-compliances were carried out within 2024.

3. Manolo Blahnik will continue to hold the Annual Responsibility Workshop for all Tier 1a suppliers, serving as an opportunity to provide training on its policies and expectations and a platform to engage with suppliers on best practice and challenges.

**UPDATE:** The second Annual Responsibility Workshop for all Tier 1a suppliers took place on March 20<sup>th</sup> 2024 and was attended by all Tier 1a suppliers.

4. Manolo Blahnik will ensure 100% of supplier onboarding questionnaires are returned by Tier 1a suppliers. The information gathered will be analysed with the aim to identify areas of improvement and set related KPIs for Tier 1a suppliers.

**UPDATE:** 100% of supplier onboarding questionnaires were returned by Tier 1a suppliers. From these results we discovered that while all share our mandatory policies and procedures, they don't all have their own policies in place, notably: 2 no. don't have their own Labour Code, 3 no. don't have an Environmental Policy, 3no. don't have a mechanism in place for employees / third parties to report incidents of alleged bribery or corruption and 4 no. don't have a Whistleblowing Policy. We will be working with our Tier 1a suppliers to support them in developing these policies.

5. The declaration document for Tier 1a suppliers to confirm and attest that the Tier 1b and Tier 2 suppliers they work with comply with Manolo Blahnik's Mandatory Policies will be issued in 2024 with all completed declarations required by the end of the year. This will ensure that all Tier 1b and Tier 2 suppliers have been issued with the Labour Code, Supplier Code of Conduct and Non-Compliance Policy. In addition Manolo Blahnik will increase direct relationships with Tier 2 suppliers in order to further implement its Mandatory Policies.

**UPDATE:** The Annual Compliance Declaration including the Labour Code, Supplier Code of Conduct and Non-Compliance Policy, was signed by all Tier 1a suppliers in 2024, confirming they have shared the mandatory policies with all Tier 1b and Tier 2 suppliers they work with. In an extension of this action, all mandatory policies were also translated into Italian before they were distributed to both Tier 1a and Tier 1b suppliers.



MANOLO BLAHNIK

6. All non-commercial product purchasing teams will be trained on the Supplier Code of Conduct and Non-Compliance Policy.

**UPDATE:** This training was not completed in 2024, but has been completed in quarter one of 2025.

7. Manolo Blahnik will conduct company wide training on the Whistleblowing Policy and its implementation to ensure the appropriate steps have been taken to comply with the Whistleblowing Policy and legal obligations.

**UPDATE:** All employees of Manolo Blahnik International Limited, Manolo Blahnik Americas LLC and MB France SAS were invited to partake in a mandatory training on Modern Slavery and the Manolo Blahnik Whistleblowing Policy in 2024.

8. The Responsibility Manager and other key members of the Manolo Blahnik team shall attend further conferences and talks dedicated to addressing labour and Modern Slavery concerns and best practice.

**UPDATE:** In 2024, the Responsibility Manager attended a forum and two additional talks on Modern Slavery concerns and labour best practice, which were also attended by a member of the Legal team.

ACTIONS FOR 2025:


Key performance indicators for 2025 are as follows, and from now on will be grouped in the following core commitment areas:

Core Commitment Focus	2025 KPIs
1. Achieve enhanced traceability through data collection	A. Deploy specialised ESG software to start mapping supply chain to greater extent and build a plan for how we can gather more information on our Tier 3 suppliers where we currently lack visibility in order to increase traceability.
2. Ensure robust governance structure across supply chain	A. Develop Supply Chain Mapping Policy to include our process for onboarding new nominated and approved suppliers. B. Support Tier 1a suppliers in ensuring they have their own policies and procedures for their workers, as identified through the 2024 supplier questionnaire.
3. Undertake due diligence through audits and monitoring	A. Continue our audit scheme, moving to a risk-based approach to audits throughout the supply chain, continuing to audit Tier 1b and Tier 2. B. Create and share guidelines from findings of 2024 Tier 1b audits for Tier 1a suppliers to then onward share with Tier 1b best practice, implications and educate how to escalate concerns.
4. Protect and promote worker voice	A. Continue to implement and improve on Great Place to Work scheme for Manolo Blahnik employees in the UK, France and US. B. Run second pulse survey for Great Place to Work scheme at owned factory Re Marcello.

MANOLO BLAHNIK

5. Organise training to upskill value chain	<div>A. Refresh annual Modern Slavery and Whistleblowing Training to be undertaken annually by all employees.</div> <div>B. The Responsibility Manager and other key members of the Manolo Blahnik team share learnings within the business from conferences and talks dedicated to addressing labour and Modern Slavery concerns and best practice, to constantly evolve brand’s approach.</div> <div>C. Run Annual Responsibility Workshop for Tier 1a suppliers to provide training and engage on best practice, while providing a forum for feedback and open dialogue.</div>
---	---

This statement was approved by the Directors of Manolo Blahnik International Limited on 16 May 2025.

DocuSigned by:  
  
917D9F1CC937411...

**Eva Kristina Hülsebus**  
Director of Manolo Blahnik International Limited  
16 May 2025