

Labour Code

Vision and Values

At Manolo Blahnik as part of our brand values we believe in treating everyone with honesty and respect while nurturing our teams to deliver excellence. We believe in making people smile.

Everyone should be entitled to live and work freely, in a safe environment without fear, intimidation, discrimination, disrespect or harassment in any form. When such conditions are guaranteed and protected, individuals thrive and their creativity, health and wellbeing are all nurtured and allowed to flourish.

We recognise the importance of compliance with laws, regulations, industry guidance and best practice to ensure individuals and the environments in which they work are protected and meet applicable standards and requirements.

We want to work with business partners, suppliers and service providers that share our values and expectations around responsible working conditions to strengthen our business and supply chain management. One of the ways we can achieve this is to ask our supply chain partners to join us in upholding the standards and requirements set out in this code which is based on the International Labour Organisation (ILO) Conventions on Labour Standards.

Companies that work with, partner with or provide products or services to Manolo Blahnik and form part of the supply chain should, as a minimum, comply with the laws and regulations of the country in which they operate and in which they employ or engage workers. Our supply chain partners should implement the necessary policies and procedures to ensure that the principles and standards set out in this code are maintained and monitored. This code should extend to third parties engaged by any supply chain partner to provide products or services to Manolo Blahnik directly or indirectly. We are happy to provide reasonable support to supply chain partners to apply and execute this code.

Forced or Compulsory Labour

Employment should be freely chosen and there should be no forced labour anywhere in the supply chain, including prison labour, bonded labour or other forms of forced or compulsory labour. Workers should not be required to provide deposits, valuables or original identification documents and should be free to end their employment on giving reasonable notice.

Child Labour

No person under the age of 16 or under the age for completion of compulsory education in their country (whichever is higher) shall be employed in the supply chain. No person shall perform tasks which, due to their nature or circumstances could cause harm to health, safety or morals. No forms of slavery or practices similar to slavery (including selling, trafficking, debt bondage, serfdom or forced or compulsory labour) are permitted regardless of age. In the event that any child labour is found it should be appropriately reported and steps and policies should be implemented and developed so such individuals can transition into education.

Fair and Equal Remuneration

Pay should be sufficient to meet workers' and their families' basic needs and provide discretionary income. Workers should receive the higher of the legal minimum wage, appropriate prevailing industry standard wage and/or Living Wage. Laws and regulations on wages, benefits and deductions must be complied with along with the terms agreed with the individual worker. Employees and workers should receive clear and transparent information about their wages, benefits, deductions, pay periods and rates before they are employed or engaged.

Deductions from wages as a disciplinary measure or punishment are prohibited. All disciplinary processes should be documented and recorded. Only deductions provided by law are permitted and deductions of any kind cannot result in the worker receiving less than minimum wage. Optional

deductions can be made only with express permission of the worker (free from undue influence, coercion or pressure).

Discrimination

No person, whether an applicant, employee or worker shall be subjected to discrimination of any kind whether directly or indirectly in relation to their hiring, wages, benefits, development, promotion, disciplinary procedures, termination or retirement on the basis of gender, race, religion, age, disability, sex, sexual orientation, nationality, political opinions or affiliation, union membership, beliefs, social group or origin, ethnicity or marital status.

Policies must be implemented to prevent such discrimination and made publicly known. Promotion and advancement should be on merit and performance, with equality and diversity policies, laws and regulations in mind throughout the process.

Freedom of Association & Collective Bargaining

The right to freedom of association and collective bargaining must be recognised and respected. Workers should be free to join unions and bargain collectively and employers should have an open attitude to such activities. Where such rights are restricted under local law, parallel measures shall be provided and facilitated to allow the same or equivalent rights. Any union representative (or similar) shall not be subject to discrimination and given free and unfettered access to carry out their functions and responsibilities.

Terms of Employment

Terms and conditions should be clearly set out and communicated and should respect workers and safeguard their rights under national and international laws and regulations. Employment should be given and performed on the basis of a recognised employment relationship under national law and practices.

Rights and protections granted by law, regulations and industry practice should not be avoided by using labour-only contracting, apprenticeship schemes (where there is no real intention to impart skills or provide regular employment), sub-contracting, home work or excessive use of fixed term contracts.

Harassment and Abuse

People should be treated with respect and dignity and not subject to harassment or abuse whether physical, sexual, psychological or verbal, including threats of abuse, unusual punishment, discipline or intimidation. Working environments should be sympathetic to all employees and workers and people should be aware of the types of behaviours that are unacceptable, and victims provided with safe redress. Policies and controls should be in place to ensure no such behaviour exists or is tolerated and to maintain a neutral working environment in which no one feels threatened or intimidated.

Health Safety and Environment

Workers should be provided with a safe workplace to prevent and reduce the risk of accident and injury arising from or linked to their activities. Responsible measures should be adopted and implemented to mitigate negative impacts on workers and the environment generally. Measures and regulations should be adopted in accordance with the best occupational health and safety practices and prevailing industry guidance and knowledge, taking into account specific hazards and risks in the business and specific activities.

Regular and recorded training should be given to all individuals and repeated for new and re-assigned workers. People should be given access to clean toilets, water and, if appropriate, sanitary facilities for food preparation and storage. If accommodation is provided, this must be clean, safe and meet workers' basic needs. Responsibility for health and safety should be assigned to a senior management representative.

Working Hours

People should not be required to work more than the regular hours and overtime hours permitted by the law of the country where they are engaged. A regular working week should not exceed 48 hours and should include 24 consecutive hours of rest every seven days. The sum of regular and overtime hours should not exceed 60 hours in a week. Overtime should only be in exceptional circumstances if allowed by national law and with appropriate safeguards to protect the health and safety of workers. Overtime must be voluntary, not requested regularly and fairly compensated. Overtime should be used responsibly and take into account the frequency of overtime, hours worked and the workforce as a whole and not used to replace regular employment.

Ongoing Compliance

In the event we have reasonable cause or reasonable belief that any supply chain partners are not compliant with this code we shall request that they provide evidence of compliance or an explanation. Should this information and evidence not be to our reasonable satisfaction, we may require access to their facilities to review, monitor and ensure compliance. We may engage an independent third party to conduct any such review which may involve speaking with employees and workers on a confidential basis.

We expect supply chain partners that engage third parties on our behalf give the same right of access and right to request information.

Following a visit, allegation or receipt of documentation requested, should we feel that the standards and expectations in this code are not being met, our first priority will be to protect and ensure the safety of the individual(s) involved or impacted. Once that has been guaranteed, we will review the issue and discuss potential improvements and changes that can be made to ensure adherence and ongoing compliance with this code. In the event of repeated breaches or where remedial measures are not an option, we may decide to terminate our relationship with the relevant supply chain partner in our sole discretion.

Implementation and Updates

This code will be sent to all existing supply chain partners engaged by Manolo Blahnik or its group companies and will be provided to any new supply chain partners engaged by Manolo Blahnik or its group companies. Supply chain partners must communicate these standards clearly and accurately to all employees in their language, so they have a full understanding of their human rights in the workplace. We in turn will communicate these standards to our own employees. As noted above, we also expect supply chain partners to communicate this code to their suppliers and sub-contractors engaged on our behalf or who directly or indirectly provide products and services to Manolo Blahnik.

This code will be updated annually in line with any developments in legislation and industry best practice for supply chain monitoring.

Please raise any queries or concerns regarding this code with your regular point of contact at Manolo Blahnik.