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|  | THE COONEEN GROUP Modern Slavery Policy Statement | Policy Reference: | P-1063 |
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1. Purpose

- 1.1. Modern Slavery is a crime and a violation of fundamental human rights. Modern Slavery can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2. The Cooneen Group is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own global operations, our supply chain, and our products.
- 1.3. This statement is made pursuant to the Modern Slavery Act 2015 and relates to our financial year ending 27/11/2024.

2. Scope

- 2.1. The Policy is applicable to all employees working for the Cooneen Group

3. Definitions

- 3.1. Modern Slavery: Encompasses slavery, servitude, forced and compulsory labour, and human trafficking. It involves the exploitation of people for personal or commercial gain

4. Conditions

- 4.1. The Cooneen Group is a market leading garment designer, manufacturer and supplier, whose brand is based on integrity, innovation, success, leadership and outstanding customer service. The Cooneen Group successfully operates in a range of clothing markets globally, from its headquarters in the UK, Cooneen provides strong, stable supply chains in order to meet and exceed their customers' expectations.
- 4.2. Cooneen realises that slavery and human trafficking can occur in many forms, for example, forced labour, servitude, child labour, and workplace abuse; its policies, procedures and practices encompass all forms of coerced labour. Cooneen prohibits and has a zero tolerance towards all forms of modern Slavery throughout our global organisation and supply chains.
- 4.3. The Cooneen group is committed to ethical improvement and legal compliance and has operated and continually developed its Social Responsibility Management System since 2009.
- 4.4. The following statement includes some of the Social Responsibility activities Cooneen have successfully undertaken and introduces the steps that have been taken in relation to our responsibilities under the Modern Slavery Act 2015 (MSA) to ensure that slavery and human trafficking is not taking place in any part of our business operations or supply chain.

5. Cooneen Group Anti-Slavery and Human Trafficking Policies

- 5.1. As outlined in the Cooneen Anti-Slavery and Human Trafficking Policy and other related policies and procedures, the Cooneen Group have adopted a zero-tolerance approach to any type of coerced labour and/or human trafficking.
- 5.2. This policy is an integral part of the Cooneen Corporate Social Responsibility Strategy.
- 5.3. In 2009 Directors of the Cooneen Group voluntarily chose to establish a Social Responsibility Management System (SRMS) which respects and conforms to the requirements of the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the fundamental labour principles that protect workers' rights as defined in the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (ILO Core Conventions).
- 5.4. Cooneen Group SRMS requires the Cooneen Group to formally commit its supply chain to ethical improvement and to respect the ILO conventions and the ETI Base Code. The company has implemented, communicated, and enforced policies, procedures, systems and

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controls to ensure Modern Slavery is not taking place in either our own business or our supply chain.

6. Managing Ethical Risk

- 6.1. We recognise and acknowledge that both our business and our supply chains must be aware of the risks and must implement procedures and processes to address all concerns through the appropriate channels and to communicate outcomes with the interested parties.
- 6.2. Our Supplier Code of Conduct defines the minimum standards that our suppliers are required to adhere to, wherever they procure materials, manufacture or perform services for the Cooneen Group.
- 6.3. The Cooneen Group has risk assessed its supply chain to identify if there are any significant areas of concern. Our sourcing and ethical evaluation programme covers the entire product supply chain. Mobilisation of our Ethical Assurance programme has resulted in gaining ethical commitment to ILO conventions, ETI Base Code, Labour Standards and compliance to the Modern Slavery Act for all its Tier 1 suppliers.
- 6.4. Ethical audits have also been conducted within the supply chain across Tier 2 suppliers, dependant on the result of risk assessments.
- 6.5. The ethical risk assessment process takes into consideration the following key points:
- 6.6. The supplier/subcontractor location
- 6.7. Supplier ethical history and commitment to Social Responsibility.
- 6.8. Ethical improvements achieved in previous year.
- 6.9. Ethical Audit key indicators include:
 - i. Age of employee
 - ii. Right to work
 - iii. Safe and healthy working environment including building structures
 - iv. No Forced or coerced labour and work contracts provided in employees own language
 - v. Traceable container security system
- 6.10. Within the Supply Chain the Cooneen Group will continue to develop its Ethical Risk programme during 2020 to:
 - i. Ensure minimal risk of slavery and human trafficking within all its global operations.
 - ii. Encourage our supply base to develop and implement their own Social Responsibility Management systems.
 - iii. Increase employee training focus on anti-slavery/human trafficking recognition and awareness and the need to apply this awareness in both the workplace and the wider communities in which we operate.
 - iv. Implement our annual SRMS training programme which includes Modern Slavery requirements.
 - v. Verify that Cooneen's shipping/transport sub-contractors have robust shipping security systems to minimise human trafficking risk.
 - vi. Maintain the Cooneen Group's excellent Social Responsibility reputation.

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Definitions and Acronyms

| Term | Description |
|--------------------|---|
| Cooneen Group | Cooneen By Design Ltd, Cooneen Defence Ltd, Cooneen Protection Ltd, Cooneen At Work Ltd and Coonen Aviation Ltd |
| HR | Human Resources |
| Employee | A person who has agreed to be employed to work for payment and is under a contract of employment. |
| Line Manager | A person who directly supervises/manages an employee. |
| Cooneen SharePoint | Online Document Resource area |

References

| Documents referenced in this Policy |
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| Anti-Slavery and Human Trafficking Policy |

Responsibilities & Authorities

| Role | Responsibility & Authority |
|---------------------------|--|
| HR | Responsible for creating, updating, adhering and reviewing all the standard processes and policies |
| Line Manager | Required to ensure adherence to the policy. |
| Employee | Required to adhere to the policy. |
| Business Support Director | Responsible for reviewing standard processes and policies |

Signed:

Date: 16/4/25



Neville McIlwrath

BUSINESS SUPPORT DIRECTOR

The Cooneen Group will review policies and procedures in line with changes in legislation, technology or good practice. A formal review of this policy will be undertaken at least every two years.

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|---------------------------------|----------------|
| 2 | 16/4/25 |
| Next Planned Revision: 16/04/27 | |