

	THE COONEEN GROUP Modern Slavery 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 and modern slavery 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 27/11/2025.

2. Scope

- 2.1. This statement is applicable to all employees working for the Cooneen Group and to our global supply chain.

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
- 3.2. Trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons through force, fraud, or coercion for the purpose of exploitation

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 systems since 2009.
- 4.4. This statement outlines the activities Cooneen has undertaken 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 Policies and activities

- 5.1. As outlined in the Cooneen Anti-Slavery and Human Trafficking Policy, Human Rights policy, Ethical sourcing policy, Ethical standards, Supplier code of conduct 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. 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).
- 5.3. Cooneen Group SRMS requires the Cooneen Group to formally commit its supply chain to ethical improvement and to respect the ILO conventions and our ethical standards which

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are based on the ETI Base Code. The company has implemented, communicated, and enforced policies, procedures, systems and controls to ensure Modern Slavery is not taking place in either our own business or our supply chain.

6. Managing Ethical Risk

- 6.1. Our Group Sourcing and Quality Director, along with the Compliance manager and Country office managers are responsible for management of our supply base and resolution of any identified instances of modern slavery.
- 6.2. We utilise a global supply base and we have country offices in key locations: China, Bangladesh, India. Our staff in these locations manage our supply chain and regularly communicate and visit the factories.
- 6.3. 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.
- 6.4. Our Supplier Code of Conduct and Ethical standards define the minimum standards that our suppliers are required to adhere to, wherever they procure materials, manufacture or perform services for the Cooneen Group.
- 6.5. This is further enhanced through our Human Rights policy and Whistleblowing policy.
- 6.6. We require our ethical standard to be on display in the factory's premises.
- 6.7. Our Supply Chain management procedure details how suppliers and factories are approved. We regard non-UK/EU based tier 1 garment manufacturing factories as high risk, and require a 3rd party ethical audit, or an agreed 2nd party ethical audit.
- 6.8. We introduced a supplier manual in 2025 to bring all our requirements into one document. All suppliers must acknowledge and agree to comply with the supplier manual.
- 6.9. Cooneen has set Modern Slavery KPIs to continue to strengthen our commitment to preventing modern slavery in our supply chain. The KPIs look at governance, training, due diligence and supply chain transparency.
- 6.10. Within the supply chain the Cooneen Group will continue to:
 - i. Ensure minimal risk of slavery and human trafficking within all its global operations.
 - ii. Continue employee training 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.
 - iii. Verify that Cooneen's shipping/transport sub-contractors have robust shipping security systems to minimise human trafficking risk.

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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: copies available at https://apps.cooneen.com/
Anti-Slavery and Human Trafficking Policy
Ethical standards
Supplier code of conduct
Supplier manual

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: 15/04/2026



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	16/04/25
3	15/04/26
Next Planned Revision: 15/04/27	