

## MODERN SLAVERY STATEMENT 2024

### INTRODUCTION

This is our ninth Modern Slavery Statement published in accordance with the UK Modern Slavery Act 2015 (MSA) and the California Transparency in Supply Chains Act 2010 (CTA).

One of the key principles of Clarks' Code of Business Ethics (for employees) and Clarks' Code of Practice (for suppliers) is to treat everyone fairly and with dignity and respect. This includes everyone from within our business and also, importantly, those within our supply chain.

### OUR MISSION

"Empower Everyone with the freedom to move comfortably".

Our mission is what drives us, it's our purpose and where we are going. It should inspire us every day and be the filter through which we put everything.

The statement is made by C&J Clark (No 1) Limited as parent company of the subsidiaries listed in Appendix I and includes the activities of those subsidiaries. It outlines the measures Clarks has taken to assess and reduce the risk of slavery (including forced and child labour) and human trafficking occurring in our business or supply chains during the year 2024. The statement also outlines our commitments to continue to mitigate risk in subsequent years.

### SUMMARY OF STEPS TAKEN TO PREVENT & REDUCE RISKS OF MODERN SLAVERY

As expanded in this statement, Clarks has well-established policies and processes that together work to prevent and reduce the risk of forced or child labour linked to the production of our products. These include our Code of Business Ethics, our Modern Slavery Policy, our Code of Practice and Remediation Process. We also conduct audits in line with our Standard Operating Procedure for Supplier Working Conditions to ensure adherence to our Code of Practice and to identify any necessary correction action or remediation. During FY2024, these policies and processes continued to be a part of our day-to-day operations, and key KPIs and results can be found in our Modern Slavery Statement.

Following a third-party systematic review and subsequent expert external guidance, during FY2024 we identified and developed improvements to our policies and processes to better assess and monitor human rights risk, which encompasses forced labour and child labour. We have comprehensively revised the Supplier Code of Conduct and Audit Standard Operating Procedures (SOPs) to align with various global standards. Key enhancements include:

- Implementation of a Four-tier escalation protocol when critical finding identified during our audits
- Formalization of root cause analysis methodologies incorporating critical-thinking frameworks
- Deployment of blockchain-enabled supply chain traceability modules.

The revised policy had been implemented across all our supplier sites, demonstrating full compatibility with EU CSRD reporting requirements to strengthen monitoring and measurement of effectiveness to our forced and child labour risk assessment.

We recognise that forced and child labour can happen all over the world and at all stages of the supply chain, and the importance of improving traceability and transparency of our supply chains to best manage any potential risks. We have developed plans to undertake supply chain mapping beyond our direct and nominated material suppliers, to improve our ability to manage potential risks in future.

### CLARKS OVERVIEW – ORGANISATIONAL STRUCTURE

C&J Clark (No1) Limited is a privately-owned limited liability company registered in England and Wales and owned by C&J Clark Limited and Viva Goods Company Limited. The term 'Clarks' as used in this statement refers collectively to C&J Clark (No1) Limited and its subsidiaries as listed in Appendix I.

Clarks was established as a shoemaker in 1825. 200 years later, Clarks designs, develops, sources and sells footwear and accessories globally, operating in 83 countries. Clarks' products are sold through our own retail and outlet stores as well as through stores operated by our franchise partners, licensees, joint venture partners and wholesale customers. Clarks sell products online via our digital platforms and third-party digital marketplaces. As of the year ending 31st Dec 2024, Clarks employed in the region of 5,744 people including part time employees.

Clarks' commercial operating model is structured across six operating regions – UK & Republic of Ireland, Europe, Americas, Middle East and Africa, Greater China and South East Asia, Japan & Korea. Each region is supported by corporate functions providing services in Human Resources, Finance, IT, Legal, Compliance, Marketing and Operations.

Our Brand hubs are located at Clarks' headquarters in Somerset UK and Boston USA, focusing on product design, line management and creative and marketing activities. Development and sourcing activities are also located in the UK and USA with several locations in Asia, including Vietnam and India.

## ACTIVITIES AND OUR SUPPLY CHAINS

Clarks undertakes the design and development of our products but outsource the manufacturing. In most factories, the facilities are shared with production for other brands.

Most of Clarks' footwear products are sourced through suppliers overseen by Clarks' sourcing team. Part of this role is ensuring Clarks' business aligns to good ethical and environmentally sustainable practices.

In 2024, approximately 50% of Clarks' footwear is sourced through direct managed factories meaning they are managed by our own sourcing operations teams, other 50% is sourced through specialist agents for which Clarks pay a fee but ensure that appropriate due diligence is carried out to determine that both the agents, and their suppliers, work to required standards.

Clarks has long standing relationships with many of our suppliers.

In 2024, Clarks sourced most of our footwear from suppliers based in Asia (Vietnam, China, Cambodia and India), with small volumes from Indonesia and Albania. Clarks also sources small quantities from within Europe. Production was undertaken through 49 factories producing finished shoes. The table below shows where the factories producing goods are located.

Source Country	Footwear	Seasonals	Accessories	Shoecare
Albania	1			
Cambodia	7			
China	19	2	5	
India	8		1	
Indonesia	1			
Japan			1	
Portugal	1			
United Kingdom			2	1
USA				1
Vietnam	9			
<b>Grand Total</b>	<b>47</b>	<b>2</b>	<b>9</b>	<b>2</b>

Non-footwear products such as handbags and accessories make up a small part of the Clarks business, representing approximately 1% of total revenues. These are all sourced through specialist agents for each product type. The production of these goods takes place mainly within China and India with some specialist goods produced in the United Kingdom.

As at the date of this statement, Clarks has no issues with any of its suppliers, trade unions or other bodies representing workers that it considers should be disclosed in the context of the MSA or CTA.

Further information can be found on our website [Clarks 2024 Footwear & Accessories Suppliers](#)



## OUR POLICIES: ADDRESSING THE RISKS

Clarks has several policies which support the fight against modern slavery and trafficking.

### Code of Business Ethics (Employees)

Our [Code of Business Ethics](#) outlines the global values and principles that help shape the way Clarks work and describes our internal accountability, standards and expectations. It is primarily aimed at employees and Clarks encourage our business partners, including suppliers, franchise and joint venture partners, to adopt and apply the Code of Business Ethics wherever they represent or promote the Clarks brand. Clarks attaches real importance to the welfare of our employees and those employed by our suppliers. The key principles include:

- We treat all employees and each other fairly, with dignity and respect;
- We operate with integrity and honesty; and
- We base our business relationships on respect; and expect the same from those that we do business with.

The Code includes a link to the International Labour Office's (ILO) Indicators of Forced Labour for further guidance. The Code of Business Ethics specifically references that "No form of forced or compulsory labour or modern slavery is tolerated by Clarks within our own operations or those of our business partners" and includes indicators and warning signals that employees should be alert to in helping prevent such issues.

### Modern Slavery Policy (Employees)

Our Modern Slavery Policy lays out Clarks' commitment to:

- maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
- be clear about our recruitment policy;
- check our supply chains;
- lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- ensure we have in place an open and transparent grievance process for all staff;
- seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and
- make an annual statement setting out the steps we have taken to ensure slavery and human trafficking is not taking place in our supply chains and to demonstrate that we take our responsibilities to our employees and our clients seriously.

### Remediation Process (Employees & Suppliers)

This lays out the process if modern slavery and/or human rights abuses are uncovered within Clarks' operations. The process is intended to end situations of forced labour and labour human trafficking, and as far as possible correct the harms experienced by victims. The process outlines who is responsible for remediation and when.

Clarks will work collaboratively with all relevant parties, including law enforcement authorities to address any instances and ensure that affected workers are not further harmed during the process. The safety and welfare of the victim is of primary importance throughout the whole process.

Clarks will:

- be flexible and responsive to the needs and wishes of the victim;
- respond to a local understanding of the factors driving forced labour;
- understand the risks and sensitivities present in the local context;
- build on the strengths and capacities of partner organisations and national authorities;
- be delivered in accordance with applicable national law and international labour and human rights standards; and
- incorporate means of preventing further abuses.

Our 2024 approach is [summarised online](#).

## Code of Practice for Suppliers

All suppliers are expected to sign up to our Code of Practice as part of their contract. Clarks' Code of Practice states the minimum working condition standards that Clarks expect our suppliers to adhere to in the production of all Clarks' products.

The code of practice includes the Consumer Goods Forum priority industry principles of forced labour. The Consumer Goods Forum is a global, parity-based industry network, driven by its members who come from over 70 countries and reflect the diversity of the industry in geography, size, product category and format. It is the only organisation that brings consumer goods retailers and manufacturers together globally to collaborate, alongside other key stakeholders, to secure consumer trust and drive positive change, including greater efficiency.

The Forum devised key principles relating to slavery and working conditions which they encourage their members to include within their Code of Practice, namely:

- "1. Every worker should have freedom of movement – the ability of workers to move freely should not be restricted by the employer through physical restriction, abuse, threats and practices such as retention of passports and valuable possessions;
2. No worker should pay for a job – fees and costs associated with recruitment and employment should be paid by the employer, not the employee; and
3. No worker should be indebted or coerced to work – Workers should work freely, aware of the terms and conditions of their work in advance and paid regularly as agreed.
4. All workers should be provided free and unrestricted access to potable water and clean toilet facilities."

These principles have been included within our Code of Practice as well as requirements to:

- comply with all local legal and regulatory requirements of the country in which the facility is located; and
- to recognise international standards and to uphold the core labour conventions of the ILO.

Where there is any conflict between these Clarks expect the higher standard to be achieved. The Code contains specific requirements which underpin the principles including "All work must be conducted on a voluntary basis, and not under threat of any penalty or sanctions. The supplier shall not use any form of forced, bonded, indentured, trafficked, slave or involuntary prison labour".

The Code must be applied to all suppliers regardless of which tier they are within the supply chain.

The Code of Practice for suppliers can be found on our [Corporate Responsibility webpage](#).

## Procurement Policy

The Clarks Procurement Policy exists to ensure accountable, efficient, transparent, and ethical practices are used to acquire products and services. The procurement team considers the legal and ethical responsibilities of Clarks (including those of modern slavery) in aspects of supplier sourcing and management including; supplier contracts, tender and purchasing processes, auditing and compliance actions. Due diligence is completed before engaging with a supplier, in the context of a manufacturer these would include a requirement for either a site visit and audit of working conditions or the Facility Authorisation Process.

Our policy is reviewed and communicated regularly, and training records retained.

## Breaches and Non-compliance

Clarks will not tolerate forced labour, slavery or human trafficking within our direct operations or supply chains. Where any non-compliance is identified, Clarks expect and support suppliers to act to address it. Clarks will actively work with suppliers to make necessary improvements and any affected suppliers will be given the opportunity to produce an improvement action plan to address those issues identified. If a supplier does not take effective action in a timely manner, through the new escalation process established and implemented in 2024, withdrawing our business will be considered as the final sanction.

Employees who breach the principles set out in our policies may be subject to disciplinary procedures.

## **Governance**

Responsibility for the preparation of our Modern Slavery Statement sits with the Board of Directors. Management is responsible for addressing the risks associated with human trafficking and modern slavery.

While all Clarks employees must follow our Modern Slavery Policy in relation to their roles, the following departments have specific responsibilities for carrying out implementation of policies and procedures that support Clarks' human rights responsibilities: Legal, Procurement, Sourcing, and Corporate Affairs and Sustainability.



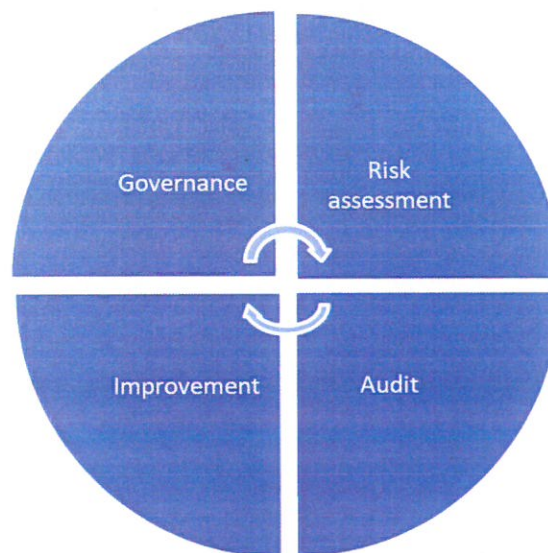
## SUPPLY CHAIN DUE DILIGENCE

### Standard Operating Procedures for Supplier Working Conditions

Audits are a requirement within our Code of Practice. The Standard Operating Procedures for Supplier Working Conditions clearly defines the supplier factory audit programme and the overall governance of the Supplier Working Conditions team and lays down the methodology that defines how the supplier audits are planned and executed.

- Annual validation and approval of Supplier Working Conditions strategy and plan
- Alignment with overall Corporate Responsibility Strategy
- Incident Response Plan relating to reputational risk incidents due to suppliers base

- Improvement Action Plan
- Training & workshops
- Monitoring & follow-up audits



- Geographic Permitted Sourcing Countries
- Facility type: Finished goods/ Accessories/ Materials/ Components
- Supplier relationship: Direct vs non-direct managed

- Audit programs: Social & Labour/ Security/ Environmental
- Strategy: Announced/ Semi announced/ Unannounced
- Resources: Internal team resources and 3<sup>rd</sup> party providers
- Audit result review

In 2024 we established a new escalation and termination process, clarifying the consequences of negative audit results. Concerns with working conditions of the production facilities for Clarks' branded goods will be raised to different levels of our management team for further support and the references for us to make the business decision.

### Facility Authorisation Process

The Facility Authorisation Process was introduced during 2019. The purpose of the process is to demonstrate that the factories used by sourcing agents to produce Clarks branded products meet the standards laid out in Clarks Code of Practice.

The process is intended to manage and control the standard of working conditions within the factories and requires the Agent to provide a variety of qualified audit reports though the preference is for those associated with multi-stakeholder initiatives or industry collaborations such as: Business Social Compliance Initiative (BSCI); Fair Labor Association (FLA); Sedex Members Ethical Trade Audit (SMETA); Social Accountability International SA8000 Standard; BRCGS Global Standard for Ethical Trade & Responsible Sourcing prior to any production taking place, and periodically thereafter, to demonstrate the facility adequately meets the standards set out in Clarks Code of Practice.

### Speak-Up Policy

The Speak-Up / Whistleblowing Policy defines the different methods available for reporting suspected non-conformities. The options are:

- Line management;
- Human Resources;
- [ethics@clarks.com](mailto:ethics@clarks.com) (an email to Compliance and Privacy Team); and
- An external reporting company which gives webpage, phone and email options (all anonymous and accessed by Compliance personnel within Clarks). Independent Speak-Up Line (EQS): [Freephone](tel:1800123456) | [Weblink](https://www.clarks.com/speakup) | [email-intake@clarks.integrityline.org](mailto:intake@clarks.integrityline.org)

The policy also includes information on Clarks' commitment to zero tolerance of any retaliation.

Summary reports from Speak-Up reports are provided to the Chief Legal Officer and the Audit Committee. The Audit Committee has responsibility for reviewing policies and processes with regards to whistleblowing and legal compliance. As well as employees, the facility is available to our Joint Venture partners and Clarks continue to roll out this programme to our franchise partners.

## Due Diligence

Clarks uses supplier on-boarding packs to communicate and certify our requirements on forced labour and modern slavery to manufacturers, agents and suppliers. Suppliers are required to sign a copy of the Code of Practice to confirm that they have received, reviewed and understand it, and that they are in, or working towards, full compliance with its requirements. Clarks' Code of Practice forms part of the terms and conditions of all relevant purchase orders and works constructively with suppliers to meet our expectations.

Where appropriate and based on the level of risk, audits are conducted, or audit reports provided by agents, for any potential new supplier prior to any purchase order for bulk production being placed.

Clarks Supplier Working Conditions Manual and Guidelines for Suppliers incorporates forced labour and modern slavery requirements. Our Facility Authorisation Process with non-direct managed factories ensures Clarks have input into all and any facilities being used, and the associated working conditions. Clarks has introduced guidelines for a Grievance mechanism into the direct managed factories and have commenced the rollout of this within our non-direct managed factories.

## Risk Assessment and Management

Clarks currently trades, operates and sources in many countries and across borders where the risk of modern slavery is perceived to be high. The evidence shows that whilst modern slavery is illegal in every country in the world, it still occurs.

Our supply chains are global and complex, especially below the first tier of suppliers. To ensure Clarks utilise our resources effectively in monitoring compliance with our Code of Practice, Clarks uses a geographic assessment of risk as an initial indicator. This includes information sources relevant to the use of forced labour in each country.

We used a list of Clarks permitted sourcing countries which defines those countries where Clarks would permit sourcing without routine auditing and those where we would undertake routine auditing prior to sourcing. We do not permit any sourcing of products, materials or components from countries that are not on our permitted sourcing list.

Clarks' approach to risk assessment includes use of external expert research (e.g. Mekong Club, Human Rights Watch, CCRCSR), improving supply chain mapping, auditing, training and stakeholder engagement. Most of Clarks' manufacturing takes place within the Asia Pacific region and this is where the largest amount of forced labour (6.3 per 1000) is believed to exist according to 2023 ILO data. Manufacturing is regarded to be a high-risk activity and accounts for 15% of those individuals in modern slavery. Therefore, Clarks works with stakeholders who help us to ensure Clarks are continuously reviewing and mitigating our risk in the supply chain.

The following have been identified as vulnerable to the risks of modern slavery:

- those in poverty or homeless
- minority groups
- those with substance abuse issues

- those with mental illness
- homeworkers
- migrant workers
- contract, agency, temporary or outsourced workers

The following indicators have been identified as potential indicators of modern slavery and have been included within our Code of Business Ethics and training materials to raise awareness:

- someone who does not have their own passport, ID or travel documents;
- someone who always allows others to speak for them or talks as though being instructed or coached by someone else;
- someone who may be withdrawn or appear frightened and may have injuries;
- a person who has limited social interaction and may always be dropped off or collected from work (they may not be able to contact friends or family freely);
- a person with very few possessions or who lives in a very poorly maintained, overcrowded place (and is often overcharged for this);
- a person who has little control over their finances or no access to a bank account;
- recruitment fees and labour agents;
- cash in hand payments;
- no unions; and/or
- no access to grievance mechanisms.

All those indicators had been included in Clarks' social audit criteria and had been carefully verified during each of our audits. Most of those indicators had been classified as "critical" findings in Clarks' audit program and any violations on those indicators may lead to the termination of business relationship with Clarks. Further communication, training and monitoring processes had been carried out by Clarks' Supplier Working Conditions team to ensure those indicators had been addressed and improved properly.

In addition, we recognise that there are risks of forced and child labour associated with raw material sourcing. While our Code of Practice requires suppliers to source according to our requirements, and according to permitted sourcing regions, in 2024 we will be bolstering our due diligence and assurances through strengthened policies and processes, including supply chain mapping and increased use of certification schemes, to better manage the risk of forced and child labour.

## Gap Analysis

Clarks had conducted an internal audit by KPMG in late 2023 to gain further insight into all aspects of modern slavery and human trafficking in relation to our business and how to best mitigate potential risks. This feedback will continue to form part of our committed actions in the future.

## Supplier Working Conditions Team

As of the end of 2024, Clarks maintains a multi-tiered supplier oversight system across all manufacturing regions. Our quality assurance protocol integrates both centralized governance mechanisms and accredited third-party verification partners specializing in labor practice audits. Clarks has a Facility Authorisation Process which requires non-direct managed suppliers (agents) to provide us with a recent audit report for a facility before it is used for production of any Clarks products and periodically thereafter.

## Supplier Relationships

The Global Head of Product Development, Sourcing & Quality is accountable for supplier relationships and for the relationships with the direct managed factories. Product buyers are responsible for the relationships within their specific product division in line with Clarks' policies. Concerns around potential non-compliance with policies is addressed and escalated in line with Clarks' policies, with end of business relationship as final sanction.



We established a new escalation and termination process, clarifying the consequences of negative audit results. Concerns with working conditions of the production facilities for Clarks' branded goods will be raised to different levels of our management team for further support and the references for us to make the business decision. This has been operationalised from April 2024.

Clarks works with the Mekong Club to improve our understanding of forced labour and modern slavery and how to identify, prevent and have commenced the rollout of their Apprise mobile phone application which helps us to identify indicators of forced labour when conducting worker interviews as part of our audit.

## Audit & Evaluation

Audits are conducted either by our in-house Supplier Working Conditions team or by independent and reputable third-party service providers on our behalf. As well as conducting scheduled audits Clarks also implemented semi-announced audits (where Clarks notify the factory a fortnight prior to the audit) and unannounced visits which, encourage our suppliers to continue to meet standards.

In 2024, factories producing the majority of our footwear were included in our audit program. In addition to audits at finished goods facilities, Clarks undertake audits of second tier material and component suppliers. These audits cover tanneries and sole suppliers that supply the majority of the volume of these materials from Clarks nominated or approved suppliers as well as other component and material suppliers.

160 social audits were conducted across our entire supply chain during 2024. In addition to the social audits conducted, 48 security audits were undertaken at finished goods suppliers in support of customs requirements.

Our audits are undertaken against criteria that assess the level of compliance by the facility to the working condition standards set out in Clarks' Code of Practice. The audit process includes a review of business licences and relevant documentation, interviews with management and workers and an inspection of all areas of the facility site. Auditors also look for ILO indicators of forced labour and modern slavery which form part of our assessment criteria.

For existing suppliers, Clarks uses a tiered approach to determine the frequency of any audits based on their compliance performance and management capability. Clarks assigns a compliance level and in 2020 revised our risk rating to a performance assessment to better understand and articulate the standard of working conditions at each facility.

Clarks expects the information gathered through our audit programme to be used by the factories to take action to improve conditions where necessary. It is also used to inform both operational and strategic sourcing decisions at all tiers of our supply chain. Clarks does not use any footwear supplier with the lowest compliance level (defined as a facility with critical issues including a lack of willingness and commitment by the senior factory management to engage and take appropriate corrective actions).

## Certification

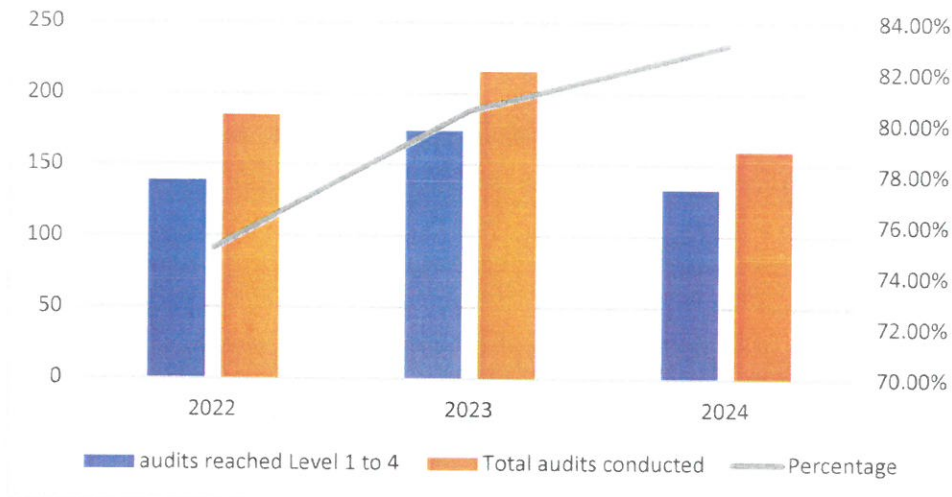
For products sourced through Clarks direct managed suppliers, the majority of materials and components used in the production are from suppliers nominated or approved by Clarks. All nominated or approved Clarks suppliers are required to meet the working condition standards set out in Clarks Code of Practice. For key suppliers such as the tanneries supplying the leather and factories supplying the sole units for Clarks specified products, we undertake social audits at those supplying the majority of the suppliers by volume to monitor the working conditions against Clarks Code of Practice. Audits were also conducted at other non-leather material and component suppliers.

## KEY PERFORMANCE INDICATORS

During 2024, 100% of suppliers were signed up to our Code of Practice and factories producing over 99% of our footwear suppliers and the majority of our material suppliers were covered by Clarks' risk assessment approaches.

Our audit programme uses a 1-7 scale to measure a supplier's compliance with our code of practice, where 1 and 2 are assessed as acceptable, 3 & 4 are assessed as improvement required and 5, 6, & 7 assessed as unacceptable. During 2024, 98% of our audits were conducted as semi-announced. 83.1% (133 out of 160) of social audits were assessed as reaching level 1 to 4, which was higher than the percentage in previous years (80.5%).

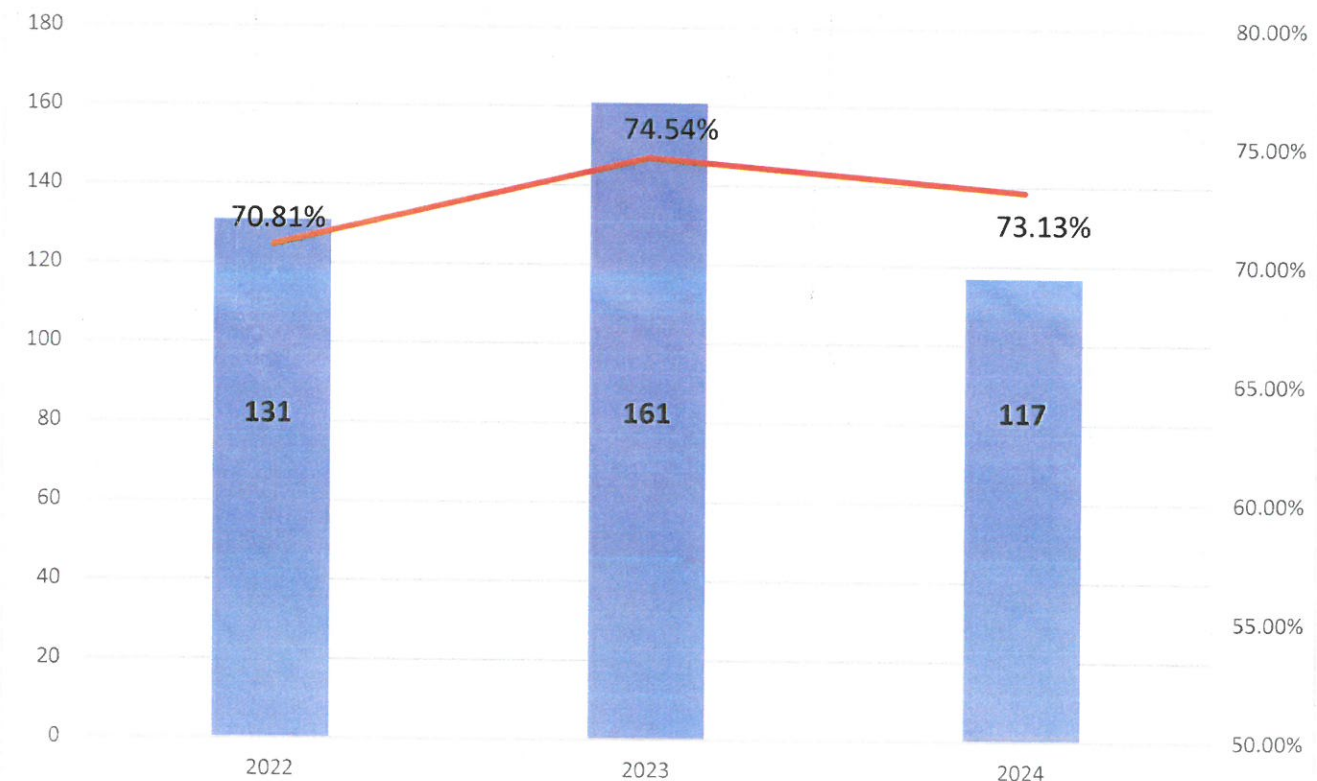
### Audit result analysis

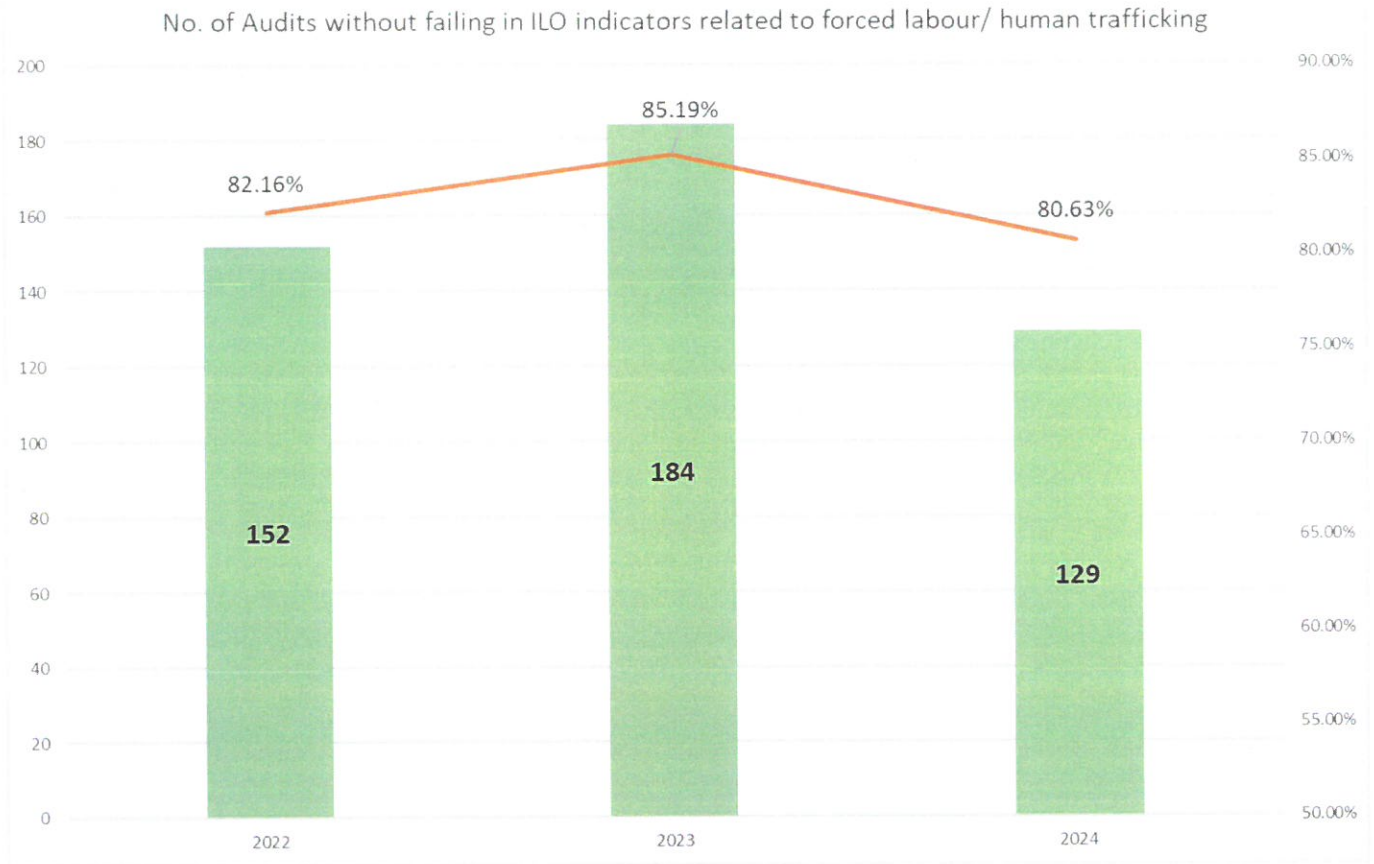


During 2024, we did not identify any cases of forced or child labour through our processes outlined above, and as such did not engage in any remediation. Clarks believes that a proper management system from each of our production facilities is crucial to reduce the potential risk of child labour or forced labour occurring in our supply chain. The evaluation of the recruitment practices and indicators from ILO-related forced labour and human trafficking issues are included in each of our social audits.

With the efforts from the Clarks Sustainability team in regularly monitoring, communicating, training and conducting other CSR projects in 2024 the compliance level in these two categories was monitored, as shown in the following chart:

### No. of Audits without failing in recruitment practice





## External

Clarks works with the Mekong Club, which is a leader in uniting and mobilising the private sector for a common cause - to disrupt and end modern slavery. They provide training materials which help raise awareness when used in the workplace. Clarks has used aspects of this within our internal training.

Clarks is proud of the steps we have taken to mitigate the risk of modern slavery within our business and supply chain. We have invested in training and raising awareness and are working to create the right culture throughout our organisation. We realise that modern slavery does not stand still and are committed to tackling the root causes through engaging with stakeholders and ongoing monitoring of activity.

## 2025 Commitments

During 2025 Clarks will continue to work to increase awareness of risks and reporting channels. We will continue our audit approaches to cover both finished goods suppliers and second tier material suppliers.

Through our sourcing strategy, we will continue to review our vendor base and will engage with 3<sup>rd</sup> party providers to evaluate and assess risk levels - to strengthen the effectiveness through our forced and child labour risk assessment process.

We are continuing to develop our plans and approaches for product and material traceability through the implementation of a new PLM system – which will assist with supply chain transparency, enabling us to better focus on higher risk raw materials including leather, cotton and forest-based products.



This Statement has been approved by the Board of C & J Clark (No. 1) Limited.

A handwritten signature in black ink, appearing to be 'C.M.' followed by a period.

Director / Interim Executive Committee  
June 2025

## **Appendix 1**

The following companies are commercial trading or sourcing organisations currently in operation which are part of the group of companies ultimately owned by C&J Clark (No.1) Limited:

C.&J. Clark International Limited  
C & J Clark Hong Kong Limited  
C&J Clark China Supply Chain Company Limited  
Clarks India Services Private Ltd  
C. & J. Clark Latin America, Inc.  
C. & J. Clark Canada Limited  
C & C Clark (Cambodia) Footwear Company Limited  
C. & J. Clark America, Inc.  
C. & J. Clark Retail, Inc.  
Clarks Shoes Handelsgesellschaft m.b.H  
Clarks Shoes Benelux BV  
C & J Clark China Trading Company Limited  
Clarks Shoes PTY LTD  
Clarks Japan Company Limited  
C & J Clark (S) PteLtd  
C&J Clark Mexico  
C & J Clark Polska Sp. C O. O.  
C & J Clark (M) Sdn Bhd  
Clarks Shoes Iberia  
Clarks Shoes Vertriebs GmbH DE