



MODERN SLAVERY STATEMENT 2025

INTRODUCTION

This is our tenth 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 2025. 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 FY2025, 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 FY2025 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 revised the 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 (PLM).

The revised policy has been rolled out to our supplier sites, with ongoing implementation support for remaining partners. This positions us to align with key aspects of the evolving EU CSRD reporting requirements, strengthening our monitoring and measurement of forced and child labour risks.

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 (NoI) 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 (NoI) 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 2025, Clarks employed in the region of 5,968 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 China, 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 2025, approximately 40% of Clarks’ footwear is sourced through direct managed factories meaning they are managed by our own sourcing operations teams, other 60% 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 2025, Clarks sourced most of our footwear from suppliers based in Asia (Vietnam, China, Cambodia and India), with small volumes from Indonesia. Clarks also sources small quantities from within Europe. Production was undertaken through 64 factories producing finished shoes. The table below shows where the factories producing goods are located.

Source Country	Footwear	Seasonals	Accessories	Shoecare
Cambodia	7		1	
China	26	2	11	4
India	8		2	
Indonesia	1		1	
Italy	2			
Portugal	1			
Romania	1			
United Kingdom	1		3	1
USA			1	1
Vietnam	17			
Grand Total	64	2	19	6

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.



As at the date of this statement, we have not identified any material instances of non-compliance among our active suppliers, trade unions, or worker representative bodies that would require disclosure under the MSA or CTA. We continue to monitor and address any emerging concerns.

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.

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 maintains a zero-tolerance policy towards forced labour, slavery, or human trafficking within our direct operations and supply chains, and we are committed to enforcing this through ongoing due diligence. 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.



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 since 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 (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](#) | [Weblink](#) | email-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 conducted an internal audit with KPMG in late 2023 to gain insights into modern slavery and human trafficking risks, and this feedback continues to guide our committed, year-round actions (including 2025).

Supplier Working Conditions Team

As of 2025, Clarks maintains its multi-tiered supplier oversight system across manufacturing regions—integrating centralized governance and accredited third-party labor audit partners. The Facility Authorization Process remains in effect, requiring non-direct suppliers to provide recent audit reports before production and periodically thereafter, ensuring baseline compliance.

Supplier Relationships

Accountability for supplier relationships sits with the Global Head of Product Development, Sourcing & Quality (direct factories) and product buyers (division-specific ties), per Clarks' policies. Concerns about non-compliance are addressed via established escalation protocols, with termination as a last resort.

The escalation and termination process (operationalized in April 2024) continued to function in 2025, clarifying consequences of audit findings. Working condition concerns are raised to management for support and decision-making.



Audit & Evaluation

Audits during 2025 were conducted by our in-house Supplier Working Conditions team. 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 2025, our audit program prioritized sustaining oversight of critical suppliers over broad expansion, aligning with a strategy of *consolidation* rather than new activity.

- **Scope:** Audits were targeted exclusively at our most strategic and higher-risk suppliers (e.g., key footwear factories, high-volume material/component vendors) to maintain continuity with existing standards. For non-prioritized suppliers, we also use agent-provided audit reports and ongoing communications to maintain oversight.
- **Methodology:** Consistent with 2024, audits followed Clarks' Code of Practice (reviewing licenses, interviewing staff/workers, inspecting sites) and included ILO forced labor indicators.
- **Tiered Approach:** The 2020-revised performance assessment (replacing risk ratings) guided audit frequency, but 2025's focus was narrowed to top-priority facilities.
- **Outcome Use:** Audit data continued to inform sourcing decisions and factory improvement plans, with a strict policy against engaging suppliers with persistent non-compliance.

2025 COMPLIANCE AND AUDIT DATA SUMMARY

During 2025, Clarks maintained coverage of our supplier base under the Code of Practice, with ongoing efforts to onboard remaining indirect suppliers.

Our audit programme—using the 1-7 compliance scale (1-2=acceptable, 3-4=improvement required, 5-7=unacceptable)—was narrowed to target only top-priority facilities in 2025. Audits were conducted with results indicating stable or improved compliance among these key suppliers.

No confirmed cases of forced or child labour were identified through 2025's targeted audit process. While our audits are designed to detect such risks, we acknowledge that continuous vigilance is required across complex supply chains. and as such, no remediation was initiated. We continue to emphasize that a robust management system at each facility is foundational to mitigating these risks—our audits still include ILO indicators for forced labour/human trafficking and reviews of recruitment practices.

The Clarks Sustainability team's ongoing efforts (monitoring, communication, training, and CSR alignment) supported the maintenance of compliance in key areas, as reflected in our internal tracking.

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.



2026 COMMITMENTS

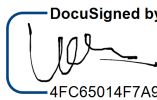
In 2026, Clarks will continue to raise awareness of risks and reporting channels, maintain our audit coverage of finished-goods and second-tier material suppliers, and refine our vendor-base review process—including engagement with third-party providers to strengthen forced- and child-labour risk assessments.

We are also advancing our product- and material-traceability plans through a new PLM system, which will enhance supply-chain transparency and help us focus on higher-risk raw materials (e.g., leather, cotton, forest-based products).

To further streamline and strengthen our ethical-supply-chain efforts, Clarks will begin requiring key suppliers to join the SMETA (Sedex Members Ethical Trade Audit) platform in preparation for 2026. SMETA is a widely recognized ethical-trade audit framework that provides standardized tools for assessing working conditions, environmental performance, and business ethics. By adopting SMETA, we will gain access to its integrated audit protocols, training resources, and data-sharing capabilities—enabling more efficient audits, targeted training, and better risk monitoring across our supply chain starting in 2026.

Through these actions, we aim to build a more transparent, resilient, and ethically managed supply chain for the years ahead.

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

DocuSigned by:

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Victor Herrero

Director

June 2026

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 & C Clark (Cambodia) Footwear Company Limited
C & J Clark (M) Sdn Bhd
C & J Clark (S) Pte Ltd
C & J Clark China Supply Chain Company Limited
C & J Clark China Trading Company Limited
C & J Clark France SAS
C & J Clark Hong Kong Limited
C & J Clark Korea Limited
C & J Clark Middle East Trading LLC S.O.C
C & J Clark Polska Sp. C O. O.



- C. & J. Clark America, Inc.
- C. & J. Clark Canada Limited
- C. & J. Clark International Limited
- C. & J. Clark Italy
- C. & J. Clark Latin America, Inc.
- C. & J. Clark Portugal Unipessoal LDA
- C. & J. Clark Retail, Inc.
- C&J Clark Mexico
- CJ Clark Turkey Ayakkabi Magazalik Pazarlama VE Ticaret Limited
- Clarks India Services Private Ltd
- Clarks Japan Company Limited
- Clarks Shoes Benelux BV
- Clarks Shoes Handelsgesellschaft m.b.H
- Clarks Shoes Iberia
- Clarks Shoes Vertriebs GmbH DE
- Clarks Vietnam Footwear Services LLC
- C J Clark South Africa