

## **MODERN SLAVERY STATEMENT**

## Introduction from the Board of Directors

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Frank Smythson Limited and its affiliated companies (Frank Smythson SRL, Inc, SARL & B.J. Chant & Sons Limited) are committed to continually improving our practices to combat slavery and human trafficking and can confirm that modern slavery is not taking place in any part of our business or in our business chain.

### **Organisational structure**

Smythson is an iconic British brand with an extraordinarily rich heritage. Established in 1887, and holder of two Royal Warrants, Smythson represents over 135 years of British luxury leather goods at their most refined. Each and every piece is exclusively produced under the eye of the expert hand of skilled artisans: from the meticulous design of our handbags to our iconic bespoke stationery department, Smythson's distinction lies in the detail.

We trade globally, currently with stores across London and Paris, along with fast growing eCommerce and wholesale channels. Together with our affiliated companies, we have fewer than two hundred employees and a series of subcontractors across the EU and UK operating throughout the business.

#### Our supply chains, policies and procedures

Smythson is dedicated to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risks, we ensure that all employees:

- Have a right to work in each country where work takes place. This involves either asking the individual directly to view their passport: a delay in providing the passport might indicate a modern slavery issue, or by using the appropriate government website and verification process for the locality.
- We check that each employee has a bank account in their own name into which their remuneration is paid.
- In addition, our employees, through the Employee Handbook, are made aware of the Company's requirement for employees to support and uphold human rights principles and know that together with the affiliated companies, we will not tolerate, engage in, or support the use of forced labour.
- All employees are provided with a clear contract of employment.

Additionally, we monitor regulatory developments linked to modern slavery and forced labour.

In December 2024, the European Union published its Forced Labour Regulation (FLR), which introduces a comprehensive ban on products made with forced labour within the EU market. This regulation applies to all products, regardless of their origin, and encompasses the entire supply chain, including components and raw materials. As a significant portion of Smythson's operations take place within the EU, we will be working closely with our supply chain partners to adopt best practices and align with the requirements of this regulation ahead of its enforcement in December 2027.

In 2024 a House of Lords Committee recommended introducing legislation requiring UK companies to conduct modern slavery due diligence within their supply chains. While these recommendations have not yet resulted in legislative changes, we will monitor any updates to the UK Modern Slavery Act that could impact our operations.

## Supplier adherence to our values

Smythson makes clear our position of zero tolerance to Modern Slavery and Human Trafficking to all suppliers and contractors, reporting any suspicion of such to management. Our supply chain is audited to ensure there is a limited risk of labour exploitation according to the commitment of the Smythson Code of Ethics.

# Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided awareness training to our staff. We also require our business partners to provide training to their staff and suppliers and providers.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Frank Smythson's slavery and human trafficking statement for the current financial year end 31.03.2026.

Approved by

Joko torta

Paolo Porta Director Frank Smythson Ltd