

Modern Slavery & Human Trafficking Statement Financial Year 2022

This statement is made pursuant to Section 54 of the UK Modern Slavery Act 2015. It constitutes Leineweber's slavery and human trafficking statement for the financial year 2022.

1. INTRODUCTION

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. Since 2008, our organisation has been and currently is a participant of the amfori Business Social Compliance Initiative (BSCI), which supports companies to drive social compliance and improvements within the factories in their global supply chains. As an amfori BSCI Participant we endorse the amfori BSCI Code of Conduct and its Terms of Implementation and cascade it through our supply chains. Therefore, Leineweber GmbH & Co. KG does not tolerate any form of slavery, servitude, forced, compulsory labour and human trafficking. This statement illustrates the steps Leineweber GmbH & Co. KG has taken to ensure but not guarantee that modern slavery and/or human trafficking is not taking place in our supply chain or our business.

2. ABOUT LEINEWEBER GMBH & CO. KG

OUR ORGANISATION

The company Leineweber GmbH & Co. KG was founded in Berlin in 1888 and is now in the fifth generation as a family-run business, located in Herford, Germany. Both in the trade and among consumers the name BRAX is synonymous with our brand values 'passionate, 'style-conscious' and 'smart'. In 2022 the BRAX collections were sold through 1,593 shop-in-shops, 59 stores, 19 factory outlet centers and our online shop. Design, purchasing and sales are developed and controlled from our corporate headquarters in Herford, while production is handled by our partner factories around the world. Our own retail activities, including stores, factory outlets and our online shop, are run in Germany by a subsidiary, BRAX Store GmbH & Co. KG.

OUR BUSINESS

We produce high-quality, modern premium casual wear under our independent brands BRAX Feel Good, RAPHAELA by BRAX and EUREX by BRAX. Based on our long-established success in our core segment of pants, we have systematically extended into other product groups, namely knitwear, jackets, shirts, blouses, shoes and accessories. In 2022 BRAX made a turnover of EUR 303 million with a team of 1,070 employees. 34 percent of that turnover was made by BRAX outside Germany. In the year 2022 we produced round about 8 million products.

SUSTAINABILITY MANAGEMENT

Together with the product-related divisions and the individual specialist departments, the Corporate Responsibility Department (CR) bears the main responsibility for many projects from this area. It is the direct staff office of the Executive Management. We are steadily working on complying with and developing environmental and social standards in our supply chain through continuous, interdisciplinary communication with colleagues at the Herford site and across the world. Our focus here is on maintaining fair business relations with our partners and sustainably supporting our suppliers to develop and improve with regards to our social and ecological standards. We work closely together with our employees on the ground and external auditing companies to meet the high level of requirements. Since we are also in continuous contact with our suppliers, we are able to control and steer the developments directly and to meet supplier's individual needs of support depending on their current level of development.

OUR SUPPLY CHAIN

BRAX operates in the context of the global competition of the clothing industry. Because of the highly specialised, labour-intensive method of production, the companies in our industry choose to produce in countries and regions where relevant jobs are available at competitive wages. Structural change in the manufacturing countries and associated geographical shifts in supply chains constantly pose fresh challenges for clothing companies and their sustainability management. That is why it is important for us to strike the right balance. As well as local laws, production standards must also comply with our social and environmental principles and values. In 2022, BRAX products were manufactured by nearly 60 partners in Europe, Turkey, North Africa and Asia. Despite our increasingly differentiated and broadening product range we keep the number of manufacturers as low as possible, as that is the only way to ensure individual support for every factory and to support them to develop and improve continuously. Irrespective of the origin of our products, in the context of our global business we constantly endeavour to establish fair trading relations and maintain them in the long term. It is therefore a fundamental principle of our procurement strategy to select our suppliers very carefully, audit them, support them and help them to develop (see details in our Sustainability Report).

3. POLICIES

AMFORI BSCI MEMBERSHIP

In 2008 we joined the amfori Business Social Compliance Initiative (amfori BSCI). amfori BSCI is an initiative by more than 2,000 enterprises aimed at improving global working conditions in various sectors. Being an amfori BSCI participant, we are part of an industry wide network that we use it to work collaboratively and exchange lessons learned and solutions in a pre-competitive basis. We believe the only way we can ensure significant, lasting improvements are made at the factories is if we get together with other enterprises. That is precisely what amfori BSCI enables us to do, and it also provides an audit system and training.














Member of amfori, the leading global business association for open and sustainable trade.

We participate in amfori BSCI. For more information visit www.amfori.org

OUR CODE OF CONDUCT

We actively integrate our suppliers in our business processes. At the latest before we issue the first production order, we request all of our business partners to read, sign and comply to our Code of Conduct. This Code of Conduct aims at setting up the values and principles that we strive to implement in our supply chain. By signing the Terms of Implementation, producers endorse the values and principles of the amfori BSCI Code of Conduct and commit to take the appropriate measures to observe the principles of the amfori BSCI Code of Conduct at their own facilities. This includes that we ask all of our producers to provide a valid amfori BSCI audit, if not yet in place. We additionally ask them to pass it onto their own significant partners, creating a positive cascade effect. The Code includes conditions for socially ethical production. It is based on the core employment conventions of the International Labour Organisation (ILO) and includes regulations prohibiting child labour and forced labour, as well as rules on discrimination, compensation and decent working hours, workplace safety, special protection for young workers and environmental protection, prevention of corruption, and finally on freedom of association and collective bargaining. The violation of the principles 'No Bonded Labour' and 'No Child Labour' is regarded as 'Zero Tolerance Issue' in the amfori BSCI auditing scheme.

CODE OF CONDUCT		ENTERPRISE COMMITMENT
NO CHILD LABOUR		THE ENTERPRISE DOES NOT HIRE ANY WORKER BELOW THE LEGAL MINIMUM AGE
NO BOUNDED LABOUR		THE ENTERPRISE DOES NOT ENGAGE IN ANY FORM OF FORCED SERVITUDE, TRAFFICKED OR NON-VOLUNTARY LABOUR
NO DISCRIMINATION		THE ENTERPRISE PROVIDES EQUAL OPPORTUNITIES AND DOES NOT DISCRIMINATE AGAINST WORKERS
FAIR REMUNERATION		THE ENTERPRISE RESPECTS THE RIGHT OF WORKERS TO RECEIVE FAIR REMUNERATION AND COMMITS ONESELF TO PAYING THE STATUTORY MINIMUM WAGE
DECENT WORKING HOURS		THE ENTERPRISE OBSERVES THE LAW REGARDING HOURS OF WORK
OCCUPATIONAL HEALTH AND SAFETY		THE ENTERPRISE ENSURES A HEALTHY AND SAFE WORKING ENVIRONMENT
SPECIAL PROTECTION FOR YOUNG WORKERS		THE ENTERPRISE PROVIDES SPECIAL PROTECTION TO ANY WORKERS THAT ARE NOT YET ADULTS
NO PRECARIOUS EMPLOYMENT		THE ENTERPRISE HIRES WORKERS ON THE BASIS OF DOCUMENTED CONTRACTS ACCORDING TO THE LAW
PROTECTION OF THE ENVIRONMENT		THE ENTERPRISE TAKES THE NECESSARY MEASURES TO AVOID ENVIRONMENTAL DEGRADATION
ETHICAL BUSINESS BEHAVIOUR		THE ENTERPRISE DOES NOT TOLERATE ANY ACTS OF CORRUPTION, EXTORTION, EMBEZZLEMENT OR BRIBERY
THE RIGHTS OF FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING		THE ENTERPRISE RESPECTS THE RIGHT OF WORKERS TO FORM UNIONS OR OTHER KINDS OF WORKER'S ASSOCIATIONS AND TO ENGAGE IN COLLECTIVE BARGAINING

4. DUE DILIGENCE PROCESSES

RISK ASSESSMENT

The ongoing process of mapping our supply chain is part of our risk assessment. Before each potential cooperation with a supplier, our CR Department carries out a review to establish whether the business is already familiar with compliance and monitoring of social and environmental standards. This kind of review – based on information about the producer, the production country, amfori BSCI audit reports and information given in our Supplier Company Profile – helps to establish in advance whether a supplier is ready and committed to roll out our social and environmental requirements and as necessary to implement improvement measures at this stage.

THE SELF-ASSESSMENT AND THE BRAX PRE-AUDIT

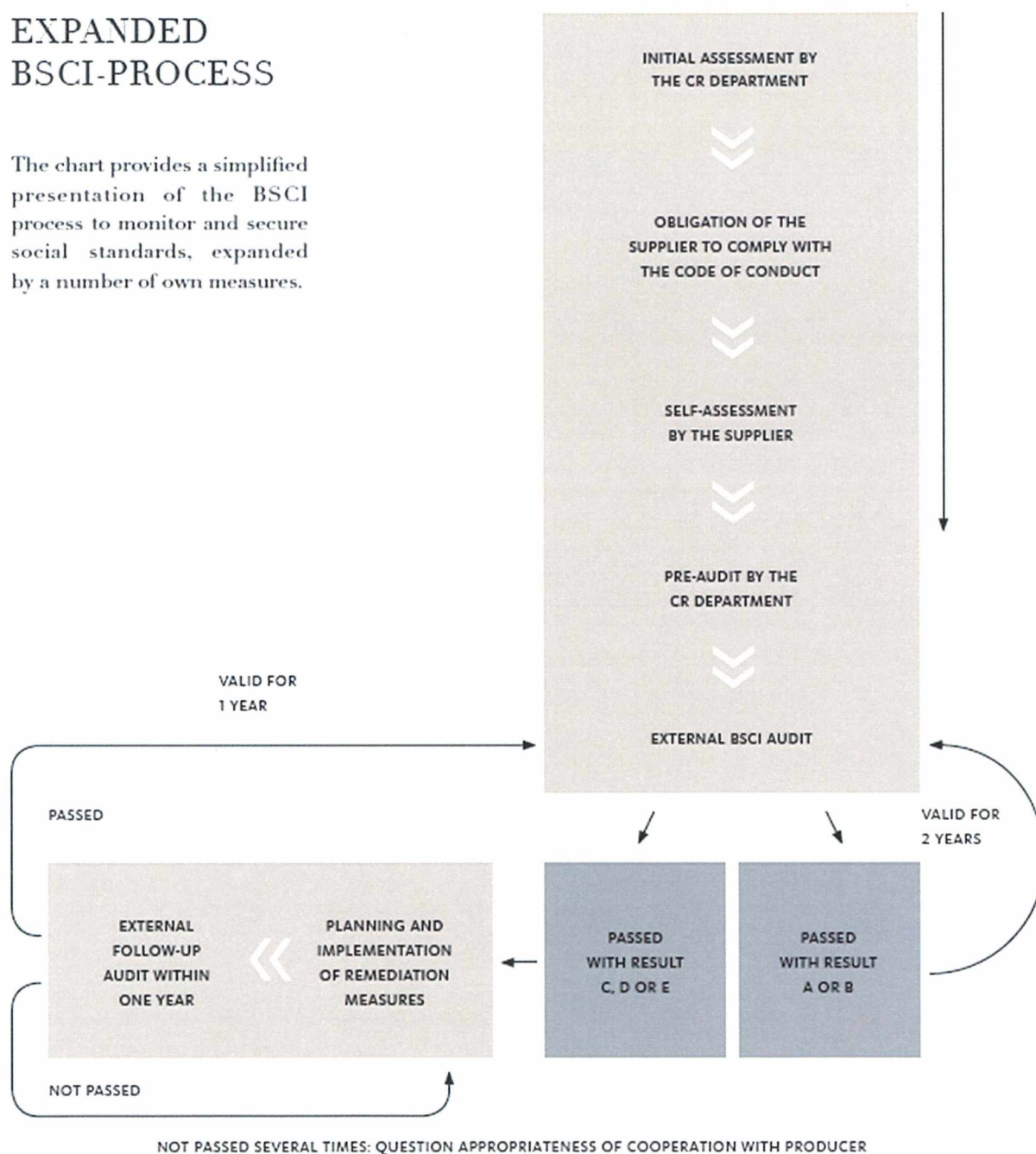
The company initially carries out a self-assessment in order to obtain a baseline analysis of the actual situation in the business. Regulations and standards are often theoretically, abstract and complex. It is therefore important that we are integrated actively in the correct implementation of these rules. In most cases, this takes place in a so-called pre-audit, which involves a visit to the company by the team from the Corporate Responsibility Department. Apart from a factory tour, this visit also includes an inspection of different documents. We also carry out intensive discussions with the management and as necessary with the employee representatives of the facility. This enables us to gain support of both for our projects. We obtain first-hand information as to whether compliance is possible with the standards we have defined. An action plan is drawn up at the end of the visit. This must have been implemented by the time the external audit is carried out in the subsequent weeks following the pre-audit.

THE EXTERNAL AMFORI BSCI AUDIT

Compliance with the amfori BSCI Code of Conduct is monitored through an audit carried out by an independent, external audit company. After an external audit has been carried out, the business and BRAX receive a comprehensive report informing them about the individual objectives and their status. If necessary, a Remediation Plan of corrective measures prepared especially for the business is implemented under the independent responsibility of the supplier. This is regularly reviewed by BRAX. Naturally, we provide assistance at all times. If a business concludes the amfori BSCI Audit with an overall result of C (Acceptable), D (Insufficient) or E (Unacceptable), a follow-up audit is carried out within the space of a year. Once again, an external auditor checks whether the business has implemented the measures defined and has remedied the non-conformities that have been identified. Successfully audited businesses with the overall result of A (*Outstanding*) or B (*Good*) also receive ongoing support. The development process is driven forward and the companies undergo an auditing process every two years. This happens in close cooperation with all the company divisions involved. Until 31 December 2022 38% of all audits were completed with the result of A (*Outstanding*) and 33% with the result of B (*Good*). 19% of audits achieved the result C (Acceptable), 8% had received an SA8000 score and only 2 % had received a score of D (Insufficient) and This means that improvements are necessary with these businesses in order for them to comply with our requirements in full. We provide suppliers with assistance in quickly closing identified gaps. A subsequent follow-up audit is then carried out to confirm implementation of the measures.

EXPANDED BSCI-PROCESS

The chart provides a simplified presentation of the BSCI process to monitor and secure social standards, expanded by a number of own measures.



FURTHER DEVELOPMENT AND TRAININGS

After our partners have successfully carried out above steps, we provide support and motivate them to continue the process of continuous improvement in their own business. We highlight advanced opportunities for training and career-development measures which are offered by organisations including amfori BSCI. In 2016 amfori, the umbrella organization of the BSCI, has launched the amfori Academy. The amfori Academy has a unique combination of online and offline learning tools involving interactive and practical teachings relevant to producers.

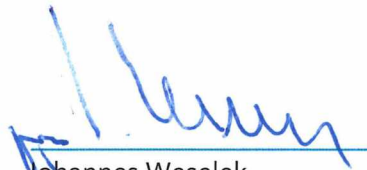
This statement was approved by all members of the Executive Board.

Signed



Stefan Brandmann
(CEO)

Leineweber GmbH & Co. KG



Johannes Weselek
(Managing Director Purchasing/Production)

Leineweber GmbH & Co. KG