

Anti-Slavery and Human Trafficking Policy

Statement 2021

Introduction

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. The Cooneen Group incorporating Cooneen by Design Ltd, Cooneen Defence Ltd, Cooneen Protection Ltd and Cooneen at Work Ltd is committed to maintaining and improving systems and processes to avoid complicity in human rights violations related to our own global operations, our supply chain, and our products. This statement is made pursuant to the Modern Slavery Act 2015 and relates to our financial year ending 30/11/2021.

Overview

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.

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.



The Cooneen group is committed to ethical improvement and legal compliance and has operated and continually developed its Social Responsibility Management System since 2009. As members of SEDEX all Cooneen companies report on the ethical compliance of their supply chains.

The following statement includes some of the Social Responsibility activities Cooneen have successfully undertaken and introduces the steps that have been taken 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.

Cooneen Group Anti-Slavery and Human Trafficking Policies

As outlined in the Cooneen Anti-Slavery and Human Trafficking Policy 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. This policy is an integral part of the Cooneen Corporate Social Responsibility Strategy. 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 Universal Declaration of Human Rights, International Labour Organization (ILO) conventions and other International Instruments as displayed on the Cooneen Group website (CSR page). Cooneen Group SRMS requires the Cooneen Group to formally commit its supply chain to ethical improvement and to respect the ILO conventions and 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.

Managing Ethical Risk

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. Our Supplier Code of Conduct defines the minimum standards that our suppliers are required to adhere to, wherever they procure materials, manufacture or perform services for the Cooneen Group.

The Cooneen Group has risk assessed its supply chain to identify if there are any significant areas of concern. Our extensive sourcing and ethical evaluation programmes cover the entire product supply chain. Mobilisation of our extensive Ethical Assurance Programme has resulted in gaining ethical commitment to ILO conventions, ETI Base Code, Labour Standards and compliance to the Modern Slavery Act for all its Tier 1 suppliers. Ethical audits have also been conducted within the supply chain across Tier 2 suppliers dependant on the result of risk assessments.

The ethical risk assessment process takes into consideration the following key points:

1. The supplier/subcontractor location
2. Supplier ethical history and commitment to Social Responsibility.
3. Ethical improvements achieved in previous year.

Ethical Audit key indicators include:

1. Age of employee.
2. Right to work.
3. Safe and healthy working environment including building structures.
4. No Forced or coerced labour and work contracts provided in employees own language.
5. Traceable container security system.

The Cooneen Group will continue to develop its Ethical Risk programme during 2021 both internally and within its supply chain to:

1. Further develop our Social Responsibility Management System to achieve increased focus on the identification of Modern Slavery and/or human trafficking within our supply chain.
2. Rollout modern slavery e-learning programme across the business, focussing on the identification of slavery and how best to respond both in our workplaces and in the wider communities in which we operate.
3. Verify that new shipping / transport sub-contractors have robust shipping security systems to minimise human trafficking risk.
4. Engage with key agencies to proactively identify and respond to risks of modern slavery.
5. Maintain the Cooneen Group's excellent Social Responsibility reputation.

This statement has been reviewed by the Cooneen Group Board of Directors and is approved by:



N McIlwrath

Business Support Director

Date: 06/01/2021