

	THE COONEEN GROUP ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT	Policy Reference:	P-1001
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1 Purpose

- 1.1** Modern Slavery is a crime and a violation of fundamental human rights which 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.
- 1.2** The Cooneen Group incorporating Cooneen by Design Ltd, Cooneen Defence Ltd, Cooneen Protection Ltd, Cooneen Aviation 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 29/11/2024.

2 Scope

- 2.1** 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.
- 2.2** 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.
- 2.3** 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.
- 2.4** 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.

3 Conditions

- 3.1** As outlined in the Cooneen Anti-Slavery and Human Trafficking Policy, Social Accountability Policy and Ethical Sourcing 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. These policies are 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.

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- 3.2** 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. All our employees receive Modern Slavery Training. The Cooneen Group 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.
- 3.3** 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 are also conducted within the supply chain across Tier 2 suppliers' dependant on the result of risk assessments.
- 3.4** The ethical risk assessment process takes into consideration the following factors:
- 3.4.1** The supplier/subcontractor location.
 - 3.4.2** Supplier ethical history and commitment to Social Responsibility.
 - 3.4.3** Ethical improvements achieved in previous year.
- 3.5** Ethical Audit key indicators include:
- 3.5.1** Age of employee.
 - 3.5.2** Right to work.
 - 3.5.3** Safe and healthy working environment including building structures.
 - 3.5.4** No Forced or coerced labour and work contracts provided in employees own language.
 - 3.5.5** Traceable container security system.
- 3.6** During 2023 the Cooneen Group have taken the following actions to minimise ethical risk and further develop its Ethical Risk management programme.
- 3.6.1** Developed and implemented an updated supplier assessment process and introduced a supplier scorecard approach which provides an overview of supplier performance.
- 3.7** The Cooneen Group will continue to develop its Ethical Risk programme during 2024 both internally and within its supply chain to:
- 3.7.1** Continue our Modern Slavery Awareness and response training programme for all Cooneen employees.
 - 3.7.2** Continue to ensure that our new shipping / transport sub-contractors have robust shipping security systems to minimise human trafficking risk.
 - 3.7.3** Engage with key agencies to proactively identify and respond to risks of modern slavery.
 - 3.7.4** Maintain the Cooneen Group's excellent Social Responsibility reputation.

4 Conditions

- 4.1** This statement has been reviewed by the Cooneen Group Board of Directors and is approved by the Business Support Director.
- 4.2** The Cooneen Group will review policies and procedures in line with changes to legislation, technology or good practice. A formal review of this policy will be undertaken at least every two years.

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Signed:

Date: 17/04/2024



Neville McIlwrath
Business Support Director