

MODERN SLAVERY



**AND TRANSPARENCY IN THE SUPPLY
CHAIN STATEMENT**

2023/24

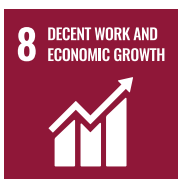
INTRODUCTION

Modern slavery is an umbrella term used to describe coercive labour practices. It is when a person loses their freedom and is exploited for the personal or commercial gain of another, with threat of punishment or penalty. It covers forced and compulsory labour, bonded labour, child labour and human trafficking.

The number of people in modern slavery has risen in recent years and affects every region of the world. The latest global estimates indicate there are 50 million modern slavery victims¹ which is approximately one in every 150 people. Crises such as the Covid-19 pandemic, conflict and climate change disrupt employment and education, increasing cases of extreme poverty and forced migration, which all lead to the increased risk of all forms of modern slavery.

At Dr. Martens we expect high standards of each other and our global supply partners. We will never accept modern slavery in any form and we take our responsibility to tackle the problem seriously. As a global business we take accountability of our role in driving transparency and change. Each year we outline our approach to prevent, detect and respond to cases of forced labour through supply chain traceability, education and collaboration.

This statement covers Dr. Martens plc and other Group companies which are in scope (and together are referred to as “Dr. Martens”) and is made pursuant to section 54 of the Modern Slavery Act 2015, California Transparency in Supply Chains Act of 2010 (SB 657) and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023 (authorized in accordance with subsection 14(4)(b)(ii)). This statement relates to the Dr. Martens fiscal year from 1 April 2023 to 31 March 2024. All actions outlined took place during this period unless stated otherwise.



¹ International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM) Global Estimates of Modern Slavery, Forced Labour and Forced Marriage

STRUCTURE, BUSINESS, AND SUPPLY CHAINS

WHO WE ARE:

- FY24 PAIRS SOLD THIS YEAR: 11.5M**
- FTE, FY24: 2,630 EMPLOYEES**
- FY24 + BUSINESS REVENUE: £877M**

WHERE WE OPERATE:

We are a global business and operate a regional model:

Region	Revenue (£M)
EMEA	£431.8M
AMERICAS	£325.8M
APAC	£119.5M

EMEA
Headquartered in Camden, London, and with offices in Milan, Barcelona, Paris and Düsseldorf.

AMERICAS
Headquartered in Portland, Oregon, with offices in New York and Los Angeles.

APAC
Headquartered in Hong Kong with regional offices in Tokyo, Shanghai and Seoul.

*Group's revenue per region (Twelve months ended 31 March 2024)

Dr. Martens is an iconic British brand founded in 1960 in Northamptonshire. Dr. Martens boots were originally produced for workers looking for tough, durable footwear, but were quickly adopted by diverse subcultures and musical movements. Six decades on, Dr. Martens products are worn by people around the world who use them as a symbol of empowerment and their own individual rebellious self-expression. Dr. Martens was listed on the London Stock Exchange in 2021.

Our products are sold through the following global revenue channels:

Our product range is centred on our originals and made up of two groups, main-line (Originals, Fusion, Casual, Kids and Accessories) and AMP (Collaborations, Archive and Made In England, 14XX). The Originals category accounted for 40% of FY24 total revenue. We create durable, high quality and timeless footwear, and these principles are rooted in our sustainable, long-term custodian approach. Our products are worn by a diverse consumer base with a 43% male and 56% female split in FY24².

² The remaining 1% are those who do not identify as male or female.

Our products are sold through the following global revenue channels:

- Direct-to-consumer (DTC):
 - +Ecommerce: Our consumer websites cover the majority of our markets.
 - + Retail: We directly 239 stores globally (102 in EMEA, 61 in Americas, and 76 in APAC).
- Wholesale: This encompasses wholesale partner relationships, together with country distributor models and franchised stores.

We employ 2,630 people (FTE) who are based in our stores, offices, factories and distribution facilities all around the world. Our priority is to provide fair and safe working conditions for all of our employees, and to foster an environment where everyone feels supported, included and empowered to express themselves.



OUR PRODUCT GLOBAL SUPPLY CHAIN

We define our global supply chain tiers in the following way

- + **TIER 1 SUPPLIER: A supplier which manufactures or assembles finished products.**
- + **KEY TIER 2: A supplier that produces a strategic component (e.g. tanneries, or outsole suppliers).**
- + **TIER 2: A supplier that produces other components.**

TIER 1:

Our products are manufactured by our global network of Tier 1 suppliers located across Asia and Europe. We have one owned manufacturing site which is located in the UK and produces Made In England and collaboration products. We have mapped all of our Tier 1 suppliers.

When partnering with Tier 1 suppliers, we value strong relationships and have worked with many of our supply chain partners for decades. At FY24 year end, there were 27 active Tier 1 supplier factories (13 footwear, 8 accessories, 6 outsole). Our Tier 1 factory list is shared on our website and is updated approximately every six months.

We hold supplier conferences which are attended by our Tier 1 suppliers and are hosted by our Chief Operating Officer. These conferences promote an environment of trust and transparency, whilst allowing us to build a deeper understanding of the issues faced by our suppliers. A constant narrative is held with suppliers regarding corporate social responsibility (CSR) topics, including the expectation of high social and labour standards. These topics are also addressed at the supplier conferences.

In addition to Tier 1 suppliers, we work directly with Key Tier 2 suppliers who produce strategic components including leather and outsole

PVC granulate. We have visibility of all key component suppliers and nominate our preferred Key Tier 2 and Tier 2 suppliers. Our top materials sourced by volume are leather, outsole PVC granulate and cardboard packaging.

We operate with nine core distribution centres (DCs) across EMEA, Americas and APAC. One DC in the UK is directly owned and operated and the other DCs are all third party operated. DC activities include receiving finished goods, inspecting and processing those products including returns, and shipping them to our customers and to our own stores. Temporary employees in our distribution facilities are hired by labour providers. In the distribution centre we directly operate, we work with a trusted labour agent for the recruitment of temporary employees for peak trading periods.

Non-product suppliers:

We also work with non-product third party suppliers that support our wider business. These include suppliers such as goods not for resale, service providers, consultants and technology providers. All new suppliers, product and non-product, must go through our Third Party Due Diligence Process.



STRATEGY AND GOVERNANCE

HUMAN RIGHTS IS A KEY FOCUS AREA OF OUR SUSTAINABILITY STRATEGY

Human rights continue to be a focus area of our Planet, Product, People sustainability strategy and is included within the People pillar. The sustainability strategy covers environmental and social aspects across eight areas based on Dr. Martens material sustainability issues. Strategic projects relating to sustainability such as resale, repair and sustainable material adoption are included in the business strategy to ensure sustainability is embedded across the business. For additional information on our sustainability strategy please see our latest Annual Report.



GOVERNANCE

The Board is responsible for the oversight and integration of ESG-related issues and activities across the business. The Chief Operating Officer (COO) is accountable for supply chain human rights and the Chief People Officer (CPO) is accountable for human rights across our own operations.

Global Supply Chain Team: Representatives from our Global Supply Chain Team are based in our manufacturing countries. They regularly conduct visits to our suppliers and work closely with our CSR team to feed in any insights.

CSR Team: Ethical trade and human rights due diligence in the product supply chain falls within the remit of the dedicated CSR Team. They work closely with our suppliers and are based close to key sourcing locations. This helps them work collaboratively and transparently with our suppliers. It also facilitates the quick identification and remediation of any potential issues, including the completion of corrective action plans. Our COO chairs regular, periodic meetings with our CSR

Team to review CSR audits and results, so these are closely monitored to ensure our high ethical standards are adhered to, and any non-conformities are addressed appropriately.

Sustainability Team: Dr. Martens has a team of internal sustainability experts who have the required skills and knowledge to support decision-making on environmental and social issues. They are also responsible for embedding and championing the strategic sustainability projects throughout the business. They attend all Sustainability Committee meetings and Working Groups to provide specialist expertise when required.

Our full sustainability governance structure can be found on page 96 of our FY24 Annual Report.



POLICIES AND CONTRACTUAL AGREEMENTS

Our policies, procedures and strong supply chain management processes ensure our suppliers comply with our business terms and regulations. Our human rights and modern slavery policy needs are reviewed by relevant teams including Legal, Compliance, Global Supply Chain and Sustainability. Policies are developed through a multi-stakeholder approach and are benchmarked against international standards and best practices across the industry.

All Dr. Martens policies are available to employees via our policy hub and are available in relevant languages. Supplier policies are also translated and communicated with suppliers in relevant languages. Some of our policies are also publicly available on our plc website. Our compliance platform allows policies and training to be consistently distributed globally across all regions in relevant languages. It also provides live views and up to date reporting and monitoring of progress rates, therefore allowing targeted training and communication where needed throughout Dr. Martens.

MASTER SUPPLY AGREEMENT

Our Tier 1 suppliers and priority Key Tier 2 suppliers sign our Master Supply Agreements (MSA). The MSA includes relevant policies, such as our Supplier Code of Conduct & Workplace Standards and Migrant Worker Policy, which cover our standards and binding clauses on issues such as human rights and modern slavery.

MIGRANT WORKER POLICY

Migrant workers are three times more at risk of becoming a victim of forced labour. Our Migrant Worker Policy sets out our expectations on the treatment of migrant workers for our supply chain. It is based on international best practices and the Dhaka Principles, which were developed by the Institute of Human Rights in Business (IHBR) and addresses the specific issues migrant workers may face.

SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct sets out our expectations for our suppliers on the treatment of their workforce. It is based on international conventions including the Ethical Trade Initiative Base Code and conventions of the International Labour Organisation (ILO).

RESPONSIBLE PURCHASING PRACTICES CHARTER

In 2024 we also launched a Responsible Purchasing Practices Charter. The charter was developed following internal and external stakeholder engagement including supplier interviews, and covers topics such as planning, fair costing and training. As part of this pledge, we have visibility to labour costs to ensure workers are paid fairly by our suppliers. Further details can be found on page 9.



Our People

DOCTRINE

In addition to our Supplier Code of Conduct, we also have a global business Code of Conduct called the 'DOCTRINE' which raises awareness and expectations amongst our own employees regarding human rights and modern slavery. It is made available via a number of channels, including in the induction pack for all new employees, on the internal policy hub and on our corporate website.

'SPEAK UP' WHISTLEBLOWING POLICY

Issues can be reported through our free, confidential Speak Up hotline. It is available for anyone seeking guidance or to raise concerns and grievances. Issues relating to human rights, modern slavery, or any other area covered in the DOCTRINE can be raised here. The Global Compliance team manage the response process.

Other relevant policies include our Global Health and Safety Policy, Global Sanctions Compliance Policy and Third Party Due Diligence Process.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

We have an Anti-Slavery and Human Trafficking Policy to ensure that our own employees are aware of their obligations under the Modern Slavery Act and other applicable laws concerning forced labour including child labour.

RISK MANAGEMENT, SUPPLY CHAIN MONITORING AND DUE DILIGENCE PROCESSES

ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) RISKS ARE INTEGRATED INTO DR. MARTENS BROADER RISK MANAGEMENT FRAMEWORK, AND ARE SUBJECT TO THE SAME GOVERNANCE, ANNUAL REVIEW PROCESS AND MANAGEMENT ATTENTION AS OTHER RISKS RECORDED ON OUR GROUP RISK REGISTER. FURTHER DETAIL ON OUR RISK MANAGEMENT FRAMEWORK IS ON PAGE 55 OF THE FY23 ANNUAL REPORT.

We use different due diligence tools to support our commitment to human rights

- + Policies and contracts
- + Group risk management framework
- + Country approval process
- + Supplier onboarding
- + Supplier monitoring programme
- + Training and workshops

HUMAN RIGHTS RISK ASSESSMENT

Environmental, Social and Governance (ESG) risks are integrated into Dr. Martens broader risk management framework, and are subject to the same governance, annual review process and management attention as other risks recorded on our Group Risk Register. Further detail on our risk management framework is on page 38 of the FY24 Annual Report.

Following the third party assessment of our human rights due diligence procedures during FY23, we established an implementation plan and agreed priorities. During FY24 we kicked off work to develop a formal Human Rights Policy for our business which was identified as a gap in our existing programme. We are also investigating how we can build upon our due diligence processes to capture more in depth and regular risk assessments of all third party suppliers we engage with. In FY24, we continued the rollout of

our new Product Lifecycle Management (PLM) system to help deliver enhanced visibility across our product lifecycle. The PLM system supports enhanced visibility across our product suppliers. We are also investigating a traceability tool to map our supply chain which will help in our commitment to transparency.

RISK ASSESSMENT FOR NEW SOURCING COUNTRIES

Before placing production in a new country, we have a thorough process for reviewing and approving new sourcing countries. We conduct an in depth feasibility review which includes a detailed country risk assessment, including human rights and forced labour. Risks are identified and, prioritised and mitigation strategies are included in the proposal for any risks identified before Board level review.

THIRD PARTY DUE DILIGENCE PROCESS

We have a third party due diligence procedure in place which is aligned to international standards and is conducted before we contract with any supplier. The process involves due diligence checks on the supplier including a Vendor Risk Assessment, compliance screening, Data Protection Impact Assessment and contract review (where applicable). An ESG risk rating is also calculated per supplier. The level of due diligence depends on factors such as the supplier's location, activities to be performed and the length and value of contract. This process involves teams across the business including Global Security, Compliance, Data Protection and Legal, and will flag any risks associated with a supplier, including historical ethical concerns such as modern slavery violations (including child labour). If critical risks are identified, such as previous unlawful practices, we may not proceed with the contract.

SUPPLIER ONBOARDING

Following appropriate due diligence checks, our supplier onboarding process is carried out before production is approved to begin to ensure our product suppliers meet our high expectations. This includes a self-assessment questionnaire, a third party audit which must meet the required standard, plus visits by our specialist CSR team.

SUPPLIER MONITORING PROGRAMME

We have an ongoing CSR monitoring programme for factories in our supply chain, which is one mechanism we use to identify and address risks relating to human rights and modern slavery. The programme is managed by our Global Supply Chain Quality and Compliance Team, which is comprised of experienced CSR professionals.

The Workplace Conditions Assessment (WCA) is the audit protocol conducted by Intertek, our specialist third party audit partner. The WCA monitors compliance with labour and environmental laws, regulations, industry standards and our own policies, such as our Supplier Code of Conduct. The frequency of audits is determined by the audit rating, which depends on the severity of issues identified. We take a collaborative approach with the suppliers and, when issues are found, a corrective action plan is agreed to remedy non-conformances in a timely manner. We then carry out further follow-up checks to verify the corrective actions have been taken. Should a supplier fail to remediate issues identified by an audit, the supplier partnership is reviewed and may be ended. When needed, we also engage with worker trade unions in our supply chain to rectify issues. More details about the WCA can be found on our [website](#).

During FY24, 100% of our audited Tier 1 footwear suppliers met our high standard in the WCA audit³.

We also audit some of our Key Tier 2 suppliers. In FY24, we focussed on auditing certain tanneries, PVC granulate and welt suppliers. The selected Key Tier 2 suppliers audited under the WCA protocol also met our expected high standards⁴. For those Key Tier 2 we do not audit through the WCA in the year, we request the factory to provide a recognised social audit report from within the last 12 months. No cases of forced labour or child labour were identified in our supply chain during FY24.

SUPPLIER ONBOARDING

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RESPONSIBLE PURCHASING PRACTICES

In FY24, we worked with third-party experts to develop the first iteration of our Responsible Purchasing Practices Charter. Purchasing practices refer to the importance of commercial buying practices and supply chain management. Good purchasing practices act as a safeguard for the fair treatment of workers and provide a healthy work environment and business relationship. The charter was developed following a review of our current practices, processes and policies, as well as both internal and supplier interviews.

Dr. Martens endeavours to interact and treat our material, product and service suppliers according to the following principles:

- 1. RELATIONSHIPS** - We invest in our suppliers, and value long-term partnerships in which we can work together to improve mutual business performance.
- 2. PAYMENT TERMS** - We operate to an agreed payment schedule.
- 3. PLANNING** - We forecast and communicate our order requirements well in advance so that our suppliers can carefully plan for what they need.
- 4. FAIR LABOUR COSTING** - We ensure legally compliant and competitive provision for wages and benefit.
- 5. TRAINING** - We train all our relevant teams on what it means to purchase responsibly.
- 6. COMMUNICATIONS** - We value transparency and understand the importance of two-way, open and honest communication.
- 7. SUPPLIER EXIT** - We will only undertake a supplier exit after full consideration and in a responsibly managed way.
- 8. SUSTAINABILITY** - We work with our suppliers to set clear expectations around sustainability, including human rights and environmental values and commitments.

We expect our suppliers to adopt the spirit of these principles with their own suppliers. Following the development of the Charter, we now plan to embed its adoption through the development of training for our people and suppliers.

³ Audit results of 75% or more, in line with Intertek Workplace Conditions Assessment scoring methodology.

⁴ Audit results above 70% or more, in line with Intertek Workplace Conditions Assessment scoring methodology.

TRAINING, COLLABORATION AND AWARENESS BUILDING

Education is a key pillar in our approach to tackling modern slavery. We continue to offer a bespoke e-learning module on Forced Labour And Ethical Trade training to all employees. The module introduces the issue of modern slavery and forced labour, the different forms of modern slavery, how to spot the signs, and what to do if there is a suspected case.

Human rights and modern slavery awareness is included in the onboarding process for new employees. The onboarding workshop includes a segment on modern slavery and an overview of our due diligence processes across the supply chain.

DR. MARTENS FOUNDATION PARTNERSHIPS TACKLING MODERN SLAVERY

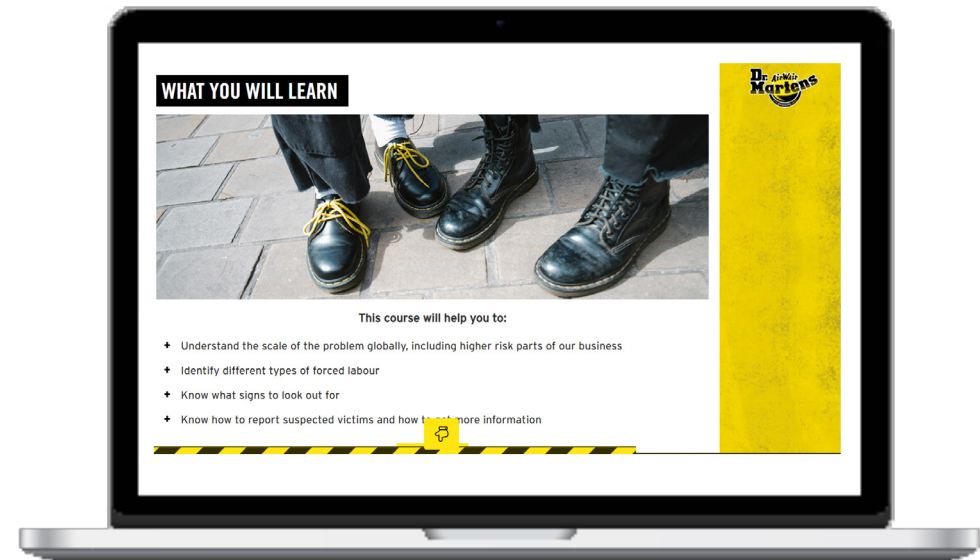
The Dr. Martens Foundation is an independent charity with a separate Board of Trustees. It funds causes tackling social injustices, including human rights violations such as modern slavery.

During FY24, the Foundation continued to fund STOP THE TRAFFIK. STOP THE TRAFFIK apply innovative technology and intelligence tools to uncover trafficking routes and hotspots, with the aim of preventing the recruitment of those vulnerable to being trafficked. A key way they do this is through the STOP App which allows people to confidentially report suspicions or incidents of human trafficking. The grant awarded in March 2024 will go towards creating bespoke content and features to better reach the Albanian community, and share lived experience stories to increase

engagement and interaction with NGOs. Alongside the projects driven by our previous grants, this will increase engagement and facilitate the expansion of the **STOP App** into multiple new and emerging high-risk areas, which creates a more accurate picture of human trafficking where it's most needed and a more effective approach to combatting it.

The Dr. Martens Foundation also supported The A21 Campaign who seek to eradicate human trafficking through awareness, intervention and trauma-informed holistic aftercare for survivors. As the threat of human trafficking across the globe continues to

grow, so does the need for victim-centred support and suitable independent accommodation options to reduce a survivor's vulnerability to re-trafficking. A21's Freedom Centres provide survivors with a safe place of acceptance as well as supportive services aimed at empowering, rehabilitating and reintegrating them into society. The focus is to strengthen their independence and reduce victimisation. The three-year grant, first awarded in 2023, supports A21 in keeping their Freedom Centres and other survivor services running, enabling them to reach more survivors trying to break the cycle of human trafficking.



PROGRESS

This is a summary of the actions we have taken since the last Modern Slavery Statement and the areas we plan to focus on next. For more information on each of these points, please see the detailed sections above.

Key area	Progress since last statement	Next steps
<p>+ MAPPING THE RISKS IN OUR SUPPLY CHAIN AND OPERATIONS</p>	<ul style="list-style-type: none"> Continued to embed use of a Product Lifecycle Management (PLM) system. Once fully operational, this will deliver enhanced visibility across our product lifecycle (page xx). Commenced investigations into a specific traceability mapping tool to monitor risks and opportunities across our supply chain. 	<ul style="list-style-type: none"> Continue to embed PLM system and progress with selection of traceability mapping tool.
<p>+ EDUCATION AND TRAINING</p>	<ul style="list-style-type: none"> Rolled out Purchasing Practices Charter to communicate and establish responsible purchasing principles. 	<ul style="list-style-type: none"> Develop Purchasing Practices Charter communications plan, including training for employees.
<p>+ EXPAND AND IMPLEMENT BEST PRACTICE DUE DILIGENCE</p>	<ul style="list-style-type: none"> Continued to monitor all Tier 1 suppliers and expanded audit programme across select Key Tier 2 suppliers. Commenced implementation plan to strengthen human rights due diligence processes. 	<ul style="list-style-type: none"> Develop and roll out internal Human Rights Policy and continue to review and develop due diligence processes.
<p>+ COLLABORATION AND PARTNERSHIPS</p>	<ul style="list-style-type: none"> Conducted supplier engagement to develop and finalise Purchasing Practices Charter. 	<ul style="list-style-type: none"> Continue to engage suppliers and employees on human rights issues through training and workshops.

Additional information about our Planet, Product, People sustainability strategy can be found on our website: www.drmartensplc.com/sustainability
 This statement was approved by the Board on 19 September 2024 and signed on its behalf by Kenny Wilson, CEO

