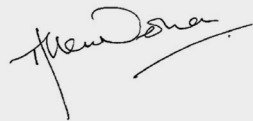


STELLA McCARTNEY

Helen Newman Introduction

"As an international luxury fashion brand, with a worldwide reputation for producing environmentally friendly and sustainable products, we recognise our responsibility to combat modern slavery and human trafficking in all its forms. We are dedicated to ensuring that our operations and supply chains are free from exploitation and forced labour. While we acknowledge the complexities of global supply chains, we firmly believe that proactive measures and collaborative efforts are essential to creating a more just and equitable business environment. We are committed to working with our partners to identify, address, and mitigate the risks of modern slavery, striving towards a future where all workers are treated with dignity and respect. We understand this is an ongoing process and we are dedicated to continuous improvement."

A handwritten signature in black ink, appearing to read 'Helen Newman', with a long horizontal stroke extending to the right.

— Helen Newman, Director

Introduction

Stella McCartney, as a group, is committed to using its expertise and voice to promote good labour standards, protecting human rights and being a force for good in the world. This is our ninth public disclosure under the UK Modern Slavery Act 2015 and it covers the financial year ending 31 December 2024. Our previously released Modern Slavery Statements can be found **here**.

This statement has been drafted by Stella McCartney's Corporate Social Responsibility (CSR) & Human Rights team, part of its wider Sustainability department, and is approved by the board of Stella McCartney's holding company, Anin Star Holding Limited. It is endorsed, approved and adopted by the following operating subsidiaries: Stella McCartney Ltd, Stella McCartney Italia SrL, Stella McCartney America, Inc., Stella McCartney Japan Limited, Stella McCartney France SAS, Stella McCartney Spain SL, Stella McCartney Shanghai Trading Ltd and Stella McCartney Hong Kong Limited. This statement applies to all of the beforenamed subsidiaries, regardless of size, location and turnover. This statement details the steps Stella McCartney has taken to comply with the relevant legislation.

Our Company And Our Products

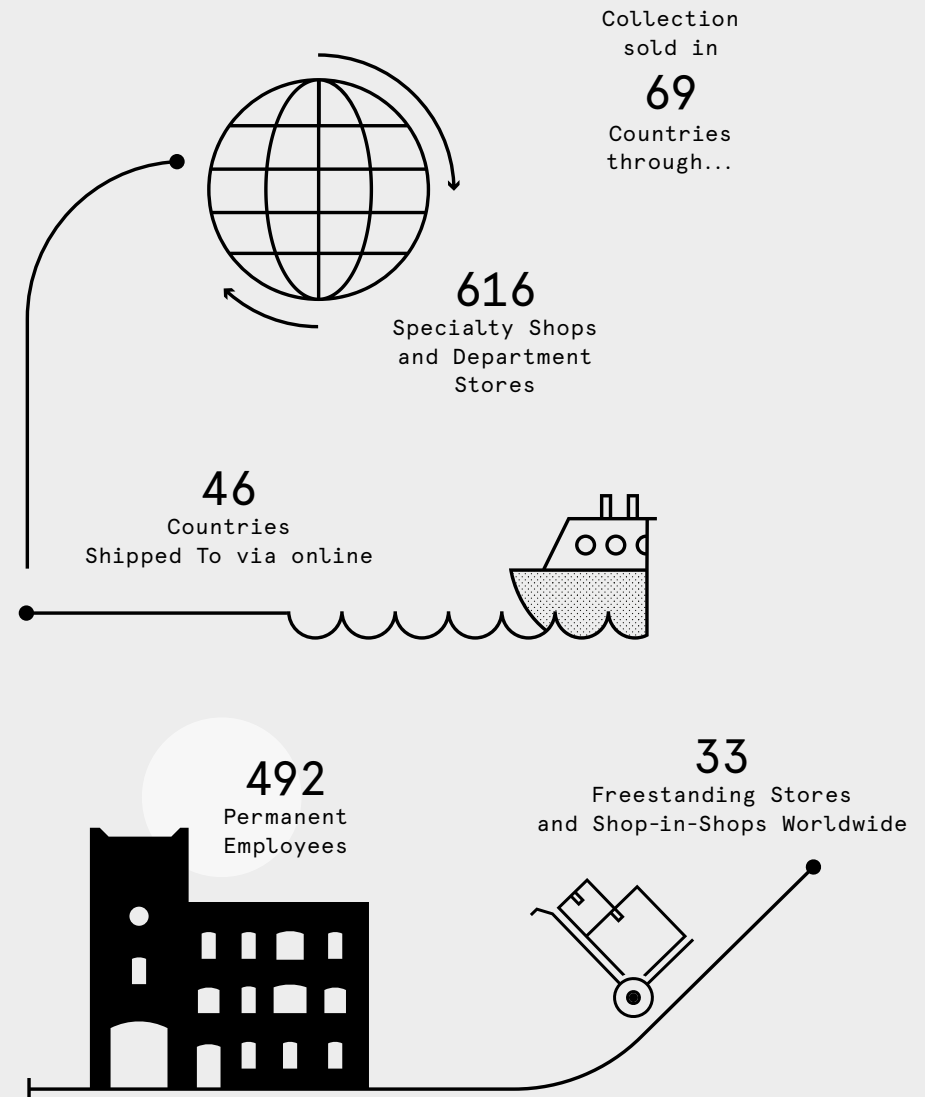
Stella McCartney is a luxury lifestyle brand that was launched under the designer's name in 2001. A lifelong vegetarian, Stella McCartney does not use any leather, skins, feathers or fur in her designs, collaborations, or licensed products. The brand is committed to ethical values, and believes the company is responsible for the resources it uses and the impact it has on people, animals and the planet.

Stella McCartney offers women's ready-to-wear, accessories and childrenswear. Periodically, Stella McCartney enters into collaborations for the production of product ranges beyond the above core categories. The standards and policies of Stella McCartney are enforced in each of these collaborations.

With 33 freestanding stores and Shop-in-Shop across major cities like New York City, London, Paris, Milan and Tokyo, and additional 616 specialty shops and department stores, our collection is now sold in 69 countries and shipped to 46 countries via online. As of 31 December 2024, we have 492 permanent employees

MODERN SLAVERY DEFINITION

Modern slavery is a term used to encompass human trafficking, slavery, servitude, forced and compulsory labour, bonded labour and some forms of child labour. Victims are coerced, deceived, threatened or abused into providing work or services without any real possibility to refuse or remove themselves from their situation. In addition to the above, human trafficking can also include an act of transportation, transfer, harbouring or receipt of persons (cross border or internal). Modern slavery is a crime and a grave violation of fundamental human rights.



(*as of 31 December 2024)

Our Company And Our Products

GOVERNANCE

At Stella McCartney, sustainability is deeply embedded in our identity and operations. We are committed to a comprehensive approach that addresses both social and environmental responsibilities. Recognising the integral role of people in the fashion industry, one of our strategy's key pillars focuses on social compliance, ensuring fair treatment for everyone in our supply chain, from farmers and workers to employees and customers.

At the highest level, the responsibility to meet the social responsibility and human rights requirements sits with our Chief Executive Officer (CEO) and the Board of Directors. The responsibility for implementing the programme on a day-to-day basis sits with our CSR & Human Rights team.

The Stella McCartney CSR & Human Rights team programme covers all areas of managing the impact (both positive and negative) that our business has on people who are not directly engaged by Stella McCartney and across the business with all the relevant departments. The issues related to CSR & Human Rights and responsible sourcing are discussed with the executive management and follow the 2030 strategy launched in 2021, defined with the CEO and all relevant internal stakeholders.

The 2030 strategy focuses on 4 key areas:

1. Fair Purchasing Practices: Prioritising fair purchasing and social compliance across the Stella McCartney supply chain, conducting regular audits to ensure suppliers meet our ethical standards and address human rights risks, including modern slavery. We are committed to continuous improvement in our purchasing practices.

2. Transparency and Traceability: Understanding the origins of our products is crucial for ensuring they are ethically and sustainably sourced, reinforcing our commitment to transparency in our supply chain.

3. People Empowerment: We foster an inclusive environment that supports the well-being and development of individuals in our supply chain, offering sustainability training to suppliers and maintaining a Whistleblowing channel for concerns.

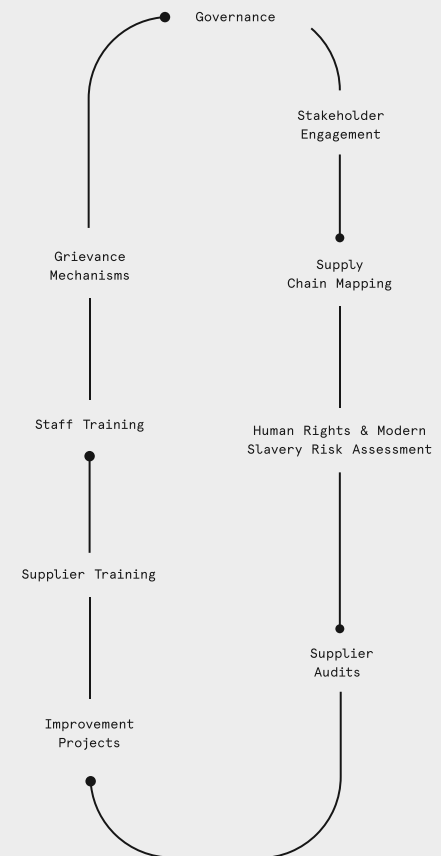
4. Positive Social Impact: We strive to create positive social impact through our business practices, leveraging our platform to support local communities through various projects.

STAKEHOLDER ENGAGEMENT

Our experience has taught us that a collective approach to addressing the complex issues around human rights is the most effective. We focus on engaging local stakeholders and experts to help us ensure we are aware of the current trends in our sourcing regions and can increasingly predict and prevent human rights risks as well as assess and address them.

Since 2012 we have been a member of the Ethical Trading Initiative (ETI), a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. The ETI enables brands to work together with industry experts and improve working conditions for workers in their supply chains. As a member of ETI, we commit to their Member Charter which outlines the actions, behaviours and ways of working essential to achieving ETI's vision and mission and to implement all the

actions needed in order to achieve an ethical and sustainable supply chain. In 2024, in line with ETI requirements, we released our direct T1 supplier list on the Open Supply Hub and submitted and satisfied the Corporate Transparency Framework where full members are asked to provide details related to public reporting requirements.



Our Supply Chain

COUNTRY	PRODUCT SUPPLIERS IN TIERS 1 & 2
Italy	84%
Portugal	4%
Spain	3%
France	1%
India	1%
Japan	1%
Poland	1%
Romania	1%
Turkey	1%
Others*	3%

Table 1: Distribution of Product Suppliers (as of December 2024)

* The remaining 3% of 2024 Tier 1 and 2 product suppliers is split between Albania, Australia, Bulgaria, Colombia, Hungary, Madagascar in Tier 1 and Austria, China, Peru, South Korea and USA in Tier 2. All of these suppliers account for less than 1%.

Stella McCartney production activities are completely outsourced through a network of almost 500 specialised partners, upon whom we rely on both for manufacturing and for raw materials procurement.

Our supply chain can be divided into two clusters:

- 1. Production of items we sell such as clothing, shoes or bags and related product packaging – “Product Supply Chain” / “Product Suppliers”.
- 2. Not-for-resale items such as furniture and non-product related packaging, and contractors such as logistics, transport, cleaning or security – “Non-product Supply Chain” / “Non-product Suppliers”.

PRODUCT SUPPLY CHAIN

Our materials are sourced, and our products manufactured through a carefully selected network of suppliers located around the world, many of which have worked with us since the brand was founded. Italy is by far our biggest sourcing country accounting for 84% of all our Tier 1 and 2 Product Suppliers (see Table 2 on page 8 for more information on Tiers and Product Supply Chain visibility). Although significantly smaller, other sourcing

countries include Portugal, Spain, France, India, Japan, Poland, Romania and Turkey. We trace the natural materials we use (such as cotton, wool and viscose) back to their country of origin. Our key sourcing countries for natural materials are Turkey and USA for cotton, Argentina, Australia, New Zealand, South Africa and Uruguay for wool and China and USA for viscose.

In 2024, we worked directly with 69 and indirectly with 155 Tier 1 suppliers. Furthermore, in 2024, we worked with 237 Tier 2 Raw Materials and Accessories Suppliers globally; many of these are small manufacturers and artisans who specialise in particular techniques and processes. For instance, our bag manufacturers are experts at working with our non-leather bag materials.

Thanks to our direct collaboration and the audits conducted, we are able to outline the main characteristics of the labour supply chain structure. In particular, workers in the value chain are primarily recruited through direct contact with our suppliers; however, cases of recruitment through intermediaries such as employment agencies have been observed. This practice depends on the country of operation, indeed, in Italy there is a tendency to hire mainly with permanent contracts, while outside Italy, there are different practices that entail certain risks. These details are outlined in Chapter “5. Risk assessment and management”.

Our Supply Chain

NON-PRODUCT SUPPLY CHAIN

In addition to the Product Supply Chain, Stella McCartney's operations are supported by a network of non-product suppliers and contractors who help us with the day-to-day running of our stores and offices. These include a range of services such as logistics, transport, non-product related packaging, construction, furniture, cleaning, catering and security. One of the most relevant service area is logistics. Stella McCartney relies on two main logistic partners located in Italy, UK, USA, Japan, Hong Kong and China. Similarly to the obligations placed upon suppliers within the Product Supply Chain, non-product suppliers are also required to adhere to our established human rights guidelines.

LICENCES

The sourcing and manufacturing of ready-to-wear clothing, accessories and shoes are managed by Stella McCartney. In 2024, as detailed in previous Modern Slavery Statements, the adidas by Stella McCartney range, together with eyewear and childrenswear product categories, were manufactured by third party licensees.

SUPPLY CHAIN MAPPING

Mapping and understanding our supply chains beyond direct relationships is one of our key priorities. We recognise that our most salient risks regarding modern slavery occur in the lower tiers of our supply chains. Because of this, we have placed significant focus on improving supply chain transparency and product traceability.

Annually, we request country level traceability of our natural materials such as cotton, wool and viscose. We have mapped and continue to monitor all Tier 1 direct and indirect suppliers. We have mapped all direct and assessed key Tier 2. We assessed some Tier 3 and 4 Product Suppliers in the past, as well as key non-product suppliers and service providers.

In 2019, we introduced the Sustainability Hub for our suppliers. The Hub is an online platform for suppliers, mainly those in Tier 1, to submit information about their own facilities, their subcontractors and raw material suppliers. In addition, the Hub provides a space for suppliers to review and sign our policies. This allows us to ensure our supply chain mapping can be updated on a continuous basis and we can have a full picture of our supply chain and its associated risks.

Throughout 2024, significant work has been done to strengthen and update our Sustainability Hub to enhance it as the main tool for communicating and sharing information with our suppliers, implementing new sections that would allow us to take important steps toward the complete digitisation and traceability of our supply chain.

In particular, the mapping of supply chain collections has been integrated, now featuring a data analysis table that

provides information on the suppliers, subcontractors, subsuppliers and factories involved in the production of a collection and the number of suppliers for business unit. From 2025, for each collection launch, active Tier 1 and Tier 2 suppliers are tagged in the collection and asked to complete the details related to each collection separately.

In addition, we onboarded Tier 2 suppliers who were not yet registered in the platform, allowing us to also gather information about their subcontractors and subsuppliers for the first time, expanding knowledge of our supply chain.

Regarding the overall onboarding process, we updated the questions asked to suppliers about their production sites and related subcontractors, requesting details about their workers and relevant documents that also support the organisation of audit activities.

Furthermore, we worked with the Stella McCartney Product Compliance department to integrate additional policies into the platform to provide suppliers with a single space to view, download, and sign social and product compliance documents.

The aim of these improvements is to progressively set up an integrated traceability system able to collect both social and environmental aspects related to suppliers and their supply chain. Stella McCartney plans to continue working and improve the Sustainability Hub in the coming years. The team is also currently working to consolidate product and sustainability information in a single process flow for alignment with the Digital Product Passport Regulation.

Our Supply Chain

	DEFINITION	EXAMPLE	VISIBILITY	MONITORING
TIER 1	Final product manufacturing and assembly	Direct suppliers and their subcontractors (indirect suppliers) carrying out sewing, cutting, printing, embroidery, packing or any other type of final assembly or finishing operations.	We have a complete map of all manufacturing sites.	Our policy requires all sites to be assessed and approved before production can begin and to be monitored on a regular basis.
TIER 2	Material manufacturing	Suppliers of fabrics, trims, components and other materials that go into final manufacturing and assembly of our products.	We have a complete map of fabric, trim and component suppliers for all women's lines. All key fabric and trim suppliers for kidswear are mapped.	Key sites are assessed and monitored periodically.
TIER 3	Raw material processing	Cotton ginnerers and spinners, pulp mills, metal smelting etc.	We have a map of the sites used by our nominated raw material suppliers.	Some sites, such as those working with our nominated raw material suppliers have been visited and assessed. As we achieve more traceability, we will include more of these suppliers in our monitoring program.
TIER 4	Raw material production	Farms (cotton, wool), mines (metals), forests (viscose, wood and paper).	We have a country-level map of our natural raw materials. For some key raw materials, we have farm level traceability (such as wool, viscose, and some cotton farms).	Some of our nominated suppliers have been visited and assessed. As we achieve more raw material traceability, we will include more of these suppliers in our monitoring program.

Table 2: Product supply chain tiers, visibility and monitoring

The Flow of Key Raw Materials & Key Manufacturing Locations



Key:
T1 - Tier 1
T2 - Tier 2

Note that T1 includes direct manufacturer suppliers and indirect manufacturer suppliers, which are direct suppliers' subcontractors. T1 indirect suppliers are located in Albania, Bulgaria, Colombia, Hungary, India, Italy, Madagascar, Poland, Portugal, Romania and Spain.

Relevant Policies

The **Stella McCartney Supplier Code of Conduct** (Code) underpins all the key sustainability principles and summarises the key requirements suppliers, sub-suppliers and subcontractors must comply with in order to work with our brand. The Code is based on the fundamental conventions of the International Labour Organisation (ILO) and specifically prohibits use of forced labour and modern slavery. In addition to the Code, the **Stella McCartney Responsible Sourcing Guide** provides detailed information by communicating our values and expectations, ensuring that our suppliers comply with our policies, standards and procedures on social welfare and environmental management. In addition, this document is of paramount importance to us as it explains the audit and supply chain monitoring process. Apart from the Code and Responsible Sourcing Guide, Stella McCartney has a number of standalone policies on specific topics. These are periodically updated, and new policies are developed in line with key risks and needs of the business. The **Stella McCartney Subcontracting Policy** sets expectations for suppliers in regard to responsible subcontracting practices in order to help them to communicate, monitor and maintain our standards where subcontractors are involved in production of Stella McCartney goods.

The **Stella McCartney Modern Slavery Policy for Partners** and the **Stella McCartney Modern Slavery Policy for Internal Staff** have been developed in 2017 in consultation with four external partners specialising in human rights. The policies not only set the standards but also include guidance on modern slavery indicators, the most common risk areas and suggested due diligence for Stella McCartney suppliers. The external policy, sets out the

steps to be taken if a case of modern slavery is identified in the supplier's supply chain. For example, it states the principle of acting in the interests of the well-being of the individuals at risk and supports our partners in developing and implementing a remediation plan.

After the implementation of a grievance mechanism system for workers in our supply chain in 2021, we developed a policy for regulating its usage and functioning for our suppliers called the **SpeakUp Policy**¹. Stella McCartney is working to release an updated policy in 2025.

All of our policies are translated into all the languages relevant to the countries in which we operate, and the implementation of our policies begins with training to employees which is reinforced with the constant and direct support we give to our suppliers in order to make all stakeholders familiar with the various topics.

We require all our direct Tier 1 and Tier 2 suppliers to read, sign and comply to the Stella McCartney Supplier Code of Conduct and all relevant standalone policies at the beginning of their relationship with Stella McCartney to confirm they understand and comply with their content. Subsequently, their actual adherence is monitored, for example, through due diligence activities, which includes checking that suppliers comply and respect the processes outlined in the relevant policies. Moreover, the suppliers can always access and download our external policies on the Stella McCartney Sustainability Hub, accessible via website. Any updates to these policies are communicated via e-mail and newsletter communications.

Our employees can refer to our internal policies which can be found in the Policies and Guides Hub located on our Stella McCartney SharePoint, which is accessible to all of our employees globally. The company updates are communicated on a monthly basis to our teams via our People & Culture Newsletter.

¹"Speakup Policy External Grievance Mechanism And Procedure".

Risk Assessment and Management

HUMAN RIGHTS AND MODERN SLAVERY RISK ASSESSMENT

We know that the more aware we are of supply chain risks, the more we can do to prepare for and/or prevent issues that may arise. The CSR & Human Rights Team, assesses the environmental and human rights risks within our Product Supply Chain to the best of its ability, taking into account both outside factors such as local context, politics, country, human rights risks and climate change, as well as internal ones typical of the single supplier. Despite not having a standardised monitoring system, we make sure to develop our assessments case by case, depending on the location of our supplier, with a risk-based approach that helps us to guide the quarterly audit plan and prioritise sites visits based on existing risks and human rights challenges. Potential risks can be identified, on the one hand, from previous audit results, and, on the other hand, also by engaging local stakeholders and experts to help us ensure we are aware of the current trends in our sourcing regions so that we can increasingly predict and prevent human rights risks, as well as assess and address them.

Using our risk assessment tool, we can determine a risk rating for all suppliers and potential suppliers based on a country risk profile, facility level risk, workforce risk and transparency and engagement risk. The tool is able to identify key modern slavery risks at country and facility levels. To achieve a country risk score, 12 separate issues (from the ETI Base Code and OECD Section II Guidance) are assessed against severity and likelihood of the risks occurring, using a range of available indices and data. This is then broken down to incorporate likelihood of risk in the fashion sector specifically. Facility level risk includes a range of data gathered in the field, including if there is

accommodation for workers provided by the employer, if the supplier uses subcontractors and if management is transparent. As certain workers are more at risk of modern slavery, and other forms of potential exploitation, the tool integrates disaggregated demographic data, including if migrant workers, homeworkers, young workers and other groups of more vulnerable workers are present.

Furthermore, we have critical red lines that automatically designate sites as high-risk. These occur when: 1. Stella McCartney has identified high-risk stakeholder on site; 2. Critical non-compliance events have been registered; and 3. Sites are in designated high-risk countries.

Overall, this methodology supports us in identifying trends and issues which are present in the different tiers inside our supply chain. The main risk areas that emerged from our assessment are related to migrant workers, child labour, forced labour and related risks, and temporary workers. Currently, this risk assessment tool informs the way we monitor and support our suppliers at Tiers 1 and 2 of the supply chain, in the future we hope to adapt it to include further tiers.

Stella McCartney, aware of the complexity of the fashion supply chain in terms of tiers and the risks that can be present in each of them, is working with external partners, to refine its tool for identifying related risks and inform its strategy. For instance, collaborating with other fashion brands plays a pivotal role in improving the positive impact we as a company can have in challenging human rights issues.

Stella McCartney is also working on integrating the risk tool into our Sustainability Hub in order to have one single

platform for the traceability and risk monitoring of our supply chain.

Identified Risks and Steps Taken

Through our social responsibility programme and modern slavery risk assessment, we have identified four key areas to monitor:



MIGRANT AND REFUGEE WORKERS

Workers who are refugees, internal migrants or economic migrants can often have fewer rights in the workplace and less legal protection. All Stella McCartney sourcing countries represent a risk in this regard.

STEPS TAKEN

Our CSR & Human Rights team and external audit partners are trained to focus on vulnerable groups during audits, such as migrant and refugee workers.

Where we identify concerns regarding the treatment of vulnerable workers, we aim to work with our suppliers and expert organisations to ensure workers are supported. In India, we are collaborating with other brands to support internal migrant workers through improving their working conditions and providing them with life skills training. This collaboration, named Utthan project, started in 2018, aims to support embroidery skills of Indian artisans located in the area of Mumbai and to leverage on putting together expertise and efforts from different fashion luxury maisons in the sector for a common objective. In the context of this programme, in 2023 the CSR & Human Rights team has visited some suppliers in that area to understand progress and alignment to the program social standards.



CHILD LABOUR AND YOUNG WORKERS

Some suppliers may lack effective age-verification systems or may subcontract HR functions to a third party. Our risk assessment tool includes a child labour risk level by country, based on indicators such as ratified ILO or UN frameworks and the UNICEF Prevalence of Child Labour score. Tiers 1 and 2 in China and India pose the highest risk of child labour in our supply chain. The most significant risks in Tiers 3 and 4 were identified in India, China, Turkey, Peru,

Pakistan, and Egypt. Risk increases as you move further down the tiers of the supply chain, and community-based handicraft supply chains can also present a risk of child labour, as craft techniques are passed down through generations.

STEPS TAKEN

We work with specialist ethical trade partners in China and India who help us to assess, monitor and train Product Suppliers on age verification systems and adequate working conditions for apprentices or young workers. In community-based supply chains, we try to work with locally based NGOs where possible to understand the community context and identify any risks or issues.

In 2020, we conducted an in-depth assessment of an artisanal supply chain in Madagascar with a specialist NGO, Engaged: Partnership for Change, which flagged a risk of child labour. As efforts to engage the supplier in remediation failed, we terminated the relationship.

Since then, we have started looking for existing community-based programmes to join and organisations to support us in sourcing from risk countries. Since 2022 we have been collaborating with Build a Nest, an NGO that foster the responsible growth and creative engagement of the artisans through dedicated programmes. This organization has supported us in finding a suitable partner with which to start a production of some artisanal items: the selected partner, based in Madagascar, has worked closely with our bags division team during 2022, 2023 and 2024 to produce 3 items that have been included in the Spring Summer collections. Moreover, with the same objective of supporting local craftsmanship, during 2022 Stella McCartney collaborated with the Ethical Fashion Initiative for our Spring Summer 23 collection. In our collection we have included some Raffia bags handwoven by EFI's artisan network in Kenya, and in particular by women belonging to the Kamba tribe in Kitui county, known worldwide for their basketry skills. We have also provided these artisans with proper training for raffia weaving to introduce a skillset to the group, given the complexity of this process.



FORCED LABOUR AND OTHER RISKS IN THE COTTON SUPPLY CHAINS

We are aware that there is a risk of modern slavery in global cotton supply chains, especially in the lower supplier tiers. Cotton is a seasonal crop, which means temporary workers are often used for picking and other processing stages. We are concerned that in some countries, such as Uzbekistan, this labour is not voluntary and is supplied through government led schemes which constitute modern slavery. We are aware of risks of cotton from countries where forced labour has been documented being mixed with cotton from other countries and sold into international supply chains. In India, the Sumangali scheme has received a lot of attention because of the risk of young girls being recruited for bonded labour in the cotton mills. Additionally, any country affected by conflict, such as Turkey due to the Syrian refugee crisis, represents an increased risk.

STEPS TAKEN

Traceability of cotton reduces this risk and allows us to monitor our supply chain. We require our Product Suppliers to disclose the country of origin of all their cotton (i.e., where the farming of the cotton happens) and we do not permit the use of any cotton from countries where forced labour has been documented for Stella McCartney products or materials, placing an outright ban currently on China, Uzbekistan, Syria and Turkmenistan. Wherever possible, we like to nominate our cotton sources, for instance through choosing to support projects aimed at more sustainable and ethical cotton production. Moreover, we are phasing out our already very minimal use of conventional cotton, choosing to source only certified cotton: regenerative cotton, Global Recycled Standard (GRS) post-consumer recycled cotton, Global Organic Textile Standard (GOTS) certified organic cotton, the certification for regenerative farming is RegenAgri and finally GRS pre-consumer recycled cotton.

We have mapped the cotton purchasing practices of our key Tier 1 and some Tier 2 suppliers to understand how we can gain visibility through

to farms. In May 2022 we organised a human rights due diligence assessment involving farms and cotton processing facilities in Turkey. We know that this level of visibility allows us to better understand risks faced by workers involved in these early stages of production and identify good practice we can promote further.



TEMPORARY WORKERS AND THE USE OF RECRUITMENT AGENCIES

Temporary workers may be hired in an informal way, without contracts or paid through an intermediary. This leaves them more exposed to exploitation than directly employed and permanent workers. Using recruitment agencies or other intermediaries may leave workers vulnerable to unethical recruitment practices. All tiers and countries represent a risk, including the use of some service providers and contractors in our own operations.

STEPS TAKEN

Mapping the use of temporary labour and raising awareness about the risk of modern slavery have become key parts of all supplier audits and internal staff factory visits we conduct.

We are working with our suppliers in Italy to ensure migrant workers understand their rights and are not treated differently to local workers.

Modern Slavery Due Diligence

SUPPLIER AUDITS

Although we do not rely on ethical audits alone, we find them to be a useful tool in gaining insight into our suppliers' social practices and potential risks in our supply chain. We aim to conduct audits in a synergetic way with our suppliers, providing details of how and why we assess their practices. Audits help us to collect data and address immediate issues as well as pick out indicators that suggest the need for additional investigation. For example, it can be difficult to identify instances of modern slavery in one audit, but we will be able to spot signs that we should look further and dig deeper.

As previously mentioned, before auditing a supplier, we ensure we always conduct a thorough risk assessment, and, when relevant, we engage with stakeholders such as other brands with whom we share suppliers or consult local experts to be aware of common risks in the area. Subsequently, using a case-by-case approach, the CSR & Human Rights team defines which supplier and subcontractor sites will be visited and assessed during the year, also thanks to the map of the supply chain the team carries out of each supplier involved in the production at every production launch.

Subcontracting in the fashion supply chain is a critical topic, for this reason it is very important to us that our direct suppliers become more responsible and aware of key challenges in global supply chains and that is why we have decided to involve them more in the monitoring process. In 2021, we developed an onboarding methodology for subcontractors, with full implementation in the Sustainability Hub planned for 2025, in order to digitalise the subcontractor data collection and on-site verification. Through the onboarding process, we ask and support direct

vendors with gathering the correct information from their subcontractors before proposing them to Stella McCartney. In this way we ensure they get in contact with the site and understand their ways of working rather than relying exclusively on our assessments. Subsequently, we request the direct suppliers to add the subcontractor's information on the platform and share details about their workforce, the production processes and production sites in order to collect the relevant details to organise the on-site assessments. The direct supplier can then request an audit in order to be verified and approved by our team before the collaboration starts.

With regards to our suppliers, we conduct different types of audits (including unannounced audits, full audit assessments for new sites, follow-up visits, etc.) depending on the circumstances, which help us to understand how our product suppliers work, identify on-site potential risk areas and support our suppliers in meeting required standards. Our audits are conducted by carefully selected, local and specialist third-party auditors. Both internal and external auditors conducting Stella McCartney supplier audits have received detailed training on the indicators and root causes of modern slavery, as well as the Stella McCartney Modern Slavery Remediation Procedure. In Italy, since early 2024, we have engaged a dedicated specialised auditor who takes care of our Italy based suppliers. This choice allows us to ensure process continuity and to have a common risk management in this area, as well as being more responsive in visiting new potential partners in the short term.

During on-site audits, the focus is on three aspects: facility visit, document review and worker interviews. On the latter, the auditor interviews a number of workers at the production site to find out their perspective on working conditions, working environment, wages and issues they

would like to raise. The perspective of the workers supports our assessment, as it can provide additional insights relevant to the evaluation.

We have also developed an ad-hoc homeworker survey to enable us to better conduct homeworkers' assessment and collect the information needed to understand the main challenges and risks. Over the past years, we completed a homeworker assessment in our Spanish shoe supply chain through a third party, and 3 homeworkers' assessments in Italy ensuring that homeworkers were treated fairly, and that working premises were safe and adequate.

In addition to third party audits, contacting and visiting our suppliers personally has always been fundamental to maintaining a direct relationship and developing a partnership based on trust and common growth. Indeed, creating a sense of belonging with our partners is essential to transmit our values and support our aim of building a responsible and transparent supply chain.

In 2024 we restructured the CSR & Human Rights team and reinforced our audit procedure; therefore, we have been able to double the number of on-site audits, performing 151 audits and 8 supplier visits. Of the audits conducted, 127 were carried out in Italy and 24 in the rest of the world, most involving Tier 1 suppliers and a few Tier 2. In 2025 we will look to reinforce our monitoring process in Tier 2, reaching a 70/30 balance between Tier 1 and 2. While in 2026, we aim to go in depth on some selected and key Tier 3 and 4 sites.

With regard to our licenses, we have periodic and direct communication with our partners in order to verify that their processes and practices are in line with our monitoring systems and standards.

Modern Slavery Due Diligence

REMEDIATION AND IMPROVEMENT PROJECTS

We investigate all breaches of our social responsibility standards identified during audits and site visits and require that remediation steps are taken where practices do not comply. During any investigation and remediation process, we aim to protect workers and their livelihoods and work with suppliers throughout this process. Should a supplier not engage, strive to meet our standards and/or resolve any identified issues, we may consider terminating our business relationship.

In particular, after the performance of audit activities, in cases of non-compliance against Stella McCartney standards, a reconciliation to a rating scheme is performed and criticality is defined at five different levels: zero tolerance, critical non-compliance, major non-compliance, minor non-compliance, observation. Assessment results are communicated and explained to the supplier and support is promoted through a remediation plan, provided to all suppliers audited regardless of the outcome.

At Stella McCartney we understand that real change takes time and must include building strong systems, raising awareness, changing mind-sets and traditional ways of working. We want to avoid setting unrealistic timelines or pass/fail policies, which tend to only contribute to poor transparency. Instead, we expect our suppliers to work towards reasonable targets and agreed timelines in a systematic way. Suppliers are expected to complete the remediation plan in full and on time and provide evidence of remediation to the CSR & Human Rights team proactively. For suppliers who find it difficult to complete the remediation work but show commitment and continuous improvement towards full compliance (and are not dealing with any zero-tolerance issues) Stella McCartney provides support

and engages them with training and capacity building activities. These training programmes can help suppliers address the root causes of the issue(s) and develop preventative systems against risks.

Suppliers have appreciated this way of working because they get clearer and more transparent information from brands on how to implement improvement actions. For us at Stella McCartney, all visits and assessments are seen as opportunities for making our supply chain grow and improve and are based on a collaborative approach: this means that we are committed to accompanying the supplier through a process of continuous improvement, where there is a willingness to collaborate. This is what we mean by having a positive social impact.

The audit reports and corrective action plans are tracked and archived along with evidence of the resolution of non-compliances highlighted during the site visit and supplier progress. Audit findings and non-compliances are also considered when updating the risk tool used to inform our audit plan. In the past years we added a section in the Sustainability Hub dedicated to audit information, in which audits results can be uploaded and that allows suppliers to add information regarding the improvement plans directly on the platform rather than through emails. These integrations are planned to be released to suppliers in the near future.

GRIEVANCE MECHANISMS

Stella McCartney's aim is to create an environment, both internally within the company and externally in its supply chain, where reporting concerns is seen as positive, proactive behaviour and as an opportunity, rather than a risk.

All Stella McCartney staff have a responsibility to raise issues that may constitute a breach of the Stella McCartney Code of Conduct and related policies, including any instance or suspicion of forced labour or modern slavery in Stella McCartney operations or supply chain. Internally, employees can report any concerns or issues on supply chain directly to the CSR & Human Rights team and serious issues are escalated to the top management.

Additionally, the SpeakUp® platform, a robust global anonymous grievance and whistleblowing mechanism was launched in 2021, accessible to both Stella McCartney staff and anyone in the Stella McCartney supply chain. The tool is provided by People Intouch, experts in misconduct reporting, and can be used via web or a phone, in any language. Training was provided to Stella McCartney staff, suppliers and workers on how to use the tool and an internal monitoring committee was set up to oversee the mechanism and ensure it operates in line with the criteria defined by the UN Guiding Principles on Business and Human Rights. After this initial implementation, every time a new supplier is onboarded, we share with them the SpeakUp policy, the related posters, which we request to affix in its production sites, the information related to the tool, and we ask them to cascade this information through the Stella McCartney supply chain.

Due to platform implementations and improvement, during 2024, Stella McCartney has worked on new internal and external SpeakUp® policy and posters, also in line with Italian Legislative Decree 24/2023.

In 2024, no cases have been reported through the SpeakUp® tool.

Training

SUPPLIER TRAINING AND ASSISTANCE

In the last three years both formal and informal training has been held for suppliers. In 2022 we organised, together with the UN agency of International Organization for Migration, a specific webinar, our Italian suppliers focused on responsible recruitment and migrant labour. During the same year we launched a training programme to increase awareness around CSR topics and improve suppliers' skills in relation to supply chain management. The programme has been delivered via three different webinars and held by an external consultant, between November 2022 and March 2023. It focused on what we mean by ethical trade and why it is important for our suppliers. This initiative has been developed together with other brands, leveraging on collaboration in the sector. For 2025 we are planning to organise a second edition of this training regarding topics related to sustainability and human rights. Both initiatives are part of our vision in assisting suppliers in managing their own supply chains better and in line with our responsible supply chain strategy.

In 2024, the training was mainly provided through constant dialogue and support to suppliers regarding the use of the Sustainability Hub for social compliance. In addition, to ensure the awareness of our suppliers in applying the previously mentioned onboarding methodology, we take the time to present it to them, with the aim to explain where the request come from and what are the key human rights challenges they need to consider and look out for when visiting a new site.

Moreover, the support provided to suppliers also takes place during audits that become advisory activities; especially in terms of human rights, during these moments the improvement approach to be adopted is explained to them

and the corrective action plan is shared. In addition, they are repeatedly asked to provide evidence of the work they have done to ensure our assistance. Stella McCartney maintains direct relationships and communication with most Tier 1 suppliers, both direct suppliers and their subcontractors, mainly in Italy where the majority of the supply chain is located, but we also engage with suppliers around the world. For instance, some suppliers in Portugal and India found themselves in more vulnerable situations and, therefore, quarterly meetings were organised to have a clearer understanding of the conditions and provide as much support as possible.

Stella McCartney is planning to organise training with respect to updates introduced on the Sustainability Hub in the coming years.

STAFF TRAINING

Our CSR & Human Rights team has undertaken a number of specialist training courses on modern slavery, learnings from which have been incorporated into our wider social responsibility programme.

These training courses, held by expert organisations, have allowed our CSR & Human Rights team to discuss modern slavery topics to our suppliers as well as supply chain facing teams within the Stella McCartney business. Internal teams such as sustainability, sourcing, production and facilities have been trained on modern slavery since 2017.

In the first half of 2024 the Sustainability team conducted company-wide training on various topics related to sustainability. The course was based on the aspects of sustainability, material innovation, and social compliance

general process, and aimed at updating employees about sustainability developments and the company's projects. The course was held online and divided by regions (Italy, UK, US, and Japan), with two sessions of two hours each and related materials (i.e. slide presentation) were shared with employees.

In December 2024, an in-person course was organised, together with the external auditors, on the topic of CSR and Human Rights and audits, mainly addressed to the teams of product development, production and technical experts. During the course, social compliance internal procedures were explained in detail, for instance, how the supply chain is mapped and how the audit entire process takes place. It also provided an introduction to the Sustainability Hub and the supply chain, delving into the number of suppliers in the platform, the distinction of tiers, and advice and useful tips for those carrying out the visits, in order to identify situations that may bring attention and constitute a warning flag.

In addition to the above, the Sustainability Team members are continuously trained in both soft skills and specific topics related to sustainability and human rights. In 2024, our team participated in trainings regarding specific norms and macroeconomic and global political dynamics impacting supply chains. Additionally, our dedicated auditor receives training directly from the auditing organisation they are part of, ensuring constant updates in auditing competencies.


Stella McCartney plans to further enhance its training offering in 2025, delivering a new course focused on explaining the Sustainability Hub to a select group of employees.

Progress In Priority Areas (KPIs) And Looking Ahead


In this section, we describe our progress to date across key areas of our social responsibility and modern slavery due diligence strategy. To ensure that our monitoring and evaluation system is effective, we work directly with auditing companies. We also outline our planned steps for the next few years to strengthen this work. Our objectives are based on the annual company strategy which is applied, and cascaded to, to all departments, including Sustainability – CSR & Human Rights. We recognise that our industry and supply chain is being severely impacted by the effects of current global challenges and we will do everything we can to respect and implement our planned next steps, but we also acknowledge that due to the current constraints in place around the world, we may have to adjust our plans to more effectively meet the needs of the workers throughout our business and supply chain.

		FOCUS AREA	COMPLETED PRIOR TO 2024	COMPLETED IN 2024	NEXT STEPS
1	T3 & 4	<p>TRACEABILITY: Develop a robust system for supply chain mapping and traceability. As a priority, we will work to improve the visibility of Tier 3 and 4 with a focus on identifying opportunities for reducing human rights-related risks (including modern slavery) in these tiers.</p>	<ul style="list-style-type: none"> Country of origin traceability for all natural materials (viscose, wool, alpaca and cotton) and polyester. Mapped and visited 10 farms at Tier 4 to date (wool, alpaca and cotton) in Egypt, Turkey, New Zealand and Peru. A key cotton supply chain in India and a recycled nylon supply chain in Slovenia mapped down to Tier 3. Introduced Sustainability Hub to build transparency of suppliers' supply chains and ensure mapping is up to date with 100% of Tier 2 invited to join. We obtained full traceability on our regenerative cotton supplier in Turkey by implementing a blockchain technology across the supply chain. This partnership commenced in 2022 and continued throughout 2023 and 2024. The project aims to improve and increase both transparency and traceability within the garment and footwear industries through exploring the use of innovative technologies, such as blockchain. We fully mapped three key products supply chains down to T4 through an LCA initiative. We fully mapped our T2 suppliers and gathered information on their supply chains and assessed key ones globally. Annually Stella McCartney collects, analyses, and reports its material consumption in line with reporting to the Textile Exchange Materials Benchmark and in support of calculating Stella McCartney's carbon footprint. As part of this data collection procedure, we request both the supplier and country of origin of our raw materials from our industrial divisions and respective suppliers. Traceability of our raw materials is key to understanding and evaluating Stella McCartney's sourcing and purchasing behaviours. In 2023, in collaboration with other brands, we took part in a pilot solution to advance traceability, and we were able to track 3 of our products, with support from the external consultant. In this context we were able to provide the supplier of Tier 1 and Tier 2, and the country of origin of the raw material vegetal or animal based. 	<ul style="list-style-type: none"> We worked with our IT department and some identified partner to pilot traceability solutions in terms of logical and physical traceability, and to ensure data security. We worked on our Sustainability Hub to implement new sections to the platform which will be released in early 2025. The new sections included the possibility to map the supply chain (Tier 1 and Tier 2) digitally per each collection including indirect suppliers, we also included the Product Compliance policies in the policies section and enabled the digital signature via the platform. In 2024, we published the list of our finished product suppliers on the Open Apparel Registry. This includes both direct suppliers and the full supply chain information for those who do not execute production processes internally (e.g., the entire production process is outsourced to subcontractors). 	<ul style="list-style-type: none"> Continue improving visibility across Tiers 3 and 4, integrating processes and working closely with other teams (e.g. IT, purchasing) to fulfil new regulation requirements in terms of traceability such as the DPP (Digital Product passport) (within 2028). Improvement of the supply chain data management in the Sustainability Hub and continuous enhancement and digitalization of the audit process (within 2026).


Progress In Priority Areas (KPIs) And Looking Ahead

		FOCUS AREA	COMPLETED PRIOR TO 2024	COMPLETED IN 2024	NEXT STEPS
2		<p>MONITORING: Strengthen our supplier assessment methodology to ensure that our audits can effectively identify indicators of modern slavery, especially in the lower tiers of the Product Supply Chain. Extend monitoring across the Non-Product Supply Chain in regard to modern slavery risks.</p>	<ul style="list-style-type: none"> New audit methodology in place since 2018 focused on strong risk assessment, collaboration and transparency. Since 2018 the majority of our audits have been carried out by an internal specialist and external nominated auditors trained on our methodology. Implemented a robust risk assessment tool for all Tier 1 and Tier 2 product suppliers. All UK cleaning and security companies audited in January 2019. Our assessments have highlighted instances which required further investigation and remediation to ensure modern slavery was not taking place, related to recruitment fees, the risk of child labour and unclear recruitment channels for migrant workers. Risk mapping of global service providers ongoing since 2021. Licence partners working on our behalf trained on modern slavery risks and effective audit methodology. Two warehouses assessed in Italy. Four homeworkers assessment carried out using the new homemaker's methodology, in Spain and Italy. In 2022 and 2023, in the context of a wider project carried out with other brands in the sector, we had the chance to visit and assess some key suppliers in India. 	<ul style="list-style-type: none"> 151 Tier 1 and Tier 2 Product Suppliers and subcontractors audited by CSR & Human Rights team and third-party auditors, and 8 site visits. We started to collaborate with an auditor focused entirely on the Italian Stella McCartney suppliers in order to improve our oversight of the territory. We refined our approach, switching to unannounced audits, more than announced, especially on subcontractors. 	<ul style="list-style-type: none"> Update of current assessment methodology to reflect sector trends and key issues that can leverage on workers engagement and collaboration with factory's owners (within 2026). Audit more suppliers across Tiers 2 (within 2025) and 3 (within 2026). Assess high-risk non-product suppliers, cleaning and security contractors once global mapping and risk assessment is completed (within 2026).

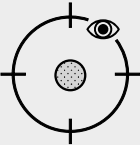
Progress In Priority Areas (KPIs) And Looking Ahead

		FOCUS AREA	COMPLETED PRIOR TO 2024	COMPLETED IN 2024	NEXT STEPS
3		<p>WORKER VOICE: Enable workers in our supply chain to raise and resolve issues by ensuring there are appropriate, robust and effective channels for them to do so.</p>	<ul style="list-style-type: none"> • Worker surveys piloted at 14 sites across Hungary, Italy, Romania, China and India. The survey questions were developed with ethical trading consultancy Impact and reviewed by experts including a trade union and the Ethical Trading Initiative. • In 2019, we piloted Direct Worker reporting, a channel for workers to give anonymous feedback, with 3 direct and 9 indirect Italian facilities, covering 237 workers through &Wider. • We have launched SpeakUp®, a global grievance mechanism tool through a third-party specialist organisation, People in Touch. The tool is available to anyone across our T1 value chain, including employees, suppliers and workers, in any country and can be used in local language. • Piloted a digital worker training and awareness raising tool with 12 facilities in Italy. • SpeakUp® channel monitoring and implementation across new suppliers. • In 2023, we managed 2 cases reported by suppliers' workers through the SpeakUp tool. The cases were managed internally by the CSR & Human Rights team and supported by a third-party company appointed by Stella McCartney. 	<ul style="list-style-type: none"> • We started to work on the new implementations made on the SpeakUp® platform which will be released via our Sustainability Hub in 2025. The implementations include updates of the platform, ways to access the grievance mechanism channel, together with the renovation of the related policy and posters. 	<ul style="list-style-type: none"> • Expand the direct worker reporting and feedback mechanism to all facilities across our supply chain and make sure it is known and effective in all sites. Tier 2 will be onboarded in 2025; the aim is to reach also further tiers of the supply chain in the future (within 2028).

Progress In Priority Areas (KPIs) And Looking Ahead

		FOCUS AREA	COMPLETED PRIOR TO 2024	COMPLETED IN 2024	NEXT STEPS
4		<p>TRAINING: Continue to raise awareness of what modern slavery can look like through scaling up training for staff and suppliers. We aim to help our suppliers build capacity to identify, remediate and prevent modern slavery in their supply chains.</p>	<ul style="list-style-type: none"> Product Suppliers from all key regions, including Italy, Hungary, India, China, Spain and Portugal have received training on modern slavery and 100% of Product Supplier received a detailed Modern Slavery Due Diligence Guidance as part of our implementation of the Modern Slavery Policy since 2017. Since January 2017, staff in key positions such as design, production, store planning and operations received specific training on modern slavery. 25 direct suppliers attended our Supplier Summit in June 2019 and received training on the key social responsibility risks, including the risk of modern slavery in their supply chains. Webinar training with information about support provided by the Italian Government to tackle COVID-19 consequences shared with all current Tier 1 suppliers in Italy through Bureau Veritas Italia. In early 2022, we have included our social responsibility programme and key training on modern slavery in the induction program for new employees. We have provided to our suppliers with a training initiative structured in 3 separate sessions focused on CSR topics to improve suppliers' skills on supply chain management with a specific focus in Italy. We have organised together with the UN agency of International Organization for Migration one webinar for our Italian Suppliers focused on responsible recruitments, migrant labour. 	<ul style="list-style-type: none"> In 2024, the Sustainability team, conducted company-wide training on various topics related to sustainability, and an in-person course, was held on topic of CSR and Human Rights and audits, internal procedures and an introduction of the Sustainability Hub. Sustainability Team members participated in several trainings related to CSR & Human Rights topics, norms and geopolitics. 	<ul style="list-style-type: none"> Extend the remote training to more partners in our supply chain (within 2026). All new employees trained on modern slavery and human rights (ongoing).

Progress In Priority Areas (KPIs) And Looking Ahead

		FOCUS AREA	COMPLETED PRIOR TO 2024	COMPLETED IN 2024	NEXT STEPS
5		<p>REMEDIATION: Ensure any breaches of our CSR and Human Rights standards and policies, including instances of modern slavery are remediated in line with UN Guiding Principles on Business and Human Rights.</p>	<ul style="list-style-type: none"> We have collaborated with four brands and a supplier in Thailand to repay workers' recruitment fees. In 2020 we terminated two Tier 1 Product Suppliers (in Madagascar and in China) due to risk of child labour and forced labour respectively and inability to put a sufficient prevention measure in place. Terminated a UK cleaning contractor due to their unwillingness to change their employment practices that put workers at a disadvantage. In 2023, 5 sites assessed were not approved for production due to the presence of critical human rights risks and the inability to improve what was needed. An improvement plan was shared with the direct supplier. We have collaborated with one other brand and a supplier in Albania to improve payments and employment conditions of temporary workers. Together with one of our licence partners, we have identified one supplier in China with serious risks of forced labour and inability to provide the transparency and improvements needed and agreed to terminate the relationship for production. 	<ul style="list-style-type: none"> In 2024, we supported specific suppliers which had critical aspects to improve but which we consider important collaborations to pursue and support (i.e. Portugal and India). In 2024, we registered 19 failed audits, of which the largest number concerned potential subcontractors who, following the outcome of the audit carried out, are not approved to work with us. 	<ul style="list-style-type: none"> Continue to ensure access to a remedy for workers through putting robust and effective improvement plans in place and continue monitoring of our supply chain to ensure improvements are sustainable. Only as a last resort, where suppliers refuse or are unable to engage in remediation and meet our standards, terminate high risk business relationships responsibly (ongoing).