

## **Jimmy Choo Statement: Modern Slavery Act 2015**

### **Introduction**

This statement sets out the actions taken by Jimmy Choo Group Limited and relevant affiliates (*Jimmy Choo* or the *company*) to understand the potential modern slavery risks related to the business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in the business and the supply chain. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Jimmy Choo's slavery and human trafficking statement for the financial year ended 31 December 2017.

As part of the retail sector, Jimmy Choo recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Jimmy Choo is committed to addressing the risk of modern slavery in its business and supply chains.

The company will publish an update to this statement annually which will report on the progress made in respect of the actions identified in this statement, as well as the plans for managing modern slavery risks in the following year.

### **Organisational Structure and Supply Chain**

This statement covers the activities of Jimmy Choo. Jimmy Choo encompasses a complete luxury accessories brand. Women's shoes remain the core of the product offer, alongside handbags, small leather goods, scarves, sunglasses, eyewear, belts, fragrance and men's shoes. CEO Pierre Denis and Creative Director Sandra Choi together share a vision to create one of the world's most treasured luxury brands. Jimmy Choo has a global store network encompassing more than 150 stores and is present in the most prestigious department and specialty stores worldwide. Jimmy Choo is part of the Michael Kors Holdings Limited luxury fashion group.

Jimmy Choo operates a flexible supply chain by outsourcing production and logistics to gain flexibility and speed in bringing products to market. Jimmy Choo produces over one million units per annum. Materials research and sourcing, product development, engineering, production planning and control, quality assurance, as well as customer service and after sales are all directly controlled by Jimmy Choo.

In order to produce luxury shoes with a high quality finish, Jimmy Choo partners with suppliers with the specific skill sets to match each particular shoe function. Accordingly, with the exception of espadrilles and cork shoes, which are made in Spain, Jimmy Choo's products are produced by specialists in the Florence and Veneto regions of Italy, where factories and tanneries are subject to mandatory legislative requirements. In addition to providing specialist skills, this multi-supplier strategy provides scalability, flexibility and speed to market, as well as diversifying risk. Jimmy Choo does not rely on any single supplier in particular.

Jimmy Choo has dedicated supply chain, product development and engineering offices close to where the suppliers are located. This helps to build strong relationships with suppliers.

Jimmy Choo is committed to improving working conditions for workers both under Jimmy Choo direct operations and across the Jimmy Choo supply chain.

## Due Diligence

The company undertakes due diligence when considering taking on new suppliers, and regularly reviews the existing suppliers.

The company's due diligence and reviews include:

- an expectation that existing, and new, suppliers and sub-suppliers include clauses combatting child labour in their contracts, with further efforts being made to widen the scope to include anti-slavery provisions for workers;
- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- the engagement of an internationally respected specialist organisation to conduct Tier 1 supplier audits, with a focus on slavery and human trafficking (see below for more detail);
- taking steps, based on the specialist organisation's recommendations, to improve any substandard supplier practices identified, including providing advice to suppliers via the specialist organisation and requiring them to implement action plans to remediate any such shortcomings;
- commencing the collection of information to create an annual risk profile for key suppliers; and
- the signature of a Supplier Code of Conduct in 2018 by all Tier 1 finished product suppliers. The Supplier Code of Conduct is being rolled out to Tier 2 suppliers. In the event of a violation of the Supplier Code of Conduct, we reserve the right to either terminate our relationship with the supplier or to work with the supplier to implement corrective action to remedy the non-conformance.

### *High-risk activities*

We are not aware of modern slavery taking place in our supply chain. We have identified the areas of Jimmy Choo's operations most at risk and in this statement we set out how Jimmy Choo is already managing these risks.

We recognise that improving risk management in this area is a continuous process. This process is led by a project team, drawn from senior managers and leaders from across the business, which regularly reviews the effectiveness of the actions being taken.

Jimmy Choo has engaged an internationally respected specialist organisation to manage an audit of our supply chain with a focus on corporate social responsibility.

An audit of our Tier 1 suppliers was completed in 2017. In most instances, where a minor deficiency was identified, corrective actions were required on a specified timeline, followed by validation by the company or its auditor that such deficiency has been remedied. No serious violations were identified.

An audit of our Tier 2 suppliers has been undertaken in 2018. No serious violations were identified as a result of this audit. In the instance of a minor deficiency corrective actions have been agreed and are currently being remediated. The completion of the identified corrective actions will be validated by the company or its auditor by the end of 2018.

In the case of a serious violation being identified, termination of the company's relationship with the manufacturer may occur, particularly where corrective action is either not possible or determined to be an insufficient remedy.

### *Responsibility*

Responsibility for the company's anti-slavery initiatives rests with the Chief Executive Officer, Pierre Denis.

### **Relevant Policies**

Jimmy Choo has in place a number of policies which support recognised human rights principles. These policies include:

- Whistleblowing Policy
- Code of Business Conduct and Ethics
- Anti-Bribery Policy
- Health and Safety Policy
- Recruitment Procedure
- Non-Discrimination Statement

### **Training**

All employees are required to undergo compliance and ethics training, including with respect to the Employee Code of Conduct, and every two years thereafter.

Employees are encouraged to raise any concerns and have multiple channels to do so, including through an ethics hotline staffed by independent third-party operators.

### **Performance Indicators**

We continue to assess the risk of modern slavery in Jimmy Choo's business and develop how we address this. Based on internal and external feedback, as well as further due diligence, we are committed to continue strengthening our processes and operational procedures.

In our next statement we will provide an update on both existing and new measures that Jimmy Choo is taking to manage the risks of modern slavery, in particular to evaluate our progress regarding the risk of modern slavery.

### **Board approval**

This statement has been approved by Jimmy Choo Group Limited's Board of Directors (for and on behalf of all relevant affiliates) who will review and update it annually.



Pierre Denis  
25 June 2018