



Modern Slavery and Anti-Human Trafficking Disclosure Statement

Beaconsfield Footwear was established in Lancashire in 1959 and has been making footwear ever since. Having introduced the Hotter brand in the early 1990s, the company has grown to be the UK's biggest shoe maker making 2 million pairs of shoes each year. Our core values are our passion for our products, our continuing drive for excellence in everything we do and our dedication to exceeding our customers' expectations. As a family company, with a culture of honesty and transparency, operating ethically is fundamental to our business. We are committed to treating all people with dignity and respect and accordingly we fully recognise both our moral, and legal, responsibility to preventing modern slavery in all its forms. We will not tolerate forced labour, the exploitation of children or other vulnerable groups, fraudulent activity, deception, corruption, or any other means of coercion or abuse of power in our business and through our supply chain in the UK and internationally.

The following disclosure statement details the actions we are committed to taking in order to identify, understand and address the risks of modern slavery and human trafficking. Significantly, we will not only be compliant with all applicable laws and regulations, we will continue to set the standard for ethical behaviour wherever we work. Moreover, we respect and support the international principles of human rights, such as those detailed in the United Nation's Declaration of Human Rights¹, the United Nations Global Compact Principles², Women's Empowerment Principles³ and the UK Government's Modern Slavery Act 2015⁴. Our support for these fundamental principles is embodied in our policies and conduct towards our employees, customers and suppliers, together with the wider communities and countries in which we operate.

Hotter Comfort Concept and Hotter are the trading names of Beaconsfield Footwear Limited. The following disclosure statement is made on behalf of Beaconsfield Footwear pursuant to Section 51 (1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. Beaconsfield Footwear is a limited company registered in England and Wales.

Sara Prowse
Chief Executive Officer
Beaconsfield Footwear Ltd.
March 2017

¹ United Nation's Declaration of Human Rights <http://www.un.org/en/universal-declaration-human-rights/>

² United Nation's Global Compact Principles <https://www.unglobalcompact.org/what-is-gc/mission/principles>

³ The Women's Empowerment Principles <http://www.weprinciples.org/>

⁴ UK Government's Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>



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The UK Government Modern Slavery Act requires all companies of £36 million turnover, or more, to disclose annually, as a minimum, the following:

- i. The company's structure, its scope of business and its supply chains
- ii. Its policies in relation to modern slavery and human trafficking
- iii. Its due diligence processes in relation to slavery and human trafficking in its business and supply chains
- iv. Assessment and management procedures for identifying modern slavery and human trafficking risks
- v. Performance indicators to measure the effectiveness of the company's efforts in ensuring modern slavery and human trafficking is not taking place
- vi. Training on modern slavery available to its staff and supply chain

About Us

Founded in 1959, Beaconsfield Footwear has been designing and manufacturing footwear for over 50 years. We introduced the Hotter brand in the early 1990s and have gained a reputation for designing and making stylish shoes with comfort built in. With our rich heritage and commitment to innovation we have also established ourselves as a leading omni-channel retailer in UK and international markets. We sell our footwear through a network of nearly 80 Hotter stores across the UK and direct to customers via our website and our 140 seater call centre. From our factory in Skelmersdale, Lancashire, we make a pair of shoes every 20 seconds, making us the UK's biggest shoe maker. We work with a select group of quality partners in the UK and internationally who supply components and services across our supply chain. These partners have been specially selected because of their expertise and work under the close supervision of our operational teams to meet our stringent requirements for achieving true comfort, quality and style.

Our Modern Slavery and Human Trafficking Policy

We absolutely oppose modern slavery in all of its forms and are strongly committed to preventing exploitation, or human trafficking, across any part of our business and supply chains. Our Anti-Slavery policy embodies our commitment to acting ethically, and with integrity, throughout our operations and to implementing effective governance systems to prevent slavery and human trafficking in our supply chains. Moreover, our business ethics and code of conduct outlines the rigorous standards of ethical behaviour we expect from our



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suppliers. In addition, suppliers are required to demonstrate that they adhere to the highest ethical standards through routine assessment.

Fundamentally, the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us, or with us. Our zero-tolerance approach to modern slavery is clearly communicated to all of our business partners and reinforced as appropriate thereafter.

Due Diligence and Risk Assessment

Existing due diligence measures concerning ethical conduct are firmly embedded within our procurement and supply chain management process. As part of our initiatives to identify and mitigate risk, we undertake quarterly reviews of our existing suppliers. Moreover, we always conduct pre-screening assessments of new suppliers. In order to augment our existing due diligence processes in relation to modern slavery and human trafficking, we will implement the following internal governance procedures at operational and senior management level:

- Identifying high risk supply chains and/or areas particularly susceptible to modern slavery issues.
- Engaging with all of our suppliers to ensure they share our commitment to acting with integrity.
- Conducting appropriate investigative and remedial actions if issues are identified
- Invoking sanctions against suppliers that fail to improve their performance in line with our modern slavery policy.
- Terminating business relationships with suppliers, or other offending parties, who knowingly violate our modern slavery policy and refuse to collaborate with us in implementing improvement plans.
- Recognising the limitations of certain ethical auditing protocols and, where appropriate, undertaking additional supplier visits and assessments.

An integral element of our due diligence and corporate governance processes will be the enhanced visibility afforded by our ongoing supply chain mapping project. This project, scheduled for completion in early 2017, will be critical in embedding transparency and supporting supply chain risk management. Additionally, this constructive approach will foster



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Lastly, we also commit to continually reviewing and enhancing our due diligence and risk assessment processes on an annual basis.

Training our Employees and Suppliers on Modern Slavery

We are currently in the process of developing an internal training programme for key staff involved in human supplier management in order to educate them on the risks of modern slavery. This will be supplemented by an internal awareness campaign across our organisation, including briefings and progress reports. Significantly, we also routinely train key employees on wider sustainability issues. Furthermore, we will align our efforts in tackling modern slavery with our broader commitments to ethical business and sustainability.

In 2017 we will make all of our tier one suppliers aware of our Modern Slavery and Anti-Human Trafficking Disclosure Statement and provide clear guidance to ensure our suppliers understand the standards that Hotter applies. In addition, we will also update our procurement code of conduct to reflect our commitment to tackling modern slavery and human trafficking.

Monitoring Performance

The following graphic summarises the key areas of activity for assessing the effectiveness of our efforts in preventing modern slavery. These will be developed into specific, measurable key performance indicators (KPIs) in early 2017, thereby embedding the commitments outlined in this disclosure statement.

Signed:

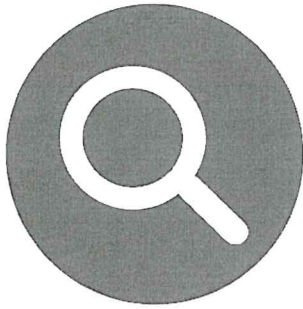
A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Position: Chief Executive Officer

Date: 16 March 2017



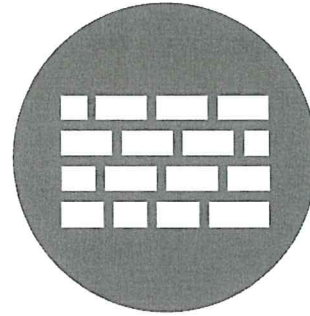
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Mapping our Tier 1 supply chain and developing a supplier compliance platform



Communicating our Modern Slavery standards to our supply base and continuing our verification programme

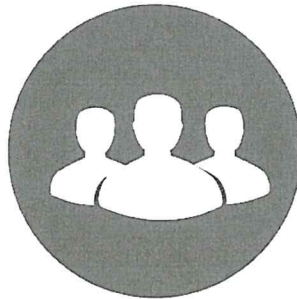


Further developing the company's due diligence processes to enable transparent reporting of ethical practices

16/17 Modern Slavery KPIs



Delivering an internal awareness campaign for our employees regarding Modern Slavery



Providing full training for key employees involved in procurement, supply chain and human resources regarding Modern Slavery



Reporting on the effectiveness of our due diligence and risk assessment procedures in ensuring Modern Slavery is prevented