Modern Slavery & Human Trafficking Statement

1. Introduction

The Modern Slavery Act 2015 (UK parliament 2015) is designed to combat slavery and consolidate previous offences relating to trafficking and slavery.

Modern slavery is a term used when an individual is exploited by others, for personal or commercial gain. This includes the coercion, forcing or tricking of individuals resulting in their loss of freedom, and covers slavery-like practices such as debt bondage, sale or exploitation of children, human trafficking, forced labour or marriage,

Fifty million people were living in modern slavery in 2021, according to the latest Global Estimates of Modern Slavery from the International Labour Organisation (ILO). Of these people, 28 million were in forced labour and 22 million were trapped in forced marriage. The number of people in modern slavery has risen significantly in the last five years. 10 million more people were in modern slavery in 2021 compared to 2016 global estimates. Women and children remain disproportionately vulnerable.

The Mondottica Group ("Mondottica", "we", "us") recognises the Modern Slavery Act 2015 and that we have a responsibility to prevent slavery and take actions to understand all potential modern slavery risks related to our business operations and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and our supply chains.

2. General

Mondottica UK Ltd.'s membership of the UN Global Compact reenforces our commitment and we recognise and apply the declaration and standards from:

- The UN Universal Declaration of Human Rights
- The International Labour Organisation (ILO) Declaration on Fundamental principles and Rights at work
- The UN Guiding Principles on Business and Human Rights

The Mondottica Modern Slavery policy and statement is issued to all Employees, Contractors, JV partnerships, suppliers and any other relevant partners along with our Code of Conduct, (where applicable) which sets out our detailed expectations, and we expect that all parties commit to our expectations and take preventative action to support our zero-tolerance approach.

Our direct employees, staff and contractors are expected to have a zero-tolerance approach to modern slavery, and are required to demonstrate acceptance of this

policy. These groups are expected to undergo the training we provide and report as soon as possible if they have any concerns or suspicions relating to modern slavery.

3 Mondottica Structure and supply chains

Mondottica design and distribute optical and sunglass frames, on behalf of Brand Partners, and work with 3rd party partners and suppliers to manufacture our product range. Our supply chain involves product development, product manufacture and quality control, including the transportation of product globally.

3.1 We currently operate in the following countries:

Mondottica's holding company is registered in Hong Kong, with Group management and administration activities based in the UK. Design, Brand relationships, PR, Graphics, Distribution, Customer Service, Sales, Finance, IT, Supply Chain and Human Resources are all managed from the UK headquarters.

Sales and sales support activities are carried out through a global network of subsidiary companies, joint ventures and dedicated Sales managers and agents. Mondottica has a presence either directly or through our Joint venture partners in the UK, US, Hong Kong, France, Spain, Poland, Germany, India, Australia and Japan, the Nordics, Serbia, Latin America and the Middle East.

Product Development, Quality Assurance and manufacturing & production activities are managed collaboratively from the UK in operation with 3rd party partners and suppliers throughout Asia and Europe, and we source from factories in China and Cambodia.

4 Due Diligence

In working with our partner organisation, the ICare group, with regard to Product development and Quality assurance, we are able to align our expectations, communicate our standards and deliver the following:

- The selection of suppliers involves an assessment of their integrity and reputation.
- We require all new suppliers to agree and commit to our Code of conduct and carry out due diligence based on geographical location, cultural custom and practice and political sensitivity.
- As of 2023, Mondottica are members of SEDEX and require all suppliers to register and complete the SEDEX Self-Assessment Questionnaire which must lead to SMETA certification. SMETA certifications must be passed and maintained annually, and we are transitioning from other third-party certification requirements to SMETA.
- All suppliers are visited weekly by Quality Control employees, to review both product and production lines and methods, producing a weekly report and therefore limiting un-fit practices.
- Where necessary we carry out additional supplier audits

- Our Code of Conduct is reviewed annually to ensure we progress our standards, and that the standards of our Brand partners are incorporated and delivered. As of 2023 we require an annual recommitment to our Code of conduct from all of our suppliers.
- A route for anonymous reporting through our Whistleblowing Policy and reporting mechanism to ensure a safe means of reporting concerns, grievances or misconduct.

Beyond our collaboration with our partner organisation, our business's purchasing practices which influence supply chain conditions are managed from the UK and reviewed with our partners. They are designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline.

Our commitment to develop our due diligence process in the next 12 months include:

- Full Assessment of our supply chain through our SEDEX due diligence, which incorporate the ILO indicators in our risk assessment process below. This will increase visibility and monitoring of potentially vulnerable groups which may lead to additional due diligence or recommendations
- Accreditation to the UK Real Living Wage foundation, demonstrating our commitment to proper living standards.

5 Managing Risk

5.1 Relevant policies:

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

Whistleblowing policy. We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of our company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Code of Ethics: Our code makes clear to all (Employees, Consultants, Suppliers, Partners or any other individual or group representing our Company) the actions and behaviour expected of them when representing Mondottica. We strive to maintain the highest standards of conduct and ethical behaviour when operating abroad and managing our supply chain.

Code of conduct: We are committed to ensuring that our suppliers, distributors and agents adhere to the highest standards of ethics. This code details our expectations to prevent any of the 11 ILO indicators of slavery or trafficking.

5.2 Training and capacity building

We provide regular training and awareness to all employed and contracted staff on:

- the basic principles of the Modern Slavery Act 2015.
- how employers can identify and prevent slavery and human trafficking.
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within Mondottica
- what external help is available, for example through the Modern Slavery Helpline.
- assess the risk of slavery and human trafficking in relation to various aspects of the business where appropriate.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our company.

In addition, from 2023 onwards all our suppliers and distributors continue to demonstrate through their due diligence process that they have carried out regular training sessions with their staff to ensure they are aware of the risks or modern slavery and that they know how to respond if they suspect there to be an incident of modern slavery.

6 Auditing and monitoring

We ensure that all current suppliers re-commit to the code of conduct on an annual basis and review the audit reports from their external certification providers.

Any breaches in our supplier code of conduct will be investigated, with the opportunity of corrective action given, although failure to remedy may ultimately lead to the removal from our supply chain.

We assess the findings from the responses to our SMETA audits, which ascertain the need for further audit and/or inspection.

7 Compliance

Employees and contractors: You must ensure that you read, understand and comply with the requirements set out in our Ethical Code, undergo training and raise concerns you may have.

Suppliers, Distributors, agents and other partners: You are expected to commit to our code of conduct upon working with us and recommit and adhere to our code of

conduct and carry out due diligence and risk assessments annually, which includes

ensuring your subcontractors and suppliers do the same. You are responsible for having an effective remediation process for any concerns and you will communicate any high-risk situation within your operations or those of your supply chain immediately and share the remedies you have implemented.

Board Member approval:

This statement was approved on by our board of directors/ members, who review and update it annually.

Director's signature:

Anthony Pessok - CEO

Date:

Director's signature:

Ben Whitaker – Group Managing Director

Date: