Modern Slavery Statement 2026

Sign off by the Superdry Limited Board

Respecting human rights is a fundamental part of how Superdry does business.

It continues to be a priority for Superdry Limited to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain.

Our FY26 Modern Slavery Statement sets out the steps taken by Superdry Limited (which includes its wholly owned subsidiaries C-Retail Limited, DKH Retail Limited Superdry EUR Finance Ltd and SuperGroup Internet Limited) to ensure modern slavery does not take place in any part of our business and supply chain. We have updated our statement with progress made for the full financial year, between May 2024 and April 2025; our overall modern slavery strategy remains on track.

Superdry, through DKH Retail Limited, holds a 50% share of Tribe Vintage Limited. This is a joint venture relationship where DKH Retail Limited is the investment company and Frederick Jones is the operational director and 50% shareholder. Tribe Vintage Limited are required, through an agreement with DKH Retail Limited, to comply with all laws including those that relate to modern slavery.

We review our approach on a regular basis and seek to continually improve through ongoing risk assessment, raising awareness of issues and requirements, and by delivering training to our colleagues and working in partnership with our suppliers and partners.

ABOUT SUPERDRY

We design, produce, and sell clothing and accessories globally under the Superdry brand with a focus on high quality, contemporary and sustainable products. Our Group annual turnover was £327.8. Our products are:

- Designed at our head office based in the UK.
- Manufactured by 45 third party suppliers, in 55 (Tier 1) factories and 280 Tier 2 & 3 specialist process, fabric and trim sites located in India, Sri Lanka, Pakistan, Turkey, China, Cambodia and Vietnam. Production is overseen by three sourcing offices, covering each territory to ensure we can quickly respond to opportunities and risks.
- Sold globally through our stores, through Ecommerce sites and through our wholesale customers.

For selected products, our brand is licensed by Lalique Group SA, Corsair Toiletries Ltd (UK, beauty, and bath) Reliance Brands (India, various), Pond Group (South Korea, various) and Inspecs (opticals), who work in collaboration with our head office-based design, sourcing, and sustainability teams.

These activities are co-ordinated by a global team of 500 employees and a network of trusted suppliers and business partners.

More information about Superdry, our organisational structure, group relationships and sustainability programme is available in our FY26 Impact Report at corporate.superdry.com, and the FY26 Annual Report.

ABOUT OUR SUPPLY CHAIN

Superdry works with apparel, footwear and accessory suppliers based in China, India, Turkey, Sri Lanka, Pakistan, Vietnam and Cambodia.

Commented [MF1]: Definition of business partner across whole document- what do we define that as?

Commented [JR2R1]: It is up to us - essentially third parties we do business with, suppliers, manufacturers, factories should all be included. I am happy with draft - let's keep it consistent with previous years please.

Commented [MF3]: Does this protect us as Tribe is 50% share?

Commented [JR4R3]: I have amended.

Commented [MF5]: Suggest we specify the separation from Tribe if we decide not to be responsible for ethics in their supply chain. E.g separate statement is needed from Tribe? Or are they under the revenue threshold to be required to publish? And add org structure chart

Commented [JR6R5]: We cannot decide not to be responsible for their supply chain - we are 50% owner, it is incumbent on Julian as director to ensure him and Freddie are running the business appropriately.

Commented [MF7]: Suggest we strengthen this section, specify licence in vs licence out and JV's

Commented [JR8R7]: Are you suggesting changes?

Commented [MF9]: Wasn't included

Commented [JR10R9]: That's fine - link it to the annual report

Our suppliers may choose to use subcontractors (also known as Tier 2) where specialist components are required, or services needed, which cannot be completed in Tier 1 factories. Our suppliers source branded trims and labels through a network of nominated and sourced suppliers (Tier 3).

Our licensees work with apparel, footwear, beauty, and optical accessory suppliers based in China, Vietnam, India and Sri Lanka. These suppliers are managed by the licensee with full visibility and oversight by Superdry's sustainability, sourcing, and production teams. These suppliers also use Tier 2 and Tier 3 factories for components and specialist services.

We also have a network of suppliers throughout our supply chain who provide goods not for resale and services to support day-to-day business operations, examples of which include transportation, warehousing, and store ancillary services.

We operate sourcing offices in key source countries, which function to support our suppliers in manufacturing our apparel, footwear, and accessories in line with our standards – from quality standards, through to compliance with our ethical standards including our Modern Slavery Policy.

Achieving full traceability throughout our supply chain is a core focus for Superdry as we recognise that the visibility of our indirect suppliers reduces as we move down the supply chain. This year we have mapped our Tier 2 and Tier 3 facilities, creating a more complete picture of our supply chain which should support improved social and environmental performance.

To tackle this, we work directly with 99% of our factories, The 1% of factories which we do not work with directly are contracted via an agent, and we maintain the same level of visibility here as with our wider supply base.

In FY26, 88% of our product volume was certified to industry recognised standards to guarantee supply chain traceability. The balance volume (18%) is produced in line with our strict ethical and quality standards and is traceable back to Tier 3.

Recognising that cotton is our largest and most high-risk raw material, we are committed to ensuring that all cotton will come from fully traced lower impact sources by 2030. By FY25, we had trained 40,274 smallholder farmers in-conversion into our supply chain since the beginning of the programme in 2022. This increases our visibility with our suppliers whilst providing opportunities to ensure our modern slavery policies are being implemented and complied with.

OUR MODERN SLAVERY COMMITMENT AND POLICY

The term modern slavery covers forced and compulsory labour, indentured child labour, servitude, human trafficking, debt bondage, deceptive recruiting for labour or services and similar violations. These are violations of human rights such as the right to be free from slavery, servitude or forced labour and the right to freedom of movement and other human rights, which are upheld by both international and national legislation.

Our commitment

We actively seek to ensure that our business, business partners and all parts of the associated supply chain are free from all forms of slavery and human trafficking. If at any point we suspect or identify any cases of modern slavery, we commit to support the remediation of any victims – working with business partners, other brands, governments, and NGOs as applicable. We also commit to assisting law enforcement agencies with the investigation, identification and prosecution of any party that knowingly engages in or facilitates slavery or human trafficking.

Our Modern Slavery Policy

We have appropriate policies in place that underpin our commitment to ensure that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This information can be found in our supplier manual, which is provided to each of our suppliers during the onboarding process.

Commented [MF11]: Highlights our liability?

Commented [JR12R11]: Given we are liable by virtue of the law itself I am not clear what the concern is?

Commented [MF13]: Can we say this with full confidence?

Commented [JR14R13]: This is not a question for legal - suggest you discuss with Martyn and Deborah.

Commented [MF15]: TBC depending on KPI signed off by Shaun

Commented [JR16R15]: Ok - it cannot be circulated for Board approval until it is complete

Commented [MF17]: Defines the scope and leaves us open if we don't have procedures in place? Tribe

Commented [JR18R17]: We need to leave this in

Commented [MF19]: Reference page 35 in supplier manual- state superdry-branded licensed goods

Commented [JR20R19]: ok

and in all contracts from 2016 onwards. This document is applicable to suppliers of Superdry and Superdry licensed branded goods.

Commented [MF21]: No branding not in scope?

Our Modern Slavery Policy and related policies upholding our commitment to eradicating modern slavery are accessible on our website and are reviewed and updated annually. The policy applies to all colleagues, suppliers, and business partners, and requires all parties to implement effective due diligence processes to enable us to understand and identify the potential risks of slavery and human trafficking so that we can report actual and suspected cases to the appropriate law enforcement agencies.

We also have the following policies in place relevant to modern slavery, which we continuously review and update:

Commented [MF22]: Suggestion to add risk mapping & mitigation and responsible sourcing policy?

1. Whistleblowing Policy which enables employees to speak up if they believe serious malpractice is taking place, safe in the knowledge that the issue will be investigated independently, with no adverse impact on the individual.
2. Code of Practice which is based on international standards including the Universal Declaration of Human Rights and the International Labour Organization's Core Conventions on Labour Standards.
3. Migrant and Contract Worker Policy and Guidelines which aim to protect vulnerable groups of workers by requiring ethical recruitment practices, appropriate conditions for accommodation, and effective communication of terms and conditions of employment.
4. Child Labour Operating Procedures which utilise industry best practice to enable remediation in the best interests of the impacted child worker.

All policies have been developed in consultation with organisations including the Ethical Trading Initiative (ETI), global experts in due diligence including Bureau Veritas, The Reassurance Network (India, Sri Lanka and Turkey) and Social Compliance Service Asia (Far East). Their ongoing development is managed by our Sustainability and Ethical Trading team, overseen by the Head of Sourcing, and reviewed by our COO and Superdry Limited Board.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We understand the heightened risk associated with complex supply chains, recognising that the risk of forced labour can go undetected. As part of our initiative to identify and mitigate risk, we apply the following processes:

Risk assessment

- We comprehensively risk assess new markets, only sourcing from approved locations within the immediate purview of our local office teams. This helps us to maintain visibility of the conditions and, risks in our local markets whilst effectively managing due diligence and remediation.
- We adapt our programme to ensure issues are addressed and continuously assess the impact on human rights within our business and existing supply chain annually.
- We publicly disclose the outcomes of our risk assessment in our Approach to Human Rights. It is important to note that there are several regions which we will not source cotton from, due to increased modern slavery risk.

Commented [MF23]: Do we?

Commented [JR24R23]: Not a question for legal - one for Martyn and Deborah

Continued assessment of current business partners

Commented [MF25]: Do we? - What is definition of business partner in this context?

Commented [JR26R25]: As above

- We comprehensively assess our Tier 1, 2 and 3 suppliers before and throughout our relationship. We visit 100% of suppliers prior to commencing our business relationship to ensure they adhere to our Code of Practice and annually audit 100% of Tier 1 factories and nominated or preferred trims and label suppliers (Tier 3) on a semi-announced and unannounced basis in all territories. We complete assessments in partnership with our suppliers on 100% of Tier 2 factories.
- We will terminate our relationship with any partners in breach of this policy, including any partners that fail to remedy any issues – transparently, sustainably, and in the best interest of impacted victims.
- In FY20 we launched our enhanced support "Intensive Care" programme – established to support factories that have had two repeated ethical audit failures.

In FY26:

- We ended the year with 100% of factories holding a yellow grade or above, with 0 factories in our Intensive Care programme.
- 0% of factories failed to make the required progress, either due to poor engagement from management or progress overall. In this instance these factories would have been exited or enter the process of exit in line with our Responsible Exit Process.

We continue our active membership of the Ethical Trading Initiative (ETI), which enables industry collaboration and supports the continued advancement of our Ethical Trading programme. Our programme, objectives and progress will be assessed in our annual ETI Progression Meeting.

HOW WE ENSURE OUR MODERN SLAVERY POLICY IS ADHERED TO

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a rigorous supply chain compliance programme. This is achieved through a dedicated compliance team, which consists of involvement from our sustainability, audit and compliance teams.

1. Raising awareness for colleagues, suppliers, and business partners

   To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide regular training to our staff. We also require our business partners to provide training to their staff, suppliers, and providers.

   To support our cross-business plan to raise awareness of our Modern Slavery Policy, we launched our modern slavery training course in FY22 with 100% of colleagues completing it. The training, involving 100% of our colleagues, is now completed annually and includes Superdry's policies related to modern slavery. All suppliers onboarded prior to 2020 have received training on modern slavery outside of the induction process.

   In addition to this, since 2017, it has been Superdry's policy to ensure that contracts with business partners include our commitment to human rights and our modern slavery policy.

2. Continued engagement with suppliers to actively eliminate modern slavery risk throughout our relationship

Commented [MF27]: Do we?

Commented [JR28R27]: As above

Commented [MF29]: Do we?

Commented [JR30R29]: As above

Superdry has a well-established global team focused on human rights whilst managing our ethical trading programme.

We have employed dedicated ethical trading experts, working directly with all suppliers across our sourcing regions, with full global coverage and visibility of factory conditions. This structure allows us to respond to risks quickly as they emerge and is critical in negotiating and facilitating transparent risk assessments with factories by building partnerships locally.

Our dedicated ethical trading experts provide training and support to factories to help remediate issues identified during the risk assessment process. Our enhanced support programme, which is designed to provide the factories who need it with additional support in maintaining compliance with our Code of Practice, has been in place for four years.

The programme involves targets and milestones agreed between the supplier and Superdry leadership teams and local experts – additional training is then delivered by third party specialists, with regular visits to monitor improvement.

3. Measuring the effectiveness of our human rights programme

We continue to report annually to the Superdry Limited Board to provide oversight of our policies and due diligence programmes.

Our risk management process includes detailed updates on human rights and modern slavery risk – with reviews completed with the Head of Sourcing, Head of Quality & Sustainability and COO on a quarterly basis. Wider information on our governance processes can be found in our FY25 Annual Report.

We continue to review the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains and update/set new targets.

Please note that the below table includes progress made against targets for FY26, our targets for the coming financial year FY26 and our long-term goals to FY30. Historic targets are available in our archived statements.

Due to changes in volume, we consolidated our supply base FY26, meaning core supporters of our Respect and Dignity programme. This has meant an overall reduction in current workers engaged in the programme.

Target	FY26	FY26 (Target)	FY30 (Target)
Volume bought contains fully traceable, certified lower impact materials. This includes sourcing from our nominated farm groups enrolled in training to transition to organic cotton.	88% (Target - 72%)	72%	80%
Workers enrolled in our Respect programme globally.	41% (Target 65%)	65%	100%
Public disclosure of supply base list to increase transparency.	Complete – Tier 1 factories	Tier 1	Tier 1-4

Commented [MF31]: Can we say we do this now?

Commented [JR32R31]: Amended

Commented [MF33]: To be updated

Commented [MF34]: Will need to update FY30 targets

The above statement has been made pursuant to the Modern Slavery Act 2015, the Australian Modern Slavery Act 2018 (Cth), and California Transparency in Supply Chains Act of 2010 (SB657).
The statement is signed by Julian Dunkerton, Chief Executive Officer, Superdry Limited, October 2026.

Commented [MF35]: Remove this jurisdiction?

Commented [JR36R35]: Why? We still operate in Australia through BC?