

Alfred Dunhill Limited Modern Slavery Statement 2025 - 2026

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 ('the MSA'). It sets out the steps Alfred Dunhill Limited ('the Company'), an entity incorporated in the UK, has taken during the 2026 financial year ending 31 March 2026 ('FY26') to prevent slavery and human trafficking from taking place in its supply chains or in any part of its business.

The Company has published a Modern Slavery Statement each year since 2016. Previous statements are available on request.

1. INTRODUCTION

The Company endeavours to continuously improve its efforts to combat modern slavery and human trafficking and works towards preventing such practices within its business and supply chains.

2. ABOUT THE COMPANY AND ORGANISATIONAL STRUCTURE

The Company is an indirect subsidiary of Compagnie Financière Richemont SA ('CFR'), Chemin de la Chênaie 50, 1293, Bellevue, Switzerland (together with its subsidiaries 'Richemont' or 'the Group'). The Company's immediate parent company is Richemont Holdings (UK) Limited. The Group owns a number of luxury brands ('Maisons' or 'the Maisons') that operate across the following three main areas: Jewellery, Specialist Watchmakers, and Fashion and Accessories/Other. Please see the [Richemont Annual Report and Accounts 2026](#) and the [Richemont Non-Financial Report 2026](#).

The Company sells Alfred Dunhill branded clothing, leather goods and hard luxury items, gifts and games ('the Products') through its retail, e-commerce and wholesale distribution channels. The Company is responsible for the maintenance of the Alfred Dunhill brand including the global marketing and design of the Products. The Company also provides after-sales care for the Products and offers a repair service for Maison branded products.

Whilst each Maison within the Group operates as an autonomous business, the Group provides certain centralised support services. The Company adheres to and upholds the policies and procedures of the Group, including the [Standards of Business Conduct](#), the [Supplier Code of Conduct](#), the [Minerals and Metals Responsible Sourcing Policy](#), the [Human Rights Statement](#), the [Environmental Code of Conduct](#), and the Group Procurement Policy.

The Company's corporate office, after-sales service centre and a repair and manufacturing facility, are located in London.

The Company is managed by an Executive Committee (ExCo) comprised of key managers from across each business function. The ExCo serves to coordinate the activities of the Company, including in respect of its compliance with the Group's policies and procedures. There are three statutory directors including the Company's Chief Executive Officer (together the 'Board of Directors').

3. GOVERNANCE

The Company's Board of Directors are responsible for compliance with the MSA. The Company is then supported and guided by Group Corporate Affairs and its subfunctions, providing support, among others, on the information gathering related to requirements under the MSA.

Sustainability governance at Richemont is anchored at the highest governance level of the Group: the Board of Directors (or the 'CFR Board'), with the support of the Governance and Sustainability Committee (G&SC or the 'Committee'), oversees sustainability strategy, policies, and performance. The G&SC provides updates and reports to the CFR Board. Established in March 2021, the Committee reviews management proposals regarding the Group sustainability framework. The G&SC supports the CFR Board in establishing and reviewing sustainability strategy, policies and guidelines. The G&SC advises the CFR Board on matters discussed and approved at its committee

meetings, such as management proposals regarding the respect of human and labour rights and social impact on supply chains and communities. The Committee convenes five times per year, and the Group Sustainability team assists with setting the agenda and preparing documents for discussion.

The Chief Executive Officer (CEO), the Director of Corporate Affairs and the Chief Sustainability Officer (CSO) of the Group are permanent attendees of the G&SC and are members of the Senior Executive Committee, Richemont's executive management body responsible for overseeing the management of sustainability performance and reporting of the Group.

The CSO leads the Group Sustainability team, which engages with the Executive Committees of Maisons, regions, and functions, as well as technical experts to support adherence to the Group's Sustainability Framework.

Please see the [Group's Non-Financial Report 2026](#).

4. POLICIES AND STANDARDS

The Company is committed to upholding the highest ethical standards in all its operations. Richemont's standards and policies, including the Standards of Business Conduct ('Standards'), the Supplier Code of Conduct ('SCoC'), the Minerals and Metals Responsible Sourcing Policy, the Group Procurement Policy and the Human Rights Statement, are the foundation of the Group's responsible sourcing practices. These are aligned with the international standards set out in the conventions of the International Labour Organization ('ILO'), the United Nations ('UN') Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development ('OECD') Guidelines for Multinational Enterprises, Due Diligence Guidance for Responsible Business Conduct, and Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (together 'OECD Guidelines'), among others.

The SCoC outlines the requirements that the Group's suppliers must comply with, in relation to business ethics, labour and human rights, including the prohibition of child labour and forced labour, modern slavery and human trafficking, and environmental protection. Richemont expects its suppliers to require that their own partners and subcontractors uphold standards equivalent to those set out in the SCoC. It is updated regularly, most recently in FY25, to further strengthen the Group's compliance procedures and reflects the evolving sustainability regulatory landscape.

Finally, the Minerals and Metals Responsible Sourcing Policy, evolved from the previous Raw Material Sourcing Policy in FY26, outlines Richemont's commitment to responsible sourcing of relevant minerals and metals. It addresses the Group's approach to Conflict-Affected and High-Risk Areas ('CAHRA'). These updates reflect, amongst others, the regulatory evolution of due diligence requirements.

5. SUPPLY CHAIN

As in many businesses, supply chains can be susceptible to human rights impacts such as modern slavery. The Company, under the Group's guidance, works towards a continuous improvement approach to address these potential impacts.

The Company sources its Products intra-group and via third party suppliers. The Company maintains long-term relationships with its suppliers based on the principles of responsible operations whilst ensuring the continued quality of its Products. As reflected in the SCoC, the Group expects its suppliers and its subcontractors to adhere to the principles defined in the SCoC. Compliance with the SCoC is a fundamental prerequisite for initiating or continuing a business relationship with the Group. Please see Section 7 below for further information on the Group's campaign to promote awareness and understanding of its updated SCoC.

The Group is encouraging responsible conduct within its supply chains. It recognises that the sourcing of its core raw materials, indirect goods and services must meet the quality standards of the Group and comply with applicable regulations, requiring an increasingly transparent supply chain model. The Group's framework is built on the OECD Guidelines to facilitate the operational applications of its standards and due diligence requirements. Due diligence processes apply selected methodologies to identify, assess and manage potential risks. These

processes include, among other elements, stakeholder engagement across supply chains, considering the regional specificities of the Group's global operations.

Specifically, risk identification and assessment integrate country risk, sector risk, and the supplier's strategic importance as weighting factors, while also incorporating the requirements of standard setting organisations.

Tailored due diligence and risk management methodologies are applied to core supply chains, specifically gold, diamonds, coloured gemstones, leather, and watch components, as detailed in the subsequent sections. Among others, these include supplier identification and validation through the Know Your Counterparty ('KYC') procedure and the Group's 'Red Flag Management System' following the OECD Guidelines. Country-level risk assessments utilise a CAHRA risk mapping tool and the United Nations Children's Fund (UNICEF) 'Children's Rights in the Workplace Index'. The internally available Group Responsible Sourcing Handbook details such risk management and due diligence methodologies.

In this respect, collective effort across the Group's supply chains is an enabler to foster continuous improvement. Please see the [Group's Non-Financial Report 2026](#).

6. RISK ASSESSMENT AND HUMAN RIGHTS DUE DILIGENCE

The Company has a zero-tolerance approach to modern slavery, and it is committed to acting with integrity in all its business dealings, benefitting from the Group's risk assessment and due diligence processes.

When it comes to supply chain management, the Group performs due diligence and risk management following a risk-based approach, considering the nature of the relationship with its suppliers corresponding to their risk profile. The SCoC outlines the requirements that suppliers and their subcontractors must comply with, including business ethics, labour and human rights, and environmental protection.

The Group endeavours to maintain reasonable control over social and environmental impacts within its supply chains through the implementation of certification and auditing standards. Suppliers are required to adhere to recognised certification systems, such as those of the Responsible Jewellery Council ('RJC') and the Leather Working Group ('LWG') as well as the International Organization for Standardization ('ISO') ISO 14001 and ISO 45001 standards and the Social Accountability International SA8000 standard.

When appropriate and depending on the results of risk assessments, supplier audits are conducted with defined plans based on the Sedex Members Ethical Trade Audit ('SMETA') methodology. For instance, Richemont has put in place a defined audit plan for its leather and textile supply chains, using the SMETA methodology. SMETA is an internationally recognised audit standard and evaluates all ESG dimensions of a company's operations, including labour rights, forced labour and child labour, health and safety, environmental impact, and business ethics within a supplier site.

Identification and validation of suppliers through the KYC procedure have been established to address money laundering and the financing of terrorism. It requires companies to identify every organisation that they deal with, to understand the legitimacy of their business relationships and, within reason, to identify and react to unusual or suspicious transaction patterns. This procedure is completed and signed by the supplier who must provide all necessary evidence and assurance. Tailored KYC procedures are applied to the minerals and metals supply chains.

The Group recognises that its monitoring, review and assessment of actions taken to both identify and address modern slavery risks in its operations and supply chain are part of an evolving process towards continuous improvement. It will continuously assess the effectiveness of its actions to contribute to the prevention of modern slavery and promotion of human rights. Its efforts to respect human rights are summarised in its [Group's Non-Financial Report 2026](#).

7. ENGAGEMENT, PERFORMANCE MONITORING AND GRIEVANCE MECHANISMS

Engagement with both internal and external stakeholders is fundamental to the Group's sustainability approach, which involves interaction with business partners, suppliers, civil society and industry stakeholders.

In FY26, Richemont launched a Group-wide campaign to promote awareness and understanding of its updated SCoC. This campaign is intended to support formal endorsement of the SCoC's principles by the Group's suppliers, including via signature, and to promote shared responsibility for responsible business conduct. The campaign was complemented by three webinars conducted with suppliers throughout the year.

As part of its due diligence and risk management processes, when social or environmental supply chain impacts are identified, these are assessed in terms of severity and likelihood, and consideration is given to a range of individual or collaborative measures to address them and, where appropriate, to further develop an understanding of supply chain-specific complexities.

Measures may include engagement with suppliers to support the adoption of preventive and corrective actions, including, where relevant, defined timelines and follow-up, as well as initiatives aimed at the continuous improvement of responsible sourcing practices, including best efforts to enhance traceability. Where appropriate, additional assessments or audits may be conducted to monitor implementation. Participation in industry platforms may also be considered to assist with further risk analysis, particularly where individual leverage may be limited due to supply chain or country-specific factors. Additionally, engagement with relevant industry standard setting bodies forms part of a broader approach to support the continued development of supply chain due diligence standards and methodologies. Engagement with civil society organisations can complement the spectrum of actions, enhancing insights into local context and informing targeted support.

The Group applies a combination of monitoring and risk-informed reviews to support assessment of due diligence processes, including prevention and mitigation measures. This encompasses periodic reporting of progress to management, including, where relevant, the tracking of identified impacts and remediation actions.

The Group maintains grievance mechanisms to identify and address potential impacts within its value chain. The Richemont 'Speak Up Platform' is an integral component of the Group's ethical framework. The platform allows employees and affected third parties to report any concerns via phone or online, with an option for anonymity. These reports are then escalated to the Group's Internal Audit function, which assesses concerns and forwards them to an appropriate impartial party for further investigation and resolution. All reports and follow-ups are recorded and documented through NAVEX, an independent external provider and global leader in compliance software, using its EthicsPoint Hotline and Incident Management platform, providing an audit trail that meets regulatory requirements. The platform is available in 13 languages to operating entities globally.

Individuals are encouraged to report concerns through the platform and information collected within a report is treated confidentially, except where disclosure is required by law or for investigatory obligations. The handling of personal data during this process, including the exchange or transmission of personal data to any competent authorities, is conducted in accordance with the Group Data Privacy Policy. Richemont maintains a zero tolerance policy regarding retaliation against anyone who reports in good faith or participates in an investigation.

The Group constantly learns from the reported concerns and endeavours to adapt its business practices accordingly. To ensure impartiality, the Speak Up reporting system is overseen by the Head of Internal Audit, who is independent from management and reports to the Chair of the Audit Committee, who is informed promptly on all significant matters raised. Any reported concern is assessed and investigated fully in accordance with the [Speak Up Policy](#).

For the Company, in FY26, no cases of modern slavery were reported through the Speak Up Platform.

8. TRAINING

Building internal knowledge and capacity on sustainability topics and standards aims to support the Group's response to the evolving market and regulatory landscape. Since the Richemont Sustainability Academy (the 'Academy') online platform was launched in FY24, it has offered a suite of courses and modules, as part of the Group-wide training programme. This programme provides upskilling resources to assist employees within the Group in acquiring relevant capabilities through targeted learning and development (L&D) opportunities.

The Academy's catalogue of training offers undergoes period review to align with the business' needs. Following the human rights training module 'Business and Human Rights at Richemont' launched in 2024, the training campaign was further rolled out across functions and regions within the Group, including the Company. Upon the development of an in-depth Human Rights Due Diligence training in FY25, it was further subsequently deployed during FY26 with the aim of building competencies and supporting greater understanding on the importance of human rights in their roles.

Additionally, eLearning modules on 'Modern Slavery & Human Trafficking' were introduced in August 2022. The training is available to all employees worldwide and it is mandatory for employees located in the UK amongst other countries.

Group-wide training is made available to promote the Speak Up Platform, which is designed to focus on the reporting of concerns and their handling.

Finally, the Group expects its employees to complete online training modules on the key topics addressed in the Group's Standards of Business Conduct. In FY26, Richemont launched a Group-wide campaign to promote awareness and understanding of its updated SCoC. The campaign is intended to support formal endorsement of the SCoC's principles by the Group's suppliers and to promote shared responsibility for responsible business conduct.

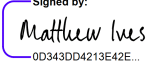
9. LOOKING AHEAD

The Company and the Group continue to use their best efforts to advance their human rights practices. In light of a continuous improvement approach, the Company and the Group aim to continuously refine and strengthen their human rights management system.

This Statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes the Company's Slavery and Human Trafficking Statement for the financial year ending 31 March 2026.

It was approved by the Board on 28 September 2026
Statement is accurate as of that date.

and the information contained in this

Signed by:
Signature: 
Name: Matthew Ives
Title: Chief Executive Officer
For and on behalf of
Alfred Dunhill Limited
Date: 28-Sep-2026 | 21:28 CEST