



Vivienne Westwood

Vivienne Westwood Srl – Whistleblowing Policy for Modern Slavery – Business Partners

1. Introduction

Vivienne Westwood Group is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable business partners to voice concerns in a responsible and effective manner.

The aim of this policy is to ensure that customers, suppliers, suppliers' employees and contractors are fully aware that they should report concerns or suspicions about any breach of Vivienne Westwood Modern Slavery Policy, wrongdoing, unethical practice or criminal acts within Vivienne Westwood Srl supply chain and be assured that any information received will be treated seriously, in line with best practice and applicable law, and as far as possible, confidentially.

The company Vivienne Westwood Srl adopted in the year 2021 the Organisational and Management Model pursuant to Legislative Decree no. 231/2001, i.e. Legislative Decree no. 231 of 8 June 2001, concerning the "Discipline of the administrative liability of legal persons, companies and associations, including those without legal personality". Therefore, this Whistleblowing Policy updates and replaces the previous version, which provided an attached Form as a mean of reporting any violation under the Modern Slavery Act and the law in force.

What should be reported

There is no predetermined and definitive list of what would be classified as wrongdoing, but examples include, although are not limited to, the following acts which you reasonably believe have or will take place:

- Abuse of workers' vulnerability (immigrant status, language barriers, existing debts etc.).
- Deception (false promises, misleading information etc.).

- Restriction of movement (surveillance, workers locked up, no exit visa etc.).
- Isolation of workers (workers are isolated in rural areas or not allowed to interact with the community).
- Physical or sexual violence.
- Intimidation or threats (threats of denunciation to the authorities, verbal and psychological abuses).
- Retention of ID documents.
- Withholding of wages (delayed payments, no control over bank accounts etc).
- Debt bondage (debt created by employer for a loan, excessive interests etc).
- Abusive living and working conditions.
- Excessive overtime.
- A criminal offence including fraud or theft.
- Bribery or corruption (e.g. accepting incentives in return for awarding business, or receiving benefit).
- Any failure to comply with a regulatory or legal obligation.

3. **How to report**

Reports of any breach of Modern Slavery Policy and suspected wrongdoing, unethical practice or criminal acts should be made to Vivienne Westwood Srl using the dedicated link below:

<https://whistleblowersoftware.com/secure/viviennewestwood>

and filling in the pre-set digital Report Form or by using oral recording of the report, which will be distorted to allow anonymity.

By accessing the link provided, you will find all the instructions on how to proceed with filling in and recording.

For effective communication of the reporting tool to your employees, we would kindly ask you to print this document and display it on your company bulletin board.

Anyone can easily access the tool by framing the following QR Code with their smartphone:



4. **Our response to reports**

Once a concern or incident has been reported, the Supervisory Board of Vivienne Westwood Srl, provided for by Article 6 of Legislative Decree 231, which is in charge of supervising the effectiveness, functioning and observance of the Model, as well as its updating, and the Board of Directors will carry out preliminary investigations together with the Supply Chain Sustainability Manager and will decide whether to proceed with further investigations. If necessary, it will be decided whether to conduct the investigation internally or whether the matter should be referred externally. Where possible, we will notify you of the outcome of any investigation.

Any customer, supplier, supplier employee or contractor who does report their genuinely held concerns will not be victimized or treated less favorably in any way as a result. However, deliberately raising false or malicious allegations is not acceptable and will be viewed extremely seriously.

Vivienne Westwood S.r.l.

Country Manager Italy

Giorgio Ravasio