

BYLAND U.K. LIMITED (TRADING AS "L.K. BENNETT")
SUPPLY CHAIN AND MODERN SLAVERY ACT STATEMENT 2019

This statement is drafted and published in accordance with section 54 of the Modern Slavery Act 2015. The statement is a summary of the steps taken to ensure slavery and human trafficking is not taking place in any part of our business or in our supply chain.

Introduction

Founded in Wimbledon in 1990, L.K. Bennett is a British accessible luxury brand defined by its cultural heritage; a love of vintage eccentricity, functionality and tradition with a desire for beautiful design and considered luxury.

We acknowledge and understand the severity of modern-day slavery and human trafficking. We take seriously our responsibility to make every effort to ensure that slavery and human trafficking is not within our business.

Who are we?

Byland UK Ltd. entered into an asset purchase agreement with L.K. Bennett Ltd. (in administration) on 12 April 2019. The parent company of Byland UK Ltd. is Ying Ling Kam Trading Company Limited (based in Hong Kong), a Chinese upmarket apparel group trading from over 1400 locations in China.

L.K.Bennett is a multichannel global retailer with over 100 stores, concessions and branded locations worldwide. Our vision is to be a Global leader that inspires modern, confident women through luxurious British Design. We employ circa 370 people and anticipate an annual turnover in excess of £60 million.

Byland UK Ltd. remains true to the origins of L.K.Bennett, offering exceptional quality in all we do. We are respectful of what our customer wants and expects from us; a stable supply base and well-established relationships with suppliers and manufacturers who share our business values.

Our unique selection of clothing, shoes and accessories all designed in our London-based head office and beautifully crafted across a network of 31 primary suppliers linked to 50 nominated manufacturing sites located in China, Bulgaria, India, Italy, Macedonia, Portugal, Romania, Spain, Turkey.

Our suppliers are carefully selected not only for the quality of their product development but for the standard of working practices that they provide and their reflection of our brand values.

Quality

We deliver an unrivalled and consistent level of excellence in everything we do, across all of our products, customer touch-points and interactions.

Respect

We respect our customers by delivering what they want and expect from us and even more.

We respect employees by encouraging an open and motivating work environment.

Authenticity

We articulate authenticity through genuine people, real design, honest service and by staying true to our values

Inspire

We want to inspire our customers and create an emotional connection with them.

We want to inspire our employees to want more and go further.

Our Modern Slavery Act. Policy

Byland UK Ltd. has adopted a Modern Slavery Act Policy that seeks to ensure that not only our business but our business partners and those within the supply chain operate a zero-tolerance approach towards slavery and human trafficking, recognising it is complex with multiple layers within a Global supply chain.

We are committed to working in collaboration with suppliers to encourage continual review, development, transparency and working towards best practice, in all our business operations.

We require all our final goods manufacturers to adhere to our comprehensive (contractual) Supplier Manual in which we confirm the importance of ethical business policies and practice requirements both in our own business and within our supply chain.

Our sourcing principles are based on the Ethical Trading Initiative (ETI) base code founded on the conventions of International Labour Organisation (ILO) an internationally recognised code of labour practice, designed to be fair and achievable, covering the principles of international law for best practice in rights at work: no child labour, no forced labour, no discrimination, the right to freedom of association and collective bargaining, wages, working hours, communication of employment, health and well-being setting a minimum requirement for suppliers and associated manufacturing sites to demonstrate Corporate Responsibility wherever in the world we are operating.

Due Diligence Processes

We acknowledge the greatest exposure to slavery and human trafficking lies within our supply chains. In order to mitigate and manage the risks we have continued to focus on open communication and transparency across our supply base, with continual mapping of our primary suppliers and associated product manufacturing sites.

All first-tier suppliers are required to declare policies and practices within the nominated manufacturing sites to demonstrate they meet the minimum standards set out in our Code of Conduct. These include:

- Employment Ethics
- Health & Safety Practices
- Environmental Practices
- Animal Source Material Ethics

We know that any genuine and thorough assessment will inevitably reveal incidents of non-compliance and where breaches are identified, we work closely with our supplier and/or the manufacturer to improve standards recognising the need for education and assessment both in our business and those who supply us with goods and services. We are investing time and resource to support our supplier/manufacturers.

When we introduce a supplier/manufacturer we do so follow the sourcing principles below:

- 1) All proposed Suppliers must be met in person at Byland UK Ltd. Head Office or alternatively in the country of manufacturer.
- 2) All proposed Suppliers are to be registered onto our supply base and accounts systems. In order to do so all Suppliers must complete a: Supplier & Factory set-up Form; a Factory minimum standards Self-Evaluation Form and provide a copy of a recent independent IRCA social compliance audit report which is conducted in compliance with the legislative requirements where in the world the manufacturing operates. These documents are reviewed by a senior member of the Byland UK Ltd. Technical team and discussed with Head of Buying and the proposed supplier.
- 3) All suppliers are issued with Byland UK Ltd. Supplier Terms and Conditions forming part of the Supplier Manual during initial discussions outlining our full terms and conditions of engagement including the code of conduct and business policies by which we operate.
- 4) Suppliers are asked to sign an agreement of compliance to our principles and responsible sourcing code of practice (please refer to the Code of Conduct), prior to the confirmation of production commitment.

Once we begin a relationship with a supplier, our Design, Buying and Technical teams visit the supplier/manufacturing site to build strong and trusting working partnership. We maintain an on-going dialogue and process to remedy any identified breaches and improve business policies and practices.

We are working with suppliers to assess the management of manufacturing lead times within our critical path to avoid situations where excessive overtime may be required in producing our orders. Our aim is to ensure that all workers in our supply chain are protected from pressure and duress.

We recognise that all our supplier/manufacturers represent a valuable source of employment for often vulnerable individuals and it is to everyone's benefit to improve the standards of under-performing facilities rather than walk away where concerns are identified. We reserve the right to report offending organisations, cease supply and terminate our contract where a supplier does not address the issues raised.

Upcoming actions to prevent slavery and human trafficking

With the support from our CEO and Leadership team we will affirm our zero tolerance towards slavery and human trafficking to all our service providers and suppliers. Department Heads from Design and Buying, Merchandising, Technical, Logistics, Marketing, Property and Human Resources are responsible for disseminating Byland UK Ltd.'s position on slavery and human trafficking to their relevant staff and stakeholders.

We acknowledge that the problem of slavery and human trafficking is complex and recognise that the risks are not static. We are committed to preventing slavery and human trafficking; we will continue to assess the efficacy of our current actions and measure progress on an annual basis.

This statement has been approved by the Board of Byland UK Limited and its Chief Executive Officer,
Mr Darren Topp ^{27th} September 2019

Signature:



Date:

27/9/19.

If you have any concerns or questions regarding our MSA statement, please contact Byland UK Ltd. Head of Technical and Creative Development, Lynette Bradford: email lynette.bradford@lkbennett.co.uk