



WASH

MODERN SLAVERY AND
TRANSPARENCY IN THE
SUPPLY CHAIN STATEMENT



CONTENTS

INTRODUCTION	04
STRUCTURE, BUSINESS, AND SUPPLY CHAINS	05
STRATEGY AND GOVERNANCE	08
POLICIES AND CONTRACTUAL AGREEMENTS	09
RISK MANAGEMENT, SUPPLY CHAIN MONITORING AND DUE DILIGENCE PROCESSES	12
TRAINING AND AWARENESS BUILDING	14
PROGRESS	16

INTRODUCTION

Modern slavery is a broad term that includes exploitative labour practices involving coercion, control, and loss of freedom. It occurs when people are forced to work against their will for the benefit of others under threats of punishment or harm. This includes forced and compulsory labour, bonded labour, child labour and human trafficking.

The number of people affected by modern slavery has increased in recent years, impacting every region of the world, with current estimates suggesting approximately 28 million people globally are victim to forced labour. Crises including conflict, and climate change disruption, employment and education, increasing cases of extreme poverty and forced migration, lead to the increased risk of all forms of modern slavery.

At Dr. Martens, we hold ourselves and our global supply chain partners to high ethical standards. We have a zero-tolerance approach to modern slavery, and we are committed to playing an active role in addressing this issue. As a global organisation, we recognise our responsibility to promote transparency and drive meaningful change. Each year, we outline our strategies to prevent, identify, and respond to forced labour, focusing on supply chain traceability, education, and collaborative action.

This statement covers Dr. Martens plc and other Group companies which are in scope (and together are referred to as “Dr. Martens”) and is made pursuant to section 54 of the Modern Slavery Act 2015, California Transparency in Supply Chains Act of 2010 (SB 657) and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act, SC 2023 (authorized in accordance with subsection 14(4)(b)(ii)).

This statement relates to the Dr. Martens fiscal year from 1 April 2024 to 31 March 2025. All actions outlined took place during this period unless stated otherwise.

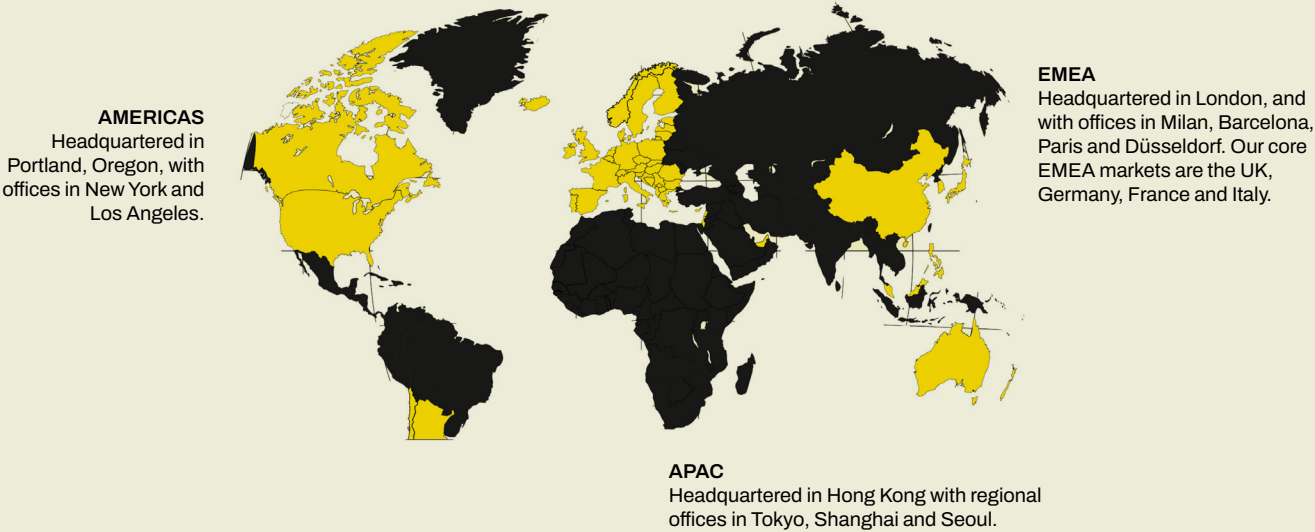
STRUCTURE, BUSINESS, AND SUPPLY CHAINS

10.5m	2,348	£787.6m
PAIRS SOLD (FY25)	EMPLOYEES (FY25)	BUSINESS REVENUE (FY25)

Dr. Martens is an iconic, global footwear brand. We make boots, shoes, sandals and accessories, which we sell through our direct-to-consumer (DTC) channel via our ecommerce platforms and our stores, and through our business-to-business channel via wholesalers and distributors. We create durable and timeless footwear which are worn by a diverse consumer base. Our iconic, global brand, together with our high quality and unique product are the equity that drives sustainable, long-term growth.

WHERE WE OPERATE

We are a global business and operate a regional model.



We operate through two main channels: Direct-to-Consumer (DTC) and Wholesale. The DTC channel includes our ecommerce websites, which serve most of our markets, along with 239 company-operated retail stores worldwide. The Wholesale channel consists of sales into wholesale accounts, together with country distributors and franchised store models.

We employ 2,348 people (FTE) who are based in our stores, offices, factory and distribution facilities all around the world. Our priority is to provide fair and safe working conditions for all our employees, and to foster an environment where each member of our global team feels inspired to reach their full potential and do their life’s best work.

OUR PRODUCT GLOBAL SUPPLY CHAIN

Our global supply chain tiers are defined in the following way

TIER 1	KEY TIER 2	TIER 2
A supplier which manufactures or assembles finished products (e.g. footwear, accessories, shoe care and outsole suppliers).	A supplier that produces a strategic component (e.g. tanneries).	A supplier that produces other components.

TIER 1

Our products are manufactured through a global network of Tier 1 suppliers based across Asia and Europe. We also operate one owned manufacturing facility in the UK, which produces our Made in England range .

We value strong long-term relationships with our Tier 1 suppliers and have worked with some for decades. As of the end of FY25, we had 27 active Tier 1 supplier factories: 11 footwear, 9 accessories and shoe care, and 7 outsole factories (which are classified as Tier 1 because soles are supplied for shoe repair). All Tier 1 suppliers have been fully mapped, and we publish our Tier 1 factory list on our corporate website, updating it approximately every six months.

We also hold regular Tier 1 supplier conferences, led by our Chief Operating Officer (COO), which focus on open communication and the exchange of information. These sessions foster a culture of trust and transparency, while helping us gain deeper insight into the challenges our suppliers face. Ongoing dialogue around corporate social responsibility (CSR) topics, including our expectations around high social and labour standards, is maintained throughout the year and reinforced during these conferences.

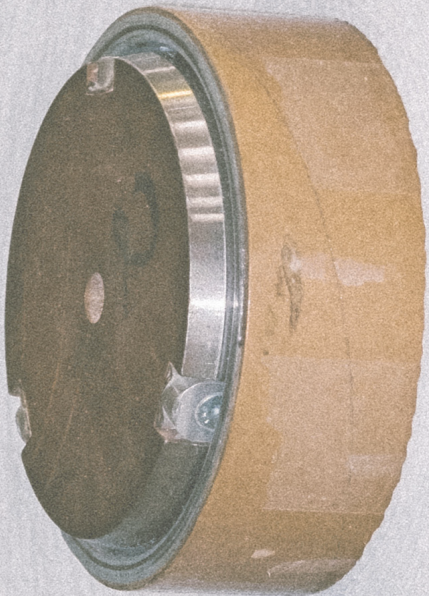
We also directly engage with Key Tier 2 suppliers who produce our strategic materials including leather and PVC outsole granulate. We have visibility of all key component suppliers and nominate our preferred Key Tier 2 and Tier 2 suppliers. Our top materials sourced by volume are leather, outsole granulate and packaging materials.

LOGISTICS

We operate with nine core distribution centres (DCs) across the EMEA, Americas, and APAC regions. One, in the UK, is owned and operated directly by us, while the others are third-party operated. Temporary workers at all DCs are engaged through labour agencies. For our UK-operated DC, we work with a trusted partner to recruit temporary workers during peak trading periods.

NON-PRODUCT SUPPLIERS

We also work with non-product third party suppliers that support our wider business. These include suppliers for goods not for resale, service providers, consultants and technology providers. For more on the due diligence processes we follow for our suppliers, see page 12.



STRATEGY AND GOVERNANCE:

HUMAN RIGHTS IS A KEY FOCUS AREA OF OUR SUSTAINABILITY STRATEGY

Human rights remain a key focus within our Planet, Product, People sustainability strategy, forming an integral part of the People pillar. The strategy addresses both environmental and social priorities across eight focus areas, aligned with Dr. Martens' material sustainability issues. Strategic sustainability initiatives, such as resale, repair, and the adoption of sustainable materials, are embedded within our broader business strategy to drive company-wide integration. For more information, please refer to our latest Annual Report.

GOVERNANCE

The Board is ultimately responsible for the oversight and integration of ESG-related issues and activities across the business. The Chief Operating Officer (COO) is accountable for supply chain human rights and the Chief People Officer (CPO) is accountable for human rights across our own operations.

Global Supply Chain Team: Our Global Supply Chain Team has representatives based across key manufacturing countries. They conduct regular supplier visits, working closely with the CSR team, to collaborate directly with suppliers to provide ongoing insights and support.

CSR Team: Our dedicated CSR Team oversees ethical trade and human rights due diligence in the product supply chain. Based near key sourcing locations, they collaborate closely with suppliers to quickly identify and resolve issues, including corrective action plans. During FY25, members of the team educated Tier 1 suppliers on CSR topics including Dr. Martens CSR strategic approach, CSR industry news and trends. The COO chairs regular reviews with the CSR team of supplier audits to ensure high ethical standards and address any non-conformities.

Sustainability Team: Dr. Martens has a team of internal sustainability experts who have the required skills and knowledge to support decision-making on environmental and social issues. They are also responsible for embedding and championing the strategic sustainability projects throughout the business. During FY25, they attended the Sustainability Committee meetings and Working Groups to provide specialist expertise when required.

The sustainability governance structure can be found on page 79 of the FY25 Annual Report.

POLICIES AND CONTRACTUAL AGREEMENTS

Our policies and supply chain management processes help ensure supplier compliance with our business standards. Human rights and modern slavery policies are reviewed by relevant teams including Legal, Compliance, HR, Global Supply Chain and Sustainability. They are developed through a multi-stakeholder approach, and are aligned with international standards and industry best practices.

POLICIES FOR SUPPLIERS

Supplier policies are translated and shared with suppliers in relevant local languages, with select policies also published on our plc website.

MASTER SUPPLY AGREEMENT

Our Tier 1 suppliers sign our Master Supply Agreements (MSA). The MSA is a collection of contractual agreements we require our Tier 1 suppliers to comply with, such as our Supplier Code of Conduct & Workplace Standards and Migrant Worker Policy. Suppliers are expected to apply these policies to their permitted subcontractors and suppliers. We also engage with Key Tier 2 suppliers to confirm their adherence with our policies.

SUPPLIER CODE OF CONDUCT & WORKPLACE STANDARDS

Our Supplier Code of Conduct sets out our expectations for our suppliers on the treatment of their workforce. It is based on international conventions including the Ethical Trade Initiative (ETI) Base Code and conventions of the International Labour Organisation (ILO Conventions).

MIGRANT WORKER POLICY

The risk of becoming a victim to forced labour is three times higher than the average for migrant workers. Our Migrant Worker Policy sets out our expectations on the treatment of migrant workers. It is based on international best practices and the Dhaka Principles, which were developed by the Institute of Human Rights and Business (IHRB) and addresses specific issues migrant workers may face.

RESPONSIBLE PURCHASING PRACTICES CHARTER

Last year, we developed our Responsible Purchasing Practices Charter. Purchasing practices refer to the importance of commercial buying practices and supply chain management. Good purchasing practices act as a safeguard for the fair treatment of workers and provide a healthy work environment and business relationship. The charter was developed following a review of our current practices, processes and policies, as well as both internal and supplier interviews. The Charter covers topics such as planning, fair costing and communication. As part of this pledge, we have visibility of labour costs to ensure workers are paid fairly by our suppliers. Further details can be found on our corporate website.

POLICIES FOR EMPLOYEES

All Dr. Martens’ policies are accessible to employees via our policy hub and are translated into relevant languages. The compliance training platform enables consistent, global distribution of policies and training, along with real-time tracking and targeted follow-up where needed.

HUMAN RIGHTS POLICY *NEW*

A third party assessment of our human rights due diligence procedures recommended the development of a Global Human Rights Policy. To ensure its effectiveness, we partnered with Slave-Free Alliance (SFA) to conduct a review and benchmarking exercise. SFA is a social enterprise specialising in supporting businesses to tackle labour exploitation. The policy aligns with the UN Guiding Principles on Business and Human Rights (UNGPs), relevant ILO Conventions, and the ETI Base Code.

THE POLICY COVERS:

- + Prohibition of Forced and Child Labour
- + Non-Discrimination and Equal Opportunity
- + Freedom of Association and Right To Collective Bargaining
- + Safe and Healthy Working Conditions
- + Fair Wages and Benefits
- + Work-Life Balance
- + Speak Up
- + Training and Development
- + Privacy and Confidentiality
- + Respecting and Protecting the Environment and a Just Transition

The policy applies to all Dr. Martens employees globally and was developed by the Sustainability, HR, DE&I, Global Supply Chain and Legal teams with independent third-party review by SFA. The policy has been translated into all relevant global languages and set for roll out to employees in FY26.

BUSINESS CODE OF CONDUCT

Our global business Code of Conduct, the ‘DOCtrine’, sets clear expectations for employee conduct, including human rights awareness. It is shared with all new employees during induction and is accessible via our internal policy hub and corporate website.

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy outlines employee responsibilities under the Modern Slavery Act and related laws on forced and child labour.

‘SPEAK UP’ WHISTLEBLOWING POLICY

Our confidential Speak Up hotline allows employees to report concerns, including those related to human rights or modern slavery. The Global Compliance team oversees all reports and follow-up.

OTHER KEY POLICIES

Additional relevant policies include our Global Health and Safety Policy, Global Sanctions Compliance Policy, and Third Party Due Diligence Process.

RISK MANAGEMENT, SUPPLY CHAIN MONITORING AND DUE DILIGENCE PROCESSES

The following due diligence tools demonstrate the mechanisms we use to uphold our commitments to human rights:

- + Supplier and employee policies and contracts
- + Group risk management framework
- + Third Party Due Diligence Process
- + New markets risk assessment and approval process
- + Supplier onboarding and self-assessment questionnaires
- + Supplier CSR monitoring programme including Corrective Action Plans
- + Employee and supplier engagement, training, and workshops

HUMAN RIGHTS RISK MANAGEMENT

Environmental, Social and Governance (ESG) risks are integrated into Dr. Martens' broader risk management framework, and are subject to the same governance, annual review process and management attention as other risks recorded on our Group Risk Register. Further detail on our risk management framework is on page 36 of the FY25 Annual Report.

During FY25, we developed a Global Human Rights Policy for our business with third-party input and benchmarking from Slave-Free Alliance. This was identified as a gap in an assessment of our management approach for human rights risks (see page 10). We also investigated how we can build upon our due diligence processes to capture more in depth and regular risk assessments of all third party suppliers we engage with. This is an ongoing piece of work we plan to develop over the coming years.

In FY25, we traced 97% of our leather back to the abattoir, enhancing visibility over potential social and human rights risks in the upstream supply chain. This included extensive collaboration with, and input from, our tannery suppliers. We also traced a small volume of leather back to the farm level. While limited in volume, this marked a positive step forward in our traceability efforts, which we aim to continue to improve each year. More information on this project can be found in our FY25 Annual Report on page 62.

NEW MARKET RISK ASSESSMENT

Before sourcing products from a new country, we conduct a thorough risk assessment covering human rights, forced labour, and other key issues. Identified risks are prioritised, with mitigation plans included in proposals reviewed at Board level.

THIRD PARTY DUE DILIGENCE PROCESS:

For product and non-product suppliers which meet certain risk-based thresholds, a third party due diligence procedure is conducted. The level of due diligence implemented depends on factors such as location, activities and contract length and value, and is aligned to international standards. The process involves a Vendor Risk Assessment, compliance screening, Data Protection Impact Assessment and contract review (where applicable). This process involves teams across the business including Global Security, Compliance, Data Protection, and Supply Chain, with support from Legal. The screening flags legal violations, including those relating to human rights violations.

PRODUCT SUPPLIER ONBOARDING

Product suppliers undergo an onboarding process managed by the Global Supply Chain Team that includes various stages such as a self-assessment questionnaire, a qualifying third-party audit, and site visits to ensure they meet our standards before production begins.

PRODUCT SUPPLIER CSR MONITORING PROGRAMME

We operate an ongoing CSR monitoring programme covering all Tier 1 and selected Key Tier 2 factories to identify and address human rights and modern slavery risks. This programme is managed by our Global Supply Chain Quality and Compliance Team, comprised of experienced CSR professionals.

Audits are conducted using the Workplace Conditions Assessment (WCA) protocol by Intertek, our specialist third-party partner. The WCA assesses compliance with labour and environmental laws, industry standards, and our Supplier Code of Conduct. Audit frequency is based on performance, with follow-up checks to verify completion of corrective action plans. Should a supplier fail to remediate issues identified by an audit, the supplier partnership is reviewed and may be ended. We also engage with trade unions where necessary to resolve concerns.

In FY25, all Tier 1 suppliers were audited, and all met our high WCA standard (score $\geq 75\%$). We also audit our authorised repair and resale partners to the WCA protocol, to ensure they also meet our ethical standards. Certain Key Tier 2 suppliers are also audited under the WCA audit protocol, including tanneries, PVC granulate, and welt factories. All Key Tier 2 audited achieved our highest expected standard for Key Tier 2 suppliers (score $\geq 70\%$). No instances of forced or child labour were identified in our supply chain during the year. More information on the WCA protocol is available on our corporate website.

TRAINING AND AWARENESS BUILDING

EDUCATION AND COLLABORATION

Education is central to our approach to addressing modern slavery. All employees have access to a bespoke e-learning module on Forced Labour and Ethical Trade, covering types of modern slavery, how to identify risks, and how to respond to potential cases. Awareness of human rights and modern slavery is also embedded into our employee onboarding, which includes an overview of our supply chain due diligence processes.

Team members also attend human rights related events to stay up to date on regulatory updates and industry news. For example, members of the Sustainability Team attended the British Retail Consortium event in March 2025 regarding the publication of the new guidance document 'Transparency in supply chains: a practical guide' by the UK Government. Following this event, the team reviewed Dr. Martens' FY24 Modern Slavery Statement using the guidance, identifying existing strengths and areas for improvement to align with best practices.

HOW DR. MARTENS FOUNDATION PARTNERSHIPS ARE TACKLING MODERN SLAVERY

The Dr. Martens Foundation is an independent charity that exists to back the right to be yourself. This includes tackling injustices like modern slavery that stop people from living freely and fully as themselves.

During FY25 the Foundation continued to partner with STOP THE TRAFFIK and A21 – two causes dedicated to combatting human trafficking.

The Foundation's funding helped STOP THE TRAFFIK (STT) use lived-experience data to identify trafficking routes, hotspots, and at-risk communities – helping them to put a stop to exploitation before it happens. They supported 12 organisations to collect, clean, and share data to uncover more key patterns and emerging trends. They were also able to establish new long-term data-sharing partnerships with frontline NGOs, strengthening the sector's collective intelligence on trafficking.

STT also strengthened the work they do to target prevention in one of the UK's most vulnerable communities to trafficking – the Albanian community. They translated and promoted their STOP APP to better capture and understand Albanian victims' experiences, and delivered bespoke safety information to Albanian nationals through social media to help reduce risk.

The A21 Campaign seek to eradicate human trafficking through awareness, intervention and trauma-informed holistic aftercare for survivors. As the threat of human trafficking across the globe continues to grow, so does the need for victim-centred support and suitable independent accommodation options to reduce a survivor's vulnerability to re-trafficking.

A21's Freedom Centres provide survivors with a safe place of acceptance as well as supportive services aimed at empowering, rehabilitating and reintegrating them into society. The focus is to strengthen their independence and reduce victimisation. The three-year grant, first awarded in 2023, supports A21 in keeping their Freedom Centres and other survivor services running, enabling them to reach more survivors trying to break the cycle of human trafficking.



PROGRESS

This is a summary of the actions we have taken since the last Modern Slavery Statement and the areas we plan to focus on next.

AREA	PROGRESS SINCE LAST STATEMENT	NEXT STEPS
+ MAPPING THE RISKS IN OUR SUPPLY CHAIN AND OPERATIONS	+ Developed a specific traceability mapping system for leather to monitor risks and opportunities across our supply chain, tracing 97% of leather to the abattoir and a small volume to the farm.	+ Continue to improve material traceability to monitor risks and opportunities across our supply chain.
+ EDUCATION AND TRAINING	+ Developed Global Human Rights Policy for our employees. + Continued to offer bespoke e-learning training module on Forced Labour and Ethical Trade to all our employees.	+ Roll out Global Human Rights Policy, adapt for suppliers.
+ EXPAND AND IMPLEMENT BEST PRACTICE DUE DILIGENCE	+ Continued to monitor all Tier 1 suppliers and select Key Tier 2 suppliers with third-party CSR audits.	+ Roll out internal Human Rights Policy and continue to review and develop due diligence processes for all supplier types.
+ COLLABORATION AND PARTNERSHIPS	+ Conducted supplier engagement to develop and finalise Purchasing Practices Charter.	+ Continue to engage suppliers and employees on human rights issues through training and workshops.



Additional information about our sustainability strategy can be found on our website:
www.drmartensplc.com/sustainability

This statement was approved by the Board on 25 September 2025 and signed on its behalf by Ije Nworie, CEO

DR. MARTENS



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