



MODERN SLAVERY STATEMENT 2024/25

This statement is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act SC 2023*. This statement constitutes the slavery and human trafficking statement for Specsavers Canada Inc. (“Specsavers”) and all its subsidiary companies for its financial year 2024/2025. The board of directors of Specsavers have approved this statement.

INTRODUCTION

Specsavers is committed to acting responsibly, trading ethically, and ensuring that the people involved in providing our products are safe, healthy and free from human right abuses.

As part of the Specsavers group of companies, of which Specsavers International Healthcare Limited is the parent company (known as the “Specsavers Group”), Specsavers remains committed to playing its part locally towards preventing and mitigating risks of modern slavery throughout the entire global business and supply chain.

This Modern Slavery statement outlines the upcoming plans and commitments that the Specsavers Group as a global business has made towards preventing and mitigating risks of modern slavery throughout the business and the supply chain. The Specsavers Group continues to broaden its understanding of modern slavery risks, strengthen due diligence processes and increase transparency of reporting, whilst also embedding knowledge and understanding of human rights across the global teams. The Specsavers Group continues to focus and continually advances the business efforts in tackling modern slavery.

OUR BUSINESS AND GLOBAL SUPPLY CHAIN

The Specsavers Group includes subsidiaries which are, or support, optical retail outlets, audiology stores and domiciliary partnerships throughout the UK, Republic of Ireland, Northern Europe, Spain, Canada, Australia, and New Zealand, as well as Specsavers Group owned manufacturing and distribution sites.

The Specsavers Group has more than 40,000 employees across Guernsey, UK, Republic of Ireland, Netherlands, Denmark, Finland, Sweden, Norway, Spain, Hungary, Canada, Australia, New Zealand, Shanghai, and Hong Kong.

As a retailer, the product supply chains are extensive and global; the Specsavers Group sources more than 3,500 products from more than 20 countries.

The Specsavers Group takes the obligations to combat modern slavery and to trade ethically very seriously, with a dedicated team of experts supporting risk assessment and due diligence activities.

The global supply chain is predominantly managed out of the Specsavers Group’s UK and Hong Kong operations on behalf of the entire Specsavers Group (including its Canadian supply chain). Approximately 99% of the Canadian product portfolio is sourced by the global supply chain which therefore requires a global and consistent approach to tackling modern slavery risks and changing demands. A dedicated team of experts (the Regulatory and Compliance teams) supports risk assessment and due diligence activities for supplies to the Specsavers Group.

OUR APPROACH

As a people-oriented business, the Specsavers Group takes the welfare of its customers, employees and value chain workers very seriously and is committed to creating positive working environments that place people at the front and centre of its operations. With this as a backdrop the Specsavers Group aims to create and maintain strong, long-term relationships with suppliers, many of whom the Specsavers Group has worked with for decades.

The Specsavers Group uses well recognised ethical principles to ensure that the work being done with suppliers is centred on safeguarding people within our value chain. To verify that these principles are being adhered to, the Specsavers Group regularly audits product suppliers based in territories that do not operate in globally recognised regulatory environments. The audits are structured to identify non-compliance on issues such as, employment being freely chosen, reasonable working hours and safe and hygienic work environments. The Specsavers Group also carries out checks to ensure that child labour is not used and that employees are treated fairly with no discrimination or rights violations, both within the global operations and in the supply base.

This year the Specsavers Group has joined SEDEX in order to strengthen and further formalise the approach to ethical trading. This represents a step forward in the Specsavers Group's commitment to ensuring that all suppliers are formally risk assessed and audited where classified as high risk. The SMETA-4 audit standard is used globally by retailers and other businesses to deliver a consistent assurance on ethics and human rights. In the coming year the Specsavers Group aims to onboard all of our product suppliers onto this system which will give the Specsavers Group significantly better visibility of workers in our value chain.

There is no place for illegal, unethical, or unprofessional conduct within the Specsavers business. We encourage all colleagues to speak up and report if they become aware of any activity that is not consistent with the Specsavers vision and values, and have a whistleblowing policy to protect those who report such activity. Since 2011, the Specsavers Group has reported on activity, business plans and progress relating to reducing modern slavery risk in the Specsavers Annual Review. As part of this reporting and commitment, practices, and procedures to progress and enhance the ethical trading activities, improvement of the transparency of reporting, and training within each region and area of the business continue to be developed.

IDENTIFYING AND MANAGING RISKS

POLICIES AND CONTROLS

The Regulatory and Compliance teams continue to focus on ensuring that global operations are free of unethical practices and the Specsavers Group continues to make the processes more robust in this area. The Specsavers Group requires suppliers to adhere to the Specsavers Global Ethical Trading Policy or have their own equivalent standard and checks in place. Specsavers retains the right to independently audit compliance with these principles and requirements. New suppliers in the product sourcing category are required to undergo a risk assessment process and a third-party audit. Alongside this, the Specsavers Group carries out additional compliance checks, all of which must be completed and approved before production is commenced.

Throughout the relationship with the supplier, functional leaders are supported by the Regulatory and Compliance teams to embed compliance activity into their commercial decisions and supplier performance discussions.

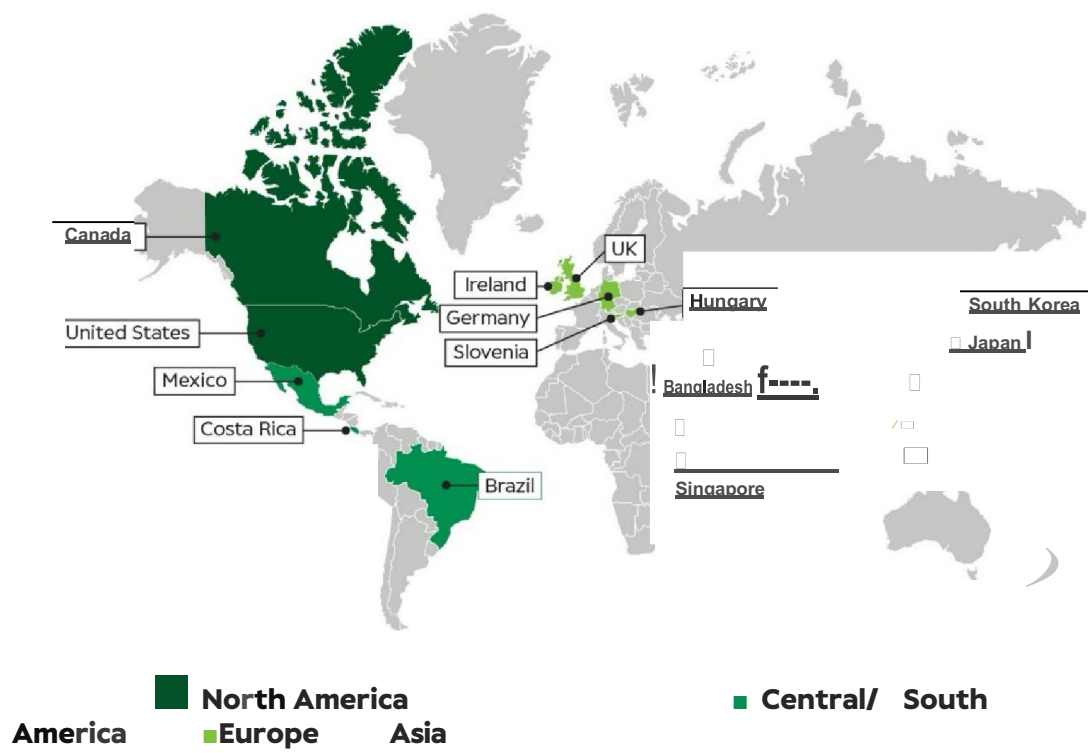
After undergoing an initial third-party audit, these suppliers join the global monitoring programme and are each independently audited every two years (as a minimum). The audits focus on risks associated with modern slavery and human trafficking, including the occurrence of passport retention, illegal documentation, the right to work, illegal deduction of wages, child labour, forced labour, excessive hours of work and illegal subcontracting. Where any of the Specsavers Group suppliers outsource major components to a second-tier supplier, it is paramount that the suppliers pass the Specsavers Group policy to them, and that monitoring is ensued.

Where there is a concern as a result of any audit, the supplier is immediately given a corrective action plan (CAP) and a timetable within which to take remedial action. If the supplier fails to take the required remedial action, the Specsavers Group maintains the right to reduce, withdraw or (if a new supplier) withhold business.

INCREASING TRANSPARENCY

The Specsavers Group is focused on increasing transparency across its supply chain and overall business. The Specsavers Group works with over 70 suppliers and 200 factories in 20 countries and is committed to delivering the highest standard of products to every single Specsavers customer. Therefore, understanding where products are sourced and made, and the risks inherent across the supply chain operations, is an essential part of due diligence undertaken.

The product origins for the Specsavers Group are represented on the sourcing map below. Primarily the products come from globally recognized regulatory environments or factories situated in low and medium- risk countries. The activity in the countries which the Specsavers Group source product from is continually monitored to ensure that slavery and human trafficking does not exist within the Specsavers supply chain.



GOVERNANCE

As part of the approach to global supply chain governance, the Specsavers Group now has a team dedicated to onboarding suppliers to the SEDEX platform and monitoring ethics performance. In addition to formal audits, key members of the Specsavers Group supply chain team regularly undertake onsite factory visits. During 2024, members of the Specsavers Group had over 250 planned visits into China and Asia collectively, and any action required by the suppliers visited, is or shall be reported into the ethics governance process.

The Specsavers Group has formalised the ethics governance process, with issues and non-compliances forming a standing agenda item at quarterly, operating board level meetings. Where non-compliances are not able to be resolved by the Regulatory and Compliance teams, our supply chain board are responsible for ensuring that these form part of a discussion with suppliers. The preference is always to work with suppliers to resolve issues that support them in ensuring that their employees' rights are protected.

A key part of the Specsavers Group's governance process is to ensure that the product directors of the business consider the ethical status of our suppliers and have responsibility for communicating our requirements where issues are identified. This process allows the Specsavers Group to use commercial leverage if it is required, whilst avoiding a cut and run approach to supplier relationships.

SUSTAINABILITY: SOURCING RESPONSIBLY

Sourcing responsibly is integral to the way we operate. The Specsavers Group works to ensure that the people who make our products have safe and healthy workplaces, where human and civil rights are respected. We also require our suppliers to take the necessary steps to protect the environment.

The Specsavers Group remains committed to our Global Ethical Trading Policy to ensure regular, independent audits of all our major suppliers who do not operate in globally recognized regulatory environments. However, we recognize a need to continuously evolve and enhance how we manage ethical and sustainability risks in our supply chain. As such, the Specsavers Group has begun the transition of its supply base onto the SEDEX platform. 105 supplier sites have been onboarded to date as at the date of this statement, giving us increased visibility of ethics within our supply chain.

Alongside this ongoing piece of work, the Specsavers Group is developing a comprehensive risk assessment process to allow us to evaluate risks to human rights across our extended value chain. This work is expected to complete in the second half of 24/25 allowing the business to risk assess the operations full value chain next year.

The Supplier Code of Conduct lays out our expectations of our suppliers which are aligned with, amongst other topics, The International Labour Organisation's Declaration on Fundamental Principles and Rights to Work. To date, the Specsavers Group Supplier Code of Conduct has been issued to and accepted by the businesses top 75 suppliers, representing 65% of our spend on products and services.

TRAINING AND AWARENESS RAISING

Specsavers recognizes the importance of training, raising awareness and embedding knowledge and understanding of human rights, ethical standards and risks across the business. The Specsavers Group has developed training tools for its employees, including whistleblowing training to raise awareness about reporting activity. Through forming strong relationships and partnerships with product suppliers, Specsavers continues to raise awareness and undertake discussions as to the continued implementation of preventative measures including audit processes, improved policies and agreeing on the

standards expected.

OUR PROGRESS

During 2024/25, we continued to invest in, and develop, our people to ensure appropriate skills and resources were in place to deliver the Strategic Plans in relation to regulation and compliance. The global team has grown and subject matter experts have been recruited and are dedicated to each element of the long-term plan.

Specsavers Canada has:

- Identified the opportunity to deliver targeted forced/child labour training in its local distribution centre in Canada and conducted training sessions on site, discussing the risks of forced and child labour and reinforcing the importance of continued compliance, providing resources and tools for future reference

The Specsavers Group has:

- following the launch of its Supplier Code of Conduct, engaged with and received commitment from the business' top 105 suppliers across goods for resale (GFR) and goods not for resale.
- completed 94 supplier audits for suppliers across the product categories. These audits ensure compliance with our social and environmental standards and adherence to regulatory requirements, enabling long-lasting improvements to be achieved;
- become registered members of SEDEX, as part of its commitment to ensuring good working conditions within the supply chain. The ethical and environmental data platform will allow the Specsavers Group to report more transparently on suppliers' performance, identify risks more accurately and therefore focus the teams' efforts accordingly;
- onboarded 105 manufacturing sites onto SEDEX and has started the process of mapping its full value chain. The Specsavers Group has consulted with key suppliers to better understand which ethical and sustainable standards and practices they have in place;
- begun inserting sustainability related contractual clauses into new agreements with suppliers. These enable the implementation of measurements and reporting on environmental targets;
- formalised its governance of ethics across the supply chain, ensuring that senior directors up to executive board level are informed and involved in decision making on ethics and human rights issues.

OUR PLANS

In 2025/26, the Specsavers Group will remain committed to being ethical and sustainable across our business and making a positive difference by:

- Ensuring a robust approach to human rights and ethical risks. Working with independent auditors, as well as the introduction of our new systems, enables us to conduct risk assessments and proactively rectify any non-compliance of our policies
- Continuing to embed the Specsavers Group's Supplier Code of Conduct which sets out the behaviours and standards that suppliers must always demonstrate when

working with us;

- Ensuring that all of our product suppliers are audited and onboarded onto SEDEX and CAPs in place where required
- Carrying out risk assessment of our wider value chain to identify further areas of ethics and human rights risk
- Continuing to educate the global business' colleagues on areas of risk within the supply chain and how to identify and manage them
- Working collaboratively with our product suppliers to identify opportunities to share best practice and to drive improvements
- Identifying areas where the business needs to engage third party organizations and NGO's to build our knowledge of developing human rights risks
- Continuing to evolve and adapt our sustainability related contractual clauses to keep up with changing targets, expectations and regulatory requirements;
- Engaging stakeholders within our value chain to identify areas for improvement.

MEASURING OUR PROGRESS

The Specsavers Group has committed to adhering to the following key performance indicators to measure the effectiveness of steps taken to tackle modern slavery and human trafficking in the global business

- all scheduled audits completed with Corrective Action Plans (CAP) in place and actioned within appropriate timeframes; and.
- quarterly board reporting on identified risks of modern slavery and ethical compliance

This statement is made pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act SC 2023 (the "Act")

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Specsavers Canada Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. The board of directors of Specsavers Canada Inc. have approved this statement.

Entities owned or controlled by Specsavers Canada Inc have been consulted in and approved this statement.



Bill Moir, Managing Director, as authorized
signatory with the authority to bind
Specsavers Canda Inc.
Dated May 22, 2025