

SAMSØE SAMSØE

MODERN SLAVERY STATEMENT
FOR FINANCIAL YEAR 2025

1. PURPOSE

This statement is published by Samsøe Samsøe A/S in accordance with Section 54 of the UK Modern Slavery Act 2015 and covers our financial year 2025. It sets out the steps we have taken to identify, prevent, and address the risks of modern slavery and human trafficking across our own operations and supply chain.

We explicitly condemn all forms of modern slavery as defined under the Modern Slavery Act 2015, including slavery, servitude, forced or compulsory labour, and human trafficking. These practices are fundamentally incompatible with the rights embedded in the UN Universal Declaration of Human Rights, and they have no place in our business or in the supply chains we source from. We recognise that the fashion industry carries structural risks of labour exploitation, particularly at the production stage and at lower tiers of the supply chain, where workers may face coercion, wage theft, or restricted freedom of movement. We publish this statement as part of our commitment to transparency, and as an honest account of where we stand and where further work is needed.

This statement should be read alongside our Human Rights Policy, Responsible Business Conduct Policy, and Supplier Code of Conduct, which together form the overarching framework for our approach to responsible business conduct.

2. ORGANISATION STRUCTURE AND SUPPLY CHAINS

2.1. ABOUT SAMSØE SAMSØE

Samsøe Samsøe is a Denmark-born fashion house, founded in 1993 in Copenhagen – the city our headquarters still calls home today. We design and sell collections of clothing, footwear, and accessories for men and women, shaped by a design ethos rooted in longevity, quality, and versatility. As of the end of 2025, we employed 455 people globally: 261 in retail across nine countries, and 194 across our Copenhagen HQ, warehouse, and international showrooms. Our Copenhagen HQ and regional offices are managed by a central leadership team, with departments including Product, Business Development, Marketing, and Sales working cross-functionally to design, develop, and bring our collections to market. Our Sustainability team sits within this structure, with responsibility for our social and environmental performance.

Our products reach customers through our own-brand retail stores, wholesale partnerships, and a growing e-commerce channel. Our primary markets include Denmark, the Netherlands, Germany, Sweden, the United Kingdom, and the United States, among others.



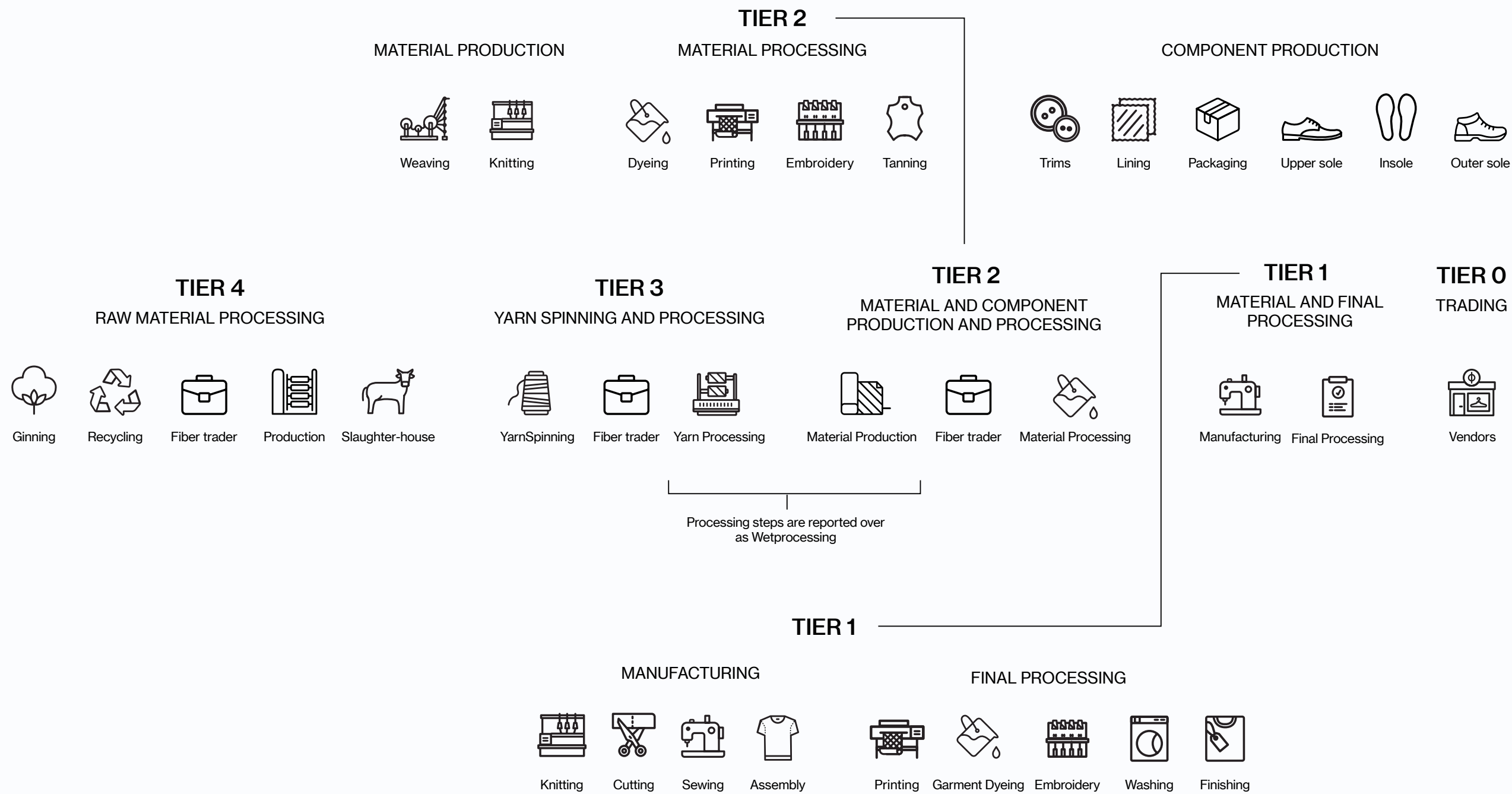
Illustration of Samsøe Samsøe value chain, including upstream and downstream activities.

2.2. OUR SUPPLY CHAIN

Our supply chain is global and multi-tiered. In 2025, our supply chain comprised 92 final product manufacturing locations managed by 61 trusted vendors. China and Turkey remain our key sourcing countries, with additional manufacturing spread across Europe and other regions. Our supplier base is deliberately diverse in scale: 36% of our manufacturing locations are classified as very small (fewer than 50 workers), 21% as average (51–100 workers), and 8% as medium (201–500 workers), 6% as large (501–1,000), and 3% as mega (>1,000), reflecting a network that spans specialist workshops and larger-scale factories alike. Several of our supplier relationships span more than a decade, and longstanding partnerships remain at the heart of our sourcing strategy.

Our supply chain is structured across four tiers. Tier 1 consists of the garment manufacturing facilities we work with directly. Tiers 2 and 3 encompass fabric mills, yarn suppliers, and processing facilities such as dyeing, printing, and finishing. Tier 4 covers the cultivation and extraction of raw materials. In 2025, Tier 3 traceability for apparel increased from 73% to 84%, and from 71% to 75% for accessories and footwear – meaningful progress that reflects our ongoing investment in supply chain visibility. To manage and verify this traceability data, we work with Retraced, our dedicated traceability and due diligence platform, through which 403 suppliers were onboarded by the end of 2025, comprising 58 vendors, 68 factories, and 186 processing facilities, with 54% actively engaged through a live user account.

TIER DEFINITION



3. OUR POLICY FRAMEWORK

Samsøe Samsøe's approach to modern slavery sits within a broader policy ecosystem, through which we set expectations for our own operations and for every party operating within our value chain. The policies below are directly relevant to the prevention of modern slavery and human trafficking, and should be read in conjunction with this statement.

Our Human Rights Policy is the cornerstone of our approach. It sets out our commitment to respecting human rights across our own workforce and supply chain, and explicitly prohibits all forms of forced labour, bonded labour, debt bondage, trafficking, and modern slavery in line with ILO Conventions 29 and 105. It also addresses child labour, freedom of association and collective bargaining, wages and working time, occupational health and safety, and equal treatment and non-discrimination. On wages specifically, the policy articulates our commitment to living wages as a direction of travel: while a standalone living wage policy is under development, our current commitment requires supply chain partners to assess the gap between wages paid and a credible living wage benchmark, and to develop a plan to close that gap over time. The policy establishes that where national law falls short of the standards we set, our policy applies – and where national law offers greater protection, national law prevails.

Our Responsible Business Conduct Policy provides the overarching framework within which all sustainability commitments sit, establishing our due diligence system as a continuous, risk-based process informed by the OECD Due Diligence Guidance for Responsible Business Conduct.

Our Supplier Code of Conduct translates these commitments into contractual expectations for supply chain partners. Compliance is a condition of all commercial relationships with Samsøe Samsøe. Suppliers are required to sign the Code before commencing work with us and to cascade equivalent expectations to their own subcontractors. Our Responsible Sourcing and Purchasing Policy governs our

buying decisions and commercial engagement with suppliers. We require that no worker bears the cost of securing employment through recruitment fees, deposits, or any other charges – and apply this expectation across our own operations and supply chain. Where audit findings indicate that recruitment fee practices are in place, this is treated as a priority non-conformity.

Our Anti-Corruption Policy and Equality and Diversity Policy further support our modern slavery prevention work, addressing corruption risks that can enable labour exploitation and protecting groups, including migrant workers and women, who face disproportionate vulnerability.

4. DUE DILIGENCE PROCESSES

Our due diligence approach is grounded in the OECD Due Diligence Guidance for Responsible Business Conduct and structured as a continuous process rather than a one-off compliance exercise. It begins at the point of engaging a new supplier through a thorough risk assessment, and is maintained through ongoing dialogue, annual verification, and collaborative engagement throughout the supplier relationship. In 2025, we prioritized in-person engagement and significantly strengthened the systems underpinning this work.

4.1. SETTING EXPECTATIONS

Risk identification at Samsøe Samsøe begins at the point of engaging a new supplier and continues throughout the relationship. We assess suppliers against labour, country, and sector-level risk factors, informed by where we source and by the structural risks well documented across the fashion industry, including forced labour, wage theft, excessive working hours, and reduced visibility at lower tiers of the supply chain. Our sourcing is concentrated in China and Turkey, alongside a broader supplier base across Europe and other regions, and we factor this country-level risk profile into how we prioritise engagement and oversight.

All suppliers are required to meet ILO standards, adhere to the UN Global Compact, and manage risks in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. These expectations are embedded in our Supplier Code of Conduct, which all partners are required to sign before commencing work with us, and reinforced through our Responsible Sourcing and Purchasing Policy. All supplier relationships are governed by our anti-bribery, anti-corruption, and modern slavery compliance policies, with systems and controls developed to support implementation across our supply base. We require that no worker bears the cost of securing employment through recruitment fees, deposits, or any other charges, and we apply this expectation consistently across our supply chain.

4.2. SOCIAL AUDITS AND COMPLIANCE

Independent social audits are our primary mechanism for detecting risk on an ongoing basis once a supplier relationship is underway. New supplier facilities are assessed against our Code of Conduct using a combination of third-party audits, in-person visits, and remote assessments, allowing us to verify conditions on the ground rather than relying on a single method. In 2025, we prioritised in-person supplier visits, visiting all strategic suppliers, including fabric and yarn mills and wet processing facilities across Europe and the Far East.

In 2025, 91% of our total order volume was produced at manufacturers with third-party verified audits, including SMETA, BSCI, SA8000, and WRAP, up from 72% in the previous year. This reflects our ongoing commitment to independent verification of social compliance across our Tier 1 supply base.

Additionally, we became a member of AMFORI BSCI, adopting a standardised social responsibility framework that provides auditing and verification support, capacity building opportunities, and structured risk management. We also joined the SLCP Acceptance List, reinforcing our commitment to reducing audit burdens on suppliers by streamlining assessments and avoiding duplication, enabling suppliers to focus on meaningful improvement rather than administrative compliance.

The most frequently reported non-conformities in 2025 were related to Occupational Health and Safety (37%), Management Systems (21%), and Working Conditions (18%). These findings are consistent with the sector-level risks identified above, and they directly inform our corrective action priorities and the focus of our ongoing engagement with suppliers.

Additional workforce data collected from our Tier 1 factories in 2025 indicates that garment factories employ an average of 64% women and 36% men, that 74% of workers are covered by social insurance, and that 81% of factories have an elected workers committee. While data availability varies across the supplier base, this information provides important context for our risk assessment and engagement priorities.

4.3. SUPPLY CHAIN TRACEABILITY AND RETRACED

We are committed to supply chain transparency and traceability, tracking the journey of our products from raw materials to finished garments. By understanding where and how our products are made, we can better manage social and environmental impacts and ensure responsible sourcing at every stage.

In 2025, we moved from spreadsheet-based supply chain mapping to a more sophisticated, order-level verified approach through our partnership with Retraced, our dedicated supply chain traceability and due diligence platform. By the end of the year, 403 suppliers had been onboarded to Retraced, comprising 58 vendors, 68 factories, and 186 processing facilities, with 54% actively engaged through a live user account. We began the year by onboarding 15 vendors representing 80% of order volume, gathering learnings before scaling up across the broader supply base.

Overall, Tier 3 traceability for apparel increased from 73% in 2024 to 84% in 2025, and from 71% to 75% for accessories and footwear. In 2025, we also achieved 39% visibility into Tier 4 sourcing regions. These figures reflect meaningful progress in our ability to understand and oversee the full depth of our supply chain, including the stages where modern slavery risks are most concentrated.

4.4. CORRECTIVE ACTION AND SUPPLIER ENGAGEMENT

Where non-conformities are identified through audits or other assessments, we follow up with suppliers through Corrective Action Plans with clear timelines and responsibilities. We take a collaborative approach, prioritising the most critical risks while supporting suppliers in driving continuous improvement. As many suppliers have integrated annual audits into their own processes, our role is often to monitor progress and provide guidance rather than to impose punitive measures.

Our A and B vendors, representing 75% of our total order volume in 2025, receive the most intensive engagement within this process. In 2026, we will further strengthen corrective action follow-up through Retraced and BSCI, alongside increased capacity-building efforts.

Where a supplier relationship must be terminated, we follow a responsible Supplier Offboarding Policy to ensure that terminations are managed in a structured manner, with clear communication and mitigation of potential social and operational impacts for workers.

4.5. WAGES

Like many companies in the fashion industry, we work with independent manufacturers and do not directly set garment workers' wages. We currently hold our partners to the standards required by AMFORI BSCI, which mandates compliance with national laws on wages, including minimum wage regulations, overtime pay rules, social security contributions, and other statutory benefits.

We recognise that legal compliance is a floor, not a ceiling. As the cost of living crisis continues to affect workers globally, we are developing ambitions to explore what contribution we can make to securing living wages for workers in our supply chain. From 2026, AMFORI BSCI audits will serve as a key tool to identify gaps where wages may not yet meet basic needs, and to drive improvement in wage systems and practices across our supplier base.

4.6 GRIEVANCE MECHANISMS AND REMEDIATION

When issues arise, we act promptly to remediate. Workers and supply chain stakeholders can currently raise concerns confidentially through Samsøe Samsøe Whistleblower Program

Form. We maintain a zero-tolerance approach to retaliation against anyone raising a concern in good faith, and where adverse impacts are identified that are directly linked to our business relationships, we use our leverage to encourage suppliers to prevent, mitigate, and address those impacts.

In 2026, we are committed to significantly strengthening our grievance infrastructure and extending access to anonymous reporting to all workers across our supply chain. We are also introducing internal anonymous worker sentiment surveys covering wages, grievance handling, and supervisor relationships, and will provide local-language guidance and supervisor training to ensure these mechanisms are genuinely accessible. We intend to use each grievance received as an opportunity to identify root causes and implement preventive measures, rather than treating individual cases in isolation.

5. TRAINING

Samsøe Samsøe reports annually on the implementation of this policy and progress against our environmental commitments through our Sustainability Report. We are committed to transparent reporting: where gaps or failures are identified, we will disclose these alongside the steps being taken to address them.

Ultimate oversight of environmental responsibility at Samsøe Samsøe falls with our CEO. Operational oversight priorities are managed by our Leadership team and CSR Manager. Our Environmental policy is reviewed on a regular basis to reflect relevant changes in risks and opportunities related to our business, value chain and opportunities.

5.1. INTERNAL TRAINING

Our CSR team works in close collaboration with our sourcing and production teams to educate, train, and support colleagues in assessing modern slavery and human rights risks, ensuring these teams remain well informed as part of their day-to-day decision-making. Senior management and board members receive regular updates on our due diligence approach and on progress in traceability and social impact, ensuring oversight of modern slavery risk extends to the highest levels of the organisation.

5.2. SUPPLIER TRAINING

Suppliers are supported and trained through our Code of Conduct, detailed guidance on using Retraced, and in-person visits. We communicate directly and actively with suppliers on our human rights expectations, addressing ethical challenges such as modern slavery, migrant worker rights, and child labour prevention as part of this engagement.

In 2026, we intend to strengthen supplier capabilities to support sustainable compliance and continuous improvement. This includes delivering general training on social compliance aligned with AMFORI BSCI requirements across our supplier base, alongside more targeted training shaped by the non-conformities identified through our audit programme, with a particular focus on working hours, living wages, and health and safety. In India, this will include training for women workers on sexual and reproductive health and rights (SRHR) and gender-based violence and harassment (GBVH).

6. ROLES AND RESPONSIBILITIES

Ultimate accountability for this statement and our approach to preventing modern slavery sits with our CEO. Operational oversight is held by our Head of Sustainability, supported by the Sustainability team, with day-to-day implementation embedded across our sourcing and production teams. The Leadership Team receives regular updates on progress and remains responsible for ensuring this work is resourced and prioritised appropriately.

7. APPROVAL AND SIGN-OFF

This statement was approved by the CEO of Samsøe Samsøe A/S on 24/08/2026 and constitutes our Modern Slavery and Human Trafficking Statement for the financial year 2025, in accordance with Section 54 of the UK Modern Slavery Act 2015.

A handwritten signature in black ink, appearing to read 'Peter', followed by a long, horizontal, slightly wavy line.

Peter Sextus
CEO, Samsøe Samsøe A/S
24/08/2026

