



**MODERN SLAVERY
STATEMENT
2023 / 2024**

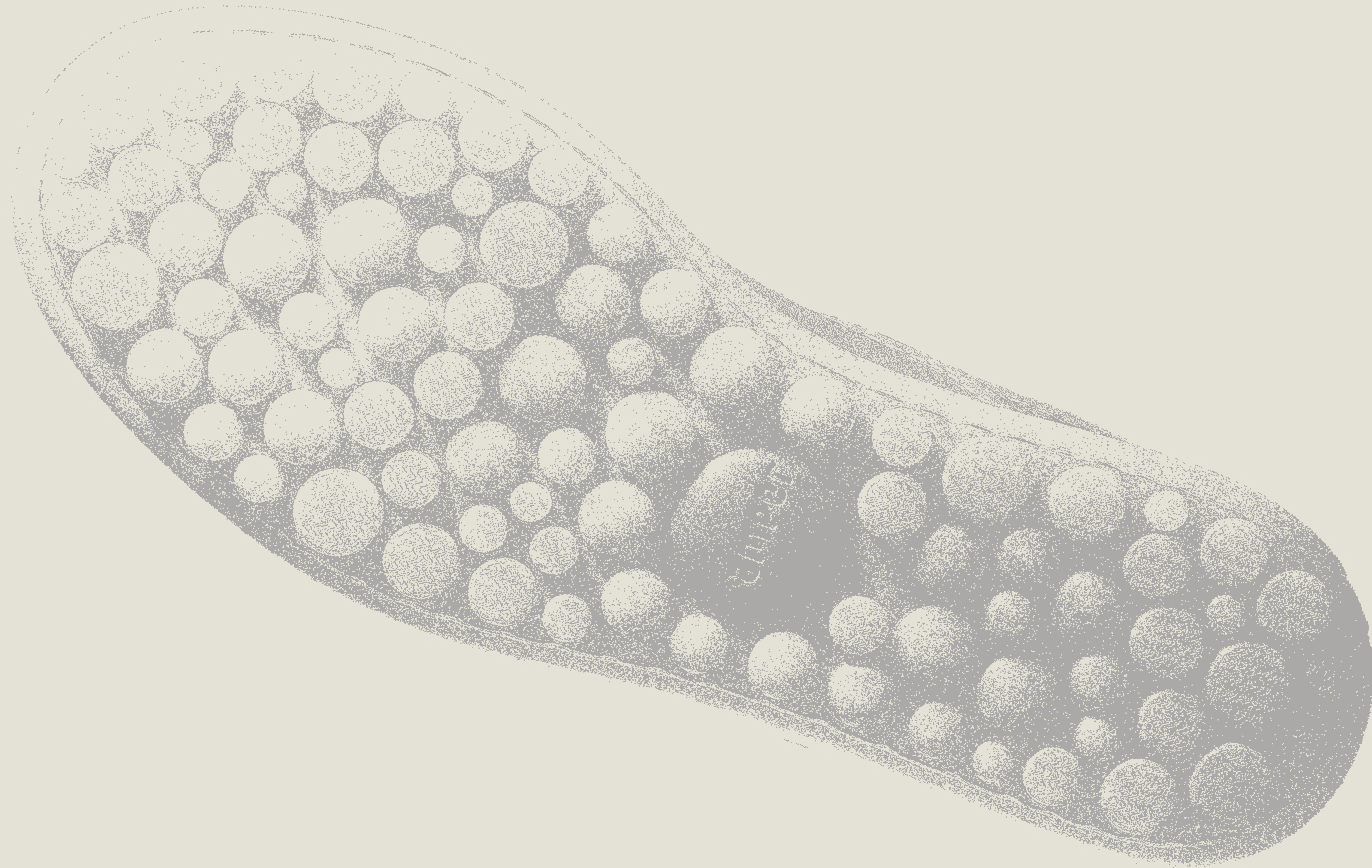


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01 

ABOUT

CAMPER



In compliance with the UK Modern Slavery Act 2015 (MSA), the California Transparency in Supply Chains Act 2010 (CTA), and the Australian Modern Slavery Act 2018, Camper presents its updated Modern Slavery Statement for the 2023/2024 period. Regrettably, according to the International Labour Organization (ILO), the prevalence of modern slavery has seen a significant increase over the past five years. The organization's recent 2022 report estimates that approximately 50 million individuals are currently subjected to modern slavery.

Although there is no specific legal definition for modern slavery, it encompasses various forms of exploitation where individuals are coerced, deceived, or forced into circumstances against their will, including forced labor, human trafficking, servitude, and slavery. As a company, Camper acknowledges the critical importance of addressing and eliminating such practices within our operations and supply chain.

We are resolutely committed to eradicating any form of modern slavery within our operations and in our supply chain. This involves rigorous measures to ensure ethical practices, conducting due diligence and regular assessments, and fostering transparency with all our partners. By upholding these standards, we aim to contribute significantly to the global effort of eliminating modern slavery and ensuring the dignity and rights of all individuals involved in our supply chain are respected and protected.

ABOUT CAMPER

Challenging the status quo since 1975

Our heritage goes back more than 145 years, when the Fluxà family began making shoes on the Mediterranean island of Mallorca. Using the highest quality materials and the most innovative manufacturing processes and machinery, the family established Mallorca as a region renowned throughout Europe for the production of high quality footwear.

In 1975, Lorenzo Fluxà, the third generation of our shoe-making family, founded Camper to create footwear that was easy to wear yet difficult to define.

Our first shoe, the Camaleón, was a unisex design inspired by the footwear of local farmers, who made their own shoes using recycled materials.

Each season we continue to develop unique collections from Inca, Mallorca, combining iconic products such as Pelotas, Peu, or Twins with new products such as our Kobarah, Junction, or Tossu. All products share the same values: a unique and inclusive design; the highest quality and comfort; useful, sustainable products designed for maximum durability and repairability.



LETTER FROM OUR CEO

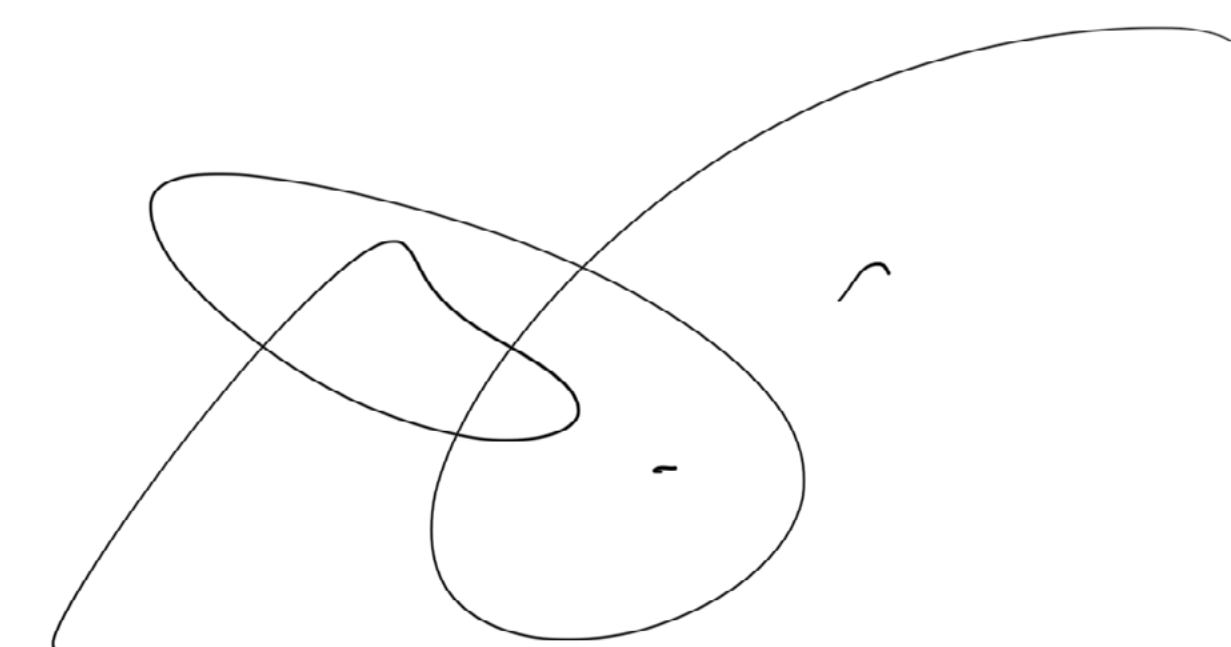
Our identity as a family business is still a big part of who we are, placing the wellbeing of our people and all those connected to us at the core of everything we pursue. As we reflect on another year of dedication and progress, we remain committed to our foundational values of accountability and sustainability— both socially and environmentally.

A significant milestone we achieved in 2022 was obtaining the B Corp certification. This certification is a recognition of our dedication to meeting high standards of social and environmental performance, accountability, and transparency. It also sharpens our focus and enhances our capabilities in detecting and addressing violations of human rights.

At Camper, we uphold a zero-tolerance policy towards any practices that undermine human dignity. As part of our dedication to maintaining ethical practices, we continue improving to better track our value chain to be able to identify and mitigate potential risks related to modern slavery. Our efforts are driven by a commitment to ensuring that every aspect of our business operations is conducted with respect for human rights and in alignment with international standards. We extend our sincere gratitude to our stakeholders, partners, and the dedicated team at Camper, whose support and hard work are critical in upholding these principles.

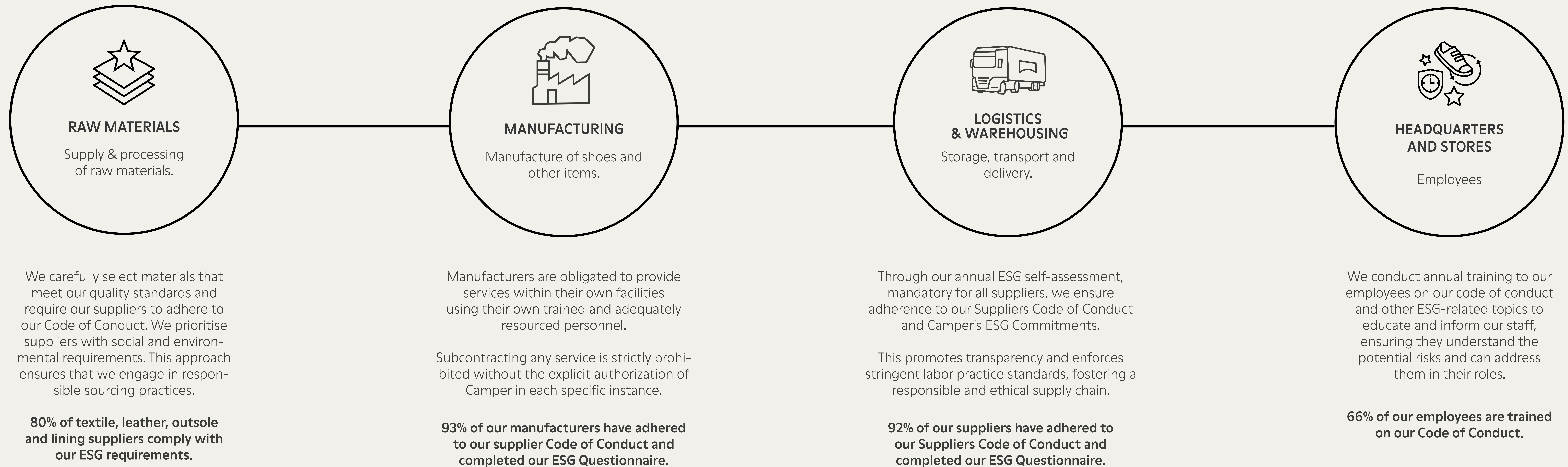
This statement represents our modern slavery statement for the financial year 2023/2024 and has been approved by the Camper Executive Committee in July 2024 and embodies our unwavering commitment to eradicating modern slavery in all its forms within our operations and supply chains.

Miquel Fluxà, CEO



OUR VALUE CHAIN

Analysing our value chain allows us to understand all the social and environmental aspects of the manufacture and distribution of our products. It is also a useful exercise to identify the different stakeholders involved, key risks, and ESG impacts in our operations. With this knowledge, we can develop strategies to mitigate these risks and associated impacts, improving the resilience and efficiency of our entire value chain.



02 

OUR

GOVERNANCE



OUR GOVERNANCE

We believe that our responsibility extends beyond profit creation to encompass the well-being of people and the planet. Our governance model is designed to promote responsible and ethical growth, ensuring that our operations are conducted with integrity and respect for human rights. This commitment is reflected in our "Modern Slavery Statement," which outlines our comprehensive approach to preventing modern slavery and human trafficking within our supply chain.

Our robust Governance, Risk, and Compliance (GRC) System underpins our commitment to ethical and responsible management practices. The GRC System comprises several key pillars:

1. Code of Conduct and Ethics. Our Code of Conduct and Ethics serves as a foundational document guiding the behavior and decisions of our employees. It establishes the principles and standards that we expect from everyone associated with Camper.
2. Policies. We have implemented a range of policies to support our ethical commitments, including our Human Rights Policy and Purchasing Policy. These policies provide clear guidelines on respecting human rights and responsibly sourcing materials.
3. Risk Management System. Our Risk Management System is dedicated to identifying, assessing, and mitigating risks across our operations.
4. Organisational Management System. We have established a comprehensive Organisational Management System to ensure that all aspects of our business are aligned with our ethical commitments. This system facilitates transparent decision-making and efficient management practices.
5. Compliance System. Our Compliance System monitors and enforces adherence to all relevant laws, regulations, and internal policies. It serves as a critical safeguard to ensure that our operations remain compliant with legal and ethical standards.

The integration of these pillars within our GRC System ensures the efficient management of our practices, safeguarding the well-being of our workers. By maintaining rigorous standards and procedures, we strive to create a safe, respectful, and equitable environment for all individuals involved in our operations.



OUR POLICIES

Camper's corporate policies strengthen compliance and governance by providing clear guidelines for employee behavior, mitigating risks, and ensuring legal and ethical operations. Basing policies on international human rights standards, like the Universal Declaration of Human Rights and the International Labour Organization's Declaration, underscores our commitment to ethics and enhances our reputation. This alignment fosters stakeholder trust and promotes a fair, respectful workplace culture, demonstrating dedication to human rights and a sustainable business environment.

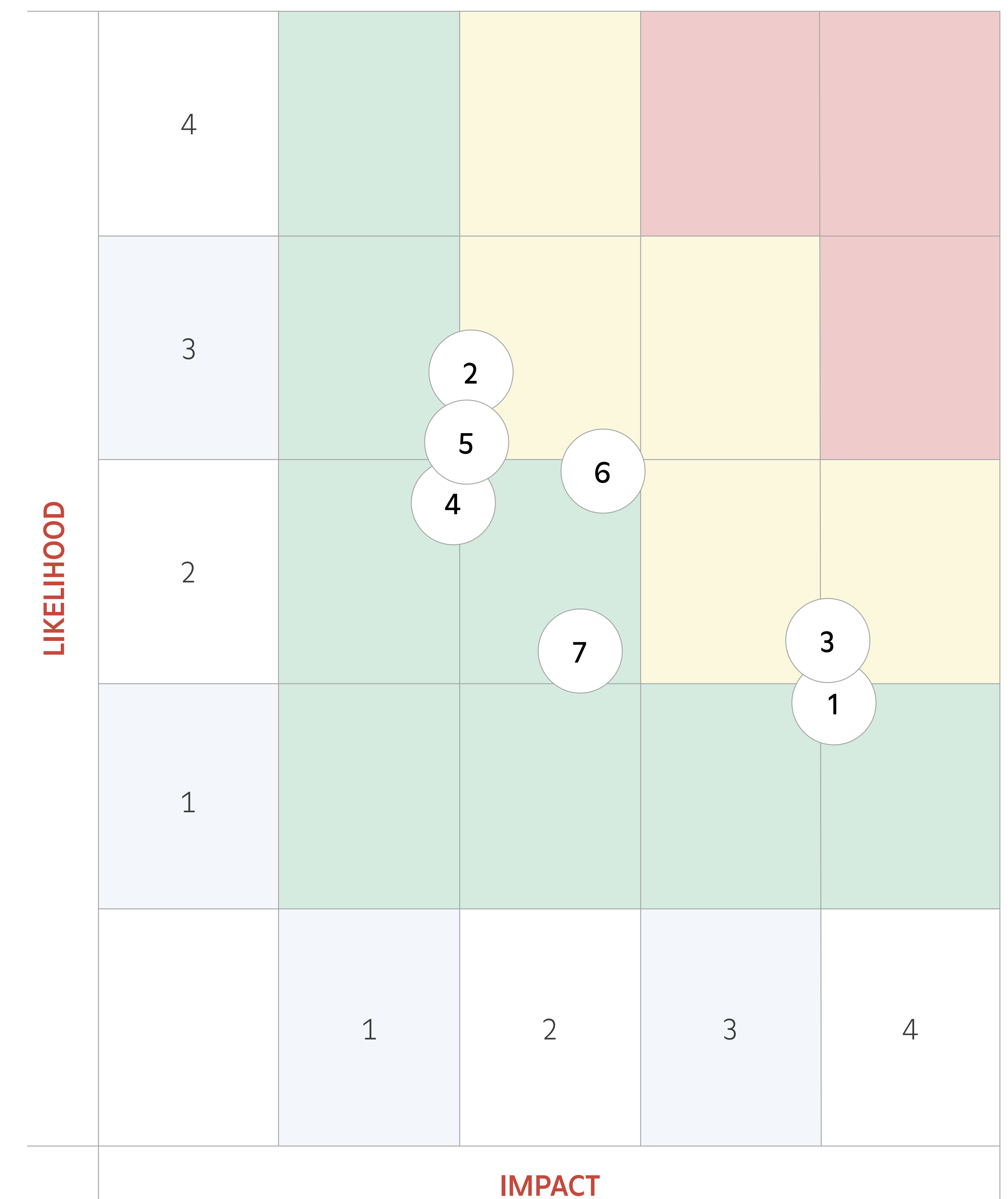
OUR COMMITMENTS	POLICIES, MECHANISMS AND MANAGEMENT TOOLS	SUPPORT POLICIES
Creation of Lasting Value	Compliance Policy	It ensures adherence to laws and reflects our commitment to ethics, integrity, and social responsibility as stated in our Code of Conduct and Ethics. We urge all team members to understand and commit to these principles, recognizing our collective responsibility to maintain the company's integrity and contribute to society.
	Risk Management Policy	By identifying, assessing, and mitigating potential risks, we enhance operational resilience and promote a proactive culture of safety and efficiency. A comprehensive Risk Management Policy prepares the company for uncertainties, supporting sustained growth and instilling stakeholder confidence.
Commitment to Our Team	Occupational Risk Prevention Policy	By integrating preventive management into all activities and decisions, the organization protects employees from exploitative practices and upholds their rights and dignity. Promoting teamwork and cooperation reinforces a culture of vigilance and support.
	People Policy	The People Policy sets a minimum standard, respecting laws and regulations where the Camper operates and is key to fighting modern slavery and human rights violations, ensuring all entities protect human rights and prevent exploitation. It reinforces a commitment to comply with laws internationally and locally, upholding human dignity globally.
Strong and Solid Relationships	Supplier Code of Conduct	Camper is committed to being a responsible employer, focusing on a People Policy that fights modern slavery and human rights abuses by upholding individual rights and professional growth. Our culture of teamwork and empowerment naturally opposes modern slavery and rights violations, aiming to ensure a safe, fair, and respectful workplace through strong policies and standards.
	Purchasing Policy	We prioritize quality products and reliable suppliers, selecting them through transparent criteria for long-term partnerships. Our Purchasing Policy ensures suppliers meet ethical standards. This approach underscores our commitment to social responsibility, ethical procurement, and sustainability, protecting the dignity and rights of individuals in our value chain.
	Procurement Guidelines	These guidelines are designed to ensure that procurement processes are conducted in a fair, transparent, and consistent manner. They include specific criteria and requirements aimed at identifying and mitigating the risks of forced labor, human trafficking, and other forms of exploitation within the supply chain.
Duty in Society	Human Rights Policy	This policy ensures that both the organization's operations and those within its supply chain adhere to these standards, thereby fostering a responsible and ethical working environment. By implementing a zero-tolerance policy towards any form of human and labour rights violations, including modern slavery, the organization guarantees accountability and promotes continuous improvement in preventing such abuses.
Promise to the Planet	ESG Policy	By having this policy, we guarantee that there is no exploitation or abuse in our supply chains and operations. By doing so, not only is social and environmental well-being promoted, but a positive and sustainable contribution is also made to the well-being of the communities involved.

RISK MANAGEMENT SYSTEM

A Risk Management System plays a crucial role in defining, identifying, managing, and controlling both internal and external risks within an organization's framework. Our approach includes three lines of defense, which leverage best practices in risk management and control. This model effectively integrates, coordinates, and aligns all support and assurance functions to handle both existing and potential risks efficiently.

In 2023/24, we have updated our Risk Analysis and completed a Double Materiality assessment to maintain our vigilance and progress on tackling these critical issues, like Human Rights or Health, Welfare and Safety at work. This assessment, which involved a comprehensive review of risks from both a financial and societal perspective, ensures that our strategy remains aligned with current global challenges and stakeholder expectations.

RISK/OPPORTUNITY	RISK/DESCRIPTION	IMPACT (1-5)	LIKELIHOOD (1-5)	TOTAL RISK (1-5)
1. Forced Labor and Child Labor	Abuse of power or of a situation of vulnerability of certain people to force them to work; child labor; forced or bonded labor.	3,24	1,25	4,05
2. Working hours	Long working hours, lack of breaks, overtime, vacations and/or leaves in breach of the regulations in force in the country where the organization operates. Limited time to address all responsibilities generating a continuous overload of work.	2,18	2,33	5,07
3. Unfair wages	Setting of unfair wages and/or below the legal agreement or regulation of the country where the organization operates; and/or below the "living wage" (which does not guarantee a dignified life).	3,19	1,26	4,00
4. Freedom of association and collective bargaining	Violation of the rights to freedom of association and collective bargaining, leading to high social and union pressure and potential reputational damage.	2,00	1,88	3,75
5. Health and Safety	Deficient compliance with occupational health and safety regulations by procurement, purchasing, and service providers, resulting in occupational accidents and a reactive rather than preventive approach due to the lack of audits.	2,10	2,11	4,43
6. Harassment and Abuse	Events of workplace harassment (including physical, verbal, sexual or psychological harassment, abuse or threats) and gender-based sexual violence in the workplace. Failures in the harassment prevention system, with the consequent reputational damage by associating the organization with such an event.	2,71	1,97	3,23
7. Discrimination	Discrimination against people in the organization's facilities based on non-objective criteria (gender, origin, age, religion, functional or intellectual diversity, etc.).	2,65	1,20	3,19



03

DUE

DILIGENCE



DUE DILIGENCE

Monitoring potential risks of modern slavery and human rights violations is especially relevant to our organization. At Camper, we have implemented several control mechanisms and made resources available for our stakeholders to address these critical issues. Such measures are fundamental to ensuring the integrity and ethical standards of our operations.

Supplier Code of Conduct

Declaration that describes the environmental, social and ethical manner in which Camper acts in its business relationships, and the minimal requirements that are requested to all companies which intend to establish commercial relations with Camper as suppliers.

ESG Questionnaire

Self-assessment to be completed annually by suppliers to ensure that they are following the Suppliers Code of Conduct and Camper's ESG Commitments.

Purchasing Policy

This document aims to optimize procurement by prioritizing first-level suppliers and fostering long-term relationships. We contract based on objectivity and transparency, balancing supplier solvency with Camper's interest in securing favorable conditions.

Factories Suppliers Scorecard

Internal assessment dashboard designed by Camper to evaluate the performance of the factories during the production of each season.

ESG Audits platform

Audits through online platforms where environmental, social and labor aspects are assessed / audited by an independent third-party, among others.

Restricted Substances List

List which intends the elimination of toxic substances and progressive substitution of the rest of materials with other, less aggressive ones, insofar as the products are available on the market and comply with similar quality standards.

Whistleblowing Channel

Camper has its own tool for calling behaviours that go against laws, regulations and internal policies. This channel serves as a confidential way for employees and other stakeholders to report any concerns or suspicious activities regarding unfair treatment or rights violations within the company or its operations, ensuring that these issues are addressed promptly and appropriately.

Training

The importance of training in combating modern slavery cannot be overstated. At Camper, this commitment begins with our onboarding process, which includes various training modules, including one on our Code of Conduct. This ensures all employees are aware of our ethical standards and practices, reinforcing our resolve to combat modern slavery and uphold human rights.

04 

ACTION AND MEASUREMENT



ACTION AND MEASUREMENT

During 2023, we have been vigilant in monitoring for any signs of modern slavery or human trafficking within our operations and those of our suppliers. We are glad to announce that no instances of modern slavery have been detected throughout the year. Updates on this matter are transparently shared in our Sustainability Report.

Our unwavering dedication to ethical behavior and responsible practices ensures that we will take decisive action if any such allegations emerge.

Upon uncovering any suspicious activities, we will immediately address the issue with the concerned supplier and report the findings to the relevant authorities to ensure proper corrective measures are undertaken, thus maintaining our commitment to integrity and human rights.

As we move ahead, we are committed to eradicating modern slavery in all its manifestations and will persist in promoting transparency and accountability across all our operations.

SCOPE	KPI	2022	2023	2024
COMMITMENT & EMBEDDING	Strengthen Code of Ethics and Conduct	63% of our employees trained on our Code of Ethic and Conduct	63% of our employees trained on our Code of Ethic and Conduct	Goal to train 100% of managers, heads and directors on the Code of Ethic and Conduct
COMMITMENT & EMBEDDING	75% of employees trained on Human Rights related issues	No updates	No updates	Goal to train at least 75% of employees on Human Rights issues.
COMMITMENT & EMBEDDING	Whistleblower Policy and Procedure enforcement	No official regulation available in Spain	Policy and Procedure updated to make them compliant with Spanish regulation	Disclosure of Whistleblower Policy and Procedure included in key trainings.
COMMITMENT & EMBEDDING	100% of our manufacturers to adhere to our Suppliers Code of Conduct and to complete our ESG Questionnaire	N/A	93% of our manufacturers have adhere to our Suppliers code of Conduct and completed our ESG Questionnaire	Goal of 100% of our manufacturers
COMMITMENT & EMBEDDING	100% of our suppliers to adhere to our Suppliers Code of Conduct and to complete our ESG Questionnaire	N/A	92% of our suppliers to adhere to our Suppliers code of Conduct and to complete our ESG Questionnaire	Goal of 100% of our suppliers
ASSESS AND TRACK	Keep Risk Map Updated	No major updates	No major updates	Major update
ASSESS AND TRACK	Sustainability Report published and verified by an independent third-party	Published and Verified	Published and Verified	Published and Verified
ASSESS AND TRACK	UN's Global Compact Communication on Progress	Published	Published	Published
REMEDY AND GRIEVANCE	Publicly report on cases received through the Whistleblower Channel and their remedy	No cases reported in 2021	8 cases reported in 2022 - None on Modern Slavery	6 cases reported in 2023 - None on Modern Slavery



More information on Modern Slavery can be requested at esg@camper.com
Any reports or concerns regarding this topic can also be directed via our
Whistleblower Channel <https://report.whistleb.com/en/camper>