SUPPLY CHAIN AND MODERN SLAVERY ACT STATEMENT

1. Introduction

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

1.2 L.K. Bennett is a British brand founded by Linda Bennett in London in 1990 with a promise of bringing "a bit of Bond Street luxury to the High Street". L.K Bennett has rapidly become a global fashion house renowned for feminine footwear and Ready-to-wear collections offering complete wardrobe solutions for all occasions.

Our core values of exceptional quality, respect, authenticity and integrity are at the heart of our business.

1.3 We acknowledge and understand the growing threat 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, whilst recognising there are multiple layers within our supply chain. We continuously review transparency and assess improving practices in our business operations to ensure that we are a socially and ethically responsible business.

2. Who are we?

2.1 Cavendish Holdco Limited is a private, limited company with a UK ownership. It is the parent company of our trading entity, L.K. Bennett Limited. We are a multichannel global retailer with small subsidiary companies in Europe and USA, through retail, wholesale, franchising and online.

In 2016/17 L.K.Bennett had a turnover of c£90m and we employ over 550 people.

2.2 L.K. Bennett is a design-driven brand, with a stable supply base and well established relationships with suppliers and manufacturers who share our business values. We source quality products from suppliers and manufacturers in Albania, Bulgaria, China, India, Italy, Lichtenstein, Lithuania, Mauritius, Philippines, Spain, Tunisia and 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 own reflection of our brand values.

3. Our Modern Slavery Act Policy

3.1 L.K. Bennett has adopted a Modern Slavery Act Policy that seeks to ensure that not only our business, but business partners and those within our supply chain operate with a zero tolerance approach to modern day slavery and human trafficking.

3.2 We require all our final made goods manufacturers (hereafter "manufacturers") to adhere to our fully-comprehensive (contractual) Supplier Manual incorporating all of our ethical business policies and practice requirements.

3.3 L.K. Bennett's ethical standards are based on the Ethical Trading Initiative (ETI) base code, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. ETI exists to improve working conditions in global supply chains and its key principles include: freely-chosen employment, prevention of child labour, payment of a living wage and prevention of harsh or inhumane treatment in the workplace. All of our suppliers/manufacturers are required to sign a declaration confirming their level of compliance with the ETI base code, and to the local laws in their country of manufacturing.

4. Due Diligence Processes

4.1 L.K. Bennett requires that all supplier/manufacturers' within our supply chain to be audited for compliance to our ethical standards. We know that any genuine and thorough assessment will inevitably reveal incidents of non-compliance and where breaches are identified, we work closely with supplier and/or the manufacturer to improve working practices.

Our Buying and Technical teams visit supplier/manufacturing sites on a regular basis to build strong and trusting working partnerships. We maintain an ongoing dialogue and process to remedy any breaches and improve business policies and practices.

4.2 L.K. Bennett assigned dedicated resource to work on mapping our primary supply chain in 2016, the objective to have greater transparency of our primary supply base. We asked our supplier/manufacturers to share with us

available independent third party work place assessments (social audit reports) conducted in their facility within 2016/2017, in which compliance with the ETI Base Code and local laws were evaluated.

We recognise that the greatest exposure to slavery and human trafficking lies within our supply chains. In order to mitigate and manage these risks effectively, we continue to focus on honest communication to manage concerns about breaches or failures identified through work place assessments. We plan to continue to review our actions and measure the progress during 2018. The objective is to ensure that all of our supplier/manufacturers are committed to continual development and best practice compliance with the ETI Code of Conduct and their own local laws, 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.

4.3 During the work place assessments various non-compliance issues have been identified, with support provided to put remedial plans in place. Recurring issues which were harder to solve alone:

4.3.1 Breaches of Chinese working hours regulations; and

4.3.2 Non-payment of Chinese employer's social security payments to worker's accounts.

On investigation, we learned that these practices were freely chosen by the workers themselves who (a) voluntarily chose to work longer hours than prescribed by regulation; and (b) chose themselves not to pay into their own social security plans, thus vitiating the employer's need to match their instalments. To alleviate the first issue, L.K. Bennett reassessed manufacturing lead time in its critical path to avoid situations where excessive overtime was employed in producing its orders. It is our aim as a business to ensure that all workers in our nominated factories are protected from pressure and duress.

4.4 Contractually, failure of our factories to comply with audit standards enables us to terminate our relationship with them, but whilst we reserve the right to report offending organisations, our preferred approach is to work with them to become responsible employers themselves. 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 shut them down altogether.

4.5 Within our own business, we have identified areas of potential risk as regards modern slavery and seek to relay a continuous message across our workforce to be aware of this issue in everything that we do. We have implemented modern slavery reporting procedures so that any suspected cases can be referred appropriately.

5. Further

5.1 We provide internal training to key individuals on the requirements of the Modern Slavery Act and the adequacy of this programme will continue to be reviewed.

5.2 We have created the role Head of Technical and Creative Development with responsibility to ensure a quality assured supply base, ethical practices, policies in supplier partnership and commitment to continuous improvement with respect, responsibly and accountability.

5.3 Our commitment to the Modern Slavery Act as an ongoing, we recognise the risks of slavery and human trafficking are not static. We continue to assess the efficacy of our actions and measure progress we have made on an annual basis.

Signature (s)

LINDA BENNETT, FOUNDER

For and on behalf of the board of Cavendish Holdco Limited on [1. MARCH] 2018.