



MODERN SLAVERY STATEMENT 2021/22



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1 INTRODUCTION

This is our first Modern Slavery Statement published in accordance with the UK Modern Slavery Act 2015 (MSA) and the California Transparency in Supply Chains Act 2010 (CTA) and the Australian Modern Slavery Act 2018.

According to the International Labour Organisation (ILO) more than 40 million people worldwide are victims of modern slavery. Although modern slavery is not defined in law, it is used as an umbrella term covering practices such as:

- Human trafficking – a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.

- Forced and compulsory labour – any work or services which people are not doing voluntarily and which is exacted under a threat of some form of punishment.

- Bonded labour – any work or services demanded as a means of repayment of a debt or a loan.

- Slavery – a situation where a person exercises (perceived) power of ownership over another person.

In summary, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

LETTER FROM OUR CEO

MIQUEL FLUXÀ



Miquel Fluxà

Miquel Fluxà, the fourth generation of the founding family, took over as CEO of Camper in 2012.

As a family business, the care of our people, and the people connected with our business, are of our utmost priority. Over the years, we have built up a small number of long-term, trusted suppliers who share our values. When they became our partners, they agreed to support our vision to continual improvement, creating more efficient processes, environmental practices and ensuring exemplary human rights standards.

As part of our continued commitment to ensuring ethical working conditions, we fully support the legislation put in place for the prevention of modern slavery and human trafficking. Modern slavery can take many different forms and is a complex issue. Camper has taken steps to identify the areas where there is risk of modern slavery occurring and the processes and checks in place to eliminate that possibility. We take

a zero-tolerance approach and are fully committed to preventing slavery and human trafficking across our operations and throughout our supply chain.

At Camper we dream of a fairer and better world. We believe that companies can, and must, be successful while at the same time contributing to greater social welfare. We will continue to work each day with effort and humility to achieve our goals.

This statement, made under the Modern Slavery Act 2015, constitutes our modern slavery statement for the 2021 financial year. It has been approved by the Camper Executive Committee on September, 2022.

Miquel Fluxà, CEO

2 ABOUT CAMPER

ABOUT CAMPER

Camper has been a family business since 1877 when Antonio Fluxá, an artisan shoemaker, gathered a group of craftsmen together in Inca, Spain and introduced the first shoe-making machines. Founded in 1975 by Antonio's grandson, Lorenzo Fluxá, Camper's contemporary footwear design embodies quality, imagination, irony, and innovation.

Camper means 'peasant' in Mallorcan language. The austerity, simplicity, and discretion of the rural world in combination with its own history, culture, and the Mediterranean landscape inspire the brand's aesthetics and values.

Respect for tradition, arts, and crafts reinforces our promise: to create timeless, quality products, with consideration for their social and environmental impact.

Today, operating in more than 40 countries, Miquel Fluxá, CEO, and now the fourth generation to enter the family business, remains committed to preserving the values that have defined the brand since its inception.



2.2

Human Rights are an absolute and universal requirement and they are embedded within our mission and our values. We are committed to following the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights

MISSION

WALKING WITH PURPOSE: delighting people with a playful, sustainable, and responsible walking experience.

MISSION AND VALUES

VALUES

REAL

We have been shoemakers for over 140 years. Quality and craftsmanship remain at the heart of what we do.

IMAGINATIVE

Camper thinks differently and we want to be seen as different, but not in a loud and showy way. We add a twist of understated imagination to everything we do: in product, retail, and communication.

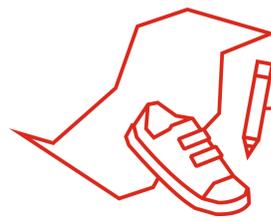
PLAYFUL

Camper is from the Mediterranean. We are serious about what we do but we don't take ourselves too seriously. We walk, we don't run, and we will always try to add a smile to life.

CARING

Camper is about people with local values and global horizons. We will do the right thing for people and the environment wherever we work.

3 OUR VALUE CHAIN



1. Design

Our products are designed and developed at our Headquarters in Inca, Mallorca. Here, a team of designers and technicians work together to create approximately 500 styles per season.

Employees:
19 Designers and 29 Product Developers who work to create our collections, with a total of 239 people working at our headquarters across different departments.

Main Modern Slavery Policy:
Code of Conduct & Ethics

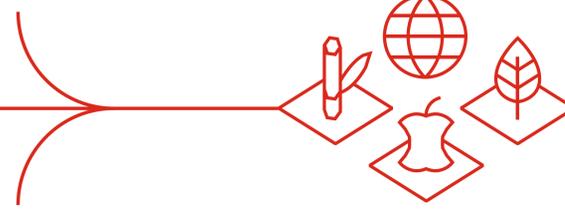
Key KPIs:
Around 80% of headquarters employees conducted our Code of Conduct Training in 2021.

Risk of Modern Slavery:
Low

Mapping Status:
-

Audit Status:
-

Global Presence:
Mallorca, Balearic Islands, Spain.



2. Raw Materials

Each season we identify the best raw materials, selected by the Camper Design and Technical Teams to ensure we are sourcing and manufacturing the best ethical and environmentally sustainable products. We only select Tier 2 and Tier 3 partners who adhere to our Code of Conduct for Suppliers and who have the certifications we request.

Employees:
5 working at our headquarters and 2 based in our Guangzhou office, China near to our suppliers.

Main Modern Slavery Policy:
Suppliers Code of Conduct

Key KPIs:
100% of our Key T2 suppliers signed our Code of Conduct.

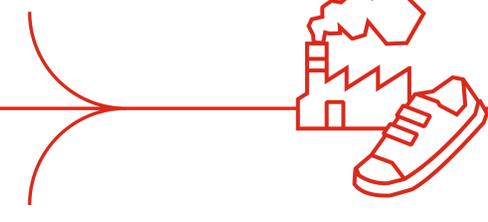
One third are members of the Sustainable Apparel Coalition.

Risk of Modern Slavery:
Medium

Mapping Status:
Tier 2 - Fully Mapped

Audit Status:
Not yet audited

Global Presence:
17 Key Tier 2 suppliers from China, Germany, Italy, Morocco, Pakistan, Spain, Taiwan, Thailand and Vietnam.



3. Manufacturing

Our products are manufactured to exceptional standards in factories in Europe and Asia. In most factories, the facilities are shared with production for other brands. We ensure that our Tier 1 complies with social and environmental standards. Subcontracting is only allowed with our informed and written consent. We have manufacturing technicians and quality controllers who work to ensure that the final designs are made to our high Camper standards.

Employees:
9 employees work on-site in Vietnam and Cambodia to oversee the production and work with our partners. In our factories approximately 10,000 are employed by our partners.

Main Modern Slavery Policy:
Suppliers Code of Conduct

Key KPIs:
100% Tier 1 signed our Code of Conduct

Since 2019, we have published our first-tier factory list on our website.

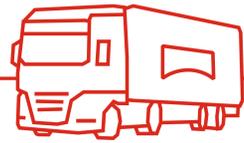
More than 80% of our shoes are produced in factories that we've partnered with for more than 15 years.

Risk of Modern Slavery:
Medium

Mapping Status:
Tier 1- Fully Mapped

Audit Status:
Audited

Global Presence:
7 factories in Vietnam, Cambodia, Portugal and Spain.



4. Operation & Logistics

Our distribution process consists of strategically distributed warehouses, logistics centres, and carriers.

Employees:

32 directly employed and another 49 people via our logistics partner in our main warehouse in Barcelona, Spain and in our distribution centres in the US and China. Our main transportation partner is DHL.

Main Modern Slavery Policy:

Suppliers Code of Conduct

Key KPIs:

100% of our Key Logistics Suppliers Signed our Code of Conduct.

Risk of Modern Slavery:

Unknown

Mapping Status:

Logistics - Partially Mapped

Audit Status:

Not yet audited

Global Presence:

Spain, China, Vietnam and the US.



5. Sales

We have several sales channels:

- Camper stores
- Camper online
- Global presence through distributors, multi-brand stores, or online platforms.

Employees:

115 employees in offices around the world oversee commercial issues and we have team of around 600 people working in our stores. Teams are selected using a standardised onboarding process which includes our Code of Conduct.

Main Modern Slavery Policy:

Code of Conduct & Ethics

Key KPIs:

Around 80% of employees conducted our Code of Conduct Training in 2021.

Risk of Modern Slavery:

Low

Mapping Status:

-

Audit Status:

-

Global Presence:

We are present in more than 100 countries with 1,500 points of sale.



6. After Sales

We have multiple customer service mechanisms, adding value to the best possible experience during and after the sale of our products.

It is possible to extend the life of Camper products with our in-store shoe care service, or customers can send back their shoes at the end of their life for us to dispose of responsibly.

Employees:

Two teams dedicated to providing the best customer service, our Consumer Service and Customer Operations team conformed of 42 people.

Main Modern Slavery Policy:

Code of Conduct & Ethics

Key KPIs:

Around 80% of employees conducted our Code of Conduct Training in 2021.

Risk of Modern Slavery:

Low

Mapping Status:

-

Audit Status:

-

Global Presence:

Mallorca, Balearic Islands.

4 OUR GOVERNANCE

Corporate Governance

As a purpose-driven company, we believe that generating value focused on profit, people, and planet ensures long-term sustainability and guarantees a triple bottom line: being economically profitable, as well as being socially and environmentally responsible. To support this, we have a corporate governance body to ensuring optimal management, safeguarding the interests of shareholders and wider stakeholders.

Responsibility for governance, risk and human rights during this reporting period, sits with the Chief Financial Officer (CFO) who is also responsible for the ESG Department where the issue is monitored (even though Compliance is covered via other specialists and departments). This reflects Campers' commitment to ensuring Human Rights is integral to everything we do.

Camper's Human Rights Policy sets out our core approach, and this is further embedded within our Code of Conduct & Ethics, Code of Conduct for Suppliers and our Procurement Policy, including this Modern slavery statement, has full sign off by the Executive Board.

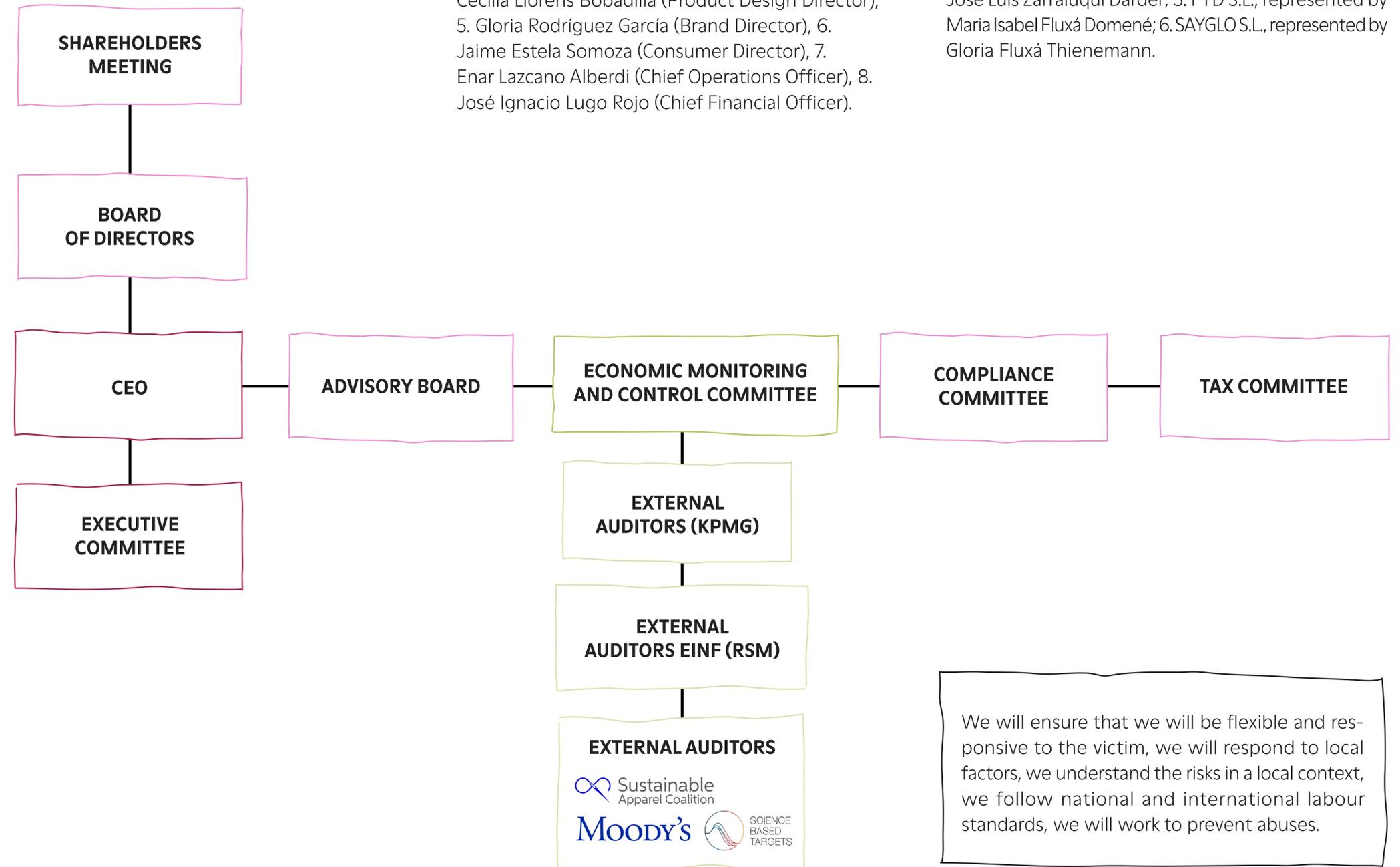
The Human Rights Strategy is set, reviewed and monitored by the ESG and Compliance Committees, both of which report directly to the Executive Committee.

We have a formal escalation process if serious issues affecting working conditions are found along our value chain. The escalation includes a briefing to the Operations Committee which will try to remediate and, if necessary, escalate the matter to the Executive Committee with a proposed action plan for remediation with agreed timescales.

Human Rights risks including, modern slavery issues are reviewed each time, and progress updates are provided.

OUR GOVERNANCE

Camper's governance structure is as follows:



Executive Committee:

1. Miquel Fluxá Orti (Chief Executive Officer),
2. Sito Luis Salas (Deputy Chief Executive Officer),
3. Vladimir Stankovic (Chief Commercial Officer),
4. Cecilia Llorens Bobadilla (Product Design Director),
5. Gloria Rodríguez García (Brand Director),
6. Jaime Estela Somoza (Consumer Director),
7. Enar Lazcano Alberdi (Chief Operations Officer),
8. José Ignacio Lugo Rojo (Chief Financial Officer).

Camper Board of Directors:

1. Forch Med S.L., represented by Miquel Fluxá Orti (Managing Director and Chairman);
2. Lorenzo Fluxá Ortí (Secretary);
3. Miquel Fluxá Orti (as an individual);
4. Jose Luis Zarraluqui Darder;
5. FYD S.L., represented by Maria Isabel Fluxá Domené;
6. SAYGLO S.L., represented by Gloria Fluxá Thienemann.

We will ensure that we will be flexible and responsive to the victim, we will respond to local factors, we understand the risks in a local context, we follow national and international labour standards, we will work to prevent abuses.

5 RISK ANALYSIS

5.1

Camper regularly monitors its practices and supply chain to combat modern slavery and human trafficking, to identify actual, potential or emerging risks. We use internal knowledge and expertise including information from our supply chain, supplier questionnaires, as well as external information relating to known risks in the industry or sourcing territories more broadly. This may include knowledge from wider stakeholders.

Camper's risk assessment methodology is incorporated into its regular practices, including the onboarding procedure, sourcing procedures and compliance.

In 2020 we conducted a materiality assessment as part of our risk analysis to rate actual or potential risks based on the severity of the issue as well as the likelihood of the risk occurring in its supply chain to help identify where the most inherent risk lies and therefore what should be a priority focus. Social Conditions and Human Rights in the Value Chain was considered of High Priority. This will be repeated in 2023.

The key risks currently identified are as follows:

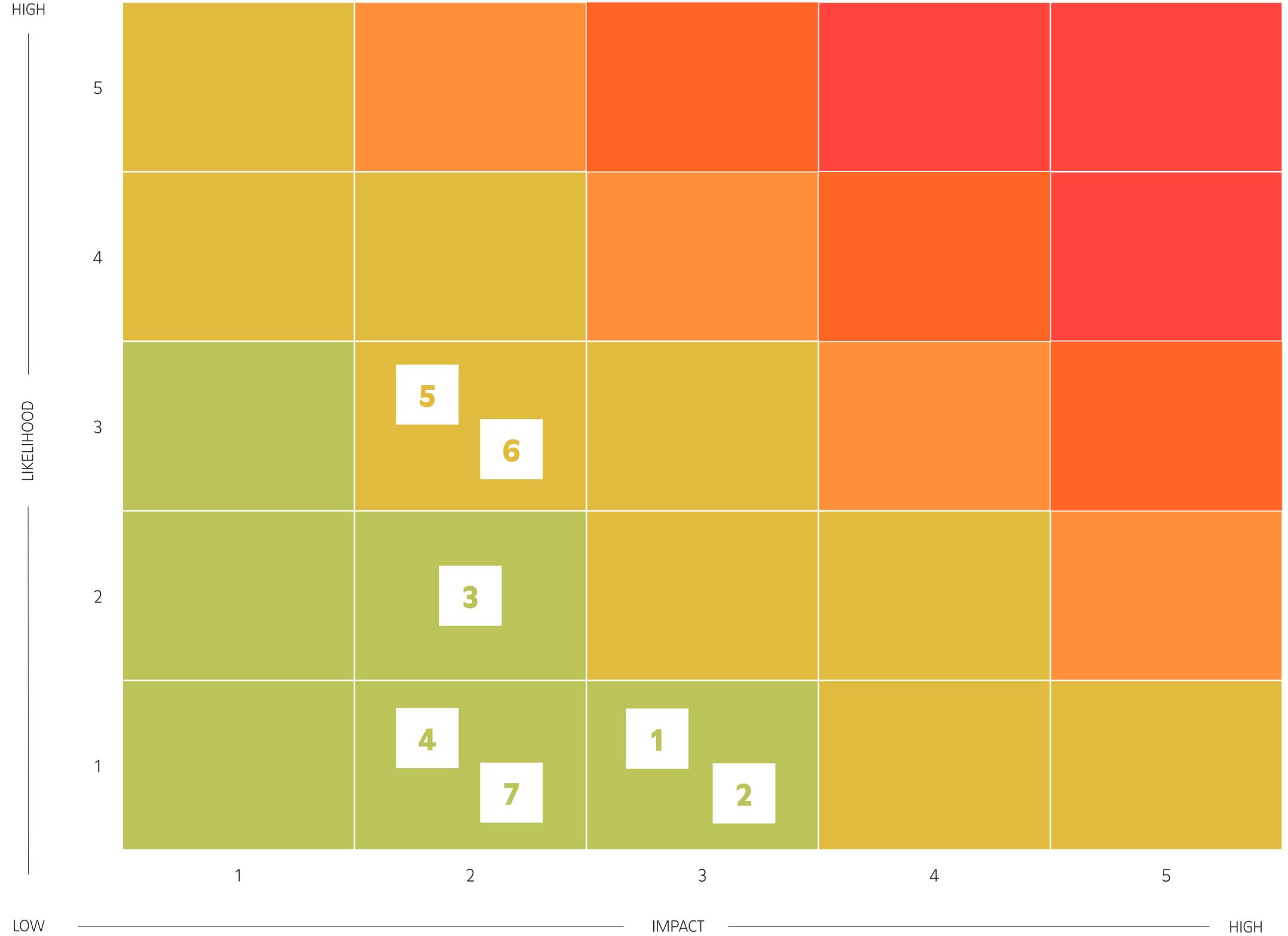
RISK ANALYSIS

#	RISK/OPPORTUNITY TYPE	RISK DESCRIPTION	Impact	Likeli-hood	Total Risk
1	Forced Labour	Risk of finding forms of forced labour or modern slavery in the supply chain.	3	1	3
2	Child Labour	Risk of finding forms of child labour in the supply chain.	3	1	3
3	Working hours	Risk to excess of overtime hours due to peaks in production/office/distribution center activity; incapability to guarantee work life balance.	2	2	4
4	Freedom of association and collective bargaining	Incapacity of guaranteeing freedom of association and workers' representation at the facility level (interference or discriminatory practices).	2	1	2
5	Health and Safety	Risk for all workers ifrom the exposure to short and long- term hazards at work and incapability to reduce workplace injuries and illnesses,	2	3	6
6	Discrimination, Harassment and Abuse	Risk of discrimination, violence and harassment, including gender-based violence and harassment.	2	3	6
7	Bribery and Corruption	Offering, promising, agreeing to receive or giving of a financial or other advantage to induce or reward improper functions or activities and/or the request or receipt of such an advantage.	2	1	2

5.2

HEATMAP OF RISKS

- 1 Forced Labour
- 2 Child Labour
- 3 Working Hours
- 4 Freedom of association and collective bargaining
- 5 Health and Safety
- 6 Discrimination, Harassment and Abuse
- 7 Bribery and Corruption



6 OUR POLICIES

6.1

Camper's regulatory body is shaped by a series of policies, tools, and mechanisms that help us to ensure strong governance and compliance across a number of different areas.

Our people related policies are designed to ensure that all our stakeholders are treated with dignity and respect. They are based on internationally recognised human rights principles and indicators encompassed in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The main policies covering modern slavery are:

OUR POLICIES

HUMAN RIGHTS POLICY

This policy outlines our overall approach and commitments to human rights across throughout our value chain.

CODE OF CONDUCT AND ETHICS

Our code encourages employees to understand our values and to do the right thing by clearly stating the actions and behaviour expected of them when representing the business. We strive to maintain the highest standards of employee conduct and ethical behaviour when dealing with any stakeholder.

CODE OF CONDUCT FOR SUPPLIERS

Our code states the minimum working condition standards that we expect our suppliers to adhere to in the production of all our products and in the delivery of services. This code was updated in 2021.

WHISTLEBLOWING POLICY

We encourage all employees, customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation. We provide a confidential helpline to protect the identity of whistleblowers.

PURCHASING POLICY & GUIDELINES

We have updated our Purchasing Policy and Guidelines to make explicit reference to slavery and human trafficking.

The main aspects include:

- No forced, compulsory or slave labour
- Prohibition of child labour
- Freedom of association and the right to collective bargaining
- Satisfactory working conditions
- Paid working hours which are not excessive
- Discrimination is not practiced
- Fair living wages are paid
- Regular employment is provided
- Environmental standards maintained to specified high standards

In addition, the following policies also support human rights issues connected with modern slavery: Anti-Harassment and Gender Violence Policy, Health and Safety Policy, Working Hours Policy, Equality, Diversity and Inclusion Policy.

We review and update these policies and practices regularly as we learn from our experiences

7 COLLABORATION

7.1

COLLABORATION

We recognise that the issue of modern slavery and human trafficking requires collaboration across private and public sector organisations, countries and civil society. We welcome collaboration on the topic, learning from others as we improve to become a business with purpose.

As a result we connect, use resources, guidance and best practice from the following organisations:



Sustainable Apparel Coalition (SAC) - is a global, multi-stakeholder non-profit alliance for the fashion industry, working to reduce environmental impact and promote social justice throughout the global value chain. Camper has been a member since 2019.



Better Work (BW) - is a comprehensive programme bringing together all levels of the garment industry to improve working conditions and respect of labour rights for workers by advising factories, and collaborating with governments and brands to improve conditions. A collaboration between the ILO and the International Finance Corporation (IFC), a member of the World Bank Group.



8 DUE DILIGENCE

DUE DILIGENCE

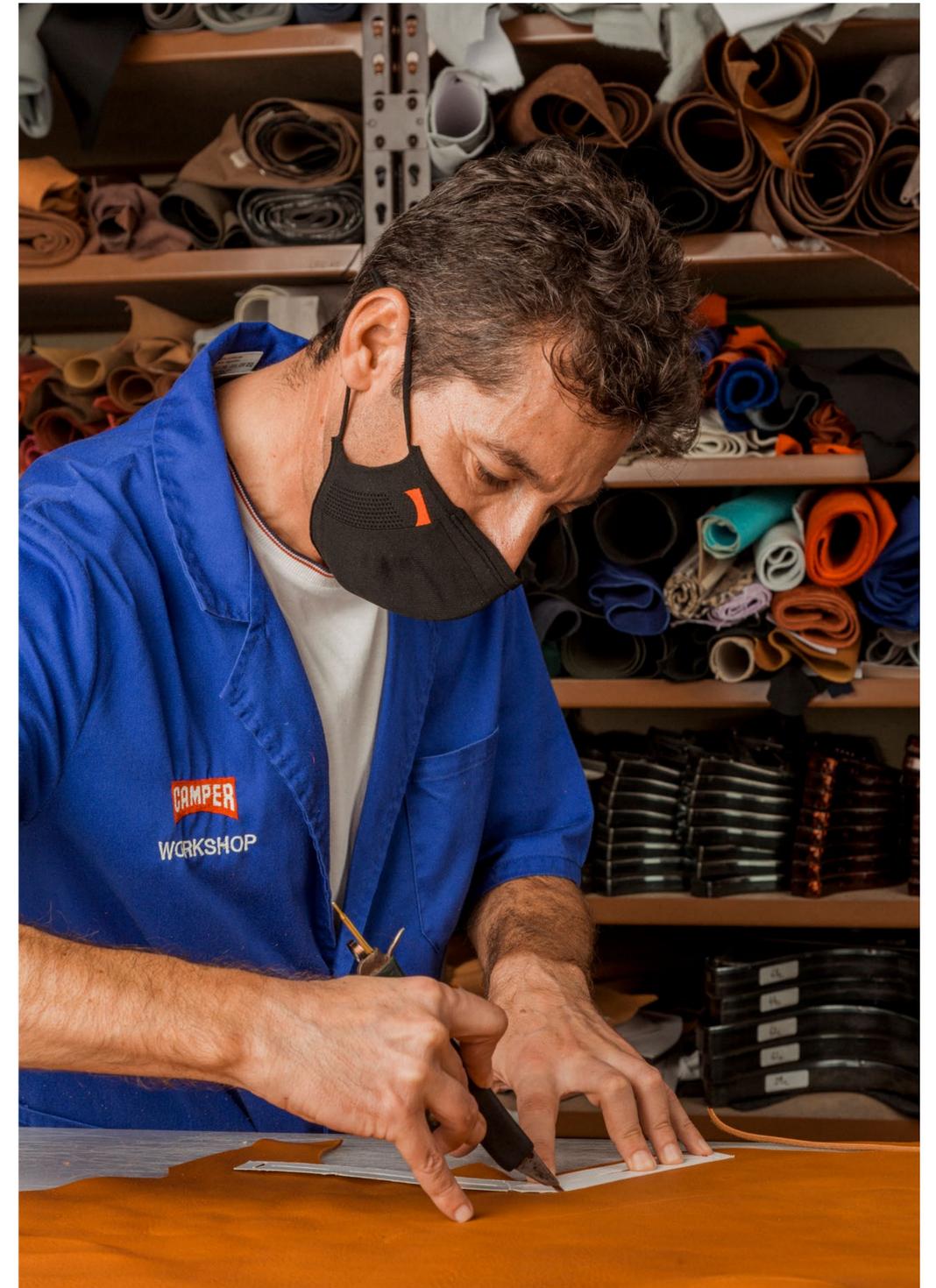
1 ONBOARDING

We review the employment of any new team member as part of our onboarding process. This includes a person’s right-to-work regarding any visas required for the country of employment. During the onboarding process, new starters are also trained on key governance aspects required for their role, including the Code of Conduct and Ethics.

2 HEALTH & SAFETY

Through assessments, one-to-one meetings and through our annual Psychosocial Risk Questionnaire*, our Health and Safety department identifies any risks to Camper people, including gender violence, modern slavery or other organisational related health issues.

* Spain only



WITHIN THE SUPPLY CHAIN

DUE DILIGENCE

1 ONBOARDING

We conduct due diligence on all new suppliers during on-boarding. All suppliers are required to sign a copy of our Code of Conduct for Suppliers to confirm they have received, reviewed and understood that they are in full compliance with its requirements. This is outlined in our Procurement Policy where we also ask our suppliers to complete our ESG Supplier. During this process we assess risks in the provision of particular services.

2 ANNUAL COMMITMENT

We also outline to our Tier 1 factories that sub-contracting is only allowed with our informed and written consent, which ensures we can monitor the situation with greater transparency. Our key suppliers must also update our ESG Supplier Questionnaire annually.

3 INFORMAL & FORMAL AUDITS

Formal and Informal assessments are an important part of identifying issues. If our employees are visiting a factory as part of their role and identify something of concern, they can contact our Sourcing Team directly. We use information from independently audited factories from the SLCP and from the SAC's Factory Social Labour Module, and we conduct our own social and environmental audits to check for abnormalities. (Better Work)

4 NON-CONFORMITY

We continue to produce internal incident reporting which provides clear visibility of where risks arise. Incidents and non-conformities are graded and, depending on the severity, are resolved within a specified timeframe. If issues cannot be resolved, or the issue is severe, we apply a zero-tolerance approach with the immediate resignation of the contract. Incidents, and associated reports, are reviewed by the Operations Committee and the ESG Committee.

5 WHISTLEBLOWER CHANNEL

We implemented a whistleblowing channel that is fully accessible to all our stakeholders, regardless of their category, allowing them to report any irregular or unethical conduct or conduct that goes against Camper's codes. The management of any complaint via the Whistleblower Channel is held by an external company, which allows us to ensure the anonymity, confidentiality, and security of the entire complaint process. Whistleblowing incidents are managed by the Compliance Committee.

8.3

Camper employees are required to complete on-line training on the Code of Conduct and Ethics during their first 30 days of employment, and on a yearly basis thereafter, and sign an agreement to abide by its principles.

TRAINING & AWARENESS

During 2021, we updated our Code of Conduct and Ethics and re-launched our training programme:

783

783 people trained on the Code of Conduct and Ethics:
352 people from the corporate area and 431 people from the retail area.

391

391.5 total hours of training on the Code of Conduct and Ethics:
176 hours in the corporate area, and 215.5 hours in the retail area.

0

No. of incidents received in the Whistleblower channel: 0



9 MEASUREMENT AND FUTURE ACTIONS

9.1

MEASUREMENT AND FUTURE ACTIONS

We monitor incidences against our code via:

- Line management processes
- Health & safety incidents
- Whistleblower channel cases
- Compliance Committee reports
- Supply Chain escalation (via audits, etc)

From our last audit reports there were some issues with extended overtime due to production time-scales. As a measure to incentivize better production plans and avoid extended overtime we modified the timeline in which we send our orders to manufacturers to allow them to better allocate resources. As we work within factories shared with other brands, it can be challenging to assess production schedules.

During 2021, we have not been aware of any critical allegations of human trafficking/slavery activities within our own business or against any of our suppliers, but if we were, then we would act immediately against the supplier and report it to the authorities.

COMPANY	TRAINING	TRANSPARENCY
Further strengthen our Code of Conduct for employees.	Strengthen our training on Code of Conduct for employees with focus on Human Rights.	Strengthen Supplier Code of Conduct & Supplier Onboarding.
Internal awareness campaign on Human Rights.	Train key teams on our Sustainable Purchasing Programme.	Strengthen our knowledge of human rights within Transport & Operations.
Integrate Human Rights KPIs on key staff's evaluation performance.	Conduct human rights training for key suppliers including modern slavery aspects.	Increase transparency and due diligence of Tier 1 and 2 Suppliers.

Relevant Facts Occurred in 2022 not included on this report:

On July, 2002, after more than two years of intensive work, Camper has become a B Corp. This means that our environmental and social practices meet the highest standards and this has been rigorously verified by a third party.

Camper's ESG Rating Score for the year 2021, assessed by Moody's was 46/100, which represents an improvement of 12% compared to the previous year.

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>