



**PERRY ELLIS EUROPE LIMITED  
MODERN SLAVERY STATEMENT 2019**

In compliance with the UK Modern Slavery Act of 2015, the following document discloses Perry Ellis Europe Limited (“PEEL”) policies and actions relating to the elimination of slavery and human trafficking in the supply chain.

PEEL is a wholly owned subsidiary of Perry Ellis International, Inc. (collectively, “Company”); which has its corporate office in Miami, Florida, United States. Perry Ellis International, Inc. through itself and wholly owned subsidiaries has approximately 2,500 employees worldwide, with offices and/or operations in the United States, Asia, Canada, Europe, and Mexico and has sourced goods and services globally for

over 50 years. Company is a global leader in the design, manufacturing, marketing and distribution of branded lifestyle apparel and accessories. PEEL is the UK division of the Company and leads the Company’s business operations in the UK and Europe.

PEEL believes that every person has a right to decent and humane working conditions. Accordingly, PEEL is committed to ensuring that our business and supply chain reflects our values. We are dedicated to developing our practices and strictly prohibit the use of forced or compulsory labor, slavery, and human trafficking.

## OUR SUPPLY CHAIN

**Our key supply chains, from suppliers and producers in 27 countries across the world, can be divided between:**

- **Our Tier 1 suppliers who are involved in the cut, sew finish and shipping of products; Suppliers that produce apparel (including wovens, knits, outerwear, swimwear, sweaters, accessories); and**
- **Our Tier 2 suppliers involved in screenprinting, laundry and embroidery.**

**During 2018 we used the US Department of State Trafficking in Persons Report to map our supply chain and identify areas of particular risk so that we could actively assess and manage those risks. Having done so, we identified those countries which gave rise to a potentially higher risk of modern slavery. Those are particular areas of our focus for extended risk assessments (described below).**

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## OUR APPROACH

Our internal policies include a Vendor Code of Conduct that outlines the minimum working and environmental conditions that all direct suppliers must meet prior to conducting business with PEEL, ensuring that we are promoting and enforcing ethical behaviors in our supply chain. Our Vendor Code of Conduct prohibits the use of child, forced labor, slavery, human trafficking and discrimination in employment. It also requires that lawful wages and benefits are provided, health and safety standards are complied with, and environmental laws are adhered to. Below is an outline of the steps we are continuing to take to promote our efforts in this regard:

1. As a condition of doing business, we require our suppliers to certify in writing via the our Master Supply Agreement and Vendor Code of Conduct that they comply with all applicable laws within the country of business including those regarding slavery and human trafficking.

2. We maintain and enforce internal accountability procedures for our employees and compliance by direct suppliers regarding company standards on slavery and human trafficking. In the case of non-compliance we reserve the right to investigate the situation and develop a best possible strategy for resolution. If non-compliance continues unresolved within a timely manner, we may terminate the business relationship.

3. Regular audits are conducted on our direct suppliers. Direct suppliers are evaluated on their compliance with our code through announced and unannounced audits conducted by our internal auditors and third party audit providers. Following advances made in financial year 2018, this has included additional human trafficking and slavery potential risk indicators such as:

- a. Indebted labor resulting from employee recruitment or placement;
- b. Deceitful employment practices at the time of recruitment; and
- c. Threat or coercion during the employment term.

4. We conduct internal training on our Vendor Code of Conduct to ensure the necessary participants who have direct responsibility for supply chain management are knowledgeable and aware of the issues and concerns surrounding the supply chain involving human trafficking and slavery including mitigating risks within the supply chain of products sourced by Company.

5. Having previously identified China as a potential high risk region for human trafficking and slavery we partnered with an expert third party provider to carry out risk assessments for all our suppliers in China. A total of 98 suppliers were assessed with a 100% response rate and our internal audit team is working with each active facility to

follow up on the responses. We will continue to hone the risk assessment process to identify and correct any disparities. For financial year 2020 Modern Slavery Supplier Risk Assessments will be launched in Bangladesh & Turkey and subsequently to suppliers in Guatemala, India, Indonesia, Jordan, Kenya, Madagascar, Malaysia and Thailand.

To download a copy of our Vendor Code of Conduct, please click the following link:  
<http://pery.com/Company/SocialCompliance>.

In addition to these steps we have been advancing training of modern slavery for staff and suppliers. In particular:

- In October 2018 our EU Sourcing, Purchasing and Quality teams, along with the Company's Compliance Director, underwent Ethical Trading Initiative training.
- As part of building on our internal training program, we have partnered with a third party to provide web-based training on

modern slavery to our EU and overseas associates. The program launched in 2018 and was geared towards ensuring staff understand what modern slavery is and how to identify it. It also helps to ensure that all those involved in procurement and engagement with our suppliers are alive to the risks and are aware of the importance of bringing matters of concern to our attention, with associates encouraged to report any suspected violations of forced labor, modern slavery/human trafficking to [legal.compliance@pery.com](mailto:legal.compliance@pery.com). The roll-out of the training will continue into 2019 in the United States and Mexico.

- As a result of Our Approach, we conducted CSR training sessions for suppliers in China. The purpose of the training was to educate suppliers on a number of topics including our code of conduct and modern slavery. These sessions will continue to play an important part in our engagement with suppliers.



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## OUR CONTINUED COMMITMENT

The Company also recognises the role it plays within the wider sector and has been expanding its involvement in relation to tackling modern slavery in the industry more generally. This has included collaborating with other brands in conjunction with the House of Lords and Anti-Slavery International to discuss the continued development of Modern Slavery Act transparency statements. Additionally, Company was a signatory to the Commitment to Responsible Recruitment together with the American Apparel and Footwear Industry (AAFA) and the Fair Labor Association (FLA) together with other brands and retailers. This confirms our commitment to working within our global supply chain to create conditions so that no worker pays for their job, workers retain control of their travel documents and have full freedom of movement, and workers are informed of the basic terms of their employment before leaving home. This is an important and ongoing commitment for us.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending February 3, 2019.

This statement was approved by the Board of Perry Ellis Europe Limited.

Signed

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Julie Dow  
Director, Perry Ellis Europe Limited  
July 2019



**PERRY ELLIS**  
INTERNATIONAL  

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SOCIAL COMPLIANCE