



(Modern Slavery Act 2015)

**International Eyewear Limited,
Birmingham, UK**

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1 Introduction

We are committed to improving our practices to combat slavery and human trafficking.

2 Organisation structure, kind of business and supply chains

Established in 1988, International Eyewear Ltd. is one of the UK's leading wholesale eyewear suppliers of optical frames and prescription sunglasses. Using our passion for great design and superior quality, we are able to provide a wide and varied mix of eyewear products, which results in a portfolio that offers customers the complete optical frames solution.

International Eyewear Ltd. are part of the Eschenbach-Group and our ultimate parent company is Eschenbach Holding GmbH, which has its head office in Nuremberg, Germany. The Group employs 535 people worldwide.

Our supply chain mainly comprises of the manufacturer of eyewear and cases to the UK and World markets. We design frames in house by our own team of designers in the UK and source the products via a number of manufacturing sites in the Far East. Printing, packaging and point of sales material from International Eyewear Ltd. are designed in the UK and sourced using UK manufacturers.

3 Policies in relation to slavery and human trafficking

We have a zero tolerance of slavery and human trafficking and are committed to ensuring that there is no slavery or human trafficking in any part of our business or in our supply chains.

Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in our business relationships and to implementing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains. Our Anti-Slavery and Human Trafficking Policy is appended to this statement.

As part of our Ethics philosophy, we ensure that salaries paid to staff globally are done so on a fair and comparable basis regardless of an employees' ethnicity.

We require our suppliers to comply with all applicable laws, statutes, regulations and codes from time to time in force in relation to the prevention of slavery and human trafficking and to implement due diligence procedures for their own supply chains to ensure that there is no slavery or human trafficking therein.

4 Due Diligence processes

As part of our initiative to identify and mitigate the risk of slavery und human trafficking, we have carried out a risk assessment of our business and supply chains and analysed the potential external risk areas as described in "5 Risk management".

5 Risk management

Country Risk – medium to low.

Although we run most of our projects from our Birmingham office, within Eschenbach Group we operate throughout the world.

Sector Risk – low.

Wholesale is seen as a low risk sector for labour exploitation. We are not directly involved in manufacturing processes.

Activities Risk – low.

We have built strong relationships with suppliers and stakeholders over a number of years, with whom we operate repeatedly across various jurisdictions. We try to carry out due diligence in relation to all our suppliers, and try to ensure that they have appropriate measures in place to safeguard against the occurrence of slavery and human trafficking within their company and supply chains.

Furthermore Eschenbach is a member of the amfori BSCI (Business Social Compliance Initiative):

amfori BSCI Code of Conduct

Our enterprise agrees to respect the following labour principles set out in the amfori BSCI Code of Conduct.

amfori BSCI Principles



The Rights of Freedom of Association and Collective Bargaining

Our enterprise respects the right of workers to form unions or other kinds of workers' associations and to engage in collective bargaining.



Fair remuneration

Our enterprise respects the right of workers to receive fair remuneration.



Occupational health and safety

Our enterprise ensures a healthy and safe working environment, assessing risk and taking all necessary measures to eliminate or reduce it.



Special protection for young workers

Our enterprise provides special protection to any workers that are not yet adults.



No bonded labour

Our enterprise does not engage in any form of forced servitude, trafficked or non-voluntary labour.



Ethical business behaviour

Our enterprise does not tolerate any acts of corruption, extortion, embezzlement or bribery.



No discrimination

Our enterprise provides equal opportunities and does not discriminate against workers.



Decent working hours

Our enterprise observes the law regarding hours of work.



No child labour

Our enterprise does not hire any worker below the legal minimum age.



No precarious employment

Our enterprise hires workers on the basis of documented contracts according to the law.



Protection of the environment

Our enterprise takes the necessary measures to avoid environmental degradation.

amfori BSCI Approach



Code Observance

Our enterprise is obliged to protect workers' rights as mandated by the law and the amfori BSCI Code.



Workers' Involvement and Protection

Our enterprise keeps workers informed about their rights and responsibilities.



Supply Chain Management and Cascade Effect

Our enterprise uses the amfori BSCI Principles to influence other business partners.



Grievance Mechanism

Our enterprise provides a system to collect complaints and suggestions from employees.

www.amfori.org

amfori BSCI
Trade with purpose

6 Key performance indicators (KPIs) to measure effectiveness

We will use the following KPI's to measure how effective our steps are to tackle modern slavery and human trafficking in our business

- An ethical trading policy combined with our supplier purchasing agreement is issued and acknowledged by all our product suppliers
- Scheduled audits completed where necessary and accessed
- Declarations of conformity held for all our core suppliers
- Quarterly reporting on any identified risks of modern slavery and ethical compliance

7 Training on modern slavery and trafficking

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we provide training to relevant members of our staff and make our Anti Slavery and Human Trafficking Policy available internally to all staff members and via our UK website to suppliers and customers.

We also ask all new employees to read the policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Anti-Slavery and Human Trafficking Statement for the financial year ending 31 December 2018.

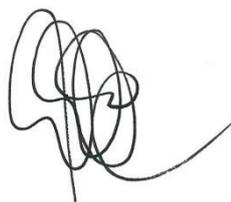
Approved by the directors and signed on their behalf:

ESCHENBACH HOLDING GMBH

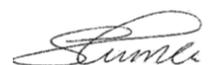
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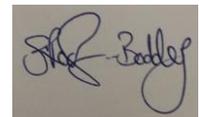
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