



OUR CODE OF BUSINESS ETHICS

EVERY STEP BEGINS WITH BEHAVING ETHICALLY



Clarks[®]
**MOVE THE
WORLD
AHEAD.**



CONTENTS

1 INTRODUCTION	02
2 CLARKS & BUSINESS ETHICS	04
3 OUR WORKPLACE RESPONSIBILITIES	07
4 OUR BUSINESS OPERATIONS	12
5 OUR COMMITMENTS TO CUSTOMERS	15
6 WORKING WITH BUSINESS PARTNERS	17
7 OUR SOCIAL & ENVIRONMENTAL RESPONSIBILITIES	21
8 ASKING QUESTIONS AND REPORTING CONCERNS	23
9 SUMMARY	27



1

INTRODUCTION

INTRODUCTION



THIS CODE SETS OUT OUR PRINCIPLES OF BUSINESS ETHICS AND PROVIDES GUIDANCE ON THE STANDARDS THAT THE COMPANY EXPECTS ALL OF US TO DEMONSTRATE TO ENSURE THAT THE HIGHEST STANDARDS ARE MAINTAINED WHEREVER WE ARE WORKING UNDER THE CLARKS BRAND.

The way we work matters to our senior leadership and the shareholders – it's a key factor in maintaining our reputation as a responsible business. It's important that we have a shared understanding of what it means to work at Clarks, and what all the different people that we come into contact with - from our customers to business partners - can expect of us. It's not an add-on to doing business, it's a foundation stone of our achievements over 200 years.

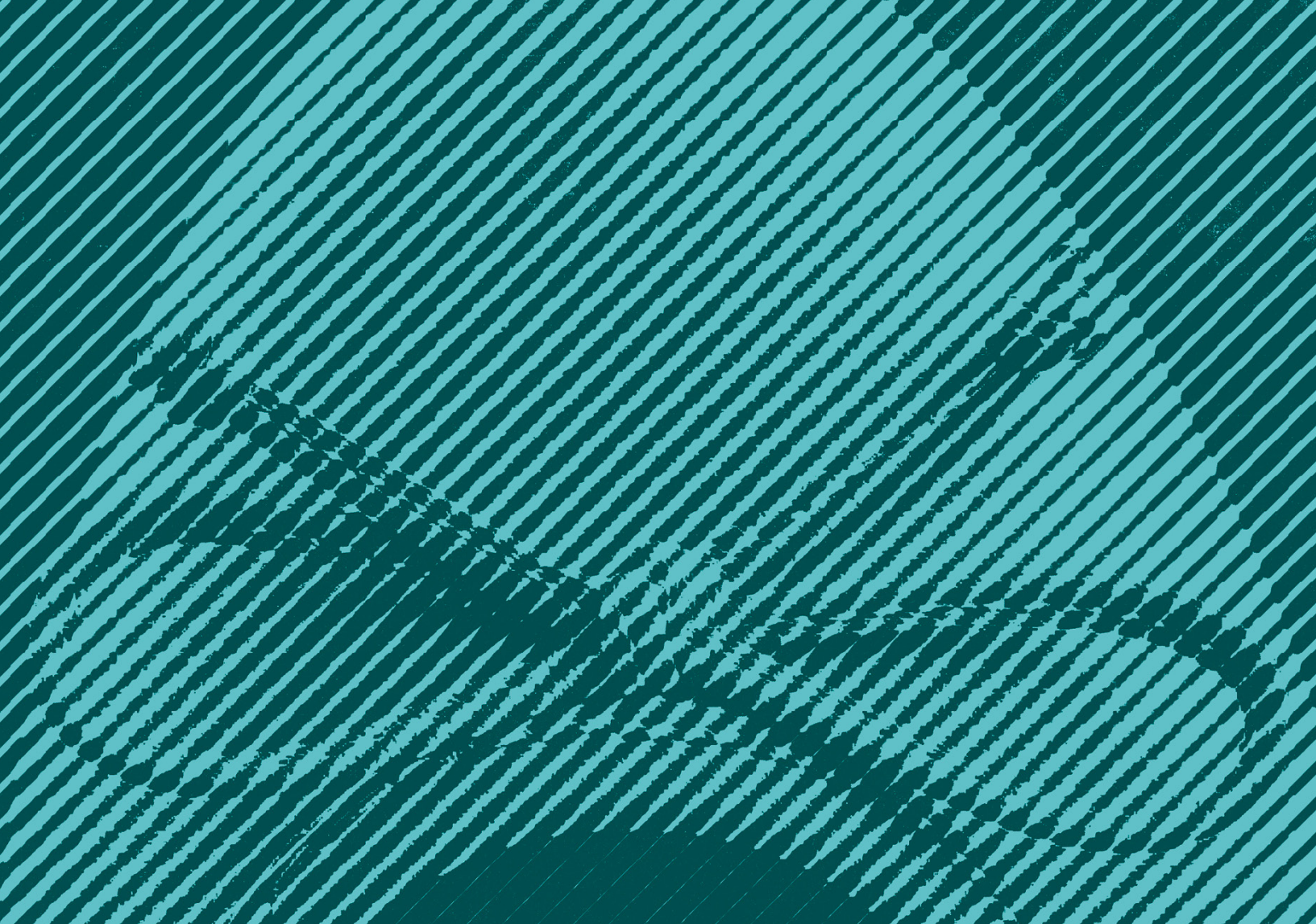
The Code is here to help guide you if you are in doubt about the right thing to do. It cannot address every ethical dilemma that you may find yourself faced with at work, but it does provide a

framework to help you make choices that align with our way of working. Please read it, follow the guidance that it provides and ensure that its principles are reflected in the way you work. Our individual and collective commitment to the Code supports us in demonstrating integrity in everything that we do.

If you should see or be asked to do something that you are unsure about, please speak up. Clarks is committed to maintaining a culture where we feel confident to ask questions and raise issues without fear of retaliation. Section 8 details the different channels available for seeking assurance or reporting concerns.

WHAT DOES BUSINESS ETHICS MEAN?

Business ethics means always acting with integrity and respect, no matter where we are and what we are doing. It's a personal responsibility to demonstrate integrity in the way we work, and to help make everyone proud to be associated with Clarks through our own actions.



2

CLARKS AND BUSINESS ETHICS

CLARKS AND BUSINESS ETHICS

WHY ARE ETHICS IMPORTANT TO US?

Being a responsible business has always been important to Clarks – the Quaker origins of the company mean that important ethical values are built into the way we work.

Acting with integrity and caring about the people that we work with remain our top priorities, whether they are Clarks employees, customers, suppliers or others that the business affects. Today, Clarks is a global brand with an international presence, and it is important that we have consistency in our ethical principles and the way we work around the world.

“The quaker upbringing and tradition of the founders of the company continue to inform the way we think about the business and its problems, and the sort of business we want to be; the conditions under which we employ people; our products and services and their integrity and usefulness to the community. Whether we think about the product or the way it is promoted, or the people who produce it, we want everyone to be proud to be associated with the company.”

Daniel Clark, Chairman of Clarks in the 1970s.

WHAT IS THE CODE OF BUSINESS ETHICS FOR?

The Code is a tool to provide guidance on Clarks principles for the way we work and to support decision-making that aligns with our ethics.

THE CODE

Outlines the global values and principles that help shape the way we work. Provides guidance on questions to consider when making decisions at work. Provides signposts of where to go and who to contact if you have further questions that are not answered in the Code.

Occasionally, we all find ourselves in situations where we are unsure of what to do or say at work. The Code is here to help in these situations – it's the resource to turn to when we are unsure, or we need a reminder of what to expect of Clarks, or of what Clarks expects of us.

WHO DOES THE CODE APPLY TO?

The Code applies to all Clarks officers, directors, employees and temporary employees. We encourage our business partners, including suppliers, franchise and joint venture partners, to adopt and apply the Code wherever they represent or promote the Clarks brand. This shared commitment will help ensure that we maintain our reputation as a company that operates with integrity.

HOW SHOULD THE CODE BE APPLIED GLOBALLY?

The Code presents principles and standards that Clarks, as a global company and brand, expects to be consistently applied wherever we do business.

HOW CAN WE EACH USE THE CODE?

There are three key ways in which we should each use the Code and put its principles into practice:

UNDERSTAND THE CODE

All employees are asked to read and understand the Code. Our commitment to it helps us to demonstrate the high standards that we apply in all of our activities, and supports us in maintaining the reputation of Clarks as a responsible company.

APPLY ITS PRINCIPLES

As employees, we make decisions every day that have the potential to affect the way that Clarks is viewed. We each have a responsibility to demonstrate the company's ethical principles through our behaviours and the actions and decisions that we take. We can do this by applying the principles outlined in the Code in day-to-day activities.

The code and the way that we work are built on two fundamental expectations: We will comply with applicable laws and regulations everywhere that we work. we will apply policies and procedures consistently around the world.

We also all have a responsibility to share and promote our business ethics with suppliers, customers and others that our business activities affect. They will then understand the way we work, what they can expect from us and, in turn, what we expect from them.

USE THE CODE TO HELP IN DECISION-MAKING

The Code is a tool that you should refer to when you are unsure of how to make the right decision. While the Code is not prescriptive and cannot address every situation that you may find yourself in, it can provide guidance and advice to help you in making decisions that align with our business ethics. If you are in any doubt about a decision, refer to the Code and ask yourself:

Am I setting a good example?

Am I comfortable with this?

Is it in line with what Clarks stands for, and the way we work?

Have I consulted with the right people?

If you answer 'no' or 'don't know' to any of these questions, stop and discuss the situation with your manager. You are the one making the decision, and it's up to you to make sure that you are happy with it.

The Code provides high-level information on important issues, but it's not a replacement for the more detailed policies and guidance that are in place throughout the business. These can be accessed via our learning platforms, or by asking your manager.

EXPECTATIONS OF MANAGERS

If you manage people, you have a responsibility to ensure that those individuals are aware of and understand the Code. You should also listen and respond to concerns that they raise. Further information on responding to concerns can be found in the 'Asking Questions and Reporting Concerns' section.



3

OUR WORKPLACE RESPONSIBILITIES

HOW TOGETHER WE MAKE CLARKS

OUR WORKPLACE RESPONSIBILITIES

PRINCIPLE

WE TREAT ALL EMPLOYEES AND EACH OTHER FAIRLY, WITH DIGNITY AND RESPECT

THIS MEANS

Fair treatment forms the basis of our relationship with employees. Anyone employed by Clarks has the right to expect that they will be respected and treated fairly at work.

We are committed to providing fair pay for all employees, paying at least the minimum wage, and providing all benefits required by local law to all employees.

We are committed to providing training and development opportunities that enable our employees to do their jobs well and to succeed in their careers with Clarks.

We respect the right of employees to form and join trade unions and bargain collectively. Where these freedoms are forbidden by law, we support the establishment of parallel means of association and bargaining.

We want people who can work effectively, so we recruit and promote people following a fair process using established criteria to measure skills, knowledge, behaviours and experience. Decisions are based solely on merit, aptitude and ability, and we never knowingly discriminate on any grounds.

We are committed to ensuring that our workplaces are free from any form of harassment, bullying and victimisation, including, but not limited to, actions related to race, religion, colour, ethnicity, nationality, age, disability, gender, sexual orientation, marital status or other factors.

We are committed to dealing fairly and sensitively with employees who may be subject to redundancy/layoff situations. We care about the welfare of employees, and are committed to providing a safe, healthy and secure place to work.

We have well-established formal routes for the purpose of raising grievances, and make every effort to ensure that all disputes are resolved fairly.

We ensure that personal data relating to employees is kept securely and used only for the purposes of employment.

Personal information relating to employees will not be shared with third parties unless required by law.



EXAMPLE QUESTIONS & ANSWERS

Q. I've been asked to take on extra responsibilities which I am not trained for – what should I do?

A. It's important that we are all equipped with the right skills to help us do our jobs well. If you think you need extra training you should discuss it with your manager as soon as you can.

Q. A colleague in the office frequently makes inappropriate remarks about other employees - I don't want to make a fuss, but their comments make me uncomfortable. Who can I speak to?

A. You do not have to put up with unacceptable behaviour and comments from colleagues at work. As a first step, you should raise the issue with your manager. If you are not comfortable with this, or if this does not resolve the problem, you can report the issue via email to ethics@clarks.com or use the independent Speak Up Line. See Section 8 for further details on how to report concerns.

OUR WORKPLACE RESPONSIBILITIES

PRINCIPLE

WE EXPECT ALL EMPLOYEES TO BE PROFESSIONAL AND HONEST IN THEIR ACTIVITIES AT WORK

THIS MEANS

We expect employees to protect commercially confidential information that may be accessed in the course of business activities, and not to use this information to benefit themselves or others. Such information includes, but is not limited to, product development details, financial data, supplier lists, marketing and advertising programmes and details of future products.

We respect the rights of our employees to participate in political processes as individuals, providing it is made clear that they are not representing Clarks.

We consider any level of bribery – giving or receiving something of financial or other value to influence a transaction – to be unacceptable, and all cases will be escalated and dealt with appropriately. The Clarks Anti-Bribery and Corruption Policy provides further details.

We trust employees to use company resources, including company time, physical and intellectual property, appropriately and to ensure that personal use of these resources does not take priority over work responsibilities.

We expect employees to attend work free from any substances that could result in unsafe or unacceptable conduct.

We respect the right of employees to participate in internet posting and social media activities, providing this is undertaken in line with the IT Code of Conduct. For example, it must be clear that the views expressed are the employee's own and do not reflect the views of Clarks, nor by association bring the name of Clarks into disrepute.

We encourage feedback from employees on all aspects of our business, and are committed to using this information to improve the way we work at Clarks.



EXAMPLE QUESTIONS & ANSWERS

Q. A colleague recently posted details of Clarks next season styles on a social media website. I know they shouldn't have done this but don't want to get them in trouble – what should I do?

A. It's your responsibility to make someone in Clarks aware of this so that the issue can be dealt with. There are a number of options including (i) ask the colleague to remove the information making reference to the fact that it breaches the IT Code of Conduct and other related policies (ii) discuss it with your manager or your colleague's manager (iii) use one of the other reporting channels outlined in Section 8.

Q. I post a regular internet blog, and have mentioned that I work at Clarks – is this acceptable?

A. Participation in social media activities is fine as long as you abide by the requirements outlined in the IT Code of Conduct and other related company policies. The IT Code of Conduct sets out specific requirements such as making it clear that the views you express are your own and not those of Clarks, and ensuring that you do not bring the name of Clarks into disrepute.

Q. I'm travelling on business and have been stopped by passport control at the destination airport. They've told me that my documentation is incomplete, and are demanding that I pay them a sum equivalent to £5 to be allowed entry to the country. They are quite intimidating - what should I do?

A. Your safety is always the number one priority - if you feel that there's a threat to your personal safety you should make the payment. If your documentation is incomplete, the payment would be classed as a facilitation payment, which we don't condone as a company. You should make every effort to ensure that your documentation is complete before travelling to avoid situations like this. You should report the payment to your manager as soon as possible and ensure that it is recorded.



4

OUR BUSINESS OPERATIONS

OUR BUSINESS OPERATIONS

PRINCIPLE WE OPERATE WITH INTEGRITY AND HONESTY

THIS MEANS

We make decisions for the long term and make every effort to be a sustainable business. These decisions are made in the context of protecting the environment and the rights of people. We uphold high standards of corporate governance.

We are committed to operating effective internal control systems which enable us to protect the assets of the business, ensure that we operate efficiently and produce accurate, timely and complete financial accounts and reports.

We expect employees to act in the best interests of the company and not to undertake activities or relationships that conflict, or appear to conflict, with the company's business interests. Actual, potential conflicts, or those that could be perceived by others, should be declared and recorded for future reference.

We consider fraud as gross misconduct, resulting in disciplinary action. Fraud is the act of deliberately deceiving for the purpose of personal gain or to cause loss to another party. Acts of fraud include falsifying records, documents and reports; failing to disclose information, or abuse of position.

We do everything we can to prevent our employees, workers, agents or service providers facilitating tax evasion by upholding all laws relevant to countering tax evasion in all the jurisdictions in which we operate, including the Criminal Finances Act 2017 and also ensuring we have robust practices in place.

We place a great deal of importance on communication, and aim to provide regular and engaging updates on relevant company performance and activities to employees.

We do not engage in anti-competitive practices or discuss details of pricing, markets or customers with competitors.

We comply fully with the requirements of competition and anti-trust law wherever we operate. We gather market information through lawful means, and do not attempt to access competitor business information using disreputable mechanisms.

EXAMPLE QUESTIONS & ANSWERS

Q. I've been asked to take on extra responsibilities which I am not trained for – what should I do?

A. We place a great deal of importance on communication, and provide updates on our policies and performance via

annual and interim reports and accounts and other mechanisms. These can be accessed on our intranet, or ask your manager or a briefing.

Q. I am part of a team assessing candidates for a new role. One of the shortlisted candidates is a family member. I think this is a conflict, what should I do?

A. You are right that this is a conflict of interest. You should make your manager aware of the relationship between yourself and the candidate in writing, and ensure that you are not involved in either the assessment process or ongoing line management if they are given the job. You should also make sure that you do not discuss the details of the job or assessment process with the family member. If the candidate is successful in their application, please ensure you both declare your relationship on the conflicts of interest register.!

Q. When completing my expenses for a recent business trip, a colleague suggested that I should enter a false claim and say that I lost the receipt. When I questioned him on this, he said 'everyone does it, where's the harm?'. Is he right?

A. No – this is fraud and is not acceptable under any circumstances. If you believe that a colleague is submitting fraudulent expense reports you should discuss it with your manager, or report it via the Speak Up Line if you are not comfortable discussing it with them.

Q. How can I be alert to practices which could potentially facilitate tax evasion?

A. There are a number of red flags such as where third parties may make a false statement relating to tax, or fail to disclose income or gains to HMRC. Other warning signs include if a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made. Individuals could try to avoid paying tax by asking to be treated as a self-employed contractor, but without any changes to their working conditions or requesting to be paid gross instead of net. Other flags would be where a third party requests payment is made to a country or geographic location different from where they reside or conducts business or end an invoice that appears to be non-standard or customised or asks for documentation to be backdated or a commission/fees that appears disproportionate to the service stated to have been provided.



5

OUR COMMITMENTS TO CUSTOMERS

HOW WE DELIVER EXCEPTIONAL SHOES & SERVICE TO CUSTOMERS

OUR COMMITMENTS TO CUSTOMERS

PRINCIPLE

WE PUT THE CUSTOMER AT THE HEART OF WHAT WE DO

THIS MEANS

We put customer expectations at the centre of the way we work, building them into our business, products and plans, and giving customers confidence in Clarks

We aim to consistently maintain the quality of – and qualities inherent in – our products globally, and recognise that customers consider quality, reliability, safety, value for money as key factors when assessing our reputation and placing their trust in us.

We market our products responsibly, and are committed to promoting positive and healthy body images in our advertising.

We are committed to being honest, transparent and accurate when we communicate with customers, whether in advertising, product information or more detailed reporting, and to respect their cultural and ethical views.

We treat customer information with confidentiality, and are committed to handling such data in a responsible manner. We don't sell, or pass on information provided by our customers to parties outside of Clarks, unless agreed pursuant to applicable privacy policies and as required by law.

We are committed to maintaining high standards of sale and after-sale service, proactively dealing with issues and complaints if things go wrong.

We respond proactively and appropriately to enquiries from customers and other interested parties.

We encourage and welcome feedback on our products, performance and service, and take this on board to improve our service.

We never knowingly discriminate against consumers on any grounds.

EXAMPLE QUESTIONS & ANSWERS

Q. Can I provide contact details for customers to an external market research company?

A. No – customer information is usually provided to Clarks on a confidential basis. You should refer to the relevant company policies on data protection and seek guidance from your manager. In case of doubt, please consult the legal team.

Q. A customer has asked me a question about the treatment of workers in the factories that we use. I don't know what to tell them – what should I say?

A. It's really important that we give our customers honest and straightforward answers to questions that they ask us. If you don't know the answer to an enquiry, try to find out for them straight-away, and/or point them to where they can find out more information. In this case, direct the customer to the Corporate Responsibility section on Clarks.com.



6

WORKING WITH OUR BUSINESS PARTNERS

HOW WE BUILD STRONG RELATIONSHIPS

WORKING WITH BUSINESS PARTNERS

PRINCIPLE

WE BASE OUR BUSINESS RELATIONSHIPS ON RESPECT; AND EXPECT THE SAME FROM THOSE THAT WE DO BUSINESS WITH

THIS MEANS

We expect our business partners to maintain high standards of integrity and encourage suppliers, franchise partners, joint venture partners and others that we have business relationships with to share our commitment to the principles of this Code.

We ask our business partners to treat their employees and those they have dealings with fairly and with respect.

We require our business partners to abide by all applicable laws and regulations, including those regarding human rights, workplace safety and worker compensation and treatment.

Modern Slavery and trafficking can be a problem in any country. We do not use child labour or forced labour in any of our operations. 24% of all forced labour takes place within the wholesale and manufacturing industries therefore Clarks need to ensure we mitigate the likelihood through strict employment policies & practices in our own operations and with third party relationships such as those with our supplier factories.

No children under 15 years, or the minimum school leaving age of the country where it is higher, are to be employed by Clarks or its business partners. No form of forced or compulsory labour or modern slavery is tolerated by Clarks within our own operations or those of our business partners.

We expect our employees to be aware of the signs that someone may be a victim of forced labour, slavery or trafficking and report any issues where you suspect this to be the case to ethics@clarks.com or through the Speak-Up line. We do not expect any employee to tackle the situation on their own, in a situation such as a factory where immediate action may be required then we should engage directly with local authorities as a priority.

We always aim to be fair and straightforward in how we deal with our business partners.

We don't give or accept improper payments, regardless of where we are operating in the world. This includes providing facilitation payments to government officials to encourage them to act more quickly.

We make decisions on the selection of our business partners, including suppliers, franchise partners, wholesale partners and others on the basis of objective criteria. Decisions must never be made on the basis of personal relationships or opportunities for personal gain.

We expect employees to use their judgement and good sense when accepting business gifts and comply with the Clarks Gifts and Hospitality Policy. You should always ensure that accepting a gift does not place you under any obligation, and that it cannot be misconstrued.



We expect all employees to avoid being placed in a situation whereby accepting hospitality from a supplier influences business decisions, or causes others to perceive that a decision has been influenced. Where hospitality is accepted, it's important that it is for valid business reasons, or when it is an appropriate cultural courtesy. All gifts and hospitality should be reported and recorded in writing in the appropriate Company register.

We respect the right of our suppliers to be paid on time and we are committed to making payments in accordance with agreed terms and conditions.

We are committed to the protection of information received from those we do business with in the course of our operations. Information provided to third parties should be true and fair and never designed to mislead. We expect employees to avoid business transactions that have the potential to result in personal benefit and not to use their position to obtain personal discounts from suppliers or contractors to Clarks

EXAMPLE QUESTIONS & ANSWERS

Q. What are the signs that someone may be a slavery or trafficking victim?

A. There are a number of areas which can alert us, these include someone who does not have their own passport, ID or travel documents; a person who always allows others to speak for them or talks as though being instructed or coached by someone else; they may be withdrawn or appear frightened and may have injuries. Other signs include people who have limited social interaction and may always be dropped off or collected from work; they may not be able to contact friends or family freely. A person with very few possessions or who lives in a very poorly maintained, overcrowded place (and is often overcharged for this, or has little control over their finances or no access to a bank account can also be an indicator. These are not conclusive evidence but are all warning signs that we can be aware of and report if we feel concerned.

For further information see the International Labour Office's Indicators of Forced Labour.

Q. I have concerns that one of our staffing agencies may be requiring workers to lodge financial deposits and identity papers in order to secure employment, then withholding them when the worker wishes to leave.

What should I do?

A. This is a potential case of forced labour or modern slavery and you should raise these concerns directly to HR, to ethics@clarks.com or via the Speak Up service.

Q. Do we monitor working conditions in our supply chain?

A. Yes, we have an established Code of Practice which sets out working condition standards for suppliers, sub-contractors and service providers. It covers issues such as child labour, forced labour, working hours and health and safety and is aligned with internationally recognised core labour principles set by the International Labour Organisation (ILO), a United Nations agency. Our factory audit programme enables us to review working conditions in factories that we use against this Code, and to identify opportunities for improvement. The information gathered through these audits informs our sourcing decisions and helps us work with our suppliers to ensure the high standards we expect in our products are reflected in the working environments in which they are made.



7

OUR SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES

HOW WE MAKE A POSITIVE CONTRIBUTION TO THE LIVES WE TOUCH

OUR SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES

PRINCIPLE

WE BASE OUR COMMITMENT TO MAKING SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES A KEY PART OF HOW WE MAKE DECISIONS

THIS MEANS

We aim to manage our social and environmental responsibilities, minimise our impacts and live up to the expectations of our stakeholders wherever possible.

We comply with relevant environmental legislation wherever we operate around the world.

We promote responsible behaviours amongst our employees through mechanisms including induction, training and ongoing communication.

We encourage employees to make a positive contribution to the communities that we are a part of globally.

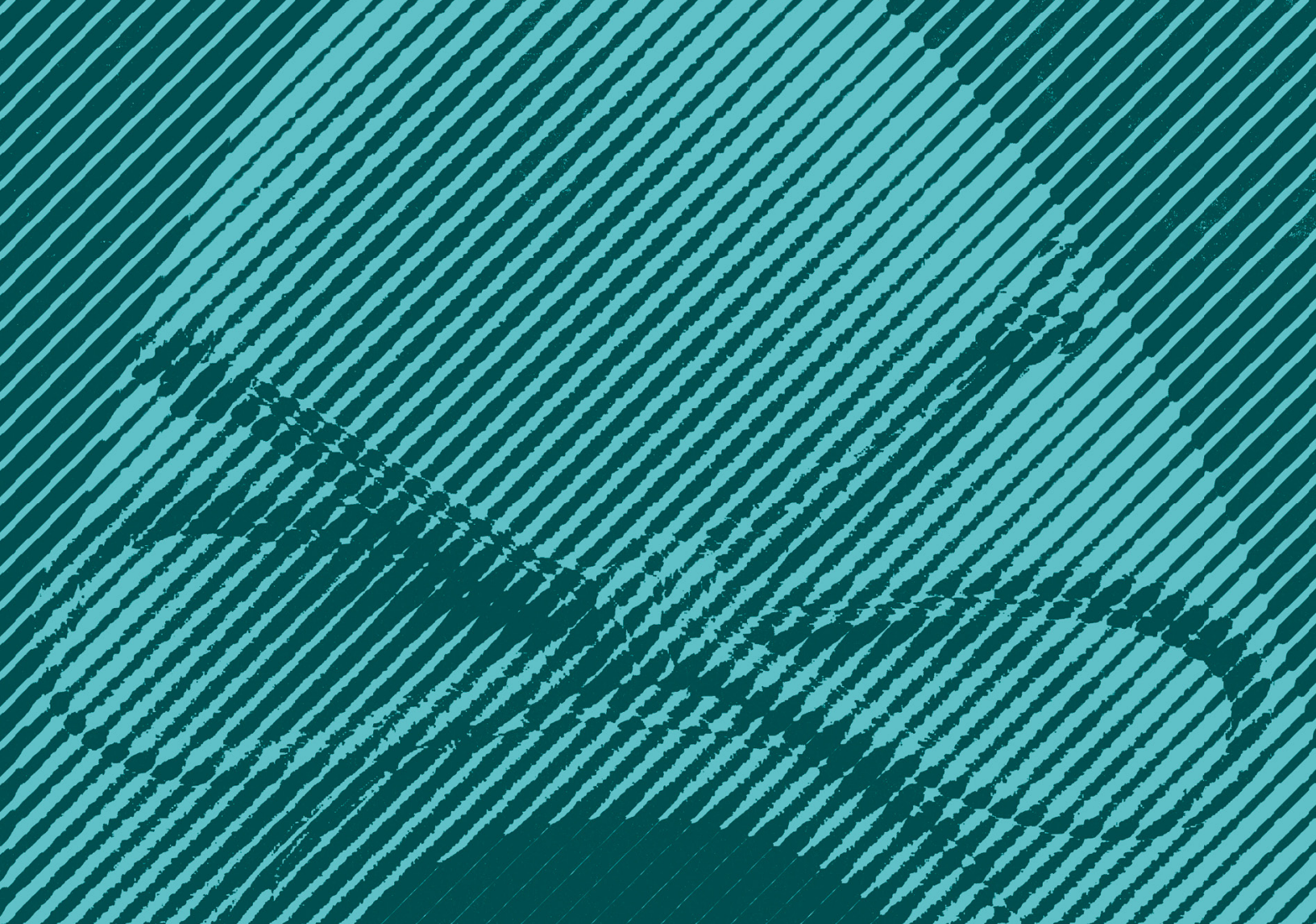
We support a range of charitable causes at a global and local level, and have a defined process to help us to identify the organisations and causes that we donate to.

We aim to reflect the values of our customers, employees and other stakeholders in our activities, and build their expectations into our business, products and plans through our Corporate Responsibility Programme.

We do not participate in political activities or make donations to political parties or individual candidates.

We do not directly lobby elected representatives or governmental organisations. Where we do seek to influence policy development, we do so transparently through our support for, and work with, expert or like-minded organisations with which we have shared values.

We are committed to engaging with relevant non-governmental organisations, and recognise the contribution that they can make to helping us improve our standards and performance.



8

ASKING QUESTIONS AND REPORTING CONCERNS

ASKING QUESTIONS AND REPORTING CONCERNS



Clarks respects the rights of employees to ask questions and report concerns, and are committed to maintaining. A working environment where we all feel confident in doing this.

Confidentiality of reported issues will always be maintained, and there will be no reprisals relating to the reporting of genuine issues.

There are three main channels available to raise concerns over wrongdoing or inappropriate activities at Clarks and these are outlined on the next page. Such concerns could include, but are not limited to:

- Financial malpractice or fraud
- A criminal act such as theft
- non-compliance with legal requirements
- conflicts of interest
- Dangers to health and safety or the environment
- Improper conduct or unethical behaviour that does not reflect our Code of Business Ethics

If your concern relates to your own working environment or conditions, how you have been treated or managed, terms and conditions of employment, personal impacts resulting from organisational change, direct discrimination or similar please consider using the Clarks Grievance Procedure to report your concern. Information of the Grievance process can be provided by your local HR team and policies can be found on your local learning platform.

Who should I contact if I have a concern about a potential breach of the code of business ethics or require advice?

If you are concerned that the principles set out in this Code are not being reflected in the way we work, are worried about a specific incident or have any questions on how to abide by the Code, there are a number of channels available to you:

YOUR MANAGER

Your first point of contact should be your manager, who has a responsibility to listen and respond to any matter that is of concern to you.

However, there may be some instances in which your manager is unable to resolve the issue or where you may feel it is not appropriate to raise it with them. In these instances, please access one of the alternative channels below.

EMAIL

Ethics@clarks.com to inform our senior legal, HR and compliance leads.

The designated Clarks contact will then follow up directly with yourself to understand the issue being raised whilst maintaining confidentiality.

INDEPENDENT ADVICE

Contact the independent speak up line.

If you'd like to speak to someone outside of Clarks, or if you have raised an issue and feel that it hasn't been dealt with appropriately, you can contact the Speak Up service, which is answered by an independent third party. You will have the option of remaining anonymous. The Speak Up service can be accessed by phone, email or online and is available 24 hours a day, 7 days a week in multiple languages.

Contact details for the Speak Up Line are promoted throughout our stores, offices and other workplaces, and are also available on the intranet. If you have any difficulty finding them please email ethics@clarks.com asking for the Speak Up contact details to be sent to you directly.

It is important that the Speak Up Line is used for asking questions and reporting genuine concerns and issues. Inappropriate use of Speak Up, for example reporting a fabricated concern for malicious reasons or for personal gain, may result in disciplinary action.

EXAMPLE QUESTIONS & ANSWERS

Q. Do I have the option to report a concern anonymously?

A. We encourage all employees to give their name when reporting concerns, as this enables us to investigate and deal with the concern quickly and appropriately, and to contact you if we need to in the course of the investigation. If you use the Speak Up line you will have the option of remaining anonymous – please state your request for anonymity at the start of your contact with them.

Q. Why does Clarks provide an external Speak Up line?

A. By using an external provider, we ensure that our employees are able to access an independent channel for reporting any potential breaches of our Code of Business Ethics and remain anonymous if they wish. The Speak Up service is operated 24 hours a day, 7 days a week and is accessible wherever we operate in a wide range of languages.

Q. It's rumoured that a colleague is paying officials to speed up import and export processes.

It's only hearsay, so should I do anything about it?

A. If you have a genuine suspicion that something is going on which is not in line with the principles and guidance of the Code of Business Ethics, and you believe the information you have is accurate, you should report your concerns. If, following further investigation, it turns out that your concerns were unfounded but you reported them in good faith then there will be no reprisals for having done so.

SUMMARY

PRINCIPLE

We treat employees, and each other, fairly and with dignity and respect

We expect all employees to be professional and honest in their activities at work

We operate with integrity and honesty

We put the customer at the heart of what we do

We base our business relationships on respect; and expect the same from those that we do business with

We are committed to making social and environmental responsibilities a key part of how we make decisions

KEY QUESTIONS TO ASK

Q. Am I setting a good example?

Q. Am I comfortable with this?

Q. Is it in line with what Clarks stands for, and the way we work?

Q. Have I consulted with the right people?

If you have a query or concern relating to our Code of Business Ethics you can:

Talk to your line manager

Refer to Clarks policies and procedures for further information.

Contact ethics@clarks.com to inform our senior legal,

HR and compliance leads.

Call the Speak Up line to report a concern.

