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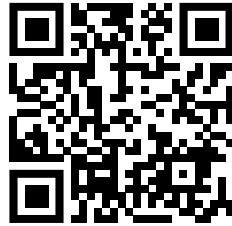
Modern Slavery Act

Product Drop
Campaign Launch
Brand Deck

HR Handbook
Responsibility Report
 Modern Slavery Act

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Details

Weight (words)

For the financial year ended
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We're Ace & Tate and we make glasses. It sounds fairly simple and that's the whole point. We're here to inject a good dose of common sense into our industry by making well-designed, quality eyewear accessible to everyone. Great fits that last, for all eyes.

Introduction.

This Modern Slavery Statement (hereinafter the "Statement") encourages us to be more transparent about how we maintain a zero-tolerance policy toward modern slavery and continuously work to keep our operations and supply chains free from exploitation. The Statement creates more transparency and sets out the necessary standard for all layers within our supply chain. It demonstrates our values, alongside describing what we consider good labour standards.

We respect human rights and we are committed to conducting our business ethically and sustainably. We support the Universal Declaration of Human Rights, which recognises that "all human beings are born free and equal in dignity and rights." Modern slavery (i.e. slavery, servitude, forced labour and human trafficking) goes against everything Ace & Tate stands for and is fundamentally unacceptable within our business and supply chain. We are fully committed to combating modern slavery and we are committed to improving our practices in this area.

Facing continuous growth, our responsibility to act on our adverse social and environmental impact increases every day. Every frame we produce, every lens we cut, and every package we ship has an impact on both natural resources and the people involved. We want to serve as a force for good, having a positive social impact.

This Statement is released in compliance with section 54 of the UK Modern Slavery Act 2015. It constitutes our Statement for the financial year 2025 and our intentions for 2026.

Signed on behalf of the
Board of Directors

Our business.

Ace & Tate was founded in 2013 in Amsterdam and currently employs 788 employees. We currently have over 85 stores across Europe (with more in the making!).



Click here to view all of our store locations. Ace & Tate's headquarters is located in Amsterdam, the Netherlands.

Operating with a deep commitment to responsibility, we ensure that our ethical strategy is seamlessly woven into the core of our organisational and business frameworks. The CEO maintains ultimate accountability for spearheading our sustainability vision, supported by a specialised Responsibility department that defines our targets and facilitates cross-functional integration.

Our supply chain

We're committed to being a more responsible business every day. Our frames are thoughtfully designed by our in-house team in Amsterdam. We work closely with our manufacturers across the globe to produce frames, lenses and materials. We ensure that these manufacturers meet our standards of social and environmental responsibility and we will continue to seek innovative technologies to create well-designed, quality frames.

Knowing where and under what conditions our raw materials and products are sourced and manufactured is key to ensuring better conditions across our supply chain.

Our policies & standards.

Operating with integrity means prioritising both people and the planet. At Ace & Tate, ethical conduct is an ongoing commitment rather than a formality. We align our global operations with human rights benchmarks, including the ILO and the Universal Declaration of Human Rights, to ensure everyone is treated with fairness and dignity.

To back this up, we embed rigorous due diligence into our core processes. We maintain a zero-tolerance approach to modern slavery and human trafficking, mandating that all direct suppliers, and partners strictly adhere to our social and environmental standards.

Human Rights Policy

Our commitment to uphold human rights is founded on the principle that every individual is entitled to equal treatment, respect and dignity. We empower all people to be their authentic selves and ensure equity and dignity in every aspect of our work.

Supplier Code of Conduct

Our direct manufacturers, suppliers and other business partners share our values and are required to read and sign our Code of Conduct. By signing, they confirm their understanding of the Code of Conduct, and they agree to compliance with its terms. The Ace & Tate Supplier Code of Conduct is based on the UN Guiding Principles (UNGP'S), OECD guidelines, as well as the conventions and recommendations of the International Labour Organisation (ILO).

Speak Up Policy

We are committed to transparent communication, equality and inclusivity. We like to play fair. We partner with SpeakUp to establish a grievance mechanism, promote early transparency and prevent ethical misconduct in the value chain through confidential reporting. Operating with integrity means prioritising both people and the planet. At Ace & Tate, ethical conduct is an ongoing commitment rather than a formality. We align our global operations with premier human rights benchmarks – including the ILO and the Universal Declaration of Human Rights – to ensure everyone is treated with fairness and dignity.

HRDD

Risk assessment and Human Rights Due Diligence

At Ace & Tate we recognise the inherent human rights risks within our supply chain and integrate a due diligence process following OECD framework into our corporate structure. This process is designed to identify, prevent, mitigate, and hold us accountable for any potential impacts on human rights throughout our supply chain.

Our approach to HRDD

We conduct ongoing HRDD across our value chain, suppliers, and materials, to identify and address actual or potential negative human rights and environmental impacts. This process is dynamic, adjusting based on operational context, risk, business relationships, and the nature of our involvement.

We integrate stakeholder and expert feedback to continually refine our approach. HRDD requires specific attention during key business junctures, such as forming new partnerships or changes in our operating environment, as these situations can introduce new potential or actual human rights impacts.

Integrating HRDD outcomes

The findings of our due diligence inform and integrate into our policies and internal systems. This involves:

IDENTIFYING AND ASSESSING IMPACTS.

TAKING NECESSARY ACTION ON OUR FINDINGS, INCLUDING PROVIDING REMEDIATION WHERE NECESSARY.

TRACKING AND MEASURING THE EFFECTIVENESS OF OUR ACTIONS.

MAINTAINING OPEN COMMUNICATION WITH OUR STAKEHOLDERS.

Focus and remediation

Our primary focus is on salient human rights issues, those with the highest risk of severe negative impact. We regularly review these issues, concentrating specifically on labour rights within our operations and value chains, given our business context.

When human rights are negatively impacted, our involvement in remedy is determined by our connection to the harm, the significance of the harm, and the relative context. We work to prevent and mitigate prioritised impacts and are accountable for how we address them.

Monitoring and continuous improvement

Ethical audits

An ethical audit aims to understand how factory practices benchmark according to local laws and the universal ILO labour standards. We accept internationally recognised standards such as SA8000, amfori BSCI, SMETA, SLCP, WRAP or QIMA ethical. We require annual ethical audits from our direct Tier 1 suppliers and recommend this with Tier 2 suppliers to ensure safe working conditions, the meeting of

human rights standards, and that processes are in place to ensure environmental compliance. When there is no valid audit in place, we schedule a QIMA audit. The QIMA audit enables us to assess our production sites and suppliers to understand the working conditions in their supply chain.

We collect the audit reports annually and follow up on non-

conformities if reported in the form of a Corrective Action Plan. The Corrective Action Plan is collectively established with our suppliers for further improvement. The Corrective Action Plan is part of the final audit report and established by the verified third party auditor, and includes time bound requirements on areas of improvement.

We expect our suppliers to be open to achieving any other international standard certifications or audits. We request all our suppliers to always be open and transparent so we can assess whether they respect our values or not. The process of such an assessment may consist of an initial collection of social accountability and Code of Conduct related information.

In cases where our product suppliers find it difficult to work through the Corrective Action Plan, we do our best to help them understand and address the root causes of particular issues, and to develop systems that prevent such issues from occurring again.

The social audits are conducted by verified, third parties. Audits are conducted against the labour standards, health & safety and environment.

Even though we are not solely reliant on audits, we believe they are a great starting point to improve our supply chain practices. We believe that audits help us ensure the monitoring of working conditions, responsible practices, consistency and continuous improvement.

ESG supplier evaluations

We work closely with our Tier 1 and Tier 2 suppliers to further improve our programmes to be sure social and environmental standards are upheld. ESG reports are completed by suppliers bi-annually. In these sessions, we assess environmental, social, and governance performance. Using these assessments as a foundation, we collaboratively develop improvement plans across various domains. This includes exploring the feasibility of establishing annual reduction targets for areas like energy consumption and waste, while also addressing and mitigating any identified issues over time. Through the ESG review sessions, we can understand the challenges of our Tier 1 and Tier 2 suppliers and have open dialogues for mutual improvement.

Operational workplace grievance mechanism

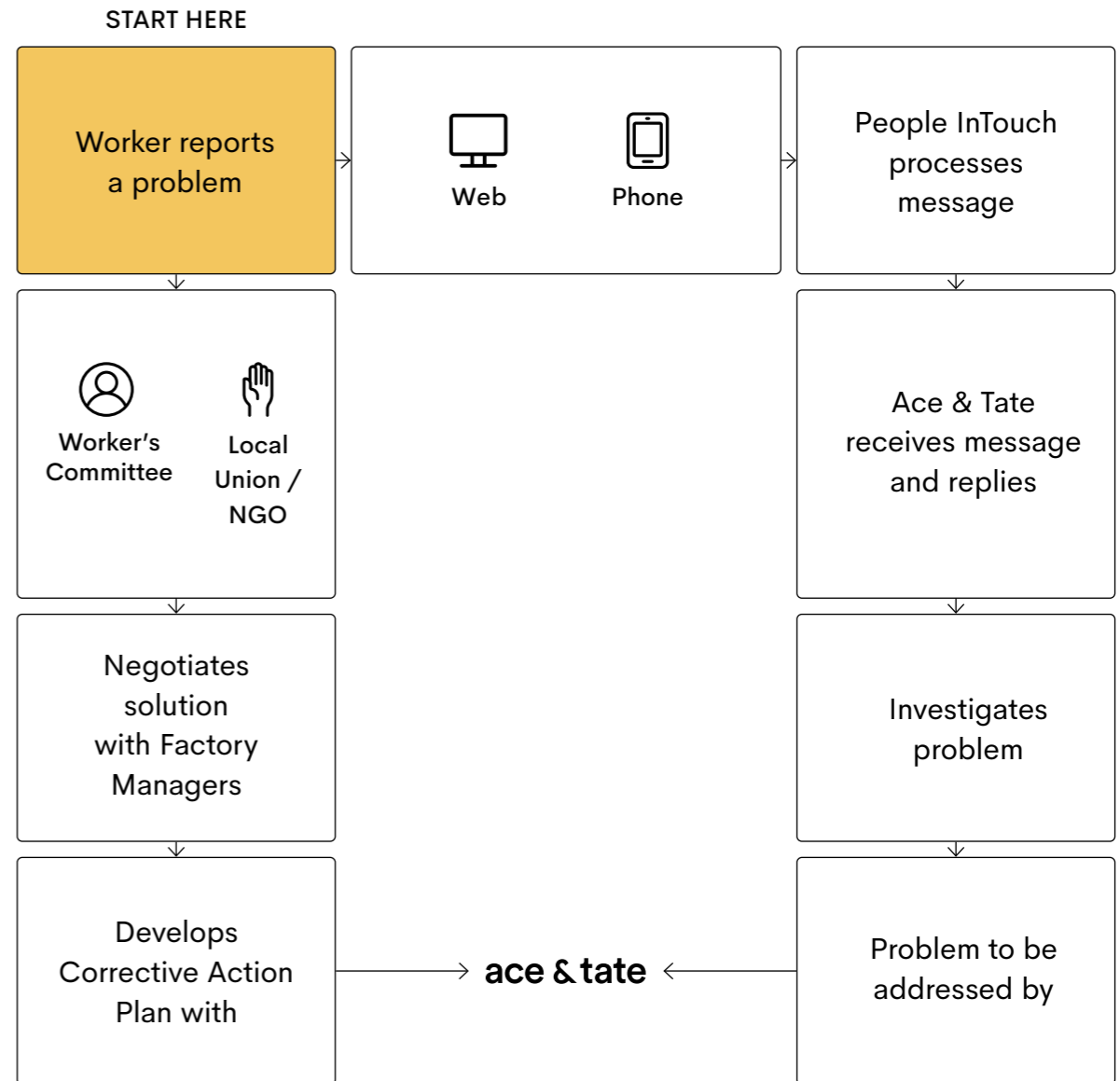
Effective grievance mechanisms help not only to prevent human rights violations, but they also constitute an important source of information on human rights risks. Monitoring the complaints being raised enables businesses to identify new, emerging or endemic issues early on, as well as to assess the effectiveness of existing mitigation actions and take additional steps if necessary, thus directly feeding into broader human rights due diligence processes.

Supply chain workers potentially face numerous human rights violations, such as modern slavery, sexual and/or verbal assaults, workplace accidents and/or gender or ethnicity-based discrimination. To minimise the risk of occurrence, we expect our suppliers to implement one (or more) social grievance mechanism(s)

themselves, e.g. by setting up a suggestion box or a hotline.

At Ace & Tate we have implemented the SpeakUp programme with all of our Tier 1 eyewear and lens manufacturers. The Speak Up programme was established to explain how, when and where one could raise concerns about any suspected misconduct. Our goal was to set up a Speak Up programme with the purpose of early transparency by means of speaking up so that ethical wrongdoing can be prevented or detected as early as possible.

Ace & Tate's Speak Up programme includes an option to make an anonymous report through the whistleblowers' software called Speak Up (formerly: People Intouch). Speak Up offers a platform that offers a user-friendly



reporting tool for reporting suspected misconduct, so anyone with a concern can speak up without fear of reprisal. This clear, effective and transparent system to provide remedy will help to ensure that we as a company meet our responsibility to protect

workers' rights.

Furthermore, all our suppliers have a responsibility to raise issues that may constitute a breach of our Code of Conduct, including any instance or suspicion of forced labour or modern slavery.

Human rights & social compliance.

Being aware of the risks we have within our supply chain will help us prepare for and prevent any issues that may arise. We have a direct line of communication with our suppliers in Tier 1 and Tier 2 and some of our Tier 3 suppliers to establish a two-way level of trust and respect. That's how we're able to maintain a high standard, and it feels good to get to know the people we work with.

We have set guidelines in our internal Responsible Sourcing and Procurement Guidelines to ensure we source suppliers that comply with our requirements.

These procurement guidelines outline our process for ensuring

ethical and responsible practices alongside our supply chain and sustainable product development. The outline of this file is in line with our responsibility mission, our B Corp certification and the international standards and frameworks on ESG practices.

These guidelines are enacted through the collaboration of our Product, Buying, Quality and Responsibility teams. In a collaborative effort, these teams ensure all new products and suppliers meet our commercial requirements and ESG standards, documentation is complete and traceability and transparency is ensured.

Looking ahead.

We strive to create a positive impact by strengthening our global supply chain. Our social compliance roadmap continues to evolve, grounded in rigorous due diligence and proactive risk assessments.

Looking ahead, our 2026 strategic roadmap prioritises the following:

Deepening supply chain transparency

We are extending our monitoring efforts beyond Tier 1 to include Tier 2 and Tier 3 suppliers, aiming for full traceability to Tier 4 raw materials.

Accountability

We remain dedicated to eradicating modern slavery through collective action and transparent reporting. We continue to strengthen our grievance mechanisms and look forward to sharing detailed progress on these initiatives in our upcoming 2025 Responsibility Report.

Worker education training

While audits provide key insights, we recognise the need for deeper capacity building. In 2026, we launched the Workplace Education Training program with QIMA to foster internal dialogue and knowledge development. This initiative includes specific training for management on grievance handling and for workers on rights and safety. The training will be expanded to all of our Tier 1 suppliers from 2026 onwards.

We invite you to visit our website to review our latest impact data and learn more about our ongoing journey to build a more responsible eyewear industry.

For inquiries regarding our responsibility initiatives, please consult our annual Responsibility Report or contact us directly:

responsibility@aceandtate.com

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