

22<sup>nd</sup> July 2009

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Anna McMullen  
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The Clarks logo is written in a bold, black, cursive script font.

Dear Anna

Last year was Clarks' first submission to the "Let's Clean up Fashion" report, as it was the first time you included footwear brands. This 2008 submission provided you with a good idea of how we operate, including our Code of Practice and audit approach.

We have confidence in our audit programme which covers compliance to our own standards as well as incorporating the key conventions of the International Labour Organisation - including freedom of association, collective bargaining and minimum wage. The primary role of the programme is to continuously improve standards by convincing partners of our commitment to our values and the benefits of sharing them.

Given the above, rather than re-iterating our existing programme I provide an update from last year's position and hope this is of use.

Clarks continue to develop and improve our audit approach, which we first implemented over ten years ago. Over the past year we have revised our process for escalating concerns from audits more effectively - with particular emphasis on achieving the right balance between our commitment to working with partners to improve standards, and our determination not to use those who continually demonstrate that they don't share this commitment.

In addition, in 2008 we recognised that the message we give is amplified when delivered alongside other Brands who share the factories we use and the values we hold. To this end we are currently reviewing membership of Multi-stakeholder organisations with whom Clarks can work: to link with our competitors and make an even more persuasive case. I expect to see action in this area in 2009.

I hope this update, alongside our submission of last year, provides you with the insight you require.

It would be great if this update improves your view of Clarks. We believe our approach fulfils the majority of Steps 1 and 2 of the four step approach promoted and identified as successful by the 'Clean Clothes Campaign'.

The expansion of your work into footwear remains of interest to us: we share your concerns over the exploitation of vulnerable people. I believe Clarks have made great strides in addressing this, but like many others, we continue to work to improve our approach. I am sure that you also will be adapting your approach as you become more knowledgeable and informed by us and our industry of the global footwear market.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Matt Turner', with a long horizontal stroke extending to the right.

Matt Turner  
Social Responsibility Manager