



# MODERN SLAVERY STATEMENT

NOVEMBER 2023

boohoo boohooMAN PRETTYLITTLETHING *NASTY GAL* *MISSPAP*

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## STATEMENT FROM CEO

“As a group we are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing systems and controls to minimise the risk of slavery in our own business and supply chain to protect those most vulnerable.

Over the past three years, the group has worked to raise standards across its supply chain to protect the welfare of our people and uphold human rights. Identifying human rights issues is increasingly challenging for retailers, and whilst our approach continues to improve, worker exploitation and slavery remain a challenge and risk to our business. We recognise that auditing alone will not identify and tackle these issues, and that they can only be addressed through true collaboration between businesses, society and government. Our approach is to tackle these issues at the root cause, working with our suppliers to raise standards, and supporting the initiatives outlined below that provide protection and support to those most vulnerable.

Ethical auditing is, and will continue to be, a vital part of how we progress. In 2022, every one of our UK Leicester suppliers adopted the Fast Forward audit standard which ensures a far deeper analysis of a business operation placing worker welfare as the most important priority. We have also adopted a beyond auditing approach, which means our UK and international sourcing and compliance teams work even more closely with suppliers to increase trust, training, understanding and knowledge.

Unauthorised subcontracting is prohibited in our supply chain to improve levels of transparency and oversight. Whilst remediation is our ideal priority, we will responsibly disengage a supplier where evidence of unauthorised subcontracting or material breaches of our Supply Chain Code of Conduct are identified and have not been rectified within a reasonable time period. Transparency is the key goal.

We are now in year 3 of a partnership with Cotton Connect in Pakistan to produce REEL (Responsible Environment, Enhanced Livelihoods) cotton. Education that supports meaningful change was a key factor of this partnership and detailed training sessions have been delivered to 2,254 farmers this year. The training focuses on the benefits of more sustainable cotton production and better business practices, which has seen a 41% improvement in profits and significant reductions in water, chemicals and pesticides usage.

Following the group's donation of £1.1 million, in April 2023 the Garment and Textile Workers' Trust (GTWT) made the first series grants totalling £343,000 to support workers in Leicester. We also partnered with local training providers to provide training for garment workers based in Leicester, with 178 having achieved a L1 NVQ to date.

As a board, we are conscious of our duty to ensure the business has processes and procedures in place to minimise the risk of modern slavery and human rights exploitation. In November 2022 the board visited suppliers and factory workers in Turkey to gain first-hand insight into the opportunities and challenges facing the group's international supply chain. We have become more aware of the issues and areas of risk for our business, but more importantly, our responsibilities in relation to workers, the community and our wider stakeholders.

Our expectations for conduct and behaviour are set out in our group policies, which cover areas such as whistleblowing, bribery and corruption, human rights, and supplier conduct. The board's aim is to ensure that human rights due diligence is carried out systematically and consistently as an integral part of all relevant processes.

Finally, all of this would not have been possible without the hard work and dedication of our teams, both in the UK and globally. I personally would like to thank each of them for their unabating support in tackling these important issues.

**JOHN LYTTLE**

boohoo group CEO

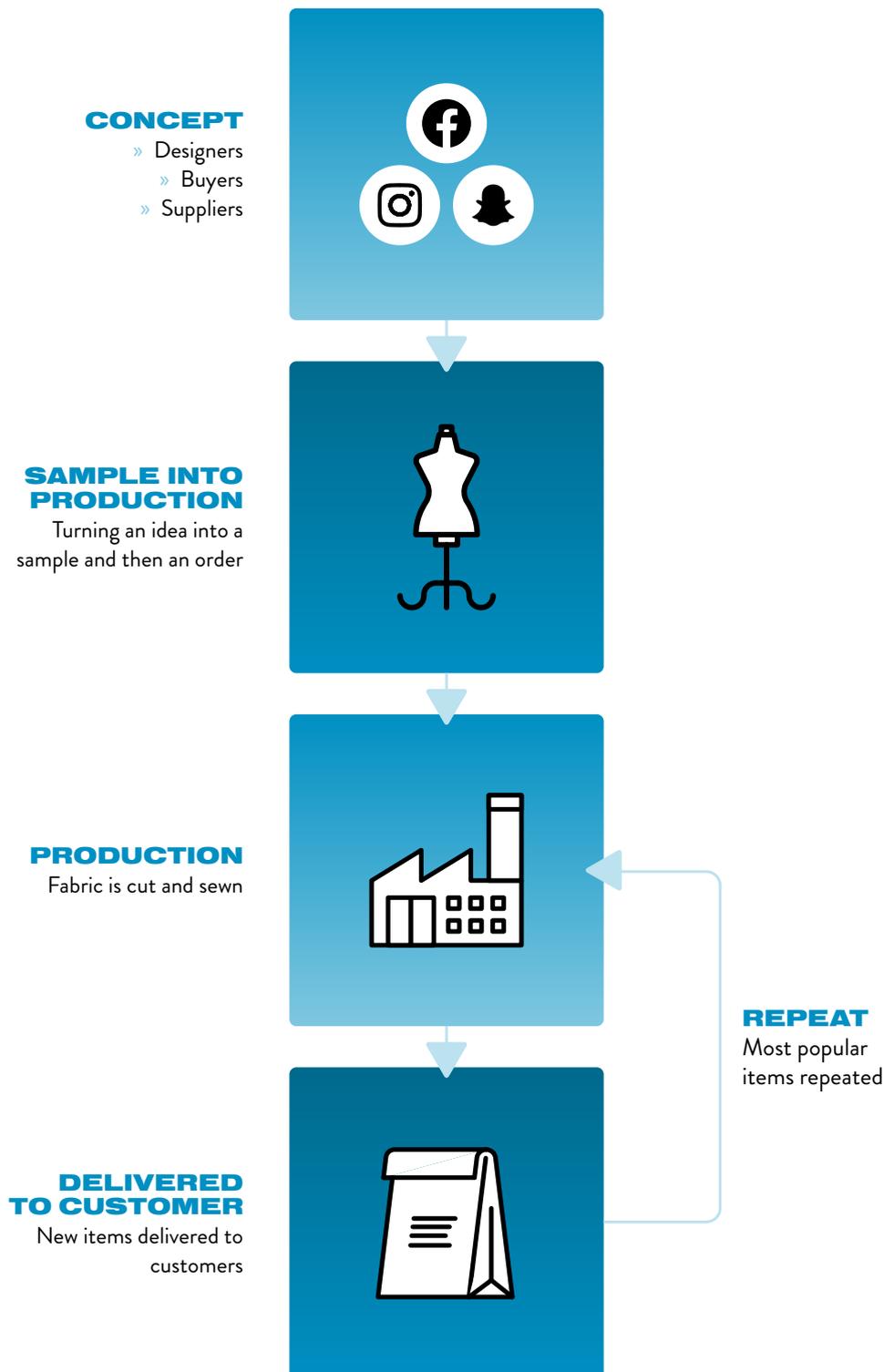
# OVERVIEW

This statement covers the FY23 reporting period from 1 March 2022 until 28th February 2023. It covers our own operations and product supply chains for all of our group brands. It should be read in conjunction with the previous 2022 Modern Slavery statement.

The group takes its responsibility to uphold the human rights of garment workers in our supply chains seriously. We recognise the risks of complex global supply chains ranging from poor labour practices, human rights abuses and modern slavery.

We are committed to protecting worker welfare and human rights throughout the group’s global supply chain by implementing processes, procedures and partnerships while managing brand reputational risk to support the group’s “test and repeat” business model.

## OUR TEST AND REPEAT BUSINESS MODEL



## BUSINESS OVERVIEW

Founded in the heart of Manchester's historic textile district in 2006 by Mahmud Kamani and Carol Kane as boohoo, the group today is home to a portfolio of innovative fashion brands targeting style and quality-conscious consumers with up-to-date and inspirational fashion. What started as one brand, growing extensively in the UK and internationally, is today a platform of multiple brands servicing customers globally, generating sales in excess of £1.7 billion.

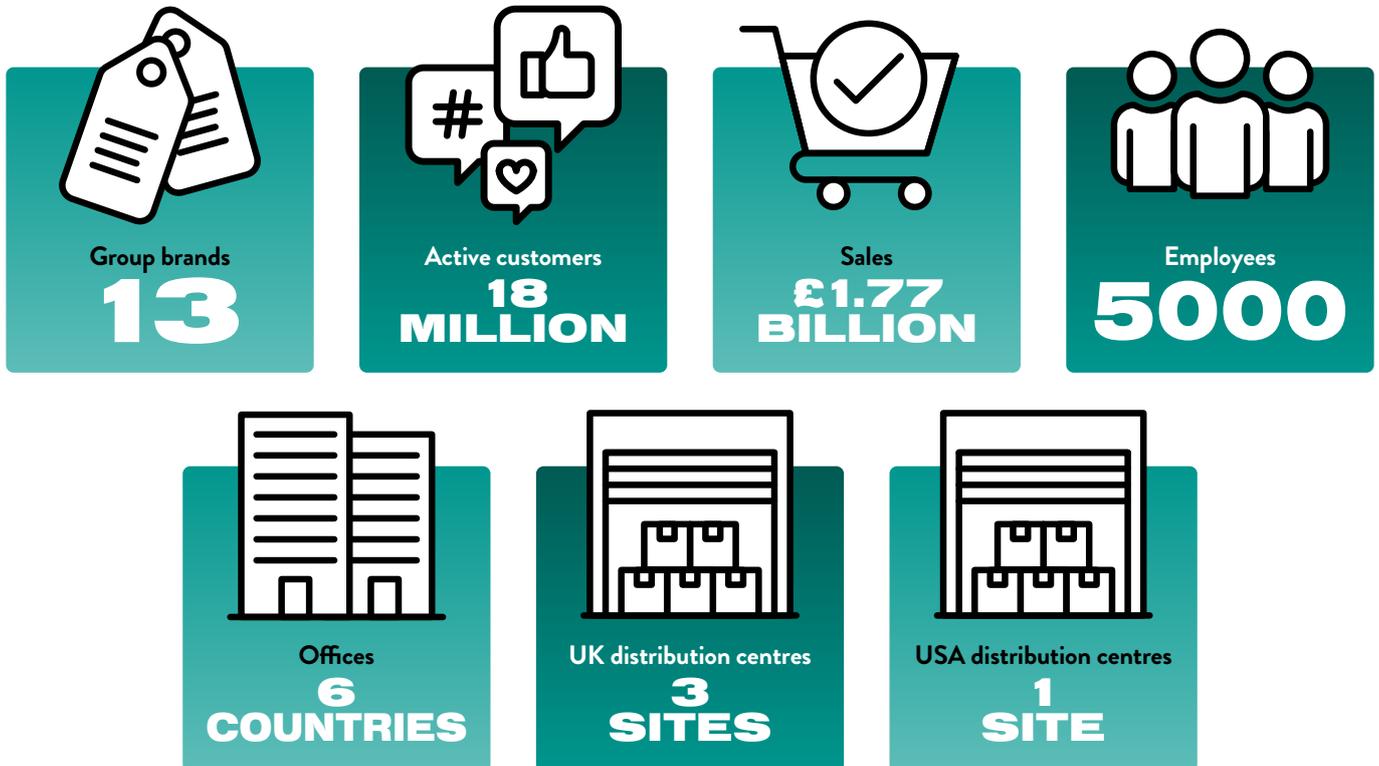
Our group of 13 brands design, source, market and sell clothing, shoes, accessories and beauty products targeted at 16 to 45 year-old consumers globally. In 2022/23 we had 18 million active customers. We use a test and repeat model which means that we purchase small runs of new stock and if our customers like them we order more. We employ approximately 5,300† people directly across the group and have offices in Manchester, London, Leicester, LA, Miami, Prato, Paris, Shanghai and Istanbul.

We operate three UK distribution centres: Burnley, Sheffield and Daventry and a US distribution centre in Pennsylvania\*\*.

In the last few years the business has grown its brand portfolio and doubled its workforce, including the acquisition of Debenhams. The group also reinstated its global partnerships business, which will see the groups brands sold via the Very group (UK), Alshaya group and Vogacloset (UAE), Myntra (India), About You (Germany) and other partners.

†Headcount as of August 2023

\*\*opened in August 2023





## SUPPLY CHAINS & TRANSPARENCY

**We source products from suppliers who manufacture in the UK, Europe and Asia.**

The factories that we work with range from small family run facilities, to larger higher volume units, we share the majority of these production units with many other high street retailers.

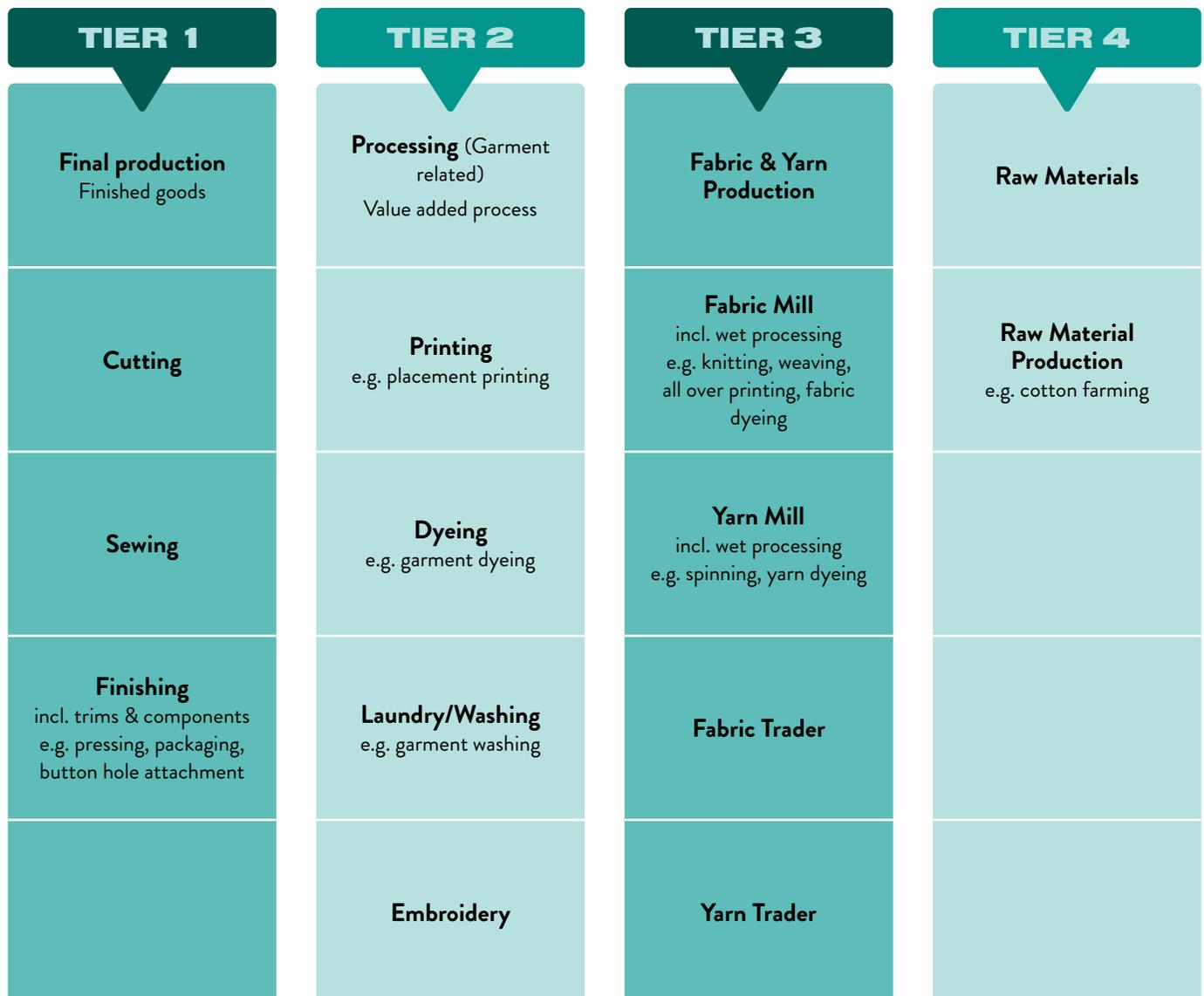
On 25 March 2021, we published a list of our UK manufacturing sites. We published our global factory list on 27 September 2021 and updated the list in December 2021, January 2022, August 2022, November 2022, March 2023 & July 2023. It is our intention to republish our global factory list every four months.

We source from 23 countries. Our top 6 sourcing countries by volume are China, United Kingdom, Pakistan, Morocco, Turkey and India.

July Publication Factory COO	Total No. Factories	%
China	461	43%
Turkey	160	15%
India	158	15%
Pakistan	94	9%
United Kingdom	65	6%
Bangladesh	40	4%
Morocco	34	3%
Italy	23	2%
Vietnam	10	1%
Bulgaria	4	<1%
Mexico	4	<1%
Romania	4	<1%
Cambodia	2	<1%
Cyprus	2	<1%
Sri Lanka	2	<1%
Tunisia	2	<1%
United States	2	<1%
Brazil	1	<1%
Egypt	1	<1%
Myanmar	1	<1%
Spain	1	<1%
Taiwan	1	<1%
Ukraine	1	<1%

# SUPPLY CHAINS & TIER MAPPING

- » We have mapped our tier 1 2 and 3 production sites within the UK and Italy and production tiers 1 and 2 in Turkey. It is our intention to begin a social compliance audit program in these sites within the next year.
- » We have started the process of mapping tiers 2 and 3 in China and this piece of work is largely finished, subject to some further validation.
- » It is our intention to commence a social audit programme on our tier 2 production sites within China within the next year.
- » We will commence a tier 2 and 3 mapping programme in India, Bangladesh and Pakistan within the next year.
- » The group are in year three of our partnership to grow more sustainable cotton in conjunction with Cotton Connect, a UK based NGO and a local NGO, in the Rajanpur district of Pakistan.
- » This has enabled the farmers involved in the partnership programme to drive a 41% increase in profits and a significant reduction in water, chemicals and pesticides used.
- » The programme enables the farmers to utilise the cotton fields during the traditional fallow period after the final cotton pick.
- » In conjunction with two other UK retailers, we are commencing a sustainable cotton programme within the Maharashtra region of India this Autumn 2023.



# HUMAN RIGHTS RISK ASSESSMENT

The group recognise salient human rights risk within all regions across the globe..

We recognise there are salient human rights risks in the countries we source from that vary by location. It is imperative that we take steps to minimise the risk of slavery and protect vulnerable groups such as children, female and migrant workers. We will focus on the most severe and likely issues when working with factories supplying the group.

The key risk areas we are going to examine in greater depth throughout the next year are; child labour, forced labour, discrimination, health & safety, migrant labour, wages and benefits, and excessive working hours within our supply chain.

We understand that these risks are not limited to the geographies highlighted below and exist globally, and will implement strategies to reduce the risk of modern slavery in all sourcing regions.

### KEY INDICATORS OF RISK:

- » **Employment is freely chosen** – restriction of movement, withholding of personal documents, withholding of wages, debt bondage.
- » **Discrimination** - worker segregation based on gender, race, religion. Equal remuneration regardless of population group.
- » **Freedom of association** – workers are not free to join trade unions. Lack of worker councils.
- » **Child labour** - young looking workers. Lack of policies. No parameters for worker on boarding.
- » **Health and safety** – poor working conditions & poor building maintenance, lack of hygiene within the facility. Lack of clean drinking water available.
- » **Wages and working hours** – high overtime hours worked. No compulsory break in days after working for 7 consecutive days. Lack of breaks for workers during working hours. Evidence of cashback payments.



#### China

- » Employment is freely chosen
- » Working hours
- » Discrimination
- » Freedom of association

#### India

- » Forced Labour
- » Working hours
- » Health and safety – clean drinking water
- » Child labour
- » Regular employment

#### Bangladesh

- » Child labour
- » Freedom of association
- » Working hours
- » Health and safety

#### Pakistan

- » Health and safety & hygiene
- » Wages
- » Working hours
- » Discrimination

#### Morocco

- » Working hours
- » Discrimination
- » Health & safety – clean drinking water

#### Turkey

- » Freedom of association
- » Child labour
- » Working hours
- » Health and safety

We plan to work closely with all factories within our supply chain, and to educate around the key risk areas highlighted previously. We plan to create an ethical compliance and trade guide for all of our suppliers to ensure they understand our full requirements and expectations in addition to the below.



Our expectation is that all of our suppliers work to eradicate forced labour in whatever form it takes ; forced, compulsory, trafficked, prison and, overtime must be voluntary. It is imperative that all of the workers within our supply chain understand their rights and exercise their freedoms.

We will continue to ensure that the workers within the group's supply chain are protected in this regard.



The group expressly prohibits the use of workers below the minimum age as defined by national law and/or the ILO. We will continue to partner with nominated NGOs and/or appropriate stakeholders to minimise the risk of child labour.



We will commence a training programme on Diversity and Inclusion within our supply chain.

We will ensure the development of further policies to support our suppliers and factories in the implementation of an inclusive workplace in whatever form that takes, including but not limited to race, colour, religion, gender, marital status, disability, sexual orientation and others.



Employers must provide a safe and hygienic workplace and take appropriate steps to ensure accidents and injuries. Our programme of continuous improvement is designed to ensure standards are upheld and improved upon.



The group actively encourages our suppliers to support the creation of workers councils and other parallel forums to enable collective bargaining where trade unions are partially or fully restricted under law.



Working hours must comply with national laws and must be included as part of a workers contract of employment.

Overtime must not be excessive and must be freely chosen.

Our regional teams will continue to support suppliers through capacity and production planning and support to enable them manage their production as efficiently as possible, given the nature of the test and repeat model.

## FORWARD LOOK: XUAR

- » We have taken the following steps in China in recognition of the provisions under the Uyghur Forced Labour Prevention Act
1. All group suppliers are required to sign declarations to confirm that they do not source any materials or use any labour from the XUAR.
  2. Our international sustainability team, with the support of our suppliers are in the process of mapping of our China based factories and their production tiers, including fabric, materials, fabric processing, trims and accessories.
  3. We have commenced a pilot soil analysis testing programme with a specific international organisation to develop a deeper understanding of the cotton supply chain challenges.
  4. Next stage of our process will be to commence a social compliance audit programme of our tier 2 and 3 sites within China.

## AUDITING & MONITORING

### AUDITING

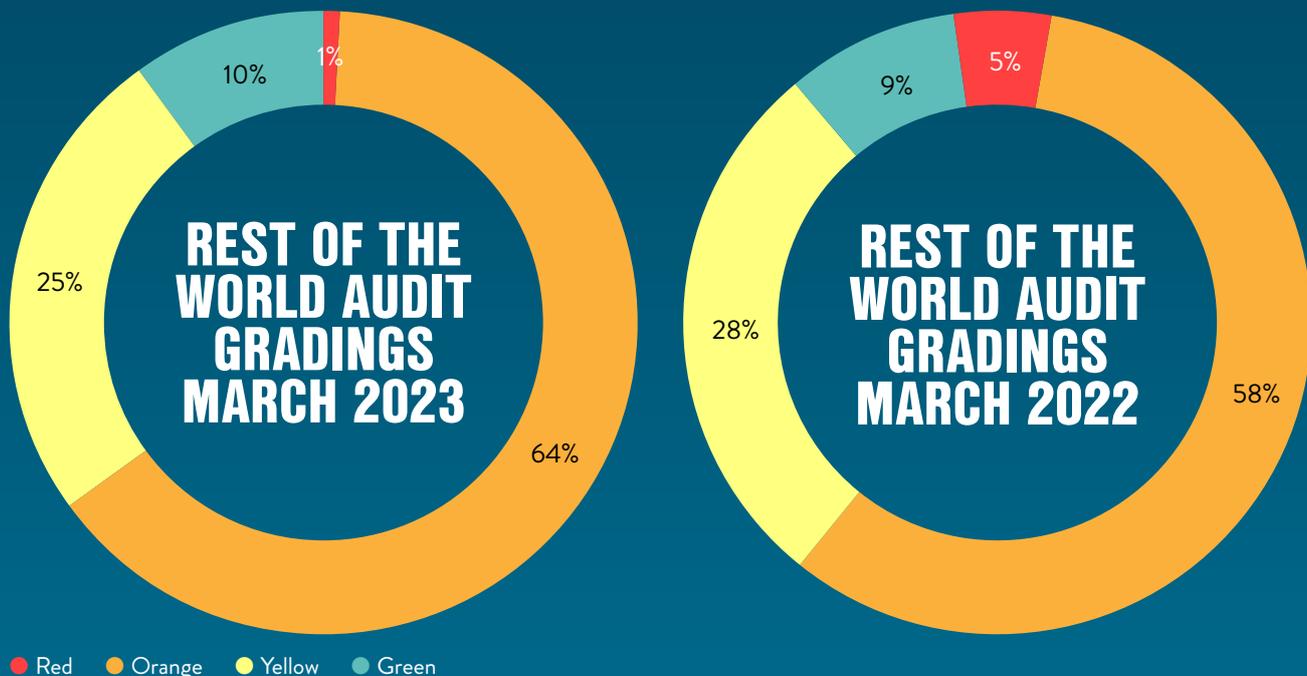
Our auditing partners Bureau Veritas (BV) have completed 382 audits globally this calendar year to date.

The group's UK and International ethical compliance team members conduct meetings with suppliers to remediate issues and ensure suppliers continually strive to improve labour standards within their supply chain.

The group's International ethical teams conduct unannounced factory visits to evidence the closure of non-compliances, worker welfare interviews, wages and documentation checks, contracts and right to work checks and health and safety factory checks. The teams also conduct full active purchase order checks within the facility to reduce the risk of unauthorised subcontracting.

We have internal compliance teams conducting factory visits and spot checks in the group's key sourcing countries – UK, Italy, Turkey and Morocco and China.

Bureau Veritas are the group's preferred global auditing partner. In line with industry standards, the group will accept audits undertaken within 12 months from 34 different audit bodies. BV converts existing audits that meet our criteria into a group audit report format.



# POLICIES

Our corporate policies are made available on the PLC website. This includes policies on human rights and modern slavery. Additional corporate policies will be made available on the PLC website in the upcoming year.

As part of our on-going monitoring & due diligence process, we have developed policies for our suppliers to adhere to. Our policies are made available to suppliers through the Supplier Portal.

## POLICIES & UPDATED DOCUMENTS

- » COC
- » Modern slavery policy
- » Anti bribery
- » Anti bullying
- » Whistleblowing
- » Health & safety policy
- » Grievance policy
- » Child labour & remediation policy
- » Diversity & inclusion policy

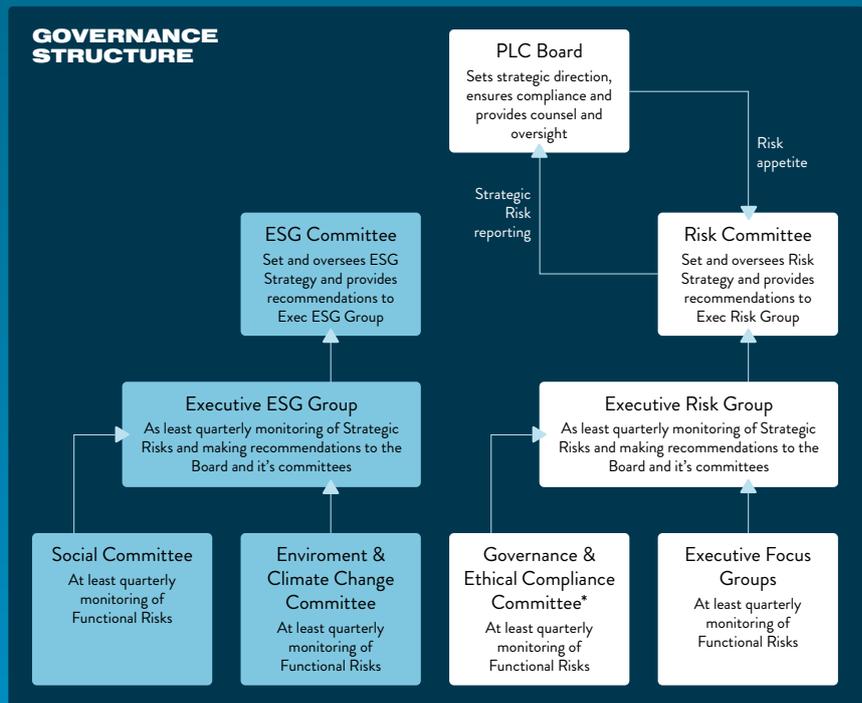
## POLICIES ON OUR ROADMAP

- » Homeworking policy
- » Unapproved Sub-contracting policy
- » Young worker policy
- » Migrant worker guidelines & policy
- » Gender discrimination policy

# GOVERNANCE

The group extended its governance framework in 2022 to provide increased oversight of supply chain related activities and risks.

The Executive Risk Group and sub-committees discuss key supply chain risks. Any matters of significant opportunity or risk are escalated to the Risk Committee.



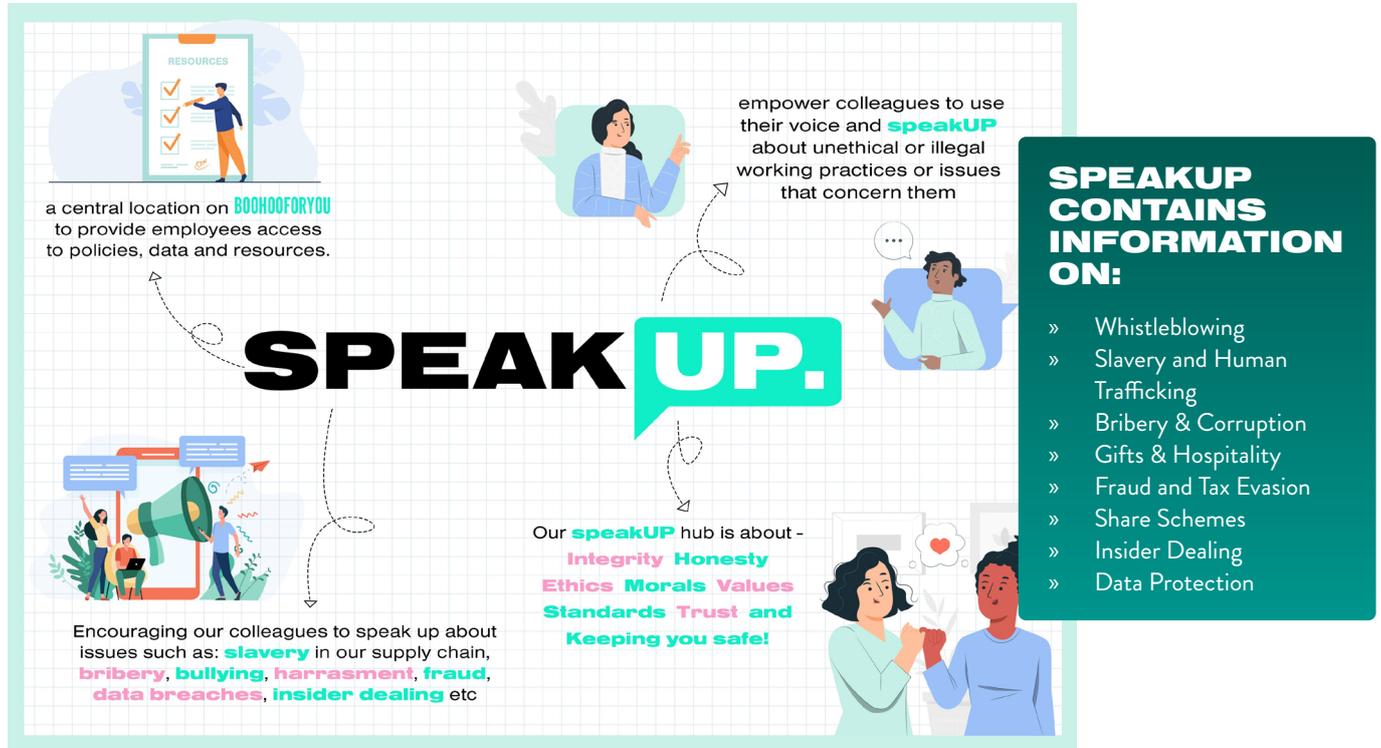
# GOODS NOT FOR RESALE

The group obtains goods and services from suppliers for business use. These are known as goods & services not for resale (GNFR). GNFR covers indirect procurement categories such as professionals services, travel, technology, software, human resource services, facilities management, logistics, utilities, consumables, marketing services, and capital goods.

To ensure suppliers with strong standards and practices are selected the process of procuring GNFR is overseen by the group's procurement team, alongside the legal team and relevant business stakeholders. As part of supplier on boarding, suppliers may be required to complete a due diligence questionnaire in relation to modern slavery. Responses to the due diligence questionnaire are reviewed by the group's legal and procurement teams.

# SPEAKUP

We encourage our colleagues to speak up about unethical or illegal working practices such as bribery, bullying, harassment, fraud, incidents of modern slavery, data breaches or other issues that may concern them. Our central intranet hub, Speak Up, houses all of our compliance related policies, procedures and information.



## WHISTLEBLOWING

### WHISTLEBLOWING

The group is committed to carrying out business in a safe, honest and ethical way. The group takes protecting its colleagues very seriously, and aims to conduct its business with the highest standards of integrity and transparency at all times. Part of that is creating an open and supportive working environment where colleagues feel able to speak up about any suspected wrongdoing. .

The group provides access to a confidential whistleblowing helpline to assist workers in our supply chain to work together to address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Each report is evaluated based on the type and location of the incident and assigned to a case manager. All cases are logged and investigated in accordance with our internal escalation procedures and treated in the utmost confidence.

In the UK alone this past year we have closed 21 whistleblowing cases through diligence on the ground and thorough checks of all reports.

**SPEAK UP.**

**OUR CULTURE ENCOURAGES EMPLOYEES TO SPEAK UP ABOUT OUR CONCERNS.**

We operate an independent whistleblowing hotline within our UK distribution centres, our Thurmaston Lane manufacturing site and our UK office locations.

 **unseen**

**INDEPENDENT UK WHISTLEBLOWING.**

We use the Unseen independent UK whistleblowing hotline to ensure that workers in our UK supply chain have access to an independent reporting mechanism.

## TRAINING

	What we do	What we will do in the next year
<b>SUPPLIER TRAINING</b>	<ul style="list-style-type: none"> <li>» Ethical audit renewal process</li> <li>» Corrective action plan (CAP) resolution management</li> <li>» What to expect from an ethical audit and how to prepare</li> <li>» Supply chain code of conduct issued and acknowledged by suppliers</li> <li>» Health and safety on site remediation during visits</li> </ul>	<ul style="list-style-type: none"> <li>» Supply chain code of conduct roll out in multiple languages</li> <li>» Modern slavery training</li> <li>» Health and Safety structured training modules</li> <li>» Translate all training guides into multiple languages</li> </ul>
<b>BUYER TRAINING</b>	<ul style="list-style-type: none"> <li>» Ethical compliance awareness training</li> <li>» The importance of ethical due diligence</li> <li>» Factory approval and selection process</li> <li>» Modern slavery training (e-learning and workshops)</li> </ul>	<ul style="list-style-type: none"> <li>» Product costings training to determine supplier benchmarks against ethical compliance ratings</li> </ul>
<b>SUPPLY CHAIN RISK PROFILING</b>	<p>Determine supply chain ethical priorities through:</p> <ul style="list-style-type: none"> <li>» Known ethical risk factors (gathered through ethical compliance assessments)</li> <li>» Inherent ethical risk factors (determined through industry bodies and supply chain risk platforms)</li> <li>» Categorisation of suppliers by spend level</li> <li>» Annual third-party ethical auditing programme for all manufacturing sites</li> </ul>	<ul style="list-style-type: none"> <li>» Strengthen our focus and assessments in key sourcing regions including China, Morocco, Pakistan, India, UK and Turkey</li> </ul>

## GARMENT AND TEXTILE WORKERS TRUST

In 2021, the group provided £1.1 million to an independent garment and textile workers trust (GTWT), established to provide support, advocacy and remedy for garment and textile workers in Leicester.

The trust has a completely independent board of trustees and in 2023, the Trust donated £343,000 to local community groups and NGO's operating within the UK manufacturing sector, including Fab-L, Sharma Women's Centre and Wesley Hall.

After commissioning a research report from Nottingham University's Rights Lab, the GTWT published that its initial priorities are to:

- » Provide English language training and education for garment workers.
- » Advocacy support work to promote workers accessing and enforcing their rights.
- » Donations to food banks situated in Leicester to help workers with the cost-of-living crisis.

The GTWT continues to use monies provided by the group in order to address its key priorities aiming to better and improve the lives of those working in the garment worker industry in Leicester.



# RESPONSIBLY SOURCING COTTON

**As of year-end 2022, cotton made up 28% of our Group fibre mix. Used across all 13 brands, cotton is an important material to the Group.**

With global supply chains, cotton can be a difficult raw material to map especially as it is often blended from different regions.

We understand that modern slavery persists in cotton supply chains. There are very serious, ongoing allegations of human rights abuses in the Xinjiang province of China in the persecution of the Uyghur minority group.

Our suppliers are aware that we will not accept products originating from the Xinjiang region. We have undertaken full mapping of tier 1 of our supply chain to understand where our goods are produced. This year we started a program to map all of the production tiers within our supply chain and this piece of work is largely completed subject to some further validation.

We support initiatives that support responsible cotton sourcing with a focus on farmers' livelihoods and reducing environmental impact, such as our partnership with Cotton Connect in Pakistan.

## CASE STUDY 1: COTTONCONNECT

We are working with CottonConnect growing REEL (Responsible, Environment, Enhanced Livelihoods) cotton across over 9,531 acres in Pakistan. The cotton is tracked through our supply chain, from village to garment with chain of custody using CottonConnect's proprietary, traceability software TraceBale.

Keeping cotton farmers at the centre, the REEL Cotton Training Programme works to improve cotton farmers' knowledge and business practices to enhance community livelihoods and reduce the environmental impact of cotton.

In Pakistan, the programme is currently being implemented in the Rajanpur region of Punjab with 2,251 cotton farmers (84% male, 16% female) across 74 villages. With the Women in Cotton Programme we have trained 400 women in our supply chain.

This year we are collaborating with two other retailers on a pilot program in India. The program is currently being implemented in the region of Maharastra with 1000 farmers across 9 villages.

## CASE STUDY 2: BETTER COTTON

We are members of Better Cotton. The mission of Better Cotton is to help cotton communities survive and thrive, while protecting and restoring the environment. Better Cotton does not permit forced and child labour on cotton farms. If either is found where Better Cotton is produced, it is considered an incidence of non-compliance with Better Cotton's standards and dealt with immediately.

### PROGRAMME DETAILS: YEAR 1 (2022-2023)

 Number of Farmers	2251
 Number of Villages	74
 Cotton Land (Acres)	9531



# INDUSTRY ASSOCIATIONS & WORKING WITH STAKEHOLDERS



**fast  
forward**

Building sustainable supply chains

The group became members of Fast Forward in May 2021. Fast Forward is the UK's leading labour standards improvement programme. We have mandated all of our UK suppliers to complete the Fast Forward audit.



**unseen**

Whistleblowing in the group's supply chain is independently managed through the Unseen Portal.



**SLAVE-FREE ALLIANCE**

Working Towards a Slave-free Supply Chain

We continue to work closely with Slave-Free Alliance who offer support and guidance to our UK sites regarding salient human rights issues.



## INTERNATIONAL ACCORD

The group is proud to be a signatory of the Bangladesh Accord.

The group is a subscriber to the Better Buying Institute (BBI). boohooMan has completed the Better Buying Partnership Index (BBPI).



**BUREAU  
VERITAS**

Bureau Veritas are the group's auditing partners and have conducted over 500 audits and report conversions for the group this year.

## EXTERNAL STAKEHOLDER ENGAGEMENT

- » We were an active contributor in the Apparel and General Merchandise Public Private Protocol and are now engaging closely within the Apparel and General Merchandising Stakeholder meetings forum.
- » The Garment and Textile Workers Trust has been set up as a separate legal entity with a £1.1million donation from boohoo group plc. The Trust has a completely independent board of trustees and, to date, the Trust has donated £343,000 to local community groups and NGO's operating within the UK manufacturing sector, including Fab-L, Sharma Women's Centre and Wesley Hall.
- » A member of our ethical trade team joined a team commissioned by the Director of Market Enforcement to conduct a major study into the scale and nature of labour market non-compliance within the UK. This study was undertaken in conjunction with University College London and the results were published earlier this year.
- » We have commissioned Slave Free Alliance/Hope for Justice to conduct an extensive and exhaustive gap analysis examination of our ESG policies and practices - both internal and external.
- » This includes time with all the senior leaders within the business, including the group's board and will focus specifically on our buying practices - our buying and merchandising teams and a selection of our suppliers will also participate. We will share our findings and we expect to have the full report by Q4 2023.
- » Our International ethical compliance teams interact with multiple different in country stakeholders, including local government and NGOs to support their local manufacturing industry with the aim to improve worker welfare within ours and other retailers supply chains.

# PROGRESS REPORT

In our 2022 Modern Slavery Statement we set ourselves seven commitments to drive improvements in worker welfare in our supply chains.

<p><b>1</b> Increase supply chain transparency and map our supply chain with a focus on Tier 2 &amp; 3 factories</p>	<p>As our largest sourcing region, in China we have made progress in mapping production tiers within our supply chain, fabric, process, trims and accessories. Please see pages 7 and 8 of this report for further information</p> <p>We have largely completed our mapping in several of our other sourcing territories including, UK, Turkey and Italy.</p> <p>Our Tier 1 production sites are published on our PLC website and we will continue to update this every four months.</p>
<p><b>2</b> Publish key corporate and supplier policies on our PLC website</p>	<p>We have published supplier code of conduct, modern slavery, whistleblowing, antibribery, Diversity and Inclusion, antibullying, responsible purchasing practices on the group website.</p>
<p><b>3</b> Report on findings from facility level assessments externally</p>	<p>Slave Free Alliance are conducting a gap analysis of the group's ESG policies and practices. We will publish the findings in 2024.</p>
<p><b>4</b> Continue supplier engagement to help drive improvements</p>	<p>Through close work and day by day continuous engagement with our suppliers in the UK we have adopted the Fast Forward audit methodology which allows for a much more invasive and systemic approach to auditing and prioritises worker welfare.</p> <p>Our UK and International teams main focus has been the remediation of any major non-compliances found during audits and the on-boarding of new and compliant production units.</p>
<p><b>5</b> Assess salient human rights risks in our key sourcing countries</p>	<p>This has been outlined on page (8) and we will continue to focus in on these risks and mitigate them to the most where possible.</p>
<p><b>6</b> Continue to improve the Supplier Hub</p>	<p>During the year we have transitioned to a new platform called 'Supplier Manager' to streamline the process of onboarding new suppliers and factories.</p> <p>Supplier Manager continues to serve as a knowledge base for suppliers to access all of the groups policies, procedures, testing manuals.</p>
<p><b>7</b> Expanding in country sourcing and compliance teams in key territories</p>	<p>We identified key territories to expand sourcing and compliance teams and are continuing this project. We have recently deployed a sourcing and compliance resource in Morocco and are actively recruiting for the US/Mexico sourcing region.</p>

## FORWARD LOOK

- » Expand our Sourcing and Compliance team to a second sourcing hub within China and establish a sourcing and compliance team in India. Publish and update our tier 1 production sites every four months.
- » Continue our international tier 2 and tier 3 mapping programme and commence an international tier 2 social compliance programme.
- » Update and publish worker welfare and ethical standards and policies.
- » Work with our auditing partner Bureau Veritas in evolving our audit protocols to safeguard worker welfare within our supply chain.
- » Complete the Hope for Justice ESG gap analysis.
- » Continue to train and engage with our brands on our responsible purchasing practices alongside the full suite of training modules currently delivered.
- » Expand our International whistleblowing service.
- » Engage with NGOs within our International supply chains with a focus on prioritising worker welfare.

# BOARD ENDORSEMENT

DocuSigned by:  
*John Lytle*  
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Board Representative

9/11/2023

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Date