

MODERN SLAVERY POLICY

POLICY STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. boohoo group plc ("boohoo") is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. This policy applies to all persons working with us or on our behalf in any capacity, including agents, contractors, suppliers, sub-contractors, external consultants, third-party representatives, and business partners.

COMPLIANCE WITH THE POLICY

You must ensure that you read, understand, and comply with this policy. The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of everyone working for or with our business. With this in mind:

- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chain at the earliest possible stage.
- You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- If you believe or suspect that a conflict with this policy has occurred, or may occur in the future then you must report this as soon as possible.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must report this as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, you should raise this query using the details below.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform us immediately.

WHO TO CONTACT

If you are (or are an employee of) a boohoo partner, supplier, subcontractor, or a member of the public:

1. Please email responsiblesourcing@boohoo.com

2. If, for whatever reason, you do not feel comfortable reporting any concerns by the methods stated above, you are encouraged to report any issues to any of the following external bodies:

- the police (on **101**)
- the Modern Slavery Helpline (on **08000 121 700**) or
- the Salvation Army's 24-hour Referral Helpline (on **0300 303 8151**).

BOOHOO'S APPROACH TO COMBATTING MODERN SLAVERY

We are committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Our approach to tackling modern slavery includes the following:

- Conducting regular risk assessments in order to establish any areas of our business or supply chain that are at high risk of involving modern slavery
- Carrying out due diligence on any new suppliers in order to identify any risks of modern slavery in their business
- Verifying product supply chains, from within our internal Sourcing and Compliance team, adopting practices and procedures in line with the boohoo supplier ethical code of conduct
- Evaluating product supply chains in compliance with the laws and regulations of the countries in which they operate by independent third party audits, supplemented by unannounced audits by our internal Sourcing and Compliance team
- Requiring all employees to take an active role in combatting modern slavery
- Providing a simple and confidential reporting mechanism (see above)
- Raising awareness of modern slavery amongst employees and, as necessary, providing regular training on this policy and on the risk our business faces from modern slavery in its supply chains and other business dealings
- Communicating our commitment to addressing the issue of modern slavery in our business and supply chains to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforcing it as appropriate thereafter.
- Including specific provisions in our contracts with suppliers prohibiting the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children (and requiring that our suppliers will hold their own suppliers to the same high standards to ensure that these standards extend throughout the chain).
- Expecting that our suppliers ensure that the materials incorporated into their products comply with the laws and regulations of the countries in which they operate.
- Maintaining accountability standards and procedures and taking further action as necessary against parties found to have acted in breach of this policy (see below)
- Continuing to review and develop this policy and our processes and procedures to ensure that we are proactively taking steps to combat modern slavery.

RESPONSIBILITY FOR THE POLICY

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Management at all levels are responsible for ensuring those reporting to them:

- (1) understand and comply with this policy and
- (2) are given adequate and regular training on it and the issue of modern slavery in supply chains.

BREACHES OF THIS POLICY

We may terminate our relationship with any individuals and/or organisations working on our behalf (in any capacity) if they are found to have been involved in modern slavery or if they otherwise act in breach of this policy.