



GROUP

Modern Slavery Statement 2024

WHAT WE STAND FOR?

The JD Sports Fashion PLC Ethical Code of Practice establishes the Code of Conduct standards, embedded in our business and the minimum standards we expect from our supply chain to ensure the protection of those workers, providing assurance that our products are manufactured within safe and fair conditions.

THE JD GROUP ETHICAL CODE OF PRACTICE AND MODERN SLAVERY ACT

The Modern Slavery Act Transparency Statement is supported by the provisions of the JD Sports Fashion plc (“Group”, “JD” “JD Group”, or “We”) Ethical Code of Practice and Code of Conduct.

The Group Ethical Code of Practice (and Code of Conduct included within) incorporates established processes and procedures for protecting workers, and provides assurance that our products are manufactured safely, in fair conditions.

The Code of Conduct is a set of core principles that suppliers must commit to meeting as a condition of doing business with the Group, and is based upon international best practice, including International Labour Organization (ILO) and Fair Labour Association (FLA) principles and standards.

Our suppliers are assessed and audited against its standards and requirements. The Code of Conduct prohibits key indicators of Modern Slavery, including but not limited to any type of prison, forced, bonded, or indentured labour and the withholding of free movement, including the withholding of identity documents.

We are dedicated to ensuring that our suppliers are responsible for ensuring that every site producing our products meets or exceeds minimum labour standards and adheres to both local laws and our Code of Conduct.

The people working for our suppliers, are to be treated with respect; their health, safety, and basic human rights must be protected and promoted. The Group recognises that human rights are fundamental principles which allow an individual to lead a dignified and independent life, free from abuse and violations. We will not tolerate, nor will we condone, abuse of human rights within any part of our business or supply chains. Any allegations that human rights are not respected will be investigated, with appropriate action taken by the Group if the allegation is substantiated.

TRANSPARENCY STATEMENT



This Modern Slavery Act Transparency Statement is approved by the JD Sports Fashion Plc Board and covers the period 1st February 2023 to 31st January 2024. Our previous Modern Slavery Act Transparency Statement (approved 15th July 2023) covered the period 1st February 2022 to 31st January 2023

Our Group Modern Day Slavery Transparency Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010 (SB 657). The Group sets out our standards, policies and processes aimed to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. The JD Group definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

As a Group we have operations overseas and this statement is intended to comply with the below acts:

- Dutch Child Labour and Due Dilligence Act
- German Act on Corporate Due Dilligence In Supply Chains
- French Devoir De Vigilance Bill

Regis Schultz



Chief Executive Officer
Date; 09/07/2024

Dominic Platt



Chief Financial Officer
Date; 09/07/2024

Disclosure	Page Number/s
Organisation structure and supply chain	4,7,8, 13
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Due Diligence Processes	12,14,15,21
Key performance indicators to effectiveness	18,19,22
Training on modern slavery and purchasing practice	25,27



UK/ROI

Country	Stores
UK	432
ROI	24
Total	456



NORTH AMERICA

Country	Stores
US	1,241
Canada	28
Total	1,269



EUROPE

Country	Stores
Spain/Canaries	321
Poland	275
France	129
Portugal	110
Germany	88
Greece	76
Italy	72
Romania	40
Netherlands	29
Belgium	16
Lithuania	16
Slovakia	14
Czech Republic	12
Cyprus	10

Country	Stores
Hungary	9
Croatia	7
Serbia	7
Austria	5
Finland	5
Latvia	5
Denmark	4
Slovenia	4
Sweden	4
Bulgaria	3
Bosnia & Herzegovina	1
Total	1,260

ASIA PACIFIC

Country	Stores
Australia	55
Malaysia	18
Thailand	8
New Zealand	4
Singapore	4
Total	89

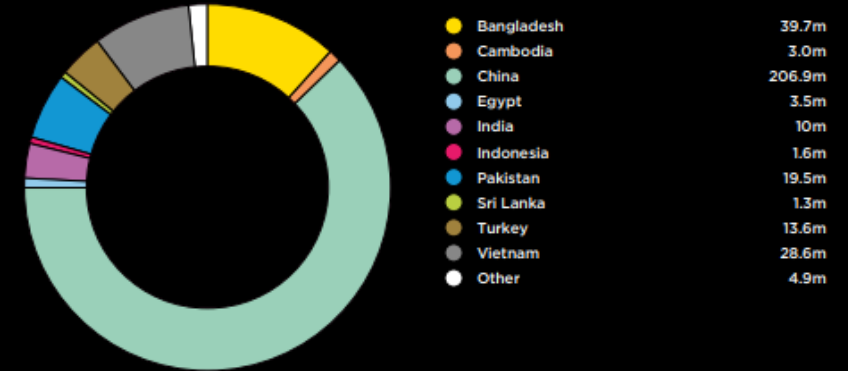
In addition, we operated stores in two additional countries, Israel and Indonesia, via joint venture agreements.

Total countries

36

THE LEADING GLOBAL
SPORTS FASHION RETAILER

Private Label Product Sourcing 2023 (£m)



SUSTAINABLE
DEVELOPMENT
GOALS



As a business, it is important to give consideration to the United Nations Guiding Principles on Business and Human Rights. This gives focus and priority to the alignment of our business with the United Nations Sustainable Development Goals (SDGs) most relevant to our business operations.



- **Policy Commitment:** We have adopted a Modern Slavery Policy that sets out our commitment to preventing modern slavery, including human trafficking, and forced labour in all aspects of our business activities both in the UK and overseas.
- **Own operational risk.:** We conduct regular meetings with 3rd party labour providers to identify and evaluate the risk of modern slavery within our own direct operations in the UK and monitor their recruitment processes to ensure they align with our business.
- **Supplier Engagement:** We work with our Private Label suppliers to promote awareness of modern slavery risks in their own supply chain and embed adherence to ethical standards and in country legislations, in line with our own policies.
- **Due Diligence:** To maintain robust due diligence processes to assess and monitor our suppliers' compliance with our Modern Slavery Policy and applicable laws and regulations.
- **Training and Awareness:** To provide training and awareness programs for our employees and suppliers to educate them about the signs of modern slavery and their responsibilities in preventing its occurrence and to consider at all times, the importance of applying responsible purchasing practices
- **Our Commitment:** The JD Group] is committed to continuously improving our efforts to combat modern slavery and human trafficking. We will regularly review and update our Modern Slavery Policy, practices, and procedures to reflect evolving best practices, regulatory requirements, and stakeholder expectations. Together, with our employees, suppliers, and stakeholders, we will work towards a future where every individual is free from the scourge of modern slavery and exploitation.



- **Supply Chain Transparency:**

We strive to maintain transparency in our supply chain, achieving 100% transparency on our Tier 1 factories across the Group and working with our contracted factories to ensure the full transparency of Tier 2 and 3 (Mill and Dye Houses). Risk assessing all factories prior to on-boarding and requiring information at the first stage on the names and locations of their value chain. We recognise the importance of assessing the environmental practices of the manufacturing chain and the need to minimize the impacts they may have on the communities they operate in.

- **Ethical Recruitment:**

We ensure that all recruitment practices, for both direct and indirect employees, including agency workers, are conducted ethically, transparently, and in compliance with applicable laws and regulations in the relevant country. In our UK operations we work collaboratively with 3rd party labour contractors to affect a joined-up approach.

Worker Welfare:

We uphold the rights and welfare of our employees, including indirect workers throughout our operations, including but not limited to, legal wages, safe working conditions, and freedom from discrimination and harassment.

- **Reporting Mechanisms:**

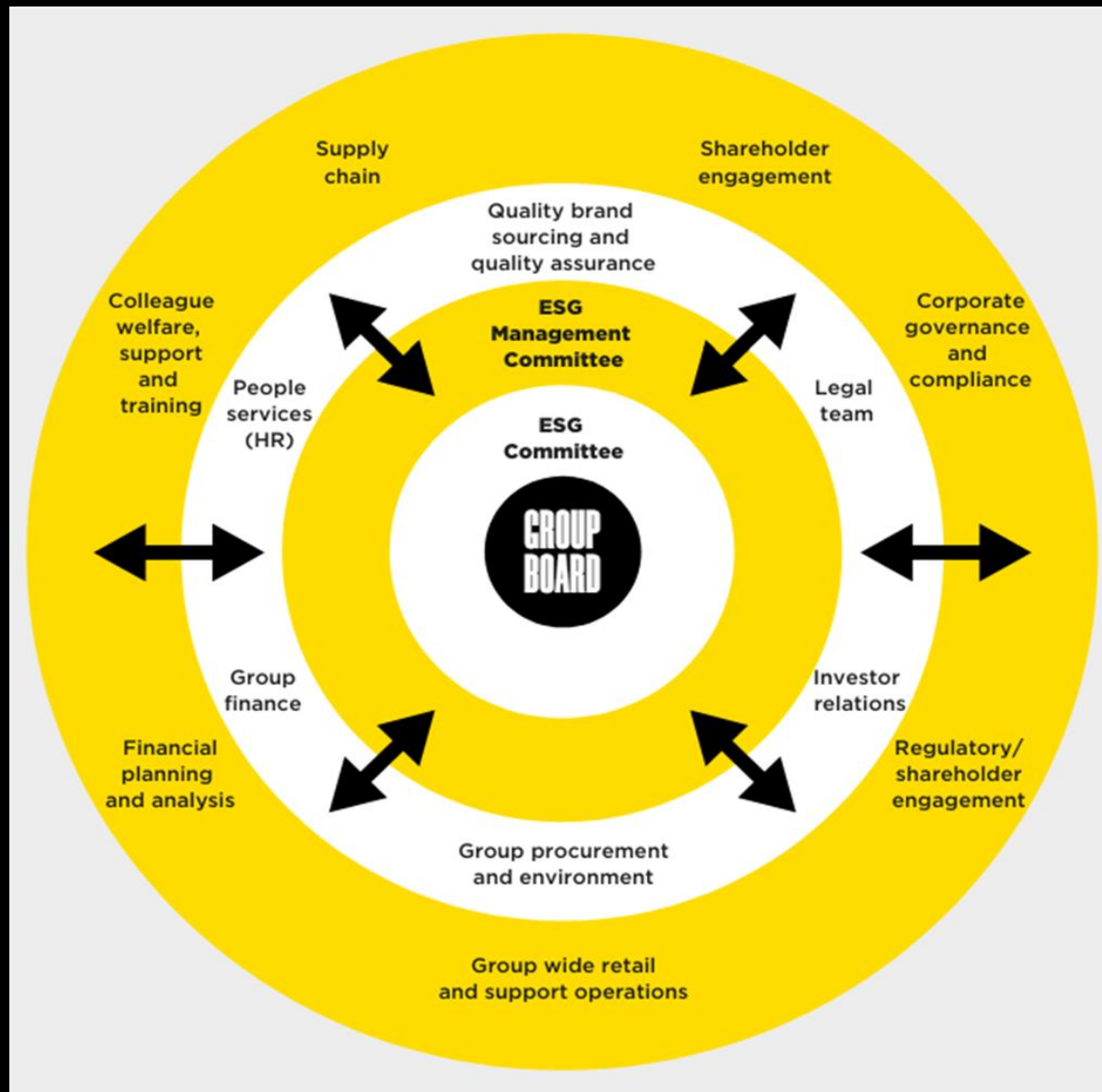
We provide reporting mechanisms for direct employees in our global operations via an external program called One Trust. This gives a confidential voice to our employees to raise concerns and grievances. Regular reporting to the UK team ensures that such reports are investigated and addressed promptly and confidentially.

- **Policies:**

Policies for our supply chain, relevant to modern slavery and labour exploitation, are found on our PLC website and the company Sharepoint system for suppliers :

<https://www.jdplc.com/esg/governance/our-policies/supplier-resource-guidance-documents>

Governance Framework



The ESG Committee holds overall responsibility for communicating risk management oversight including the analysis of risk in the supply chain of our Private Label manufacturing alongside that of our branded suppliers. The Board retains oversight of key risks and opportunities within monthly meetings. This includes emerging regulatory requirements in all countries in which we operate. The ESG Committee and Board are briefed on the impact and implementation of the requirement and progress of these regulations via monthly Board reports. The Board comprises of the Group Chair, CEO, CFO and Non-Executive Directors ('NEDs').

Americas

Group Operated Warehouse	1
3 rd Party Warehouse	2

UK & ROI

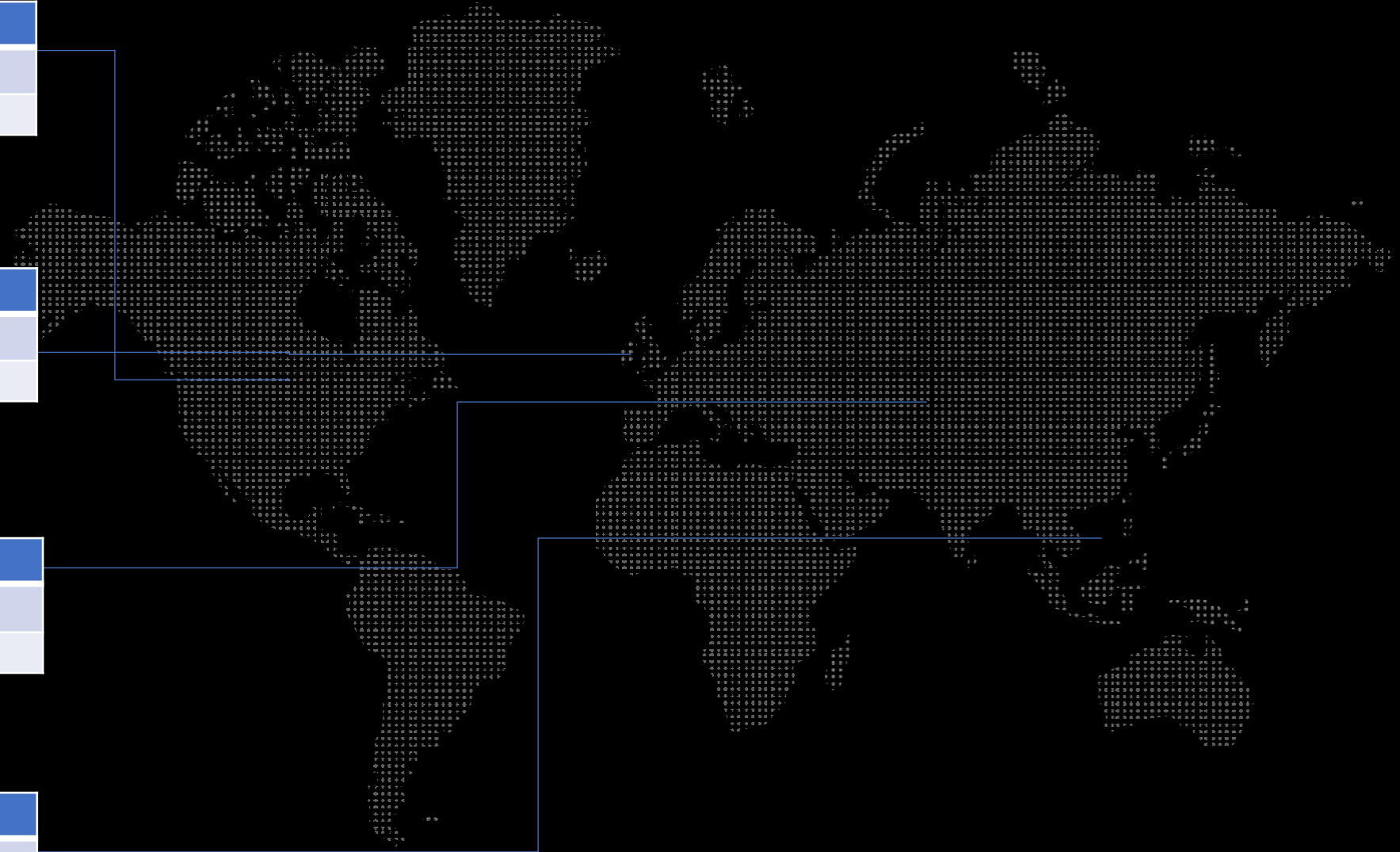
Group Operated Warehouse	3
3 rd Party Warehouse	8

Europe and Central Asia

Group Operated Warehouse	1
3 rd Party Warehouse	6

Asia & The Pacific

Group Operated Warehouse	0
3 rd Party Warehouse	4



The JD Sports **Code of Conduct** defines labour standards that aim to achieve decent and human working conditions the codes are based on the International Labour Organization standards and internationally accepted good labour practices. The code provides minimum standards that should be exceeded where possible in applying it.

EMPLOYMENT RELATIONSHIP

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

NON DISCRIMINATION

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

HARASSMENT OR ABUSE

Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

FORCED LABOUR

There shall be no use of forced labour, including prison labour, indentured labour, bonded labour, including withholding identity documents and restricting free movement.

CHILD LABOUR

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher. *Any persons less than 15 years of age unless the local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. If however, the local minimum age law is set at 14 years of age, this lower limit will apply as per the ILO exceptions for developing countries.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining.

EMPLOYER PAYS PRINCIPLE

No worker/employee should pay for a job – the cost of the recruitment should be borne not by the worker, but by the employer.

HEALTH, SAFETY AND ENVIRONMENT

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

HOURS OF WORK

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual. Employers shall not request overtime on a regular basis and shall compensate all overtime work at a premium rate. Other than in exceptional circumstances, the sum of regular and overtime hours in a week shall not exceed 60 hours.

COMPENSATION

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does.

It is important that all workers in our supply chain can fully understand the Code of Conduct and their rights in the workplace. This is available in all relevant languages on our internal supplier sharepoint system (accessible to all manufacturing suppliers to the Group).

49.6 Million people are in modern slavery globally. There are more people in slavery today than there has ever been throughout history 27.6 Million – people in forced labour around one-fifth of all people in forced labour exploitation are in situations of debt bondage.



WHAT IS MODERN SLAVERY

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including.

SLAVERY AND SLAVERY LIKE PRACTICES

Defined in 1926 Slavery Convention as the status or condition of a person whom any or all of the powers attaching to the right of ownership are exercised. In a later treaty, states agreed that there are also certain “slavery-like practices”: debt bondage, forced or servile marriage, sale or exploitation of children (including in armed conflict) and descent-based slavery.

HUMAN TRAFFICKING

Defines by the UN Trafficking in persons Protocol as involving recruitment, transportation, transfer, harboring, or receipt of person by means of threat or use of force or other forms of coercion with the intent of exploiting that person for sexual exploitation, forced labour, or slavery, among other forms.

The recruitment, transportation, transfer, harbouring, or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve threat, use of force or, coercion.



WORST FORMS OF CHILD LABOUR

Drawing on the 1999 Convention on Worst Forms of Child Labour, it includes situations where children are; exploited through slavery or slavery-like practices, including forced recruitment of children for use in armed conflict; used, procured, or offered for prostitution; used, procured, or offered for illicit activities including production and trafficking of drugs; engaged in hazardous work which may harm their health, safety or morals.



FORCED MARRIAGE

Any situation where persons, regardless of age, have been forced to marry without their free consent.



FORCED LABOUR

Status or condition where one person has pledged their labour or services (or that of someone under their control), in circumstances where the fair value of that labour or service is not reasonably applied to reducing the debt or length of debt, or the length and nature of the service is not limited or defined.



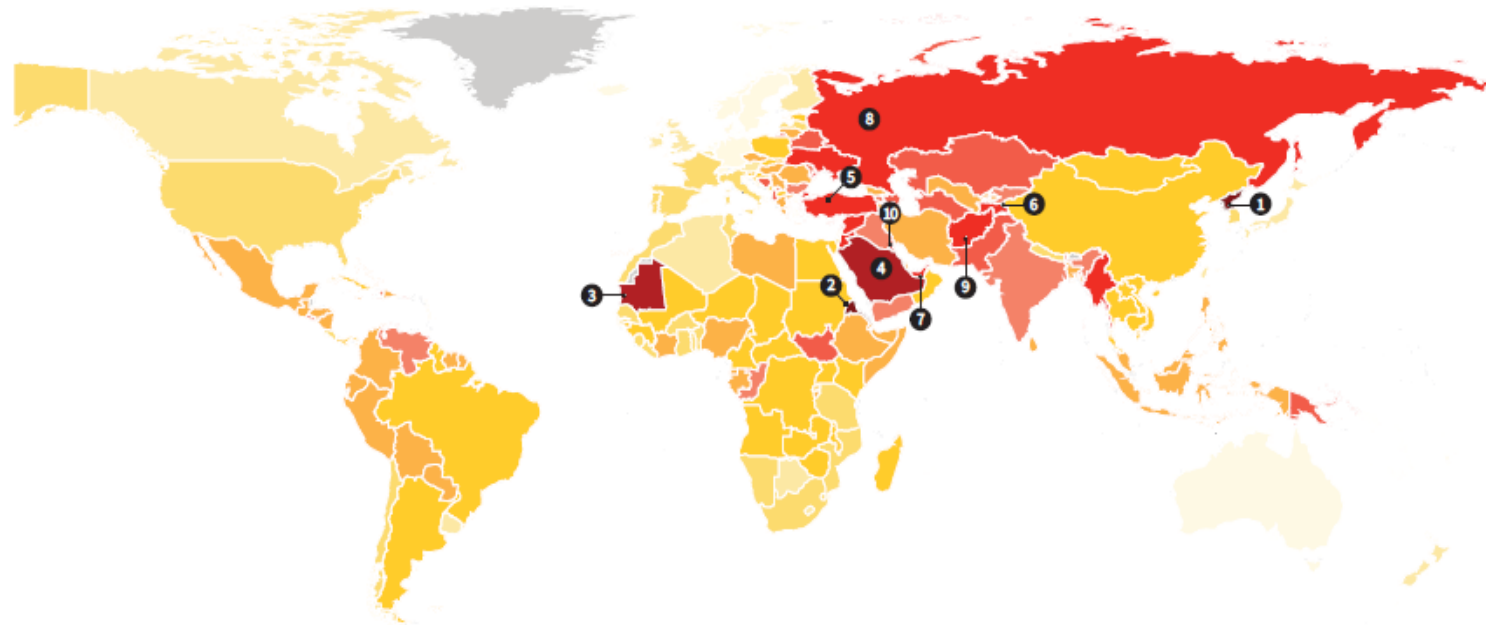


Figure 5
Estimated prevalence of modern slavery by country
 (noting estimated prevalence per 1,000 population for the 10 countries with highest prevalence)



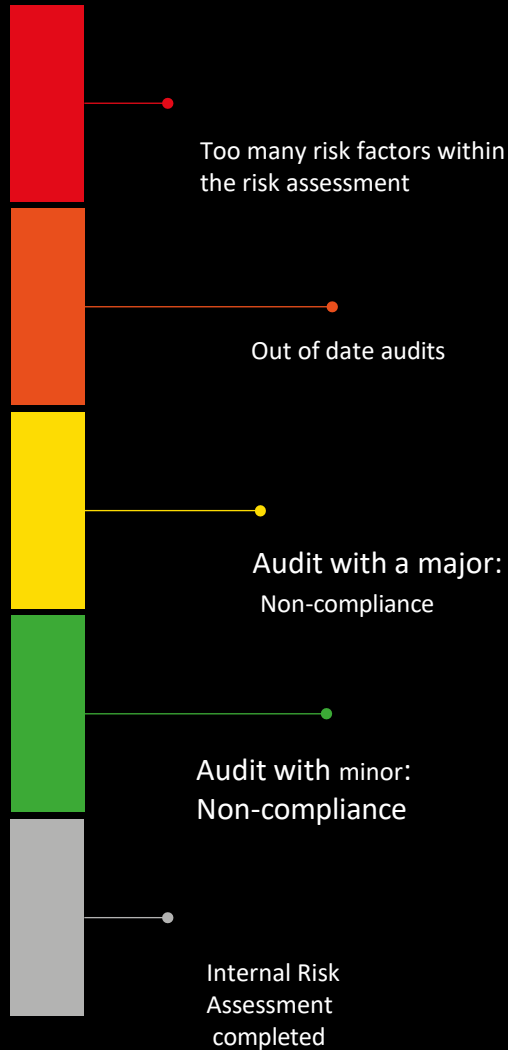
Rank	Country	Prevalence
1	North Korea	104.6
2	Eritrea	90.3
3	Mauritania	32.0
4	Saudi Arabia	21.3
5	Türkiye	15.6
6	Tajikistan	14.0
7	United Arab Emirates	13.4
8	Russia	13.0
9	Afghanistan	13.0
10	Kuwait	13.0

49.6 MILLION Men, Women and Children are in slavery globally

27.6 MILLION
 People in forced labour, 20% debt bondage

3.9 MILLION
 Forced labour imposed by state

Analysis of Risk



JD's approach to risk assessment comprises of self-assessment questionnaires and country research, supply chain mapping, 3rd party auditing and stakeholder engagement. These SAQ assessments will be adapted for the lower tiers with whom we do not have direct contractual agreements but recognize the need for monitoring and assessment on human rights in line with our Tier 1 suppliers.

Whilst we are mindful of the potential limitation of audits relating to modern slavery, it is a critical enabler in the discovery and management of issues relating to the fundamental principles in our Code of Conduct, with relevance to modern slavery practices throughout our supply chain.

Audits identify risk at factory level against that Code of Conduct and local laws, enabling us to take immediate action and mitigate risk across our supply chain whilst identifying and addressing potential factors that may exist in the background. The implementation of "Identify" "Act" and "Resolve" process which ensures all non-compliances are investigated and resolved on an on-going basis.

On receipt, the factory setup is reviewed in detail by the ethical compliance team and any risk areas verified as required. The factory site is then graded using the traffic light format opposite.

A site graded as Amber will only be on-boarded if the audit is not out of date past 1 year and all the non-compliances have been closed on the submitted conducted. A new audit is then required during the second season and re-graded according to risk. If the site is unable to provide an audit within the 12 month period, it will be graded red and no longer be a viable source. Sites graded red (or undisclosed facility) cannot be used.

In certain countries sub-contracting is an accepted part of the manufacturing process, Turkey is an example of this with a large percentage of factories using sewing units outside of their factories. However, all sewing units must complete a risk assessment.

Managing Risk - these include:

- Prevalence of Modern Slavery
- Geographical Risk level of supply chain control
- Political Status
- Worker demographics
- The presence of Governance in Management systems
- Environmental risk

OUR HIGHEST RISKS-

- Private label product supply chain
- Supply chain beyond the first tier not directly contracted
- Specific country risk where modern slavery is high
- GNFR

The analysis and consolidation of the supply base allowed us to reduce the number of Tier 1 suppliers and work to collaborate with Tiers 2-4 sites, giving better transparency and engagement within the indirect supply chain. This has increased economies of scale in a narrower supply base and will establish closer ties with those not directly contracted to us and give greater opportunity to embed the company's strategy and standards.



We conduct research using external reports and sources that are publicly available, external multi stakeholders are a vital source of information and analysis of our (internal data) taken from audit's and corrective action reports.

MODERN SLAVERY RISKS

Human Trafficking Forced & bonded labour GBVH
Low wages. Country governed by the King, risk is low enforcement of regulations and laws.

CAMBODIA
0.90% Production

MODERN SLAVERY RISKS

Freedom of association Migrant workers/ refugees Forced & bonded labour

TURKEY
4.09% Production

MODERN SLAVERY RISKS

Freedom of association
Forced & bonded labour

CHINA
62.2% Production

MODERN SLAVERY RISKS

Freedom of association Migrant
Forced & bonded labour

OTHER
12% Production

THAILAND
Unethical recruitment practices
Migrant workforce

EGYPT
Sexual harassment / abuse
SPAIN
Forced labour Migrant workers

MODERN SLAVERY RISKS
Freedom of association Forced &
bonded labour

MODERN SLAVERY RISKS

Freedom of association
Gender based violence and harassment Child labour
Culture and caste discrimination Sumangala
system/ Dowry payments

INDIA
3.10% Production

MODERN SLAVERY RISKS

GBVH
Forced and bonded labour Child labour
Low Wages

PAKISTAN
5.86% Production

MODERN SLAVERY RISKS

GBVH
Forced and bonded labour Child labour
Building Safety

BANGLADESH
11.9% Production

TURKEY

- Wage Visibility
- Social insurance payments
- Refugee/ transit countries
- Excessive hours
- Separate contracted sewing units



- Work with suppliers to encourage full transparency on wages paid
- Robust recruitment policies
- Work with supplier to re-mediate/ reduce
- Full transparency and risk assessment of subcontracted unit

INDIA

- Gender discrimination
- Cultural discrimination (Caste system)
- Excessive hours
- Child labour exploitation
- Sumangali scheme
- Recruitment policies



- Create closer partnerships with the supply chain (subcontractors)
- Training on gender-based violence and harassment using the "Train the Trainer" tool kit from the ILO.

CHINA

- Child labour exploitation
- Excessive working hours
- Remuneration difference by region adding complication
- Delayed payments
- Recruitment policies



- Additional checks on employee recruitment practices
- Worker welfare assessments to continue alongside 3rd party audits

BANGLADESH

- Workers from rural areas subject to exploitative labour practices
- Child labour
- Excessive overtime
- Health & safety concerns
- Small profit margin driven by demand for cheaper clothing



- Ensure recruitment practices are in line with company policies
- Ensure price and quality are relevant
- Strict supply chain monitoring
- Limit expansion into multiple factories and embed policies and partnership values

CAMBODIA

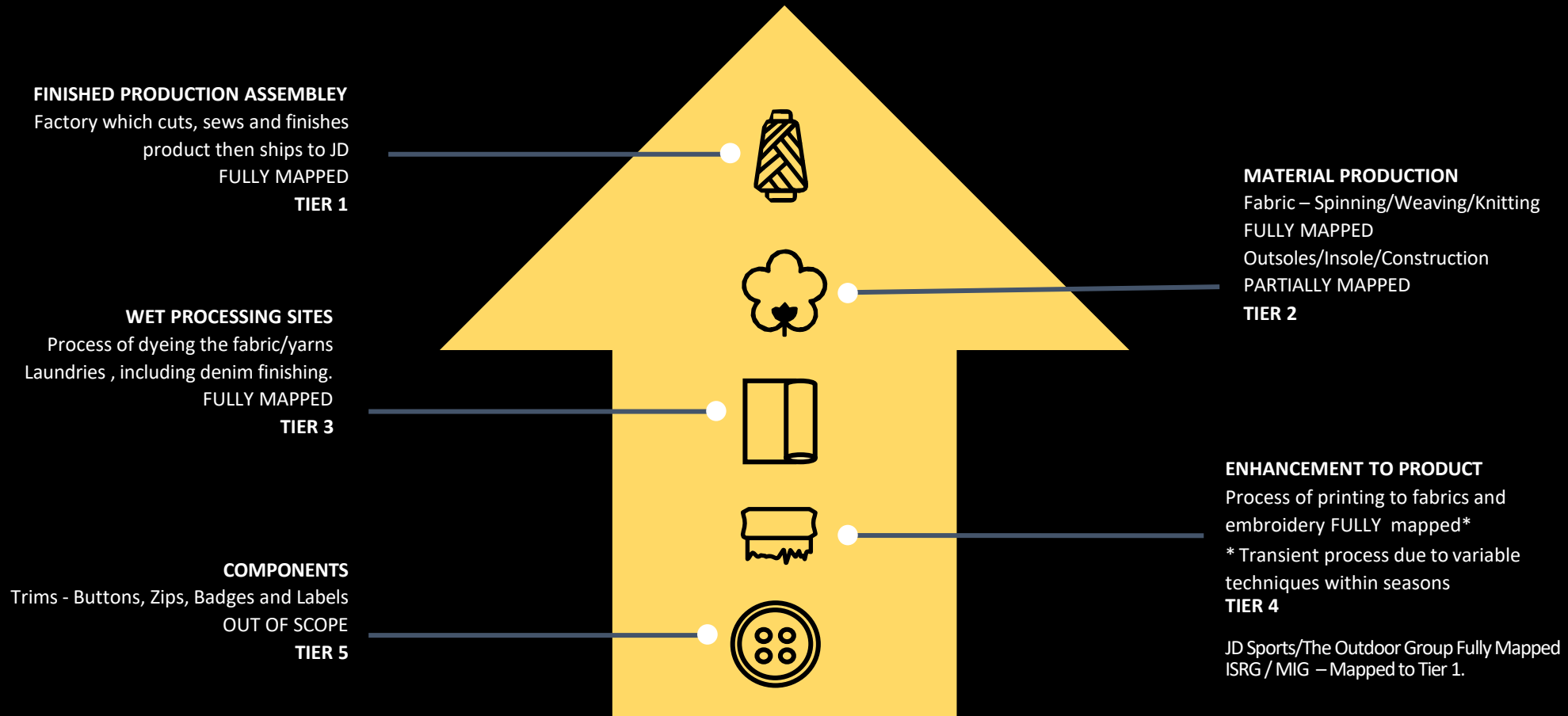
- Gender discrimination
- Small profit margin driven by demand for cheaper clothing
- Excessive working hours
- Unethical recruitment practices/ mitigation



- GBVH training
- Monitor buying practices
- Work with suppliers to re-mediate/ reduce working hours
- Ensure robust policies are in place on recruitment

The Group have completed the full mapping of our supply chain to our 4th Tier manufacturing base on private label, identifying our manufacturing base across the globe. Whilst we are aware of the need to go further down the chain, the challenges lie in the establishment of the relationships needed to identify and engage with these tiers. This is identified in our risk assessment and appropriate action is taken to remedy this.

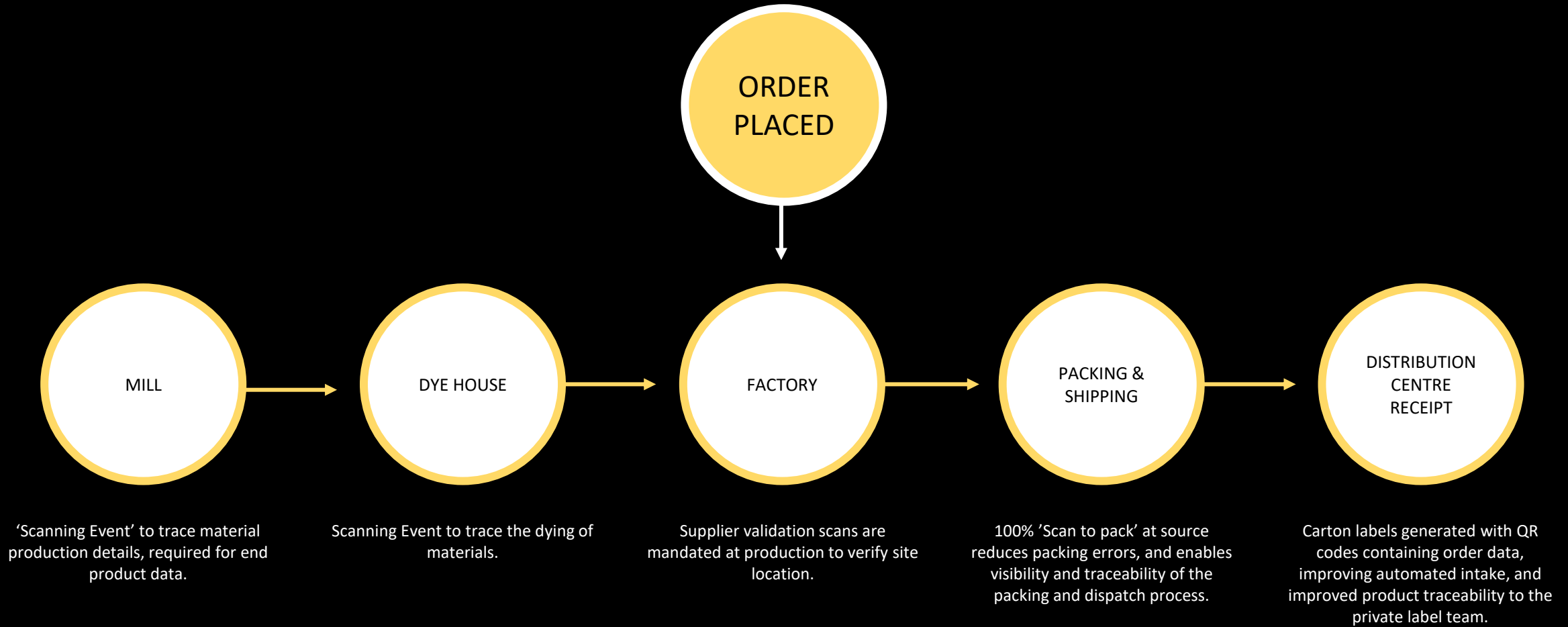
This strategy requires continual engagement with our partners, as manufacturing chains beyond first tier will often be one that changes due to demand and capacity. As a supplier of fully factored garments, our partnership does not currently extend past tier 1 historically, and we recognise the need to promote the development of these relationships further by our 1st tier suppliers.





The JD QR traceability project, in conjunction with Avery Dennison was launched in 2023. This is the first phase of the implementation of the Digital Product Passport. Digital Product Passports (DPP) will provide a platform for collecting and sharing product data throughout the entire lifecycle, illustrating a product's sustainability, environmental and recyclability attributes whilst ensuring the full traceability of the supply chain, highlighting unauthorised sites and potential subcontracting which gives better protection to workers.

Supply Chain Transparency



FORCED AND CHILD LABOUR IN THE COTTON INDUSTRY

Cotton is one of the most widely grown crops in the world and within the Groups Private Labels, cotton continues to be a staple material so it is important to recognise and mitigate the risks. Up to 99% of the world's cotton farmers live and work in developing countries. The top two cotton producers, India and China, contribute approximately 45-50 percent of the world's production, while the top four producers comprise 70-75 percent of global cotton production. Currently, India is the world's leading producer of cotton, surpassing China in 2022. There have been wide reports of forced and child labour in some of the world's biggest cotton industries including China, India, and Brazil.

There have been wide reports of forced and child labour in some of the world's biggest cotton industries including China, India, and Brazil. As a Group, we contract fully factored goods and whilst we trace the supply chain through the manufacturing processes, we do not yet have visibility at farm level. Traceability for Brands and Retailers is to be launched in the Summer of 2024 but is not available at this time.

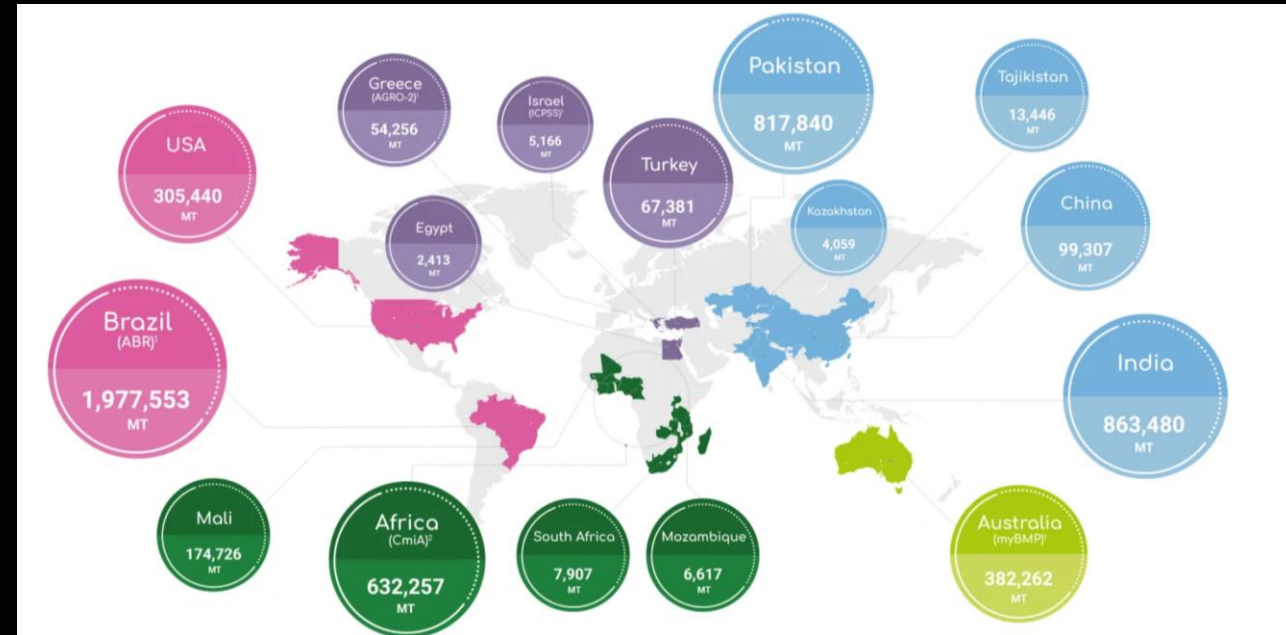
In 2015 JD & the Outdoor Group joined the Better Cotton initiative and through this membership the Group has achieved a target of over 95% of cotton sourced through the programme. Analysis of the cotton origin from those of our Tier 1 factories located in China shows that only 5% of the cotton used is of China origin in 2023.

Better Cotton aims to effect change at the farm and community level and their field-based staff work to promote decent work, including through labour monitoring, identification and remediation of any forced labour.

Better Cotton is ISEAL Code Compliant. That means the system, including their Assurance Programme, has been independently evaluated against ISEAL's Codes of Good Practice. Today 22% of the global cotton production is grown through the programme.

All Better Cotton farmers must, at a minimum, work to uphold four Fundamental Principles & Rights at Work:

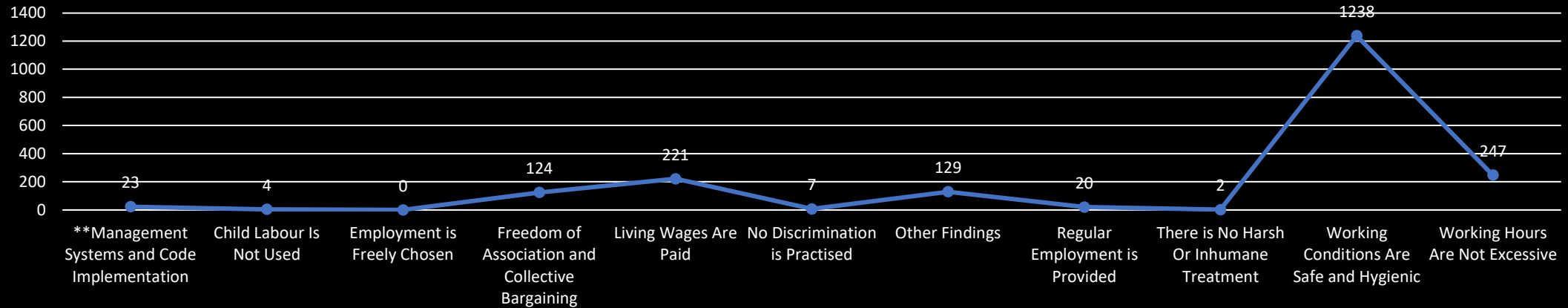
- Freedom of Association and the right to collective bargaining
- The elimination of forced labour
- The abolition of child labour
- The elimination of discrimination in employment and occupation.



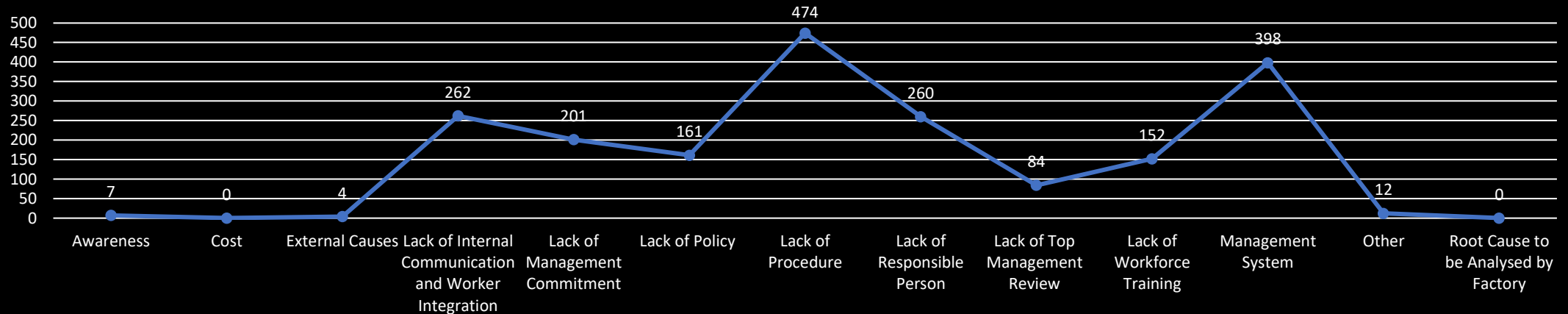
The compliance team work within an internal audit scope defined by the International labour Organisation standards, which classifies all non compliances and from this, action plans are formulated. Through this scope we review and verify closures of all non compliances highlighted in the original audit.

The compliance team have received 371 3rd party audits for the Group, between January 1st, 2023, and December 31st, 2023. From the information in the audits, non-compliances are categorised according to issue type, root cause and severity level and this is used to create the action plan proposed to the factory to work to resolve and close the issues highlighted in the reports/visit.

Non-Compliances Split into Issue Type



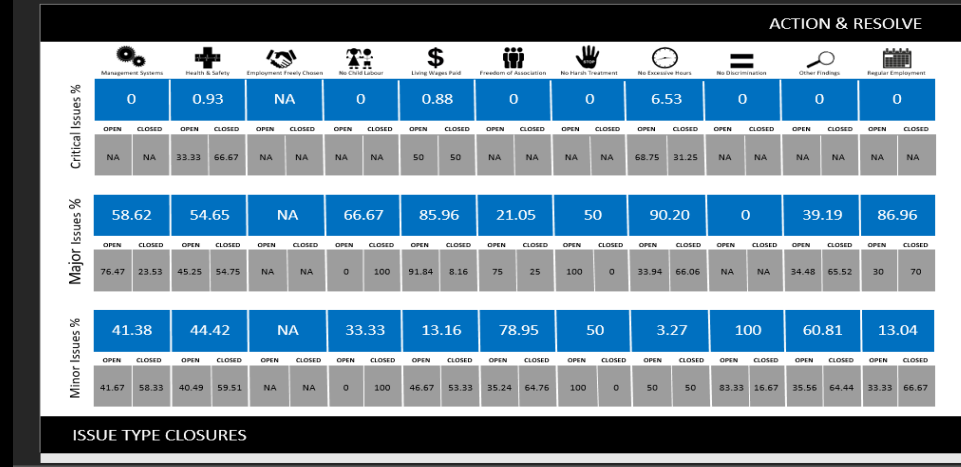
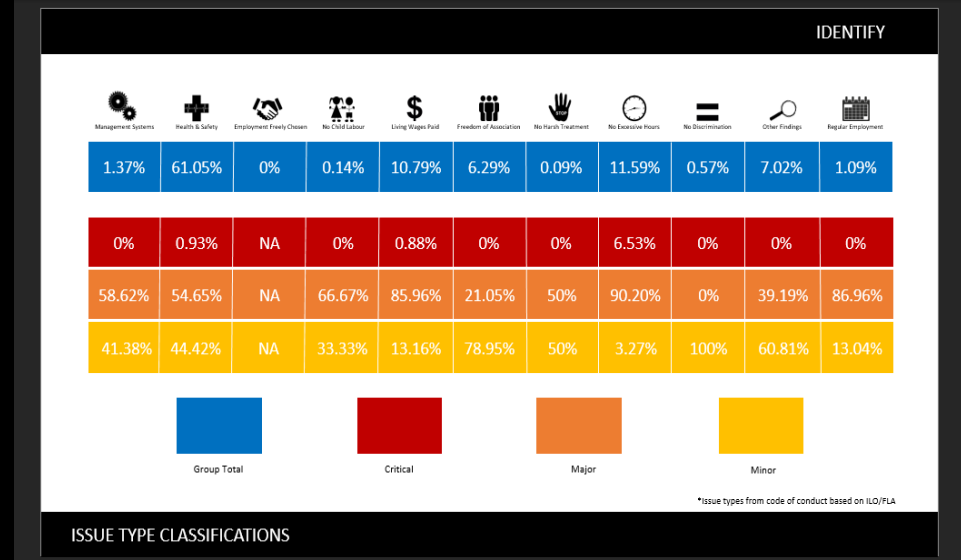
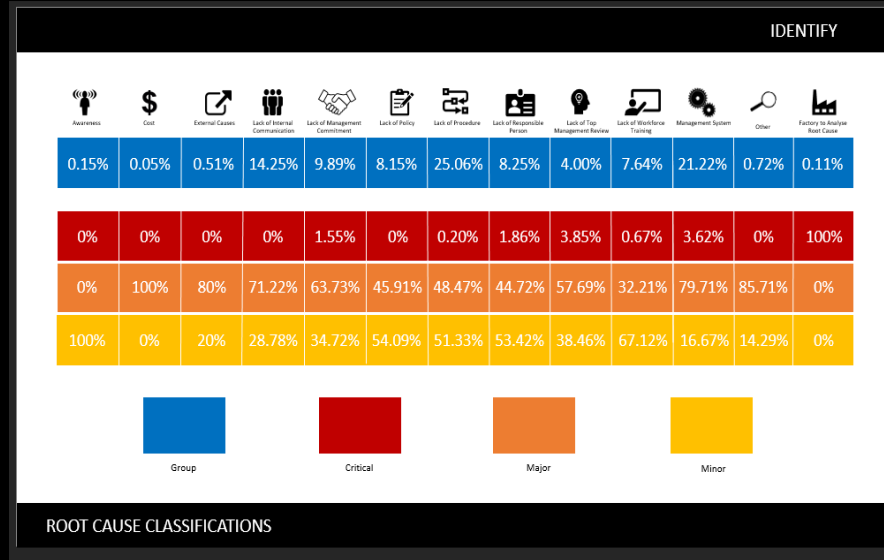
Non-Compliances Split into Root Causes



HOW DOES IDENTIFY ACT & RESOLVE IMPROVE THE LIVES OF WORKERS?

As an organisation committed to promoting safe and inclusive workplaces, we recognize the importance of implementing robust remedial actions to ensure the well-being and dignity of all employees, both direct and indirect.

The Group compliance team categorise all non-compliances within the manufacturing supply chain using our internal “**Identify Act & Resolve (IAR)**” methodology. It is important to **Identify** the root cause of the issues highlighted so that appropriate **Action** can be taken with the factory. Understanding the cause and effect of the issues results in the **Resolution** of these issues. Our disclosures are detailed in the attached link. <https://www.jdplc.com/sites/jd-sportsfashion-plc/files/homepage/esg/modern-slavery/non-compliance-disclosure-report-2023.pdf>



Indian

Romanian

Albanian

Vietnamese

Chinese

Nigerian

Pakistani

Zimbabwean

Philippines

Brazilian

Indonesia

Bangladeshi

British

South African

Kenya

Sudan

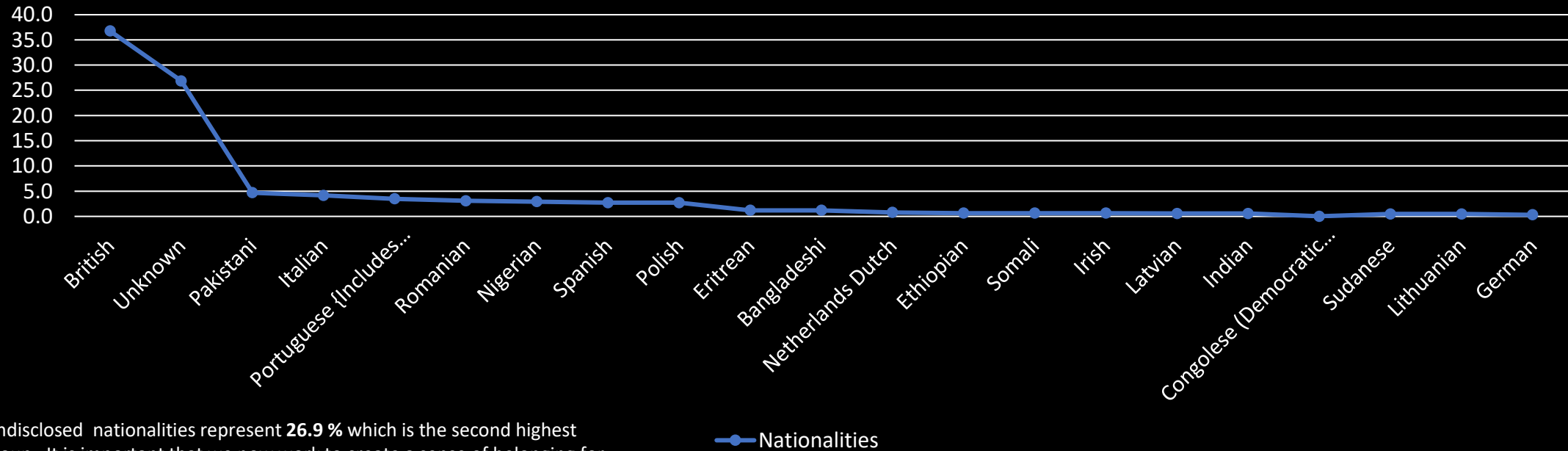
Thai

Ghana

Most at Risk

Less at Risk

% of staff by nationality in our UK DC



Undisclosed nationalities represent **26.9 %** which is the second highest group. It is important that we now work to create a sense of belonging for all minority groups and in June 2024 we have launched our first Employee Resource Groups (ERG's) to encourage colleagues across the business to have a safe space to share lived experiences and embed a supportive culture.

RECRUITMENT

- Agency workers
- Gap in policies
- Labour agency
- Worker status/checklist
- Asia joint ventures/recruitment mapping
- Identifying migrant work



- Reduction in agency labour
- Identify welfare champions and provide relevant training
- Update policies which have been identified from the gap analysis
- Conduct labour agency audits
- Conduct audits on personal files DC

WAREHOUSE & EXTERNAL

- Number of workers temp vs perm
- Ratio of workers to a designated team leader
- Workers unaware of modern slavery



- Increasing permanent worker ratio has been implemented
- Increasing team leaders
- Awareness videos in key areas highlighting red flags
- Escalation process to include UK & JV
- Identifying nationality split & assess risks of modern slavery factors
- Implement training in 3rd party site warehouses

GNFR

- Procurement practices
- Manufactured GNFR



- All suppliers to the business, including those who provide services and goods not for resale (GNFR) will be issues with the Code of Practice
- Those responsible for manufacture of GNFR will be risk assessed in line with the current system of private label production

RETAIL

- Subcontracted services:
 - Cleaning
 - Security
 - Canteen
- Retail operations overseas



- Train and educating managers
- Updating policies

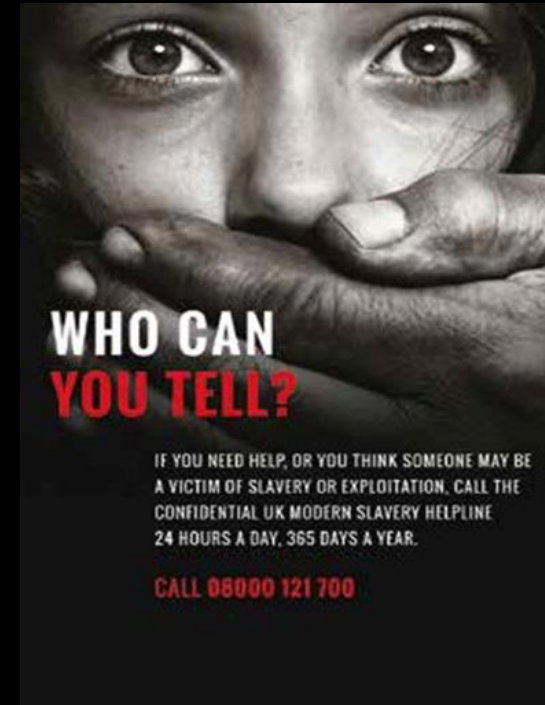
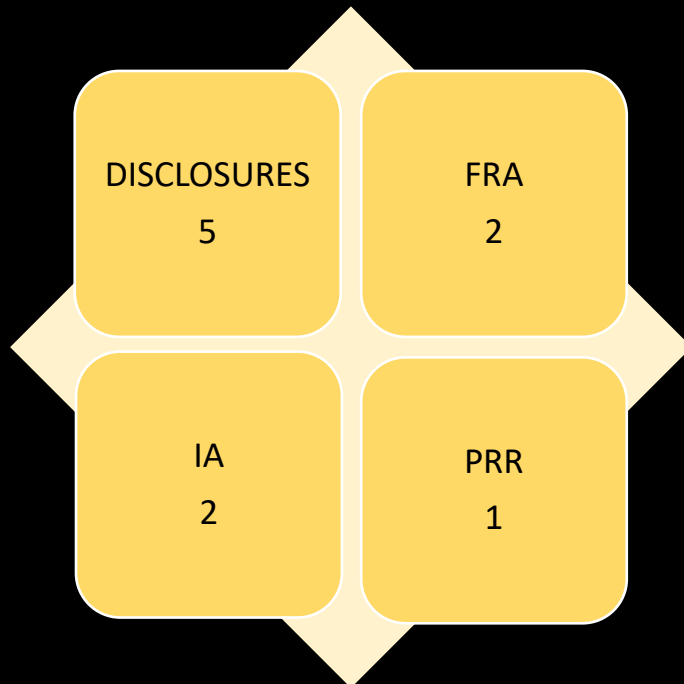


RISK



MITIGATION

Working with UNSEEN in the UK and sponsoring their helpline, has enabled us to develop a classification system for reporting potential Labour Exploitation and Modern Slavery concerns raised by employees by direct referral to our People Relations team, via the Welfare Champions or from the Helpline. **FRA** – First Responder Advice (Unseen, Police) **IA** – Internal Action (Bullying or cultural exploitation) **PRR** – People Relation Referral (warning , external assistance, training etc)



Case study

A female colleague (X) reported to her store supervisor that she was unhappy in her marriage. X confided to him, that she was in an arranged marriage with a man much older than herself.

Allegations of abuse were disclosed, and X was afraid of being returned to Pakistan.

Immediately following the report, the Critical Response team (CR team) held an emergency meeting, and an interpreter was found who worked in the senior team and was able to speak to the victim in her own language and over the next few days established a rapport of trust and X decided what action she wanted to take.

Arrangements were made for X to bring some personal belongings into work along with her passport so that when she was ready the first responders could be informed. The CR team called the Unseen helpline for advice and when X was ready the call was made for them to initiate her removal.

Within 2 hours the police attended X was taken to a place of safety.

The CR team assured the victim that she could return to work for the company when she was ready and wherever she settled. During this time, she was retained on salary for a 6 week period. Assurances were given that a job would be there for her when she was ready. Unfortunately, like many other victims, it can be a very isolating situation and it is not unusual for the victim to leave the NRM. It is not possible to have contact details when a victim enters the NRM and sadly we did not hear from X again.

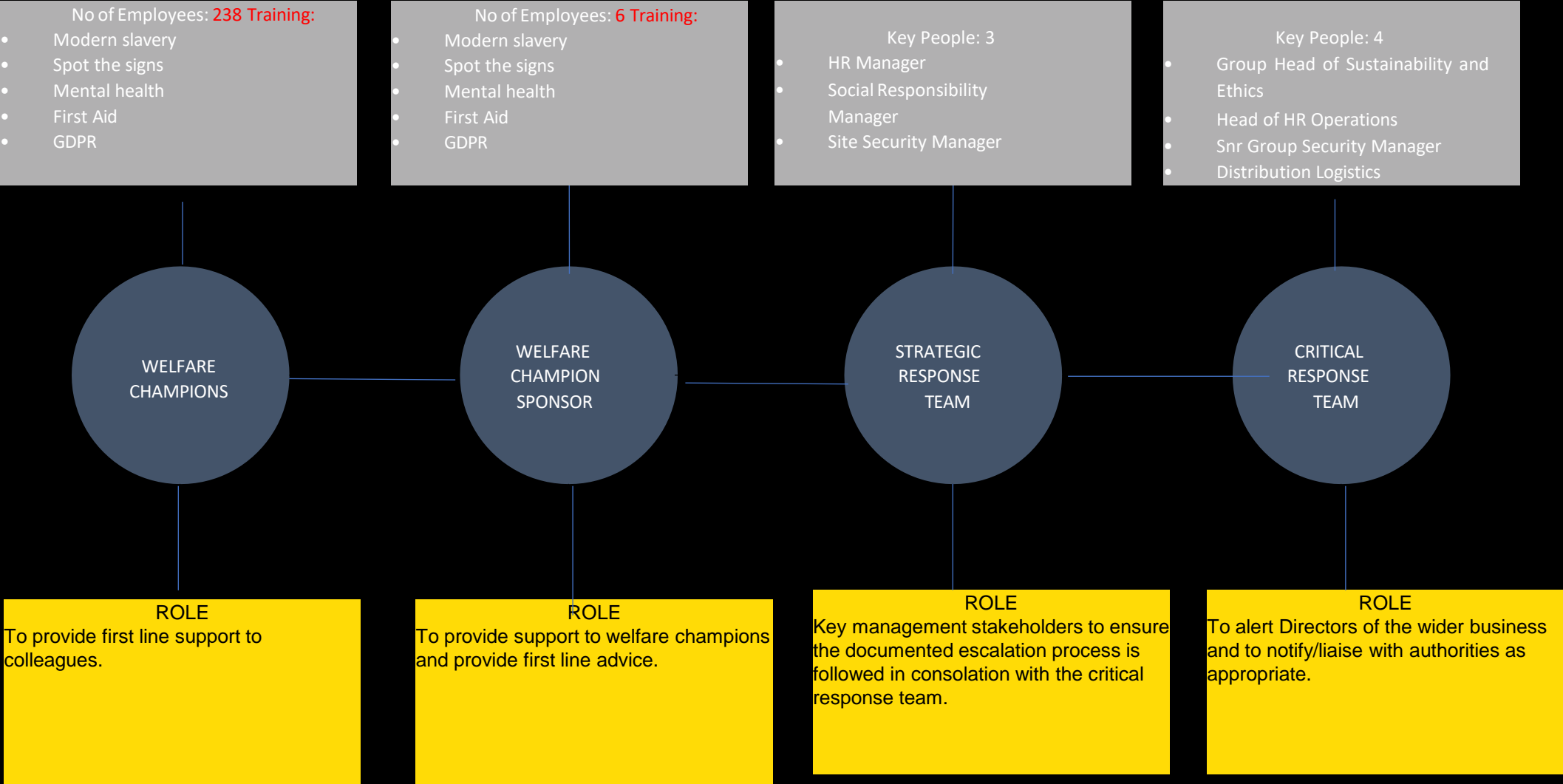
Many victims do return to their abuser, and with a situation of forced marriage this can come with the added stress of not being able to contact their family and the potential “shame” that leaving the marriage brings. In this case the process for reporting was implemented and X was safe at all times, the store supervisor was aware of the sensitivity of the situation and all staff were able to support while maintaining confidentiality. It is important to always consider the victim and what they need in the form of support, unless there is an immediate threat to life.

All store staff had received training, and the supervisor immediately followed the correct reporting protocol, reporting it to the CR team.



The JD Group Distribution Centre in the UK is our largest site and has the greater number of employees on one site and can increase in number, according to peak seasons.

Consideration has been given to the level of risk at this site which involves recruitment practices and specific training in red flag areas is embedded and the below escalation process is in place to mitigate and report labour exploitation/potential modern slavery concerns.





PROGRAMMES

Working with the JD Foundation and the Peoples team to explore opportunities within the business both in retail and in head office, for low socioeconomic schools and youth charities with the aim to encourage young people to explore their potential and break down barriers relating to class, race, gender, and equality.

Providing mentoring from employees in all areas of the businesses through educating and empowering these young people, introducing skills that will relate to young people to influence and change their aspirations.

AWARENESS

Implemented the welfare workers committees within the UK warehouse site and increased the numbers of those trained to meet its need for internal capacity building training and specialist support. Created a strategic response unit, incorporating key stakeholders at the Rochdale warehouse; demonstrated awareness and commitment to addressing human trafficking and forced labour by revamping all material, i.e. posters through the warehouse. Implemented video streams of examples of modern slavery in key areas of the warehouse. Partnered with Unseen and updated posters throughout the site with the helpline number and confidential reporting avenues.

Reviewed the training on Modern slavery and Exploitation and updated the key risk indicators to ensure they remain relevant, with particular reference to our business and included retail employees.

POLICIES

Reviewed policies relating to our Supply Chain partners and created Supplier Resource Guidance Documents relating to :

- Suppliers using 3rd Party labour providers
- Forced Labour Policy
- Migrant Worker
- Equality & Diversity (inclusive of GBVH)

SUPPORT FOR IMPROVED REMUNERATION

In 2022 we implemented a remuneration input tool and utilizing the cumulative remuneration analysis, the number of facilities meeting living wage increased from 32.27% to 72.60% The below criteria will form part of the reassessment in 2024.

Data collected includes;

- Basic wage.
- Incentive pay such as bonuses.
- In-kind benefits such as free meals, accommodation, transport etc.
- Cash benefits

The data did not include overtime as this is not a guaranteed income workers can control or rely on or deductions such as social insurance as workers are able to opt out.

Our compliance team continues to engage with our supply base to encourage participation in working towards a living wage and improving additional forms of worker compensation and remuneration. This will require the adoption of the Ankar Living Wage reference value which will remove the reliance on 3rd party audits who use different methodologies, and we are able to report consistently and influence the supply chain on a level field.

Audits are undertaken both on the global and UK supply processes. Training and raising awareness is a critical element within any business and extended supply chains. Building on the capability of key employees who have been given the increased responsibility for understanding and mitigating modern slavery risk in our business is important.

This training incorporates not only existing staff but is part of the induction of new employees to the business.

Modern slavery is an integral part of the business, supported by all levels of management and is embedded in the company culture.

This will be continually updated and refreshed on our E-learning platform and Zoom presentations. The training covers key areas which are deemed to be the most important to our group; preventing exploitation, practical steps for procurement and purchasing practices.

As a large employer of people from all cultures, we recognise that real risks are present in the exploitation of those seeking refuge from overseas and sometimes closer to home and to ensure safety for all our employees we operate a robust recruitment practice and engage all agencies involved in the provision of labour.

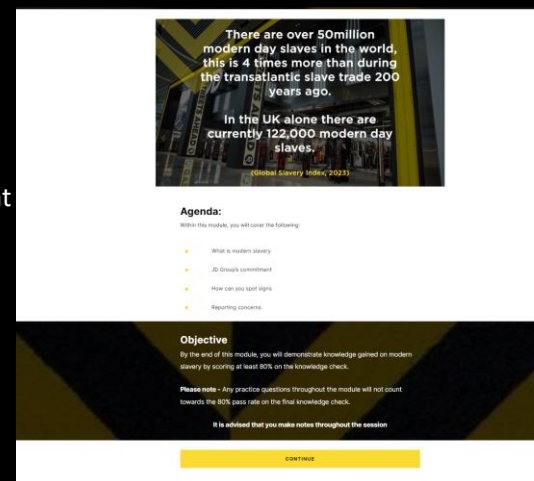
JD continues to support the UNSEEN modern slavery helpline and work with the charity to ensure up to date training and materials are part of an on-going cycle.

Objectives from the training sessions are:

- To understand modern slavery and forced labour
- Recognise the indicators
- Know how to deal with potential issues and have in-depth knowledge of the company escalation processes

Core Level 1 Training : Rolled out in June 2024 for all new starters and core level colleagues.

Welfare Champion Sponsors have been identified within the escalation process and have received Core 2 Training which is more informative. We recognize the need to have more people understanding , but we have to ensure that we have the right people in place in this sensitive area , so have selected these colleagues from the people relations teams. It is important that the different levels of training are not too widespread, and we consider the risk of “training the exploiters” so the selection process is critical.



It has been estimated that there are at least 100,000 victims of modern slavery and human trafficking in the UK. Of the 16,938 potential victims referred to the NRM in 2022, 78% (13,290) were male and 21% (3,634) were female. Dec 2023

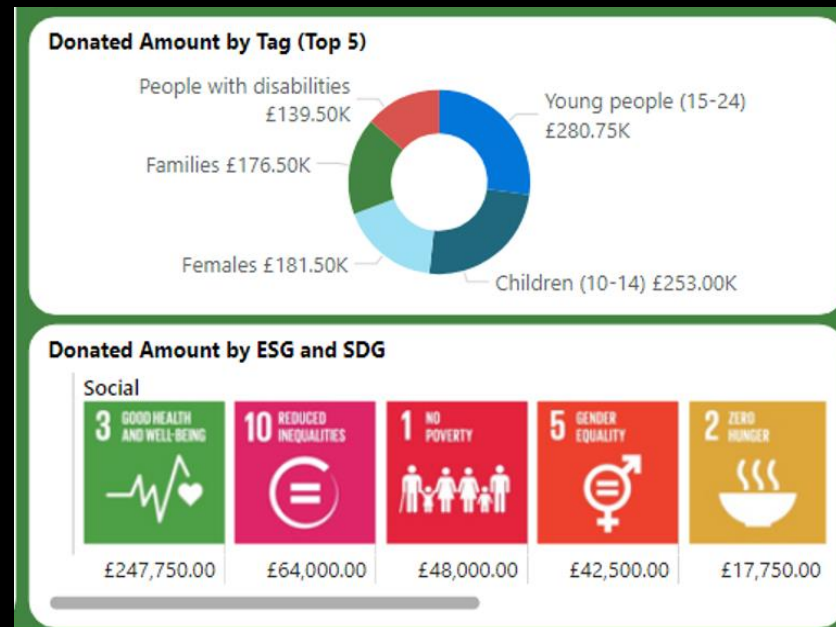
Through the work of the JD Foundation, we can support young people who at risk of exploitation and crime.

Working with charities throughout the UK who support young people from lower socioeconomic areas gives us, as a company, a platform to work towards changing their futures through mentoring support and providing opportunities for work experience, apprenticeships and potential employment.

Young people in low socioeconomic areas, are susceptible to exploitation and often have low aspirations and confidence. Working with youth charities identifies those “at risk” and as a retailer of choice for many young people aged 15-24, we have the opportunity to change their outlook using both the lived experience of our colleagues and those with a passion to make a difference to young people.

407 hours donated by our colleagues.

In 2023 our Together We Can project raised **£152,500** for women and girls in local communities. The project addressed GBVH, Gender Inequality, and those struggling financially due to their circumstances or risk.



1. FORCED LABOUR

The main common risk identified is that of forced labour both globally and in the UK. JD recognises the importance of our direct and indirect workers and those in the extended supply chain. It is important that they can raise any issues of concerns with either JD personnel or an escalation team in confidence and safety.

The Group and subsidiary sites display posters throughout their UK operations or warehouses and retail stores in several languages, giving workers confidential contact information to report issues such as forced labour/debt bondage/withholding identity documents/threatening or violent behavior etc.

JD Groups approach to auditing is to reduce audit fatigue for both factories and businesses. When we on-board a new factory we will accept an out of date audit (Classed as Amber on the risk analysis) and within the previous 12-month time-scale, but we work to ensure all non-compliances that are still open are resolved. This allows the factory and our business to ensure that the partnership is the right one and will continue for a second quarter. A new audit is required during this second quarter.

2. RECRUITMENT PRACTICES

Payment of salaries/bank accounts/overtime/social insurance

1. Ensuring correct recruitment policies are in place and agencies are registered with no fees in place for workers
2. Particularly difficult in rural areas, where recruitment is informal
3. Ensure contracts are in place for all workers, inclusive of probation and termination
4. Identify and protect home workers where used

3. EXTENDED AUDITING POLICIES

Countries and regions of risk have been identified using documented data with a number of assessments trailed and introduced in China. This has been successful and proven to be more informative than worker interviews. For example, an issue with delayed payments was identified, which otherwise had not reported in the standard audit process. This issue was immediately remedied by working with the supplier and factory to align the payments. All workers now receive the payment in a timely manner, and this will continue to be monitored.

We recognise that different countries and cultures need different approaches and that whilst the issue are the same the reasons may be more complex. An example would be India and Bangladesh where GBVH is prevalent and beyond the scope of traditional auditing.



**RESPONSIBILITY**

As the Group expands into territories that now have reporting responsibilities in their own right it is important that our Group works to assign responsibility and accountability for addressing human rights risks including modern day slavery and human trafficking in these countries .

TRAINING

Regularly conduct a needs analysis for workers within the UK sites to determine and meet its need for internal capacity building training and specialist support. Upwards of 230 personnel within the UK Distribution center and key subsidiaries have been trained as welfare champions and sponsors. The JD Academy continues to train new starters and make training mandatory in key areas.

POLICIES

Continue to communicate and review our policies and adapt them accordingly as needed. These are available on our PLC site and on a supplier SharePoint link in multiple languages.

TRAINING

We have developed a 3-tier core training program :

Core : This will be mandatory for all new starters . In place June 2024. Continual rollout.

Level 1 : Designed for the Welfare Champion Sponsors to enable them to further recognize and escalate labour exploitation and concerns. Will include the recruitment teams and agencies.

Level 2 : This is planned to be mandatory for those employees who are responsible for price negotiations, the employment of staff and the International teams who work with high-risk countries in which we operate.

- Please see link to our policies: <https://www.jdplc.com/esg/governance/our-policies/supplier-resource-guidance-documents>