

FRASERS GROUP

MODERN SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT 2026

COMPLIANCE STATEMENT

This statement has been published in compliance with section 54(1) of the Modern Slavery Act 2015 (the “Act”). It seeks to outline the steps taken to detect and prevent modern slavery and human trafficking within its business and supply chains by Frasers Group plc and its subsidiaries which fall within the scope of the Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 (all together the “Group”), for the year ending 26 April 2026.

This statement was prepared gathering updates from across the organisation involving key functions, including: Sourcing, Human Resources, Governance and Risk and has considered the following guidance and principles:

- the Home Office statutory guidance, Transparency in Supply Chains: A Practical Guide (last updated in July 2025);
- the Independent Anti-Slavery Commissioner’s January 2026 report, Strengthening the UK Forced Labour and Human Rights Legislative Framework;
- the Guiding Principles on Business and Human Rights: Implementing the United Nations “Protect, Respect and Remedy” Framework; and
- the IASC-commissioned futures analysis, Anticipating Exploitation.

This statement details how our approach to business and human rights is helping to tackle the risks of modern slavery in our business and supply chains. It provides an update on our previous statement and details of our future commitments.



CONTENTS

01	INTRODUCTION		05	DUE DILIGENCE & REMEDIATION	
	• Key developments	04		• Our Supplier Due Diligence	13
				• Our Approach To Remediation	13
02	ORGANISATION STRUCTURE		06	CONTINUOUS DEVELOPMENT	
	• Organisational Structure	05		• The Group Commits To	14
	• Our Business	06			
	• Our Supply Chains	07			
03	GOVERNANCE & POLICIES		07	EFFECTIVENESS	
	• Our Governance Framework	09		• Our Understanding Of Effectiveness	15
	• Our Policies	10		• Our Demonstration Of Effectiveness	15
04	ASSESSING & MANAGING RISK				
	• Our Risk Assessment	11			
	• Our Approach To Management Of Salient Risks	12			

INTRODUCTION

According to ILO Global Estimates (2021), there are an estimated 27.6 million people living in forced labour globally, including 3.3 million children. This is estimated to generate over £185 billion in illegal profits each year.

Modern slavery exists in supply chains around the world, from the cotton in our clothes and the minerals for our electronics, to the manufacturing, warehousing, shipping, cleaning and catering services along the supply chain. It has been acknowledged that there can be no guarantees of a slavery-free product, but we make every effort to prevent slavery in our supply chains.

We recognise that modern slavery is a growing global issue, and we understand our responsibility to prevent and mitigate where possible the occurrence of human trafficking, child labour and forced or bonded labour in our business and supply chains.

We adopt a zero-tolerance approach to modern slavery and human trafficking and take seriously any allegations of human rights abuse against people both within our organisation and within our supply chains. We have implemented and will continue to implement measures to seek to ensure that slavery and human trafficking do not exist at Frasers Group or in any part of our supply chain.

We aim to continuously review and improve our practices and policies to ensure that we have appropriate effective safeguards in place to prevent and mitigate the negative impacts of modern slavery and human trafficking.

Since our 2025 statement, key developments include:

- Our Sourcing and Sustainability teams have a dedicated two hour meeting every eight weeks with our factory partners to focus on deepening our knowledge of their operations as well as discussing audit issues and remedial actions implemented.
- With priority suppliers, we are exploring further down the supply chain to Tier 2 and Tier 3 suppliers to obtain diligence information and better understand how they prevent modern slavery in their operations.
- We have strengthened our external policies to provide greater transparency and clearer expectations for identifying and managing modern slavery risks and taken a more structured approach to supplier engagement.



ORGANISATIONAL STRUCTURE, BUSINESS AND SUPPLY CHAINS

OUR ORGANISATIONAL STRUCTURE

Frasers Group Plc is a publicly listed company incorporated under company number 06035106, governed by the Companies Act 2006. The Group consists of over **550 subsidiaries** which operate in over **20 countries**.

This statement covers all subsidiaries which have an obligation to publish a statement under section 54 of the Act. A full list of the subsidiaries can be accessed in the Group's latest [Annual Report](#).

In addition to our obligations under the Act, our European subsidiaries are subject to additional Human Rights and Modern Slavery reporting requirements depending on their local legislation.

550+
Subsidiaries

20+
Countries



OUR BUSINESS

Given the nature of our business, it is important that we undertake ethical business practices in line with our corporate social responsibilities which seek to ensure we continue to build a sustainable business. The breadth of our business means that we not only face risks as an employer, but also risks in relation to our supply chains.

The Group is one of Europe's largest sporting goods retailers and operates a diversified portfolio of the world's leading retail brands across five strategic business segments:

- 

UK Sports Retail
- 

Premium lifestyle
- 

International Retail
- 

Financial Services
- 

Property

Our UK Sports Retail arm offers a complete range of sporting apparel, footwear and equipment through our predominant fascia, Sports Direct.

In Premium Lifestyle, we are developing the Group's premium and luxury offering through the Frasers, Flannels, Jack Wills and Sofa.com fascias.

Our International Retail arm provides us with the opportunity to tailor our proposition to the local markets in which we operate which includes Europe, the United States of America and further afield.

The Financial Services segment delivers our consumer credit product, Frasers Plus.

The Property segment is responsible for the Group's real estate portfolio which encompasses both freehold properties and leasehold properties that generate rental and other property related income.

30,000+

EMPLOYEES WORLDWIDE

CIRCA

1,500

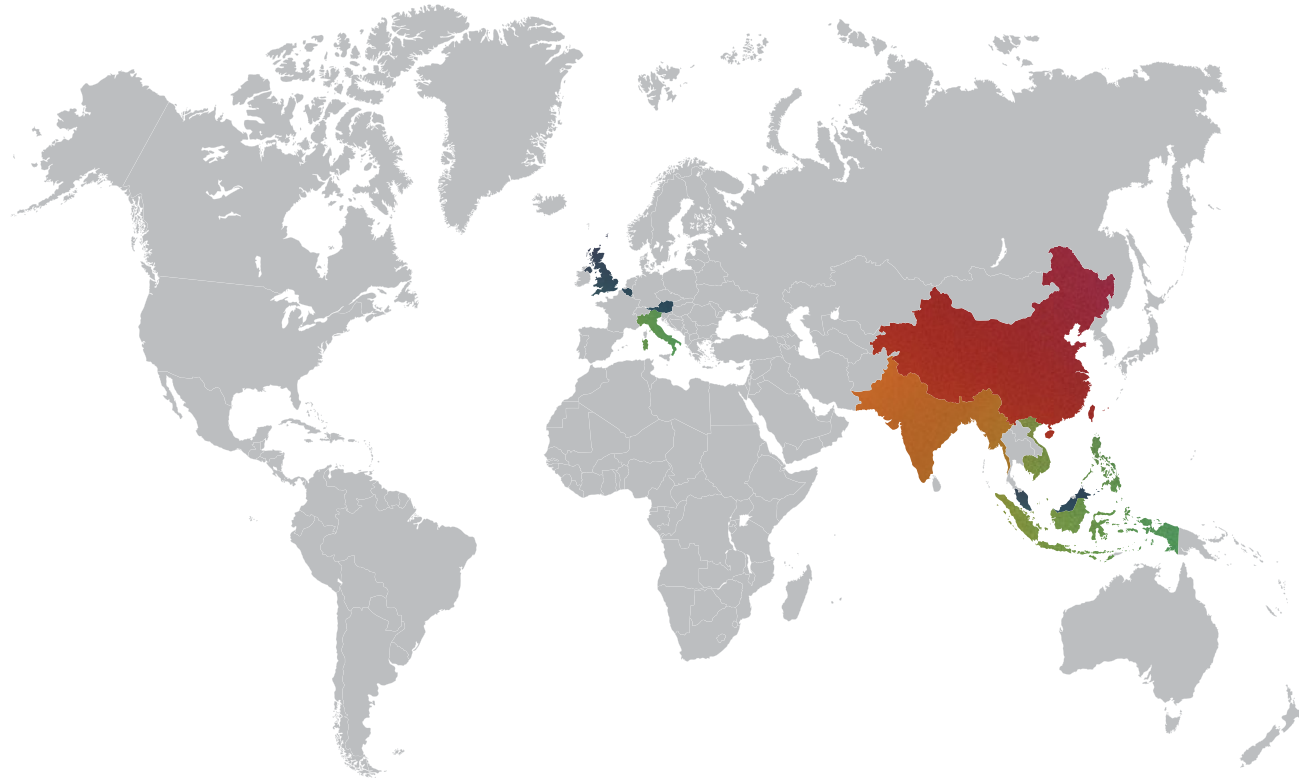
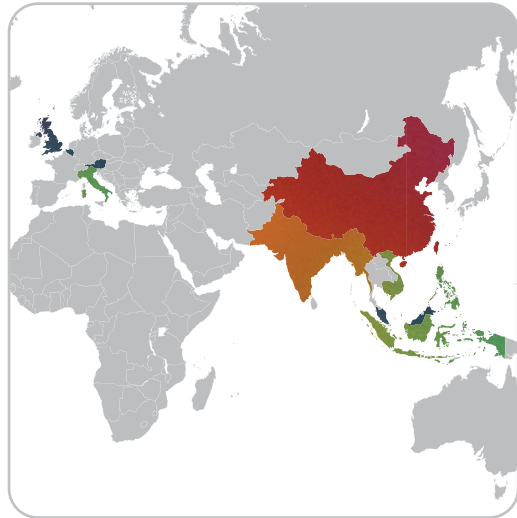
STORES GLOBALLY

20+

COUNTRIES

OUR SUPPLY CHAINS

The Group sources product from a diverse range of international manufacturing partners, with our textiles and apparel manufacturing concentrated in key regions, including Bangladesh, Cambodia, China, India, Indonesia, Italy, Malaysia, Pakistan, the Philippines, Portugal, South East Asia, Taiwan, Turkey, UK, Vietnam.



We source our Group products from many countries worldwide, with our sourcing strategies continually evolving in response to commercial priorities and market trends. Maintaining a varied supply chain with long-standing, trusted partners is essential for securing speciality products and reducing risk.

- 

DISTRIBUTION CENTRES
- 

LOW FREQUENCY SOURCING (FACTORIES < 5)
- 

MEDIUM FREQUENCY SOURCING (FACTORIES > 10)
- 

HIGH FREQUENCY SOURCING (FACTORIES > 50)

SUPPLY CHAIN TRACEABILITY

Our non-stock supply chain - including cleaning, catering, logistics and security services - is largely UK and European-based. We recognise that different tiers of our supply chain carry different risk profiles and that visibility may be lower beyond our direct (Tier 1) suppliers, which is an area we continue to work on.



We have strong relationships with our brand, supplier and factory partners and engage with them directly, in-person, regularly throughout the year to communicate and review their practices.

The Group has partnerships with many well renowned brands and suppliers who provide a second line of safeguarding for the Group. Many of these partners also fall within the scope of s.54 of the Act and as such are required to have their own robust modern slavery policies and initiatives in place as well as publish an annual statement in line with the requirements of the Act. To fully assess how our modern slavery arrangements are complemented by our largest partners - it may be useful to visit their websites and access their modern slavery statements.

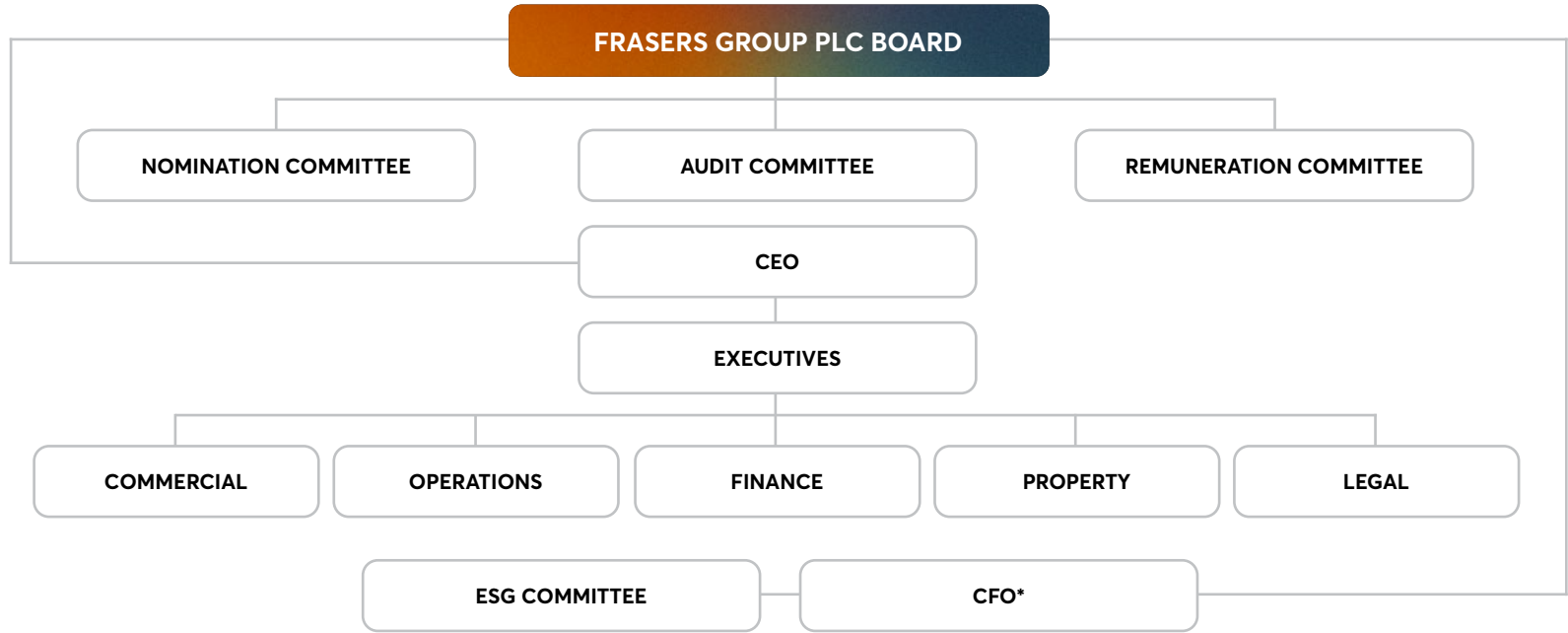
We work with our factory partners to ensure they select the most appropriate materials, find factories with the right skills and capabilities to meet our requirements and ensure that they meet the Group's standards. Our manufacturing partners who produce our products adhere to strict protocols. We require our supplier factories to have valid satisfactory third-party social auditing factory reports from organisations including (but not limited to) Amfori (BSCI) or Sedex which include audits of workers involvement and protection, anti-discrimination, fair remuneration, Anti-child labour and other areas of concern for modern slavery aligned with our Code of Practice. Our teams ensure our partner factories standards are maintained and no human rights violations occur, they do this by regular meetings, frequent visits and audits throughout the year.

GOVERNANCE FRAMEWORK AND POLICIES

OUR GOVERNANCE FRAMEWORK

Our view is that a strong governance framework, including robust policies and procedures, is key to effectively assessing, monitoring, managing, mitigating and, where required, remediating the risks posed by modern slavery and other human rights issues to our business. Our ambition is to continuously strengthen our governance processes through conducting regular reviews of our governance arrangements, to address existing and

emerging risks, taking into consideration principles such as those set out in the **UNGP's**. The Board is responsible for overseeing the governance framework which is deployed across the business by the Executive Team. The Group has an ESG Committee (as a part of our ESG strategy) the executive sponsor, the Group CFO reports directly to the Board on behalf of the Group.



OUR POLICIES

Our approach to preventing modern slavery is supported by a suite of operating policies and procedures which are designed to help detect and prevent modern slavery and human trafficking within the organisation. We regularly review our policies, to ensure they remain relevant, robust and effective. Our Sourcing, Human Resources, Governance and Risk teams are responsible for implementing and updating our policies to ensure they continue to provide safe channels for individuals to raise concerns and are treated fairly throughout our business and wider supply chain.

OUR KEY INTERNAL POLICIES INCLUDE:

Anti-bribery and Corruption

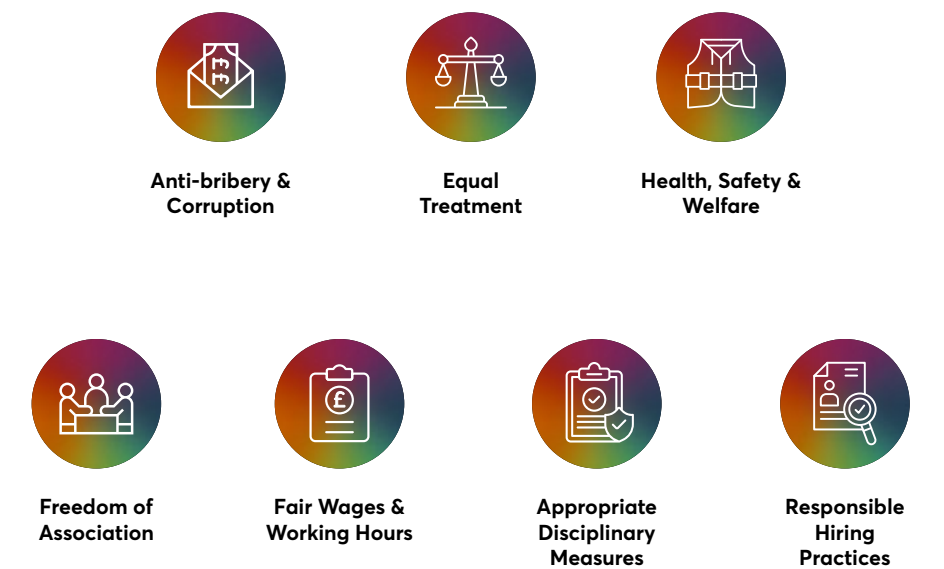
Fraud Prevention

Grievance

Harassment and Bullying

Whistleblowing

Our Supplier Code of Practice reflects our own internal policies and sets out clear expectations on matters including anti bribery and corruption, health, safety and welfare, fair wages and working hours, responsible hiring practices, equal treatment, freedom of association and appropriate disciplinary measures.



Suppliers are required to onboard through our Partner Portal and must read and acknowledge our Supplier Code of Practice. Compliance with the Supplier Code of Practice is monitored as part of our third-party audits. Suppliers are notified of any updates to the Supplier Code of Practice through the Partner Portal and during their regular meetings with the business.

ASSESSING AND MANAGING RISK

OUR RISK ASSESSMENT

Our Sustainability, Sourcing and Commercial teams conduct a risk assessment across key areas of our supply chain. Our approach to risk monitoring includes third-party and ethical audits, alongside local stakeholder engagement and desk-based research using sources such as the Global Slavery Index. Scored audits identify risks at factory level, and assessments are reviewed on a periodic basis to monitor whether updates, remedial actions or additional controls are required.

Our risk framework is subject to internal management review, with periodic oversight from the Board. Where significant matters arise, these are escalated and reported to the Board as appropriate.

Given the International footprint of the Group and its suppliers, we are exposed to a range of risks across our supply chain, outsourced activities, cleaning and catering suppliers, and agency recruitment partners. Having considered our business and supply chain profile, we consider our most salient potential modern slavery risks to be:



Within those identified risks, we have identified that the following groups are likely to be more vulnerable to modern slavery:



We recognise that the modern slavery risk landscape continues to evolve. Factors identified by the Independent Anti-Slavery Commissioner and other experts as current and emerging risk drivers include: economic insecurity and precarious work increasing domestic vulnerability; conflict-driven displacement creating populations vulnerable to labour exploitation; and technology-enabled deceptive recruitment (including fraudulent online job advertising). We keep these factors in mind when considering risk in our operations and supply chains.

OUR APPROACH TO MANAGEMENT OF SALIENT RISKS

We have identified the following as key indicators of modern slavery and highlight these to the workforce, so they can support in the identification of any possible signs of modern slavery:

- Agency workers being asked to pay fees to obtain work
- Workers not having access to or control over their immigration or ID documents
- Salaries being paid into accounts not in the name of colleagues
- Colleagues living in overcrowded conditions
- Obvious signs of mental distress or fear of physical abuse
- Restricted movement at work or in an accommodation
- Visible signs of physical abuse

If members of staff are subject to or have knowledge of a colleague having restricted movement at work or in an accommodation they are encouraged to speak to a senior member of staff or make a confidential report using our whistleblowing procedures.

We also encourage our employees to report any harsh or inhumane treatment they may have experienced or have knowledge of, occurrences of worker documentation being withheld as well as any instance of poor working conditions through our ‘your company, your voice’ initiative.

We aim to attract a diverse workforce who are passionate about what they do and reflect our values. We recruit, promote and reward people on merit, and do our best to promote equality, diversity and inclusion in all our working practices. Although we directly employ many of our colleagues, we occasionally partner with agencies to fill resource gaps that arise. We are clear with our recruitment partners about our requirements and expectations of behaviour and provide clear paths of escalation such as promoting use of our whistleblowing channels. We ensure to only partner with reputable agencies and we do not use nor permit recruitment fees. We have adopted the Employer Pays Principle: no worker

should pay for a job, and all recruitment costs are a business expense that must be met by the employer, not the worker. This principle is communicated to agency and recruitment partners. Where we become aware of a breach, we look to take corrective action.

We operate in a legal and ethical manner and when recruiting ensure:

- Legal right to work within the relevant country is checked;
- Suitable references are received;
- Suitable identity documentation is available to the candidate (i.e. they have access to their passport or other similar legal document in their name).
- We do this by requesting that these documents are presented personally by the candidate;
- Identity confirmation checks are also be carried out during the recruitment process; and
- We do not discriminate on the basis of a person’s age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership and national or ethnic origin.
- To make sure we meet this commitment, we ask candidates to voluntarily complete a (confidential) recruitment monitoring questionnaire when they apply for a vacancy. The information provided is separated from the application, so those involved in selection do not have access to it.

DUE DILIGENCE AND REMEDIATION

OUR SUPPLIER DUE DILIGENCE

The Group recognises its responsibility to embed ethical procurement practices within both stock and non-stock operations. We aim to drive visibility, promote integrity and mitigate risk in our procurement activities. We regularly review our due diligence processes and actively engage with our partners to enhance our checks, controls and safeguards to support the prevention of human rights abuses.

As part of our on-going drive to identify and mitigate the risks posed by modern slavery, we conduct due diligence across our supply chains and operations to identify where risks are present, whether we have appropriate controls in place to mitigate those risks and to identify whether there have been instances of modern slavery issues detected within our organisation and supply chain which require remediation.

We undertake relevant background checks for our suppliers, factories and manufacturers and monitor third-party actors in our supply chain. We are aware that certain services we procure, including construction, facilities management and related contract labour, can present elevated risks of labour exploitation, including where labour is sourced through multiple layers of sub-contracting. We take these risks into account when procuring such services and, where appropriate, require suppliers to confirm their own modern slavery controls.

OUR APPROACH TO REMEDIATION

In the event that modern slavery or human trafficking were identified in our operations or supply chain, our immediate priority would be the safety and wellbeing of those affected and we would seek to ensure that affected individuals have access to appropriate support.

Where ethical audits or other due diligence identify non-compliance or

areas of concern, we take a risk-based view to implement remedial action. Such action may include: issuing corrective action plans with timescales for completion; requiring additional audit visits; providing targeted guidance to the supplier; or, where concerns are sufficiently serious and cannot be remediated, reconsidering whether the commercial relationship is appropriate to continue.

Our Sustainability and Commercial teams have regular reviews with suppliers which include review of audit outcomes and updates on any remediation actions required to be made by the supplier.



CONTINUOUS DEVELOPMENT

We have a range of tools in place including videos and literature to educate colleagues about their rights and communication channels, including an internal telephone hotline and comments boxes on site, for reporting any feedback or concerns. Anyone making a report can remain anonymous if they choose.

We continue to review and develop our colleague training, monitoring processes and evaluation of outcomes, and work with our employment agencies and other relevant bodies, including the Gangmasters and Labour Abuse Authority and the police, to support our training and knowledge on the topic of modern slavery.

As part of our elevation strategy, the Group has training initiatives including our induction training which covers our expectations for colleague behaviour, colleague rights, what colleagues can expect of us as well as avenues they can utilise to provide feedback on the Group's employment practices. It also introduces new colleagues to essential policies including those set out in this statement.

The Group commits to:

- continue raising awareness around modern slavery and forced labour
- continue promoting transparent recruitment practices including:
 - ensuring all payments are made to bank accounts belonging to colleagues
 - developing and maintaining more robust recruitment policies
 - ensuring contracts are in place for all workers
- continue conducting relevant ethical audits for our partners and risk assessments

- assess ways in which to enhance our supply chain transparency which may include:
 - enhanced supply chain mapping
 - ongoing gap analysis of supplier contracts
 - strengthening our supplier governance
- consider additional training initiatives to enhance training and awareness for managers and other colleagues who are directly involved in supply chain management and HR roles
- assess the value of a partnership with anti-slavery organisations that will able to provide expert advice and guidance on how best to protect our workforce and ensure the policies and procedures we have in place are robust enough

We are aware of the evolving international regulatory environment in relation to forced labour and modern slavery, including the EU Corporate Sustainability Due Diligence Directive and growing use of import controls by trading partners. We continue to monitor these developments and consider their implications for our supply chains.

UNDERSTANDING AND DEMONSTRATING EFFECTIVENESS

OUR UNDERSTANDING OF EFFECTIVENESS

We recognise that everyone in our business and supply chains has a duty to be alert to the risks that modern slavery and human trafficking present. We encourage staff to report any concerns and are given the support to do so, and the Board and the Executive team are expected to respond to those concerns accordingly.

Our Executive Team takes responsibility for ensuring adequate resources are in place to ensure compliance with the requirements of the Act.

The Company Secretariat team is responsible for gathering the necessary information to draft the statement and present it to the Board for approval prior to its publication.

OUR DEMONSTRATION OF EFFECTIVENESS

To assess effectiveness, during the year we consider the following indicators:

- number of modern slavery-related concerns or reports raised through internal channels (including our whistleblowing service), and how those were resolved
- number of ethical audits conducted across our supply chain and overseas warehouse partners
- completion of awareness training

Concerns and reports were received through our internal reporting channels (including 'your company, your voice' and our confidential whistleblowing procedure) and were assessed for potential modern slavery indicators. None required escalation as potential modern slavery incidents. We note that

no reports of modern slavery does not necessarily indicate the absence of issues, but rather reflects continued efforts to raise awareness so that any concerns are surfaced and addressed.

The Group did not identify any confirmed cases of modern slavery or human trafficking in its operations or supply chain during the year. Any concerns identified as part of our ethical audits, were assessed and did not meet the threshold of modern slavery.

This statement was approved by the Board of Directors on 10 July 2026.

As part of the Group's commitment to transparency, this statement will also be published on modernslaveryregistry.org.

Signed by:

Date: 16th July 2026

Sir Jonathan Thompson

Sir Jonathan Thompson,
Chair and Non-executive Director,
on behalf of the Board of Frasers Group PLC

The original signed version of this statement is held by the Company.