



The Harbrough Hare Limited

Modern Slavery Transparency Statement 2024-25

INTRODUCTION

It continues to be a priority for The Harbrough Hare Limited (the “Company” or “Joules”) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We take any allegation of human rights abuse in all its forms seriously and will not tolerate human rights abuse against individuals within Joules’ own organisation or our supply chain.

Modern slavery can take many different forms and is a complex issue. Joules has taken steps to identify areas where there are risks of modern slavery occurring within our business and supply chain and we are working to eliminate that possibility.

This is our 2nd statement made under the Modern Slavery Act 2015 and constitutes our Group modern slavery statement for the 2024/25 financial year. It highlights the key activities we have undertaken during the year and aims to provide useful information to understand our commitment as a responsible retailer to reduce those modern slavery risks that could be connected to our business.

Alistair Hill

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Chief Operating Officer, The Harbrough Hare Limited

31 July 2025

The Harbrough Hare Limited. Registered in England and Wales No. 14504304. Registered Office: Desford Road, Enderby, Leicester, United Kingdom, LE19 4AT

KEY ACTIVITIES IN 2024/25

Supply Chain Transparency

- Updated Tier 1 and factory listing published on [Joules.com](https://joules.com) and the Open Supply Hub, a public platform for supply chain data.
- Updated our Tier 3 sites listing published on <https://www.nextplc.co.uk/corporate-responsibility/our-suppliers>
- 106 Code of Practice (COP) audits performed in the year across Bangladesh, India, Turkey, China, Vietnam, Pakistan, Cambodia.

Active Management and Remediation

- Worked with 1 factory to successfully remediate modern slavery issues.
- Disengaged 2 factories where remediation on issues relating to modern slavery had not been achieved and the factory did not demonstrate willingness to improve. Both of these cases were in relation to wage retention.

Training & Awareness

- 94 new Joules employees completed our bespoke online Modern Slavery training during the year. This course explains what modern slavery is, why it's relevant to Joules, our company policy along with employees' responsibilities and what it means for them.
- Internal training and awareness sessions were carried out with the Joules product teams to ensure their understanding of the Code of Practice, including audit processes and supplier responsibilities.
- Dedicated resource at Joules Head Office to implement the NEXT Code of Practice ways of working.
- Buying and merchandising directors receive regular Code of Practice updates.

Collaboration

- NEXT held in-person supplier presentations in Vietnam, Cambodia, Sri Lanka, and China, which were also attended by Joules suppliers.

OUR BUSINESS & COMMITMENT

Our Business

We believe in dressing well for the weekend, every weekend. We are inspired by the countryside, coasts and towns in which we love to spend time. And we champion our customer every step of the way. At Joules we want to help our customers be the best, most original versions of themselves.

Our Company

The Harborough Hare Limited is a private company limited by shares. Its immediate parent company is The Harborough Hare Holdings Limited, which is 74% owned by Next Holdings Limited, part of the NEXT plc group of companies.

Our Product Supply Chain

We source from 7 countries - Bangladesh, India, Turkey, China, Vietnam, Pakistan, Cambodia.

We have 80 active Tier 1 product suppliers. For details of our supply chain tiers, please refer to 'Responsible Sourcing and Circularity' section of the NEXT plc Corporate Responsibility Report at <https://www.nextplc.co.uk/corporate-responsibility/corporate-responsibility-reports/2025>

Our Commitment

Joules is committed to finding and preventing modern slavery and human trafficking throughout our business and supply chain and to understanding the modern slavery risks that may be present.

We do this by:

- Finding effective methods to work to eliminate slavery and human trafficking practices in our supply chain. We are working towards full transparency of our supply chain.
- Ensuring our policies and procedures are reviewed regularly and that we have development and training processes in place to enable our internal teams to have appropriate awareness and understanding of the issues and our responsibilities.
- Ensuring new suppliers understand our requirements before they commence working with us, and that existing suppliers comply with those requirements.
- Ensuring the people who provide the products and services we buy and use are treated fairly, and that their fundamental human rights are protected and respected.

GOVERNANCE FRAMEWORK & POLICIES

Our Governance Framework

A robust governance structure and clear risk management and internal controls framework, both of which are embedded throughout the business, are core to our approach. Our executive management team is responsible for prioritising actions and helping to monitor emerging Environmental, Social and Governance risks. On a day to day basis, significant issues seen by the COP team as part of their work are discussed with the executive directors where appropriate.

As part of the risk management process, detailed risk registers are maintained. Where local business risks are identified, assessed and managed, which include risks relating to human rights, modern slavery and bribery, specific corporate responsibility risks are recorded, considered and managed as part of this process.

Due Diligence

Our COP auditing process is a vital due diligence tool as it delivers assurance that our suppliers and their factories understand their responsibility to comply with our ethical standards. Details of our Principle Standards and Auditing Standards, which are aligned to those of NEXT, are available at <https://www.nextplc.co.uk/corporate-responsibility/code-of-practice>. We also invest time and resources to support effective communication and work collaboratively with our suppliers to prevent issues arising or help resolve issues we have identified. We use the UN Guiding Principle Reporting Framework to help us build a more detailed picture and better understand the salient human rights issues across our business (i.e. those human rights that stand out because they are at risk of the most severe negative impact through the Company's activities or business relationships).

Policies

Joules has clear policies and monitoring processes in place combined with robust supply chain management which are aligned to those at NEXT. We review and update these policies and practices regularly as we learn from our experiences. They are designed to ensure that people are treated with dignity and respect and include internationally recognised human rights principles and indicators encompassed in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Business policies relating to third party relationships and modern slavery are published on our ultimate parent company's corporate website at <https://www.nextplc.co.uk/about-next/corporate-governance/policies>:

- Human Rights and Modern Slavery
- Whistleblowing for NEXT's third parties
- Code of Practice Principle Standards and Auditing Standards

- Health and Safety
- Anti-bribery & Anti-Corruption

We also have the following employee-related policy:

- Whistleblowing for employees

The NEXT COP Principle Standards comprise:

- No forced labour or modern slavery
- Freedom of association and the right to collective bargaining
- Safe and healthy working conditions
- No child labour
- Fair wages and benefits
- Lawful working conditions
- No discrimination practices
- Employment security
- Respectful treatment of workers

We also have additional policies on our supplier portal system covering specific supply chain issues:

- Migrant Labour
- Child Labour
- Agency Labour
- Homeworkers
- Laundry Management
- Syrian Refugee Remediation Programme
- Wage Retention
- Shared Premises

During the year we have revised our auditing standards and communicated these to our suppliers via our supplier portal. We also developed tools for suppliers to use as part of their due diligence processes, including a critical issues assessment, a site tour checklist and worker dialogue questions.

We also developed a new Heat Stress Guidance document, designed to support our suppliers and factories in managing one of the known climate impacts in the supply chain. We will continue to work with suppliers on this issue during the year ahead.

RISK ASSESSMENT & DUE DILIGENCE

Where are our highest risks?

We believe those areas which give rise to the highest modern slavery risk are:

- Joules' product supply chain
- Joules' suppliers who subcontract manufacturing processes e.g. dyeing and finishing
- Specific country risks where modern slavery is higher e.g. India (restriction of freedom of movement), China (state-imposed forced labour)
- Specific goods or services not for resale e.g. logistics service providers, warehousing, cleaning services, waste recycling, employment agencies

Our salient human rights risks are aligned to those of NEXT and are as follows:

- Freedom of association and collective bargaining
- Health and safety (including mental health)
- Children's rights
- Modern slavery (including wage retention)
- Wage levels (including fair wages)
- Harassment and discrimination
- Water, sanitation and health
- Working hours

Key activities this year:

Supplier presentations were carried out in Vietnam, Cambodia and China covering topics such as sourcing country challenges, supplier compliance performance and supply chain risks. This also provided the opportunity for valuable conversations with our suppliers to understand each others' focus areas and improve ways of working together.

Unauthorised subcontracting While no cases were identified within the Joules supply chain this year, we acknowledge the severe and high risk associated with unauthorised subcontracting. This remains a persistent concern in our in-country supplier presentations, where we emphasise the importance of transparency and the maintenance of accurate production location details. Our COP teams conduct the majority of audits on an unannounced basis, which enhances their ability to identify and collaborate with suppliers to remediate unauthorised subcontracting concerns.

Forced labour In line with NEXT's approach, we continue to closely monitor developments in relation to allegations of forced labour in the Xinjiang Autonomous Region (XUAR) of Western China. Our Cotton Sourcing Policy includes a ban on the use of cotton from the XUAR. We do not directly source products from the XUAR at Tier 1 (product factory), Tier 2 (subcontractor to a Tier 1) or Tier 3 (fabric/yarn suppliers and spinners). Our work to ensure that products made or sourced for NEXT are free from forced labour is undertaken by our COP team and covers Tier 1 and 2 suppliers. Traceability of our full supply chain is a key area of focus given we do not directly source raw materials. We are working closely with our suppliers and industry stakeholders to find the most effective and accurate ways to trace our supply chain to Tier 5 (raw materials). We also work collaboratively with relevant NGOs and multi-stakeholder initiatives such as the Ethical Trading Initiative and the British Retail Consortium to share knowledge of challenges and solutions. We continue to map the raw material sources of our suppliers to provide confidence that the materials used in our products are sourced responsibly in line with our Responsible Sourcing Approach.

We take allegations of forced labour in our supply chain extremely seriously and take appropriate steps to investigate them. There are significant challenges in investigating issues of this nature. We are engaging with relevant internal and external stakeholders including the Ethical Trading Initiative and British Retail Consortium to explore proportionate and appropriate next steps.

Due Diligence & Action Taken

Concerns regarding modern slavery generally originate from one of the following sources:

- COP audits
- Whistleblowing/Grievances (with third-party platforms, such as 'This is My Back Yard' (TIMBY))
- Employee or third-party communications

We finalised and circulated a Grievance Mechanism Policy to 16 of our sites this year, which outlines our approach to implementing effective grievance mechanisms in our supply chain. The pilot and wider roll-out has included conversations with our suppliers and factories to understand any questions or concerns and to consider their input on implementation. Our COP regional teams will continue to embed our approach through 2025.

If our employees are visiting a factory as part of their role and identify something of concern, they can contact our COP team directly. On the occasions when this has happened we have been able to put an appropriate response or action plan in place. This reflects the positive engagement of our employees and their awareness of modern slavery issues which supports the work of the COP team.

During the year we have reviewed any such concerns and agreed actions accordingly. We continue to produce internal incident reporting which provides clear visibility of where risks arise, both geographically and by category. Incidents and associated reporting are reviewed by the ESG Steering Group where actions are agreed and progress tracked. Whistleblowing incidents are reported to the Audit Committee of NEXT plc.

For the 2024/25 period, all audits were conducted as on-site visits. Effective 1 February 2024, initial audits for all Joules factories were announced to build stronger relationships with our manufacturing sites and suppliers. Subsequent audits were conducted unannounced.

Focus on child labour

No instances of child labour were found in the Joules supply chain this year. However, we recognise that child labour remains a significant and high risk. It is a recurring issue in our in-country supplier presentations, product team meetings and supplier engagements. We continue to address child labour risks with our suppliers, encouraging them to utilise the resources on our supplier portal. These tools facilitate proper due diligence before onboarding new sites with Joules and allow for ongoing monitoring of existing sites.

TRAINING & COLLABORATION

Training & Awareness

Our employees & suppliers

Raising awareness and providing our employees with appropriate training remains a key focus area. Our bespoke online training course is completed by employees globally. Ongoing communication with our suppliers is crucial and our one-to-one supplier presentations have been a vital part of our approach to maintaining close contact with our supply chain partners.

Activities this year include:

- Delivering supplier presentations in Vietnam, Cambodia, Sri Lanka, and China.
- Internal COP workshops carried out with 9 new starter employees. The workshop focuses on matters like our auditing approach, audit ratings and what they mean, as well as modern slavery risks in the supply chain. We also discuss how COP fits in with the roles and responsibilities of the product teams.

Collaboration

Our business cannot tackle modern slavery alone, so it is important and valuable for Joules to work with others to develop solutions for some of the more complex and systemic problems found within global supply chains. We believe that by maintaining strong direct relationships and undertaking collaborative work with others we are able to deliver real benefits to workers in our supply chain.

Organisation	Background and Benefits	Our Partnership and Activities in 2024/25
Accord Strategic Partner	We are signatories to the International Accord for Health and Safety in the Textile and Garment Industry Agreement, which commenced in September 2021. The RMG Sustainability Council (RSC) performs factory inspections in Bangladesh focusing on three areas: fire risk, electrical installations and structural condition of buildings. Find out more at internationalaccord.org	NEXT has maintained its full support for the Bangladesh Accord as it has transferred its operations into the RSC. The RSC includes representation from brands, unions and RMG manufacturers and manages workplace safety programmes at the 1600+ Bangladesh Readymade Garment factories previously covered under the Bangladesh Accord. The RSC's work also includes remediation monitoring, safety training and an independent health and safety complaints mechanism available to workers in RMG factories. In 2024/25: • Overall Bangladesh Accord remediation average is 86% but NEXT Bangladesh average is 90% • To date, 123 NEXT supplier factories in Bangladesh have achieved 100% remediation and received a recognition letter from RSC/Accord • Since RSC established their complaints mechanism in 2015, 201 complaints have been received in relation to the NEXT supply base, with 184 closed to date.
Unseen Strategic Partner	Unseen is a UK-based NGO providing the UK-wide Modern Slavery and Exploitation Helpline. Through sponsoring the hotline, we gain insight of potential modern slavery risks and how forced labour situations are being reported. This collaborative approach is important to help us mitigate risks and manage emerging threats. Find out more at unseenuk.org	• During 2024/25, three cases were flagged to us via the portal related to one of our logistics partners, alleging that minimum wages were not paid to some workers. We collaborated with other Business Portal member brands, who were also using the same logistics partner, to agree a singular approach. Unseen coordinated meetings where we shared information and agreed appropriate steps. We engaged directly with the logistics provider and relevant senior management at NEXT to discuss the cases. The company provided detailed information about their internal checks and processes that were followed to carry out due diligence and ensure compliance with legislation and ethical standards. We continue to liaise with Unseen and partner brands. • We held a supplier event with Unseen in one of our UK warehouses for service providers including cleaning contractors and agency labour providers.
This Is My Back Yard (TIMBY) Strategic Partner	TIMBY is a digital platform focused on promoting transparency, accountability, and monitoring within supply chains, particularly addressing issues related to environmental, social, and governance concerns. It empowers workers, organisations, and communities to document and report grievances such as labour rights violations, environmental harm, and other ethical issues. Find out more at timby.org	• In 2024/25, we received 110 grievances through the TIMBY app. Our teams in-country follow up with the grievances to ensure the correct feedback to workers and stakeholders.

British Retail Consortium (BRC) Industry Membership	BRC is a trade association representing UK retailers. It created the BRC Global Standards, which are internationally recognised frameworks for ensuring product safety, quality, and operational standards across supply chains. BRC's ethical experts work collaboratively on the welfare and treatment of workers in the retail supply chain to develop and agree ways of working. Find out more at brc.org.uk	In 2024/25, we • Attended meetings of the Ethical Labour Working Group. Main topics of discussion included developments in legislation relating to forced labour and human rights due diligence, best practice on addressing modern slavery, and risks in the shipping and logistics sector, as well as government policy developments and horizon scanning of upcoming issues. • We are members of the Ethical Labour Working Group. • Provided feedback on introduction of Fair Work Agency (FWA) via BRC. • Fed back on the Labour Market Enforcement strategy. • Referred to BRC updates on upcoming legislation, market news and government policy developments.
Ethical Trading Initiative (ETI) Industry Membership	The ETI is an alliance of companies, NGOs and trade unions, working collaboratively to ensure working conditions and rights of workers producing for the UK market meet or exceed international labour standards. Find out more at ethicaltrade.org	During 2024/25 we worked with and contributed to ETI on: • Three Freedom of Association workshops. • Just Transitions webinar and workshops, to develop knowledge of climate change impacts on workers in our supply chain, primarily focusing on extreme heat and flooding. Apparel & Textile Group meetings: • Calls with fellow members in relation to unrest in Bangladesh, sharing best practice and understanding country context. • Joint event in Turkey with NEXT, Sainsbury's and ETI
AIDER Local Partner	AIDER is an NGO based in New Delhi, India, whose mission is to transform the lives of those living in poverty – they especially focus on the empowerment of women and homeworkers. Find out more at aiderngo.org	In 2024/25: • 50 children enrolled in the creche. • 96 girls attended computer and vocational training. • 55 girls attended tuition centre. • 30 girls enrolled on one-year diploma in Fashion Design & Technology. • 70 females provided with training on crochet, pattern-making and sewing. • 19 health camps held covering dental health, eyesight, nutrition, ear, nose & throat, breast cancer screening and other topics. • 706 packs of menstrual hygiene items distributed to young girls. • 60 girls supported to seek employment in external organisations, where they have completed computer/vocational training with AIDER. • Organised an eye camp which screened 120 beneficiaries aged 40+, identifying 14 cataract patients. Facilitated cataract surgery for all patients. • Undertook a shoe distribution drive which benefited over 180 students across the computer centre, tuition centre, day care centre, and sewing centre. Highlight: Mamta joined AIDER's sewing centre, seeking to rebuild her life after emotional trauma. The team recognized her potential and provided motivation, counselling and training in sewing and computer skills. With

		support and her own hard work, Mamta found employment within months. She now works at a local shoe company and is financially independent: a testament to how the right support and skills can change lives.
SAVE Local Partner	SAVE is an Indian human rights non-profit organisation that has been campaigning against child labour and for the improvement of working conditions in the spinning mills and textile factories of South India since 1993. SAVE carries out developmental programmes to uplift socio-economically poor and marginalised communities. Find out more at https://savengo.org	In 2024/25, we: • Saw 46 grievances reported. SAVE has successfully resolved 30, with the remainder still under review. • Trained 1464 members on financial literacy and helped people to connect with banking systems. • Trained 2290 members on labour and legal rights. • 1563 members received pre-departure training. • Trained 1092 women on gender based violence and prevention. • 1859 women attended a reproductive health and hygiene awareness session and 798 workers an occupational health and safety session. • Trained 3894 workers on the TIMBY App. • Educated 366 home-based workers on their rights. • Identified and trained 36 labour agents. • Provided a fair recruitment workshop for 48 participants.
United Work Local Partner	United Work is an independent organisation based in Turkey who supports Syrian refugees registered with the Turkish Ministry of Internal Affairs to find long term employment. Find out more at unitedwork.com.tr	In 2024/25, the collaboration ensured a smooth and efficient handling of work permits for our supply chain's migrant workforce, helping to streamline renewal and first-time application processes: • Six migrant workers from three different companies had their work permits renewed. • Support was provided for the initial work permit applications of three employees.

For further details of our collaborative work please refer to our latest NEXT Group Corporate Responsibility Report on nextplc.co.uk

Looking Forward

Over the coming year we intend to:

- We plan to extend the rollout of our Grievance Mechanism to additional sites in India, Turkey, Pakistan, and Sri Lanka.
- Hold in-person supplier events in China & Cambodia.
- Continue to enhance our in-person training sessions for Joules employees