

Introduction

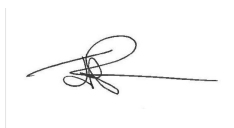
This, our sixth Modern Slavery Statement, is published in accordance with the Modern Slavery Act (2015). The Act, in particular section 54, brings UK businesses to the heart of the UK's modern slavery agenda. Along with our parent company, we welcome the increasing momentum towards mandatory human-rights due diligence in the countries that we work and trade within.

Our statement for this financial year outlines the steps taken by Office Holdings Ltd ("OFFICE") during the financial year ending 3rd July 2022 to prevent modern slavery and human trafficking in its business and supply chains. It also outlines our commitments towards mitigating the risk of modern slavery in our supply chain to 2023.

Our commitment to our customers and stakeholders is very clear; we will always provide goods that have been produced:

- Lawfully, through fair and honest dealing,
- In decent working conditions,
- Without exploiting the people who made them.

This commitment is upheld through OFFICE company policies and practices and means we will continually review and improve our policies, practices, and procedures so that we may fulfil this commitment.



Jon Richens, Managing Director

On behalf of the board of Office Holdings Ltd

08th December 2022

About OFFICE and Our Supply Chains

OFFICE is a London (UK) based footwear and accessories retailer with both our own label products and third-party brands. We are both an online and in-store shopping destination across the UK, Ireland, and Germany.

All OFFICE own label products are designed in-house and manufactured by our established supply base of third-party factories. The Corporate Social Responsibility (CSR) team manage this supply chain in collaboration with our own label buying teams. Product supply chains can be complex and involve several different material processes, however the team continue to map all our tier 1 & 2 production sites.

For our own label product OFFICE currently sources from:

- 13 Countries
- 32 Suppliers
- 82 Factories (Tiers 1 & Tier 2 process factories)

(Data correct as of October 2022)

Our Policies and Contractual Controls

Over the past 6 years, to support our compliance programme, OFFICE have continued to improve our policies. Below are our OFFICE companywide policies currently in place, relevant to modern slavery, all of which are signed off at Director level.

OFFICE Code of Ethics and Good Business Practices	This document, signed by every supplier and factory working with OFFICE own brand products, sets out our minimum global supplier ethical and environmental standards. These are drawn from international standards and internationally collaborative codes like the Ethical Trading Initiative (ETI) Base Code
Confidential Reporting Procedures	Aimed principally at our colleagues, confidential reporting channels are managed by a 3 rd party company and concerns may be raised by phone or online. This forms part of our work to strengthen our worker voice feedback mechanisms.

Our contracts with our suppliers link to our supplier manual agreement including compliance with modern slavery legislation. These standard supplier contractual terms include obligations on performing Modern Slavery Act risk assessments, instigating controls, and notifying any modern slavery findings. As part of our on-going improvements to our approach the CSR team, along with the Modern Slavery champions, annually review these terms and policies in line with applicable laws. To stay abreast of best practice and technological developments, we also reviewed publicly available information about initiatives taken by our partner brands, and companies that we work with, to combat modern slavery and human rights infringements. The outcomes of this review have been utilised in our approach for the 2021/2022 year and, in particular, the way we focus our resources.

Due diligence and Auditing programme

OFFICE's approach to risk assessment is a combination of desk-based research, auditing, supply chain mapping and stakeholder engagement. Through our latest mapping and reviews, we established that our greatest risk for modern slavery lies within our supply chains. Therefore, we have conducted due diligence within our supply chains and operations to understand whether there is evidence of modern slavery issues and whether there are adequate controls in place. As acknowledged, the impact of COVID-19 has been significant, and we have had to learn to adapt quickly to respond effectively to the constantly changing situation. Our new ways of working, established during the UK lockdowns, have allowed OFFICE to be highly adaptable in our approach.

Our auditing programme covers 100% of our tier 1 suppliers and over the 2021-2022 period we have continued to increase this to cover our tier 2 process suppliers, with the a key focus on our tier 2 process factories. Although we had been able to reintroduce face-to-face visits in some countries, in particular Europe, one of our commitments for the year was to prioritise visits to factories based in higher risk areas and those most affected by the pandemic. Unfortunately, majority of these higher risk countries have travel restrictions that remain in place, which has meant that our CSR team have been unable to visit in person. However, due to changes to the lockdown procedure in the countries we manufacture, traditional audits have been reinstated, allowing our team to have better visibility of the factories that we have been unable to visit. As we navigate an ever-changing world the CSR team are collaborating with the Modern Slavery Champions and external ESG specialists to create robust and evolving ways of working to ensure we are ever improving in the fight against modern slavery.

Training and stakeholder engagement

In our last statement we made the commitment to expand the Modern Slavery Champion scheme to cover key departments including Property and Logistics. This year we have strived to expand the Modern Slavery Champion team, and through training and development with resources from 'Stronger Together', we now have 4 Champions across head office and the warehouse. These team members work on the logistics, warehousing, and property teams, which were highlighted as the highest risk departments outside of product during our risk assessment in 2021. They have been working with our CSR team to raise awareness focusing on the team at OFFICE's head office, warehouse and among on-site contractors working for OFFICE as contracted service providers. It is important that people in different roles within OFFICE help to raise awareness of modern slavery and inform others about how to get help and support if they need it. After seeing an uplift in engagement due to the expansion of the Modern Slavery Champion program, the CSR team plan to increase the number of Modern Slavery Champions at OFFICE in the coming year, allowing our teams to collaborate on a new level in the fight against modern slavery.

Along with the expansion of the champion team we have utilised our training platform to raise awareness and train our wider teams. This program is compulsory on boarding training for all new head office staff and warehouse staff especially those who are in direct communication with our suppliers; it is also recommended for our teams in stores. This year we have trained/retrained 1056 team members on the risks of modern slavery through our updated training on the online portal.

On-going commitments and our next steps

Over the past two years there have been many new challenges in the battle against modern slavery. Despite these, we have made progress this year through the adaptability of our approach. As a result of our on-going work to tackle modern slavery within our business we have identified areas to strengthen and develop in 2022/2023. We will continue to enhance our policies and processes throughout the next financial year through the below activities.

Our Commitments	Activities planned for 2022/2023
Auditing and Supply Chain Mapping	• Continue to develop our supplier mapping process, to build transparency beyond tier 1 & 2 suppliers. • Review our supplier onboarding process, mitigating the risks within our supply chain, by limiting the number of new factories. • Travel restriction dependant: prioritise visits to factories based in higher risk areas and those most affected by the pandemic.
Training and Stakeholder Engagement	• Updating training on human rights and modern slavery for our teams. • Expanding the Modern Slavery Champion scheme to cover additional key departments including warehousing and to the wider head office and store teams.
Key Partnerships	• This year we are starting our partnership with SEISMIC, which will allow us to collaborate to improve and build upon our ESG strategy. A pillar of this will be focused on our commitments and next steps in the fight against modern slavery.

As a business, OFFICE is committed to addressing and minimising the risk of modern slavery and human trafficking within our business and supply chain. As we gain more visibility of our supply chain and further risks of modern slavery are identified, we recognise that we will need to continually renew our efforts to minimise negative human rights impacts on vulnerable people in our supply chain. We are mindful that there are limitations in each approach to the prevention of modern slavery and there are many opportunities for on-going development, therefore, we welcome your feedback. All comments, suggestions and queries should be addressed to the team at csr@office.co.uk.