

# Bravissimo Modern Slavery Statement 2023

At Bravissimo we have a zero-tolerance approach to Modern Slavery. We are committed to preventing slavery and human trafficking throughout our UK operations and global supply chains. This Modern Slavery statement explains how we do this.

## What is Modern Slavery?

Slavery is a horrendous crime where people are treated with extreme cruelty under inhumane conditions to eventually become trapped and controlled in someone else's possession and ownership with intolerable violence and threats for personal or financial gain. There are many types of Modern Slavery both in the UK and globally that impact almost every industry, unfortunately the signs are not always obvious and victims themselves may not necessarily recognise themselves as being exploited. Perpetrators of slavery prey on the vulnerable escaping poverty, which is more prevalent now than ever facing into global conflict and high rates of immigration.

## How can Modern Slavery present?

<b>Human Trafficking</b> People traded and exploited by others through deception or coercion for financial or personal gain	<b>Forced Labour</b> Any person forced to work with no or little pay, working excessive hours under threatening conditions and in unsafe environments
<b>Bonded labour</b> Any person forced into working excessive hours under threatening conditions to pay debt with no control to refuse or leave at their own choice	<b>Child Labour</b> The employment of minors, taking away their right to education, their right to a childhood and impinging on their physical and mental safety.

## How do we prevent Modern Slavery in our UK operation?

We are committed to preventing modern slavery and human trafficking via robust recruitment and onboarding processes. All Managers within the business are trained on checking and validating eligibility to work in the UK documentation and we request, check and store this prior to any new starter commencing employment with Bravissimo. We have retrained our teams since the UK's exit from the EU on the new EU Settlement Scheme and further visa implications to ensure all knowledge is up to date. All visa information is also checked regularly by our HR team. These processes are to safeguard against trafficking or anyone working against their will.

Where we use agency workers, we use reputable recruitment agencies who guarantee all legal requirements are in place for their staff; including the relevant Right To Work checks and payment of at least the National Minimum rates.

Internally, we monitor National Living and National Minimum Wage increases and subsequently increase hourly rates of pay in line with this every April, for any employees earning less. In the interim, any new hires are paid in accordance with the latest minimum rates. We also review all our employees pay on an annual basis. We have People policies and processes in place to protect everyone working in Bravissimo, the aim of these is to keep our people happy, safe, and fairly treated. These policies and processes allow for anyone in our community to raise any issues or concerns they may have in a safe and secure manner. We have a specific Whistleblowing Policy to protect people raising concerns of foul play. In addition to this, managers have one-to-one meetings with their team members giving another platform for both any concerns to be raised and wellbeing discussions to take place. There is also an online platform for employees to voice anything they want to our Senior Leaders, and they can do this anonymously if they prefer.

Bravissimo also has a specific Health and Safety policy and associated procedures to protect everyone at work, and we ask our people to be familiar with them for everyone's wellbeing. Competency and training are related to functions, jobs or processes undertaken in the workplace. The training helps our people acquire the skills, knowledge, and attitudes to make them competent in the Health and Safety aspects of their work. We want to

ensure that we are working safely together to achieve this - taking mutual responsibility.

If an internal breach of the Modern Slavery Act 2015 were to be raised or alleged, this would be taken extremely seriously and be swiftly investigated. Appropriate action would be taken to rectify any breach if there was one.

### **How do we prevent Modern Slavery in our global supply chain?**

We offer bras and swimwear from a variety of brands as well as our own-label Bravissimo products, to provide big-boobed women with as much choice as possible. Where we do not directly manufacture the products we sell, we ensure that we only work with brands who sign up to the Ethical Trade Initiative (ETI) Base Code, so we can feel as confident in the practices within their supply chains as we do within our own.

Bravissimo is not a fast-fashion retailer, and producing high quality products at fair and ethical prices is absolutely at the core of who we are. This ethos extends to our supply chain where we pride ourselves on working with reputable factories employing highly skilled workers to create the complex feats of engineering that is bras and swimwear for bigger boobs.

We don't own any of the factories that we manufacture in, but we have strong relationships with all of them and generally have worked with them for many years, regularly visiting and auditing them. The factories we work with are all audited and accredited for full transparency, which is exceptionally important to us so that we can ensure that the environmental, ethical, and social needs of the people working within the factories, are upheld, and protected.

We require all our suppliers to each make an assurance and commitment to us that they and their factories are working to the *ETI Code of Conduct* (<https://www.ethicaltrade.org/eti-base-code> ).

This ensures that all suppliers are:

- Operating with freedom of association and the right to collective bargaining
- Treating all their workers fairly and with equality
- Giving fair, legal wages to all workers in the form of money (not credit)
- Giving workers fair working hours that are in line with local laws
- Not forcing labour or allowing any inhumane treatment
- Ensuring the workers general safety and wellbeing at work

Additionally, we receive full Ethical Trade Audits for all factories who manufacture Bravissimo goods - you can read more about our Ethical policy by clicking [here](#).

### **Selecting suppliers to work with**

It's important to us that all our relationships throughout our supply chain are built on strong ethics, mutual trust, and truthfulness. Our supplier selection and on-boarding process includes the following:

#### **For our Bravissimo own-label products:**

We only agree to work with accredited factories, whose accreditation is renewed every two years. The accreditations are recognised worldwide and certify that they are working in line with local laws and workplace regulations, ensuring health and safety and environmental practices are in place to protect their staff.

Before we place any orders with a new supplier, we send them our policies and all the details of the ETI Base Code, and we ask them to sign to confirm that each factory we are using is working in line with this.

To help us ensure our standards are being met, once our first order is placed and production starts, we visit each factory to carry out an audit and risk assessment. Our audits and assessments would highlight if further controls needed to be put in place at the factory for it to meet our required standards. If we were to find that there were extra controls needed, the factory would need to agree to put these in place to continue working with us. This would be done through a Corrective Action Plan, which we would issue with a set deadline – asking them to prove to us that the issue has been rectified by this point.

Once we are happy with how our supplier is operating after our first audit, all future audits are then completed between the supplier and an independent accreditor. These audits happen yearly and ensure best practice and corporate social responsibility.

All new factories we onboard are tested with one or two styles as an introduction with close contact from Bravissimo throughout the critical path to ensure best practice is managed from end to end, and following orders are only placed when we feel confident that they are working to the highest of ethical standards.

Our Bravissimo team visit the factories throughout the year, and they are educated on what the factory should look like and how it should be operating. All our employees who visit know that if anything doesn't appear as expected, they must report concerns immediately so fast action can be taken.

We nominate the majority of our fabric and trim suppliers which helps us with transparency throughout our wider supply chain, and where we let our suppliers self-source, we ensure that they are using fully accredited mills working to industry standards for social compliance. Where it's impossible to trace from field we invest as much interest as possible to have as much transparency as we can of our full supply chain.

An overview of our Bravissimo own-label supply base:

Country of Manufacture	Number of Factories	Product Type
China	7	Lingerie, Swimwear & Nightwear
Thailand	3	Lingerie, Swimwear & Nightwear
Sri Lanka	1	Lingerie & Nightwear
Tunisia	2	Swimwear
Cambodia	1	Nightwear

***For our branded supply base (products we stock, which we do not directly manufacture):***

We only agree to work with brands who work in line with our policies and the ETI Base Code. Therefore, before we place any orders, as part of the supplier set-up process we send them information on our social and ethical requirements which include all the details of the ETI. We then ask them to sign to confirm they agree and are already working in line with this.

Our branded suppliers are also obliged to complete their own risk assessment yearly and to put in place controls based on the results of their risk assessment.

If there are any changes to our social and ethical requirements, we would re-issue the updated information to all suppliers to commit to in order to continue working with us.

### **Our April 2023 position**

We haven't been made aware of any allegations of modern slavery within Bravissimo or our wider supply chain. We maintain our commitment to delivering products that have been produced in safe and clean working conditions, through fair and honest relationships, and without exploiting the people who make them. We have been really pleased to be able to visit the factories we work with in Thailand, Sri Lanka and Tunisia so far this year and have felt proud to be working in partnership with them.

### **Next Steps for 2023**

Bravissimo is committed to continuing to address and minimise the risk of modern slavery and human trafficking within our business and supply chain, through our first-hand audit schedule. As yet, we have been unable to visit the factories based in China since 2019, prior to the global COVID-19 pandemic, due to prohibitive restrictions around quarantine. We also respect their safety to not carry out any visits from us during this time where they don't feel safe of infection risk from external visitors but continue to address any actions through weekly video calls and constant communication via email.

We hope to visit these factories later this year, as soon as it is feasible to do so in order to carry out manufacturing quality process audits, social and ethical audits and on-site observations. As ever, any areas for concern will be

addressed with corrective actions and increased audit and contact, with the aim of growing and nurturing longstanding partnerships.

We will continue to strategically plan our own-label production allocation to each factories' production capacity, to ensure working hours are not exceeding local law and within a safe working environment; maintaining a realistic flow of orders that are manageable is a measure of maintaining their commitment to ETI base code of conduct.

We will continue to measure our supplier's performance through updating our database to increase our level of transparency of our full audit trail with risk levels outlined for each factory for better visibility.

***Our financial year end is 31<sup>st</sup> October 2022; therefore, this Modern Slavery statement is published in line with requirements in April 2023.***

***This statement is endorsed by Clare Turner, Product Director, on 27<sup>th</sup> March 2023.***