

Jojo
maman bébé

Modern Slavery Act Statement

February 2023 – January 2024



Days well spent

Business Structure

July 2022 - January 2023

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Modern slavery is characterised by exploitation, coercion and deprivation of basic human rights, and continues to affect millions worldwide.

At the last estimate at least 50 million people were living in Modern Slavery, of which 28 million were in forced labour. This can be seen in human trafficking, the worst forms of child labour, forced marriage and in debt bondage which can last a lifetime and be generationally inherited.

Modern slavery permeates borders, industries and supply chains. Those who are the most vulnerable can find themselves marginalised and exploited.

As a certified B Corp, we are committed to harnessing the power of business for positive impact. In the face of a changing global climate, we remain steadfast in our dedication to treating our employees, our community, and those who work within our supply chain with fairness and respect to their human rights.

In this, our 9th Statement, we reflect on a year of progress and learning, on our salient risks, and what action we intend to take in the year ahead to continue to progress.

Gwynn Milligan
CEO – JoJo Maman Bébé



At JoJo we do not tolerate any form of exploitation within our company. We uphold stringent processes to ensure that every individual is treated with dignity and respect. Modern slavery, in all its forms, is a grave violation of human rights, and it has no place in our business or supply chain.

We hold ourselves accountable to the highest standards of social responsibility. We remain vigilant and proactive in safeguarding the rights of all individuals connected to our business. We recognise the critical role that HR plays in identifying, preventing, and addressing risks related to modern slavery. This extends beyond our own workforce to include our suppliers and business partners. Together, we can make a meaningful impact in eradicating modern slavery and creating a safer, more just world for everyone.

Karen Fry People Director

As a business long committed to ethical practice and our B Corp values, we recognise the impact our operations have on our supply chain and that we have a duty to act responsibly in our sourcing practices.

This means partnering with suppliers who share our commitment to ethical labour practices, conducting regular audits, and staying vigilant about the risks of forced labour, exploitation, and unsafe working conditions and championing best practice.

The integrity of our business depends not only on the quality of the products we deliver but also on ensuring that no one suffers in the process of making them.

Geri MacAuley Design & Buying Director



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Our Business

JoJo Maman Bébé launched in 1993 and has grown to be a leading parent & infant multi-channel retailer with a growing global presence, ecommerce website and multiple stores spread across the UK and Ireland.

All about JoJo!

JoJo Maman Bébé (or JoJo to our friends) specialises in stylish maternitywear, cute and practical baby and children’s clothing, nursery products, and fun and engaging toys.

We have a loyal following and have built trust based on our range of high-quality and fashionable products for families, catering to the needs of both parents and children.



Our Stores

We have 68 boutique stores in the UK, 2 in the Channel Islands and 3 in Ireland.

We span the length of Britain, from our most northern store in Perth, Scotland to our most southerly store in Truro, England.

We can be found on the beautiful islands of Guernsey and Jersey, on the stylish shopping area of Lisburn Road, Belfast, and our Éire store are located in the heart of Wicklow Street, Dublin and Princes Street shopping parade in Cork.

Our Website

JoJo have had a dedicated ecommerce website since early 2002.

In 2023 we had dedicated websites in 5 countries, namely France, Germany, Ireland, Netherlands and the USA.

Collaborations

In 2023 we began partnerships with other retailers and our ranges could be found in many trusted UK high-street brands. Internationally, our products sold in 70 countries.



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Our Operational Locations

Our Operations

Nestled in the vibrant area of Battersea, our **London Studio and Head Office** is the base of our creative teams, including Buying, Design, Technical, Merchandising, Visual Merchandising, International Sales, Creative Services Studio, and Marketing.

Our **Newport Office** serves as the central hub for our company’s operations, encompassing various departments such as our People Team, Finance, Stock Control, IT, Retail Operations, and Health and Safety.

Our stock is received, held and distributed from **Doncaster**, utilising Next Plc’s Total Platform system in stock management.

Excellent customer service is critical to our business, and we maintain a dedicated JoJo Customer Service team in Next Plc **Leicester** office. This team works closely with our own CS team members at our **Newport** Office.

As of the end of the financial year, we directly employed 642 people. 23% of our staff are office based and 77% based in stores.

Indirect employees at JoJo include the cleaning teams in our London and Newport offices, and freelancers such as photographers.





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JoJo Governance - our internal structure

Overall accountability for our Modern Slavery Policy and Statement sits with our Board of Directors. The Board represent all teams in JoJo and approve our annual statement and targets, taking into account company operations.

Within our own operations

Our **People Director**, supported by our in-house People Team, is responsible and accountable for employment policies and practices related to our own teams.

To support a clear and consistent roll out of policies and practices, we have an in-house **Learning and Development (L&D) Team** who manage courses and training calendar for all employees.

We have a longstanding **Equality, Diversity and Inclusion Policy**. This incorporates annual training of all employees across all sites and is managed by our in-house L&D Manager.

We adhere to **UK and EU Employment Law** and carry out employment checks for all new employees which includes 'Right to Work'. Our People Team provide comprehensive training relating to recruitment on our internal platform.

We have a **Whistleblowing Policy** (Speak Up) to report any wrongdoing, including Equality, Diversity and Inclusion (EDI) matters.

We have an in-house Payroll Team who manage employee pay in line with contractual obligations. This includes a monthly check on hours worked to ensure the organisation adheres to the UK working time directive.

Our People Policies are applicable to our Full and Part Time team members along with contractors and agency workers and are available on our internal Intranet.

Within our supply chain

During this period, our **Brand Director** had ultimate ownership for all our manufacturing supply chain, policies and procedures. This includes our Supply Chain Modern Slavery Policy, Code of Conduct and supporting policies.

Our **Head of Compliance** is responsible for drafting, submitting for approval and implementation of our supplier policies related to ethical trade.

Our **Buying and Design Director** is responsible for our approach to fair buying practices and salient risks inline with our ethos.

We have an established process to onboard factories to ensure compliance to our **Code of Conduct** and reduce the risk of onboarding factories with high level risk indicators that could be related to modern slavery. This is done collaboratively between buying, technical and ethical teams.

This includes but is not limited to communicating and training policies, reviewing supplier Self Assessments and 3rd party audits on SEDEX and working alongside our 3rd party auditors in Next Code of Practice.

All suppliers are given training and provided with support in order to comply to our **Code of Conduct**. We strive to maintain an open relationship with our suppliers for all countries of manufacture.

JoJo works to a policy of continuous improvement, however we will not tolerate inaction when serious ethical issues, including modern slavery are raised. Where suppliers are not transparent or demonstrate a deliberate approach against our Code of Conduct, we will implement **commercial consequences** which is detailed in our Supplier Handbook shared at onboarding.



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JoJo Business Structure and Key Changes

The main changes in structure since our last statement and during the time period this report covers are described as below.

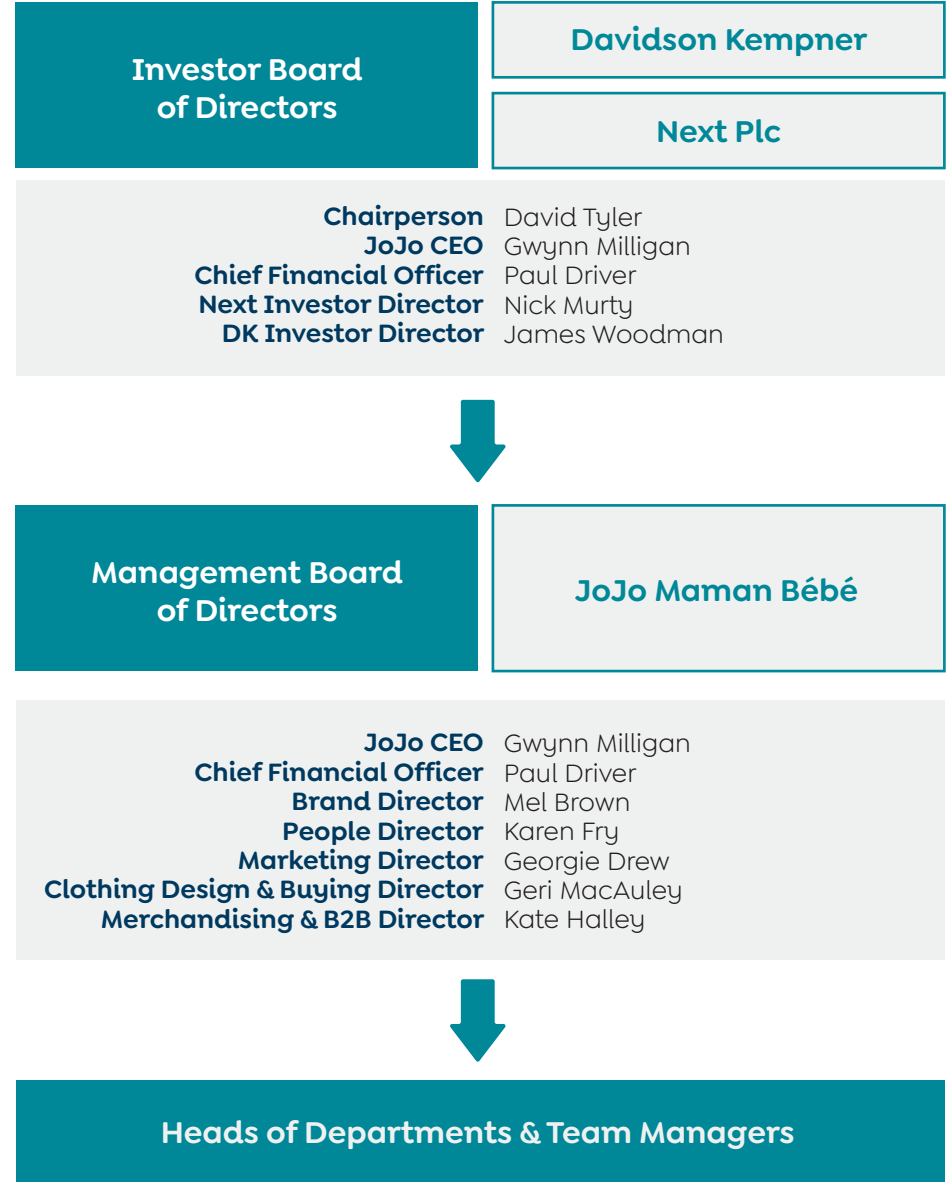
JoJo Maman Bébé operations are primarily managed by our **Management Board of Directors**, but the overall business ownership is constituted of a joint venture between Davidson Kempner and Next Plc.

The **Management Board of Directors** oversee the day-to-day operational running of the business. They ensure smooth and efficient management, strategy and policies and set long term targets whilst maintaining the **Ethos** that makes us JoJo.

JoJo also owns the subsidiary **Emma-Jane**, a specialist maternity and nursing lingerie brand exclusively available at JoJo.

Since the last statement, the overall structure has remained consistent with the only changes being new appointments and changes to titles and responsibilities.

- We appointed a new **Chief Financial Officer** who sits on both our Investor and management boards.
- Our Design and Buying Director changed role to **Brand Director**.
- We appointed two new positions to our Management board:
Clothing Design & Buying Director
Merchandising & B2B Director.





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Our Suppliers

Businesses that supply JoJo can be put roughly into 5 categories. All suppliers are set up with a unique Vendor Code which allows us to monitor and manage our level of business.

Own Label

- ✓ We predominantly sell our own branded items; this means products designed by us, manufactured by approved 3rd party factories, and sold under the JoJo brand label.
- ✓ We have mapped our Tier 1 manufacturers and are in the process of more effectively extending through the supply chain.

3rd Party Brands

- ✓ These are products wholly designed and manufactured by other brands but sold in our stores and on our website. These items complement our ranges and offer variety to our customer.
- ✓ We maintain active lists at vendor level within our buying systems.

Drop Shipping

- ✓ We have partnered with a small number of businesses who fulfil orders from their own warehouses placed on our website. This often includes giftable items such as candles, food, flowers and toys.
- ✓ We maintain active lists at vendor level within our buying systems.

Goods not for resale (GNFR)

- ✓ This includes items we purchase but aren't sold, for example store equipment and stationery including our store bags and dispatch bags for online shopping.
- ✓ Other than ad-hoc purchases such as paint, we maintain active lists at vendor level within our buying systems.

Service

- ✓ This includes professional services we need to run the business, such as logistics, marketing, consultants, IT systems and facilities management.
- ✓ Depending on the service these suppliers offer, their information is stored in different ways on our system.





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Our own brand supply chain

We currently manufacture our own brand product in 9 countries. Most of our factories are based in China, followed by India then Turkey. We work with 81 Tier 1 factories who employ around 15.5k people. 67% of our factories make clothing, footwear and textile items, and 33% make nursery and toy products. 27% of our suppliers have worked with us for over 10 years.

Supply chain mapping

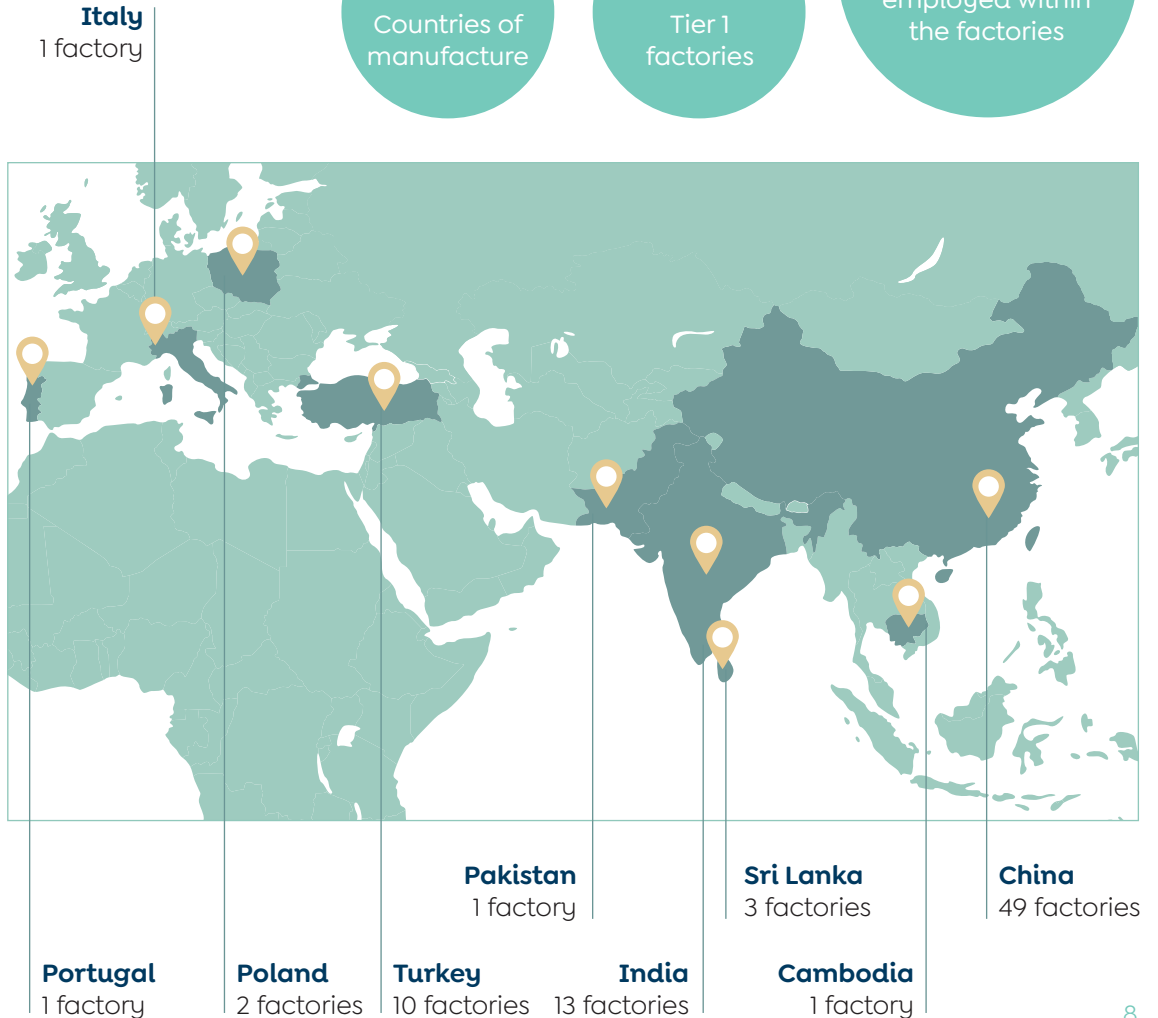
We have fully mapped our Manufacturing Tier 1 suppliers.
These are the factories that construct the final item.



We have partially mapped our Tier 2,3 & 4 suppliers.
These factories carry out additional work such as embroidery, finishing and making base components like fabric.



We have not yet mapped our Tier 5 & 6 suppliers
but this remains a target. These suppliers make the raw materials, such as growing the cotton, and transform them into usable components





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Own Label – Our Own Label Manufacturers

We have fully mapped our supply chain for Tier 1 manufacturers. In 2024 we want to go further and have set targets to understand more on the nature of the people employed within the factories we place business in.

Factory overview

During this reporting period we reworked our supplier list to focus on ‘active’ tier 1 manufacturing units. This means factories that have booked or foreseeable orders. This brought our total number of manufacturers down since our last reporting period.

At the end of our reporting period, we work with a total of 81 Tier 1 Manufacturers who supplied us with clothing, footwear and accessories, toys and nursery products.

Within our suppliers;

- ✔ **48 made clothing** for us in baby, children and maternity ranges.
- ✔ **6 manufactured footwear.**
- ✔ **11 made toys** including soft plush and wooden.
- ✔ **16 made nursery items,** both practical and decor.
- ✔ **26 were seasonal.** This means we usually buy at one point in the year or have one large production peak.
- ✔ **22 were long term,** as in we have worked together for over 10 years.

Between them, our suppliers employ 15,681 people. 91% of these are permanent employees.

Areas of focus

In 2024/2025 we need to go further with managing the topline data we maintain for Tier 2-4.

This information is held already in various forms on our system but to improve on our processes in 2023 we launched a project with a 3rd party company called Chainpoint and began developing software to better map our supply chain.

This will give us more insight into our supply chain and improve our salient risk gap analysis.

From this we want to go further in our data management to better understand the nature of our labour force, for example the use of temporary / seasonal workers, contractors and recruitment agents in our supply chain.

This will enhance our knowledge of our supply chain and improve our salient risk analysis longer term.



48 Clothing factories



11 Toy factories



16 Nursery product factories



6 Footwear & accessories factories



26 Seasonal factories



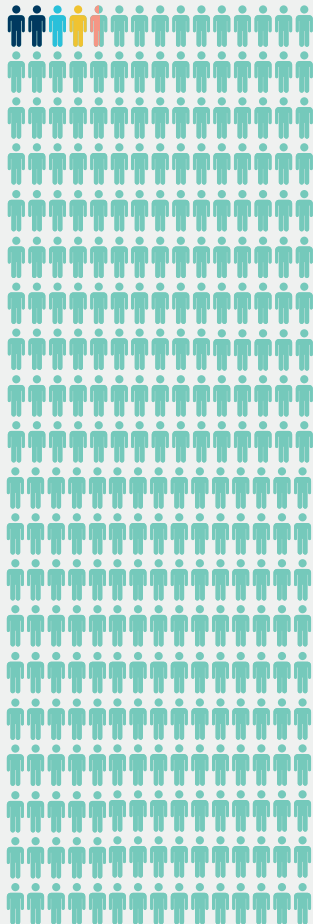
22 Long term* factories
**Over 10 years*

Definitions of Modern Slavery

Inequality is growing and the global labour market can be multi-national with many people crossing borders to look for work. People can be coerced into working against their will for little or no recompense through means such as paying off debts, by companies retaining identity papers and by false promises. There are far too many people in the world being still treated as commodities and being exploited. The Modern Slavery Act would like us all to do our part in mitigating this.

Statistics

According to the latest Global Estimate of Modern Slavery 2022:



50 million people were living in modern slavery in 2021

This number translates to nearly one of every 150 people in the world.



28 million people were in forced labour.



22 million people were trapped in forced marriage.



Forced labour accounts for 3.8 million children and **11.8 million women and girls.**



The world's population is 7.9 billion.

Human Trafficking

The recruitment, transport, transfer, harbouring or receipt of people through force, fraud, coercion or deception, with the aim of exploiting them for profit. This occurs in all parts of the world where traffickers use violence, fraudulent employment agencies and fake promises to deceive people, usually those who are vulnerable or seeking a better life. Whilst no industry or sector is immune to human trafficking, there are high-risk sectors where victims are more frequently found, for example but not limited to, agriculture, garment and textile industries, catering and domestic work.

Worst Forms of Child Labour

Child labour can take many forms, but the priority for the ILO (International Labour Organisation) is to concentrate on the worst forms which include all forms of slavery, trafficking, sexual exploitation, illicit activities and those that are likely to harm the health, safety and morals of the child.

Forced Marriage

Any situation where one or both people do not, or cannot consent, regardless of age.

Debt Bondage

A situation where a person has pledged their labour or services (or that of someone under their control) to pay a loan. Often people who experience debt bondage work for little to no pay while they must work off extortionate fees associated, such as lodgings and travel. It can be shared by whole families and inherited generationally.



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Ethical trading policies - our supply chain

JoJo are committed to working in accordance with the UN Guiding Principles on Business and Human Rights. We believe companies have the responsibility to respect human rights through policies and by working with robust standards and processes that will identify, prevent and manage the remediation of any human rights risks. JoJo is committed to upholding these human rights standards and processes in its business operations and supply chain.

Our **Code of Conduct** is drawn from core ILO conventions and accompanying recommendations and are aligned to the ETI Base Code, further detail can be found here. It is summarised below.

JoJo expects its suppliers to understand, take responsibility for and ownership of implementing Ethical Code of Practice Standards throughout their supply chains and business operations. JoJo takes a long-term view of what is right and will remain committed to the continuous improvement of delivering high standards to meet the expectations of our customers, stakeholders and to protect the human rights of those engaged within, and supplying to, our business.

Modern slavery sits at the extreme end of a spectrum of labour exploitation. Tolerance of less severe abuses can create an environment that allows modern slavery to occur. Adhering to these minimum standards goes some way to limiting the risk.





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JoJo Supplier Code of Conduct

- ✓ **No forced labour or modern slavery - employment is freely chosen:**
There must be no form of modern slavery or forced labour, whether it be human trafficking, involuntary prison labour, indentured labour, bonded labour or otherwise. No employee should be obliged to work through force, financial pressure, intimidation or by any other means.
- ✓ **Freedom of association and the right to collective bargaining:**
The supplier and its factories must recognise and respect the right of the employee to join and organise associations of their own choosing and to bargain collectively.
- ✓ **Safe and healthy working conditions:**
Suppliers and their factories must provide their employees with a safe and healthy working environment and continue to work towards preventing work-related accidents and maintaining the welfare and safety of their employees.
- ✓ **No child labour:**
Suppliers must not employ children who are less than 15 years old or less than the legal minimum age in the country of manufacture.
- ✓ **Fair wages and benefits:**
Employees' wages should be enough to meet the basic needs of employees and provide for some discretionary expenditure. In all cases, wages must equal or exceed the minimum wage required by law or the industry benchmark standard.
- ✓ **Lawful working hours:**
The normal working hours should not exceed 48 hours per week and must comply with national laws or the benchmark industry standards.

- ✓ **No discrimination is practiced:**
Employees shall be afforded equality of treatment irrespective of their gender, race, colour, language, nationality, ethnic or social origin, religious beliefs, political opinion, marital status, disability, property, age, sexual orientation or union membership.
- ✓ **Employment security:**
Wherever reasonably practicable, all workers should enjoy security and stability of employment and regularity of income.
- ✓ **Respectful treatment of employees:**
Employees must be treated with respect, dignity and be employed in a workplace free of harassment, abuse, and degrading treatment.





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Our People Team policies

At the heart of our People strategy lies our unwavering commitment to ensure our employees don't just thrive, but do so at the right moment, adapting to the evolving workplace and world.

Whilst ultimate responsibility on policy and procedure are set by our People Director, all employees at JoJo, under the guidance of the Board are responsible for preventing Modern Slavery within our operations.

The below policies are available in our employee handbook;

- ✓ Recruitment Procedure
- ✓ Prevention of Illegal Working
- ✓ EDI Policy
- ✓ Grievance Policy
- ✓ Speak Up Policy

Our dedicated People Team ensure we maintain a HRDD (Human Rights Due Diligence) approach. This includes but it not limited to:

All policies are accessible to our employees via the company's **Intranet** and directly from the **People Team** (HR Team).

The Employee handbook: This is integrated into the tasks and activities within the onboarding program.

Nimble: A comprehensive guide to all policies is also available on the company's learning platform.

Right to work check: The organisation has invested in a platform for conducting right to work checks, ensuring that managers can verify eligibility to work in a safe and efficient manner within GDPR guidelines. Managers undergo training to perform these checks, ensuring company compliance with regulations.

In addition to current practices and training programs, we plan to enhance employee education on modern slavery through workshops, discussion boards, and internal communication channels to raise awareness.





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Salient Risk Assessment

Salient risks within Modern Slavery represent the most severe negative outcome in terms of human rights. Identifying them allows us to conduct due diligence assessments of internal and external operations and wherever possible, mitigate current and future risk through appropriate policies, practices and training. Ending modern slavery by 2025 for children in all forms, and overall by 2030 is part of the UN Sustainable Development Goals (SDG target 8.7). Therefore, it is vital all businesses identify risk areas within their own operations.

Within our manufacturing supply chain

We consider the below to represent the largest areas of concern identified within our areas of operation related to human rights.

- ✓ **Migrant, agency and casual labour** – often most at-risk individuals of exploitation.
- ✓ **Countries and regions with alleged systematic exploitation of human rights** including alleged forced labour within the Xinjiang Uyghur Autonomous Region in China, Uzbekistan, Turkmenistan, and Syria.
- ✓ **Displacement of people and labour** caused by global events
 - The devastating 2023 **earthquake in Turkey**
 - **Global armed conflict**
 - **Natural disasters**
- ✓ **Undeclared subcontracting** is where an item is made in an undisclosed location. This means we are unable to assess compliance to our Code of Conduct.
- ✓ **Lack of resource management** and HR capability in smaller units to identify and address the risks of modern slavery.
- ✓ **Falsified records** – where true information is hidden to present a better impression of the factory. We expect transparency from our suppliers on the true nature of their operations.

Within our commercial operations

We know sustained bad practice can directly and negatively impact our suppliers. As a business we must work to avoid this;

- ✓ **Short lead times** – this can lead to excessive overtime or suppliers taking on contract labour to complete orders at short notice. We must always be realistic in expectations of suppliers and work to understand their capabilities.
- ✓ **Unrealistic price targets** – we understand our suppliers are also in business to make a profit and we must work together to find the fair price.
- ✓ **Delayed or missed payments** – this could result in a risk of delayed worker payment.
- ✓ **Cancelled orders** – if the supplier has bought the raw materials or planned production to fulfil an order this can be damaging to their operational margins and this impact can trickle down to worker payment and treatment.
- ✓ **Demanding unreasonable discounts after an order is placed** – JoJo will never demand a discount to improve our margin. Whilst we do apply penalty charges, these are applied for delays, poor workmanship, incorrect labelling etc. as well as non-adherence to our Code of Conduct, but there are clearly laid out in our Supplier Handbook and only applied to cover a proportion of loss of earnings and direct measurable costs.



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Risk Assessment & Due Diligence within our supply chain

All suppliers are assessed to ensure they meet our Code of Conduct through the audit process. We want to work with suppliers who are engaged and transparent, and where an issues is raised, they are sufficiently pro-active in managing them to a close.

Audit review practices

Whilst responsibility for order placement, volume and frequency business resides with our buying teams, the assessment of our suppliers to produce stock to our standard and within our policies is the responsibility of our Technical and Ethical team. Where possible we will visit in person or call in remotely to see production in process.

Code of Practice audits are carried out by the specialist auditing team at Next who assess our Tier 1 manufacturers against their Auditing Standards.

Following an audit, the factory is given an overall score based on the observations and non-compliances identified during the visit. They are graded into categories from 1 - 6 with a Cat 1-3 considered 'compliant', Cat 4 'unacceptable', Cat 5 'absolutely unacceptable', and Cat 6 requiring immediate attention and a hold on new orders until the issues are resolved. Factories are expected to improve and cannot maintain a high-risk grade over a series of audits, for example a Cat 5 would ultimately become a Cat 6 if no improvement was made on certain issues.

New factory onboarding requirements

- ✓ **Welcome meeting:**
Designed to give our new supplier an overview on what they can expect from working with JoJo. Our Code of Conduct and auditing processes are introduced, and from the start of 2024, this also included Chainpoint supplier mapping.
- ✓ **Distance technical audit assessment**
completed via self-audit and virtual visit of the factory. The focus is understanding the supplier's ability to consistently make the product, and identify the likelihood of subcontracting.
- ✓ **Internationally recognised 3rd party audits**
for example SMETA/BSCI which are widely used within manufacturing and retail as they assess a factory against the ETI Base Code. Where available, these are reviewed.
- ✓ **Pre audit meeting:**
Prior to the audit going ahead, our suppliers attend a 1:1 with the in-country auditor who explains the process, assesses their systems and based on information shared gives an overview of their likely outcome.
- ✓ **Next Code of Practice audit:**
Once the pre-audit meeting goes ahead a full in person audit is conducted against the Code of Practice Auditing Standards. A final grade is issued. The supplier understands the outcome and grade at the end of the audit.

Once these steps are completed a factory is onboarded new factories are signed off by our Head of Quality, Technical and Compliance and continuous improvement is managed by our technical and ethical teams.



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Audit Outcome Overview – Tier 1 manufacturers

During this reporting period we completed Code of Practice audits on 100% of our Tier 1 manufacturers. We also updated the method and type of data we regularly assess. Our learnings will be taken into the next year and we aim to continually build on them.

End of year overview of findings

- 87% of our tier 1 branded factories were rated as 'compliant' to our Code of Conduct.
- 13% need further support and we are working with them on action plans to improve.
- We disengaged 7 factories who either did not want to or couldn't meet our minimum standard.
- 53% of non-compliances raised across all audits were for Health and Safety – this varies in severity but can usually be straightforward to put right and will be monitored over the next year to see improvements.
- 27% of non-compliances were related to working hours. Long working hours can be the result of bottle necks due to poor production planning, or unforeseen issues to the critical path. Overtime must always be voluntary, not excessive and paid according to local laws. No instances of Forced Labour, Child Labour, or Discrimination were identified.

China

We work with 49 Tier 1 manufacturing units in China located across 9 provinces, with the majority (37%) located in Guangdong followed Zhejiang (27%).

- 43** factories were graded a Category 3.
- 1** factory is graded Category 4, but have since worked hard to close the issues raised and are waiting on re-audit.
- 5** factories are graded Category 5, we are working with each factory to complete a Corrective Action Plan and make improvements prior to reaudit.

India

We work with 13 Tier 1 manufacturing units in India located across 3 regions. We have 6 in Tirupur, 5 in Delhi and 1 in Gujarat.

- 11** factories were graded a Category 3.
- 1** factory is graded Category 4 and are working on closure of the non-compliances raised.
- 1** is graded Category 5 and has since has an in person follow up meeting with the local auditor to review and support progress on closing their non-compliance.

Turkey

We work with 10 Tier 1 manufacturing units in Turkey located across Istanbul and Denizli.

- 8** factories were graded a Category 3.
- 2** factories are graded a Category 6, however both these units are continuing to receive orders as this non-compliance is due the building licences not being updated following extensions. These factories have since conducted building safety assessments conducted by competent structural engineers.



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Key activities with our teams until January 2024

We are always aiming to build on our processes and improve our collaboration, training and communication within our own teams and our wider supply base. In the reporting period, the below represent the key activities completed in relation to Modern Slavery.

- ✓ Created a joint working group with other Total Platform brand partners which consisted of in-person meetings to discuss our joint approach to ethical trade and challenges we commonly face. By communicating with industry peers, we all build our skills and knowledge and share learnings beneficial to longer term aims.
- ✓ Joined Stronger Together at one of their online training sessions covering Modern Slavery to continue to broaden knowledge on the subject.
- ✓ Rolled out refreshed training to our Buying and Technical Team to deep dive into our ethical trade programme and our salient risks. This training covers Modern Slavery Act, B-Corp, Supplier Ways of Working and Responsible Purchasing. This training was in person and supported by our department leads in buying and was a really engaging session for our teams.
- ✓ Reviewed our existing Modern Slavery training on offer to our wider teams and began working with our Learning and Development team to refresh the content to make it more widely understood.
- ✓ Signed off and completed development of 3rd party software with Chainpoint to map our suppliers to Tier 4. This will give us details on names, locations, and processes. Our Phase 1 and 2 suppliers received logins for the system early 2024.





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Key targets & timeframes

Following a review of our most salient risks, we commit to taking forward the following actions. We recognise improvement in our operations is a journey and some goals will take longer than others to achieve either due to logistics or resource. These targets have gained board approval and will be measured through updates in our monthly internal reporting mechanisms.

February 24 – January 25

- Effectively map Tier 2 – 4 of our own label manufacturing suppliers with topline information on name, address, and processes utilising Chainpoint. Introduce a method to monitor the number and type of suppliers in our chain and consider how we ensure our Code of Conduct is effectively communicated.
- Study patterns in non-compliances raised across our suppliers by region to understand commonalities, salient risks and local challenges taking into account type and frequency by region.
- Study the nature of our suppliers labour force – namely temporary / seasonal workers; home workers, migrant workers recruited through labour agencies, agency workers).
- Work with our suppliers to close straightforward health and safety non-compliances with an aim to reduce the average number of issues raised.
- Conduct a full review of our Responsible Sourcing policies to ensure they continue to be fit for purpose with the changing needs of our business ensuring they are robust enough to meet the challenges identified in our internal assessments.
- Roll out refreshed and longer-term communication and training strategy on ethical trading targets, policies, process and progress with our Tier 1 manufacturers, buying and wider teams, this will ensure our targets are known within our business.

February 25 – January 26

- A continued focus on understanding the nature of our supply chain and working through salient risk gap analysis, building on what we have learned in the previous year.
- Through data and supplier engagement, continue to monitor and assess progress and improvements.
- Understand our supplier capability to manage effective human resource, recruitment practice and long-term goals. Within this, identify training needs and capability building.

