BAIRD GROUP Dressing men well

Modern Slavery Statement

2021-2022

Baird Group are committed to protecting human rights both within our own operations and in our global supply chain.

It continues to be a priority for Baird Group to ensure that we trade ethically and source with integrity, as such we take the issue of modern day slavery and human trafficking very seriously and work to prevent this within our supply chain.

The reality is that global challenges in the last year seeing the displacement of refugees, rising social inequality and widespread labour shortages are likely to bring with them the increased risks of Modern Slavery and Human Trafficking.

This is a complex issue and collaboration is an essential tool to improve human rights and reduce risk; we are very proud to say that this year we have become a foundation member of the Ethical Trade Initiative. By joining ETI we look forward to connecting with other members and learning from the combined knowledge of the companies, trade unions and NGOs that make up its membership to continually inform our approach to ethical trade and create initiatives that will improve outcomes for workers across global supply chains.

Knowing where our products are manufactured is key to our business and transparency helps us to understand the areas of risk within our supply chain, to date we have mapped out all of our Tier one manufacturing sites for our inhouse brands and we will publish these on our own website before the end of 2022.

Our aim is for Baird to be a company people are proud to work for and customers can be confident to buy from, to achieve this we must continue to act responsibly and continually challenge the ethical and environmental standards within our supply chain.

Baird and all its employees have and will continue to behave in a way that reflects the values set out in our Cultural Framework.

- Mark Cotter, CEO of Baird Group



Organisational Structure and Supply Chains

With a rich heritage dating back to 1894, at Baird Group we pride ourselves on the quality of our product and the service we deliver. Baird Group are a part of the Arafa Group, Arafa Holding is a leading global textiles and apparel manufacturer and retailer based in Egypt.

A part of the Arafa Group, Baird Group serves a diverse global audience, including top international brands and global retailers. The company's business activities are fully integrated, covering luxury wear, formalwear, and casual wear markets, as well as the full value chain from textiles to apparel and tailoring to retail and distribution.

Baird Group operate across retail, ecommerce and wholesale, our portfolio consists of our own brands such as Antique Rogue, Limehaus and Racing Green, we have also worked closely with Jeff Banks owning the licence since the 1990s.

Since 2016 we have held the UK licence for Ben Sherman adult casualwear and formalwear and in 2019 acquired the licence for the German, Swiss, Polish, Austrian and Dutch markets. More recently in 2020 we acquired the licence to design and manufacture Ted Baker formalwear.

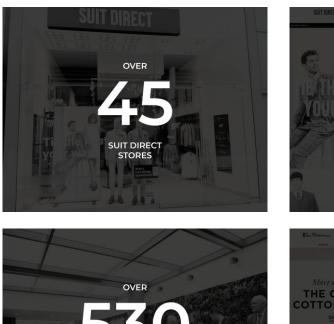


Organisational Structure and Supply Chains

Currently we have 44 of our own retail stores known as Suit Direct with ambitious plans to grow our presence on the High Street further.

Our core values of Behaviour, Ethics and Integrity are a part of our DNA. Individually, they are obvious, but when combined together, they make Baird Group and our employees who we are. They underpin every decision we make and ensure we remain a company where employees and their values are respected.

The following statement has been published in accordance with the Modern Slavery Act (2015) and outlines the steps Baird Group has taken during the financial year Ending Jan 2022 to identify and prevent Modern Slavery and human trafficking from taking place within our business and supply chains.

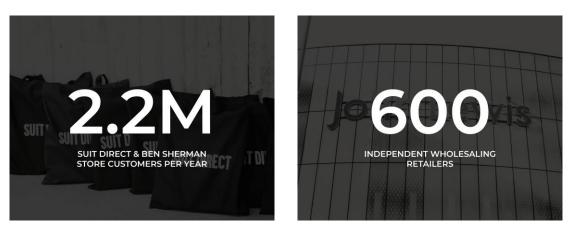


EMPLOYED BY

BAIRD IN THE UK







Organisational Structure and Supply Chains

Baird Group Policies

The maintaining, updating and issuing of Baird Group compliance policies lies with the Sourcing and Sustainability Manager and the relevant Technical teams across all product categories.

Baird Group Policies - Code of Conduct

We require all our suppliers and factories involved in the manufacture of goods sold in our stores to comply with our Code of Conduct. Baird Group's Code of Conduct is aligned to the principles of the ETI base code, detail behind each principle can be found here:

https://www.ethicaltrade.org/sites/default/files/shared_resources/E TI%20Base%20Code%20%28English%29_0.pdf

This policy defines the shared ethical responsibilities between suppliers and buyers for the protection and promotion of human rights.

Sub Contracting

As stated in our manual all factories engaged in the production of Baird Group products must meet minimum standards in each of the following areas:

- Employment Ethics
- Health & Safety practices
- \cdot Technical Competence, relative to the product they will produce
- Quality Assurance systems
- Suppliers are reminded that all premises involved in manufacture are subject to these standards. This includes any subcontracted processes.
- Subcontracting must be declared at the time of order placement
- Manufacturing processes conducted from domestic premises are not acceptable to Baird Group. (Exceptional cases must have written approval of the appropriate Baird Group Buying and Merchandising Director, prior to order placement).

Unapproved sub-contracting

Our Ethical Code of Conduct dictates that only audited, approved factories and sub-contractors are used. However, we recognise that we cannot be complacent to the risk of unapproved sub-contracting to units with ethical failings (including potential for Modern Slavery conditions and practices).

Due Diligence Processes

Baird Group Policies- Ethical Audits

In-house Brands

Our Tier 1 product is made up of our own brands and those brands we hold Licences' for, manufacturing clothing and a small number of accessories.

New factory set up process: Orders cannot be placed with any factory until it has completed pre-assessment and approval by the Baird Ethical team (as well as Technical and Buying).

As part of our factory onboarding process we review independent 3rd-party audits (SMETA/ BSCI/ WRAP) and corrective action plans, all of which must be dated within the last 12/24 months depending on the audit type submitted.

In addition to this factories are also required to agree compliance to the below:

- Ethical Code of Conduct
- Baird Group Manual
- Raw Materials Policy
- Chemical Compliance (REACH declaration)

Should we begin a trading relationship factories are required to submit a new audit every 12/24 months (as above), any areas for improvement that are identified are seen as a tool to support the overall improvement of ethical, technical, safety and quality standards across our suppliers and factories.

We continue to collaborate with suppliers and factories to make improvements as required, but we will discontinue business with any supplier or factory who persistently fails to do any of the following: be open and honest; take responsibility for meeting our ethical standards; and make required improvements to rectify serious non-compliances within an agreed time frame. Our focus to date has been on the Tier 1 suppliers, factories and sub-contractors who directly manufacture our products.

Baird Group are members of the Supplier Ethical Data Exchange (Sedex) which is a not-for-profit, membership organisation for businesses committed to the continuous improvement of ethical performance within their supply chains.

Due Diligence Processes

Third-Party Branded Supply Chain

While we do not currently have full visibility of all our 3rd Party Brand manufacturing sites, we do require that they sign up to our Sourcing Principles for Third Party Brands or provide a copy of their own standards if they offer a greater social or environmental protection.

Within this suppliers sign up to our Code of conduct on behalf of all the factories they are using to manufacture products sold to Baird Group.

Visibility of production location

Suppliers are contractually obliged to manufacture Baird Group products at the factory named on the Purchase Order (PO). Only pre-approved sites may be used, and written approval is required in the event that the location needs to change. This allows us to report, measure and risk assess our product supply base according to location and business levels.

Looking ahead

Within the next year we will focus on the following areas:

Publishing a list of our Tier 1 factories on our own website before the end of 2022 Signing up to the Transparency Pledge.

Releasing Baird Groups anti slavery and Human Trafficking policy Releasing Baird Group's Anti corruption and bribery policy

Launching a new online compliance platform so we can share information with our full supply base quickly and manage supplier engagement more effectively



Baird Group Sourcing Map 2021-2022

7 Source Countries

54 Tier 1 Factories

> **37,742** Workers

21,003 (55%) Female Workers

79 3rd party audits reviewed by Baird Group

13 In person factory visits this year



Bangladesh 18/32.5%

> **China** 16 / 13.5%

India 8 / 9.5%

Pakistan 4 / 25.6%

Vietnam

3 / 1.8%

Egypt 2 / 15.2%

Turkey 2 / 1.8%

Identify Areas of High Risk

Supply base risk assessment:

We are mindful that some production locations carry a higher potential risk of Modern Slavery and Trafficking. Key risk factors include: migrant labour (within a country or between countries), a high presence of refugees, young workers (concern of child labour), contract and agency workers and female workers. In addition, the security situation and increasing threat of terrorism in some countries makes it more difficult to travel safely to conduct visits.

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

Baird Groups in-house branded product supply chain

Baird Groups suppliers who subcontract manufacturing processes

- e.g. dying, washing and finishing
- Specific country risks where modern slavery is highest e.g India, China and Turkey

Our stand out human rights risks are as follows:

- Freedom of association and collective bargaining
- \cdot Health and safety
- Children's rights
- Modern Slavery
- Wage levels
- Harassment and discrimination
- \cdot Water, sanitation and health
- Working hours
- Privacy and data security

Specific goods or services not for resale e.g cleaning services.

Identify Areas of High Risk

Sourcing

Baird Group prohibits the use of cotton sourced from Uzbekistan, Turkmenistan, and the Xinjiang Uygur Autonomous Region (XUAR) in China in all products. This is as a result of documented human rights concerns, including the occurrence of child labour and forced labour in the harvesting of cotton

Baird Group have identified the following as high risk and ask all our Tier 1 suppliers to confirm they do not source in these regions through our Raw materials Policy.

Afghanistan, Belarus, Central African Republic, DR Congo, Crimea, Cuba, Iran, Iraq, Libya, North Korea, Russia, Somalia, Sudan, Republic of South Sudan, Syria, Venezuela, Yemen, Zimbabwe, Occupied Territories and Golan Heights

Looking ahead

Within the next year we will:

Continue with our internal cotton sourcing strategy for 100% of the cotton we source to come from a more sustainable source by 2024.

Use the tools provided by Radar on Sedex to deepen our understanding on risk within our supply chain

Training on Modern Slavery and Trafficking

At Baird Group, we recognise that our people are the key to our continued growth and success. Because of this, it's important to us that we create an environment that people want to work in and maintain a culture where all employees feel safe. We also want to help our employees reach their potential by nurturing and developing talent across the business and supporting everyone in reaching their goals.

Our Cultural Framework

We believe that by creating a framework that underpins the core values of the business, together colleagues can create an environment that is supportive, collaborate, and productive.

Our Cultural Framework is made up of three categories, each with their own sub-categories. They are:

Behaviour: Integrity, Courage, and Respect

Ethics: Safe, With Pride, and Accepting

Environment: Innovative, Commercial, and Owned

You can find out more about our values here: <u>https://www.baird-group.co.uk/our-values/</u>

Cultural Guardians

Within Baird Group we have colleagues who have taken on the role of Cultural Guardians, one of the key roles of these Guardians is to promote our Cultural Framework and the values within it. They provide a confidential avenue for people to highlight and discuss anything they may see or experience in the workplace that they feel is not in line with the framework. Our Guardians receive specific training to provide support to individuals confidentially and help them to reach a conclusion on any action that may need to be taken.

Training on Modern Slavery and Trafficking

Our Employees

Raising awareness and providing our employees with appropriate training is a key focus for Baird Group.

This year we have launched our Rise Above program to support our in-person induction program.

This is a fully blended training programme with e-Learns and interactive sessions, covering topics such as Finance, Buying and Merchandising, Supply Chain, Marketing and more. The content has been written by our own experts in each area, and then developed internally into an L&D programme, these are currently available to head office employees but the program is being rolled out to stores and warehousing this year.

Both of the above have modules covering Ethics and Sustainability at Baird, they cover how we onboard new factories through to Responsible purchasing practices and sustainability initiatives through the business.

Partners with The Retail Trust

We recognise that our own colleagues may sometimes need additional support with their own wellbeing, Baird Group are a partner with The Retail Trust who champion health in retail by lobbying for better standards in employee wellbeing. Their experience and expertise mean they are best placed to understand what people may be going through and how best to tailor support to their needs.

Looking ahead

We plan to launch additional Rise training modules/ in-person sessions one of which will be focused on Modern Slavery ' the people behind the product'- to align with the launch of our policies in this area.

Our business cannot tackle Modern Slavery alone but by educating our colleagues and increasing awareness we can share the scale of the problem for the industry as a whole and help them to understand signs they should be aware of that maybe warning of a bigger issue.

Initiate ways to educate our supply base further on the risks of Modern Slavery in their own supply chain using our online compliance platform.

New Membership-ETI

We have for several years embedded the principles of the ETI into our own code of conduct a code as a minimum standard which all of our Tier 1 suppliers and agreed subcontracting sites are required to meet.

We have joined the ETI to connect with other members and learn from the combined knowledge of the companies, trade unions and NGOs that make up its membership, to continually inform our approach to ethical trade and create initiatives that will improve outcomes for workers across global supply chains.

The Principles of the ETI base code are detailed below:

- 1. Employment is freely chosen
- 2. Freedom of Association and the right to collective bargaining are respected
- 3. Working Conditions are safe and hygienic
- 4. Child Labour shall not be used
- 5. Living wages are paid
- 6. Working hours are not excessive
- 7. No discrimination is practised
- 8. Regular employment is provided
- 9. No Harsh or inhumane treatment is allowed

*The full detail behind each principle can be found on the ETI website <u>https://www.ethicaltrade.org/sites/default/files/shared_resources/ETI%</u> 20Base%20Code%20%28English%29_0.pdf

Whilst our ethical approach continues to be based on building trust and transparency with our suppliers and factories (to fully understand the conditions, risks, and challenges that exist), we realise that the potentially deep-rooted and systemic practices associated with Modern Slavery may not be identified through pre-arranged visits.

Looking ahead

Over the next couple of years we will be working closely with the ETI to complete the foundation program with a view to then graduate to full membership.



What's Next for Baird?

Baird Group are committed to protecting human rights both within our own operations and in our global supply chain. We work to protect and respect all individuals including employees, supply chain workers and our customers. Tackling and eliminating Modern Slavery from our business and supply chain continues to be an important part of our business. We see our drive to increase the transparency of our supply chain as key to reaching this aim and strive to find and help resolve problems that may exist to help protect the human rights of workers.

Summary of 2022/2023 Commitments

Structure and Supply Chains

- 1. Publish a list of our Tier 1 factories on our own website before the end of 2022
- 2. Sign up to the transparency pledge

Due Diligence processes

- 1. Launch a new online compliance platform
- 2. Review current Baird Group supplier policies



Identify areas of high risk

- 1. Continue with our cotton sourcing strategy for 100% of the cotton we source to come from a more sustainable source by 2024.
- 2. Use the tools provided by Radar on Sedex to deepen our understanding on risk within our supply chain

Training on Modern Slavery and Trafficking

- 1. Initiate ways to educate our supply base further on the risks of Modern Slavery in their own supply chain using our online compliance platform.
- 2. Work with the ETI to progress our foundation program
- 3. Review how our colleague policies and processes relate to modern slavery
- 4. Launch inhouse Training Modules with a focus on Modern Slavery and Human Trafficking