Modern Slavery Statement 2022

This statement, agreed at the end of our financial year 2021-22, evidences how MandM Direct Limited ("MandM Direct", "we", "our") complies with the Modern Slavery Act 2015 ("MSA"). In particular, this statement fulfils the requirement for relevant businesses to be clear and transparent about their practices across all six categories described in section 54(5) of the MSA.

In summary, we at MandM Direct take extreme pride in our ethical approach to business, demonstrated by our keen and continued commitment to recognise and prevent all forms of modern slavery, human trafficking and human rights violations, both within our own Company and also across our supply chain.

1. Organisational structure and supply chain

MandM Direct is one of the UK's largest online off-price retailers, offering significantly discounted clothing and footwear for men, women and children. Our UK website is complemented by five European sites, supporting customers in Ireland, France, Germany, the Netherlands and Poland. Additionally, we own the Stylepit brand, and as such, operate the Stylepit website, serving customers in Denmark.

In 2014, MandM Direct was purchased by Danish fashion group Bestseller United A/S. We are now part of Heartland A/S.

Our products are sourced from a wide range of international fashion and sportswear suppliers, in whom MandM Direct has no ownership interest. We also offer customers choice from a selection of own-brand products, which are purchased directly from UK importers.

In order to monitor our adherence to applicable laws, regulations and international best practices, we operate a Compliance Committee, which reports directly to the Company's Board. As such, the means by which we practically comply with the requirements of the MSA form a key focus of this Committee.

2. Organisational policies

MandM Direct maintains a ***Modern Slavery and Human Trafficking Policy***, which was updated in June 2020, and which is currently undergoing review. We also have a ***Supplier Code of Conduct***, which has been signed by all our own-brand suppliers, and which will additionally be sent to any

new own-brand supplier with whom we may trade in future. This document re-emphasises our explicit requirement that all partners observe international standards in the prevention of forced or involuntary labour, working hours, the right to collective bargaining, the prevention of child labour / protection of young workers, adequate compensation, the prevention of discrimination and harassment, the protection of Vulnerable Groups, health and safety, environmental protection and ethics.

Additionally, in order to articulate the Company's approach to identifying, preventing and/or mitigating any possible adverse impact on human rights, we maintain a ***Human Rights Policy***. This not only demonstrates our commitment to protecting and valuing our own workforce, but also considers all people who contribute to our business partners, and as such, seeks to ensure that no third party organisation with whom we work, condones or supports child labour, forced labour, exploitation of vulnerable individuals or groups, unreasonable reward for workers, excessive or illegal working hours, or inadequate health and safety practices.

As further support for our employees, we offer a ***Hybrid Working Policy*** and a ***Home Working Policy*** to allow for flexibility in working styles. We also have a ***Whistleblowing Policy***, ***Bullying and Harassment Policy***, ***Equal Opportunities Policy***, ***Safeguarding Children Policy*** and ***Young Workers and Work Experience Policy***. Moreover, there are departmental-specific ***Codes of Conduct***, relevant to particular areas of operation.

All policies that are written or updated by the Company, are submitted to the Compliance Committee for comment, ratification and approval, ahead of dissemination.

3. Due diligence

MandM Direct proactively considers any potential impact on human rights that may be caused indirectly through our supply chain. Currently, we charge our UK-based importers with lead responsibility for undertaking regular factory audits in international territories, and thereafter providing us with all necessary assurance and evidence that there is no malpractice or violation of international standards within our supply chain: also, that all suppliers are acting compliantly with local legislation and regulations.

Whilst we have no material concerns with this approach, we nevertheless complement this with our own enhanced processes. This is exemplified by the use of our ***Supplier Code of Conduct*** as referenced above, which is supported by additional due diligence checks on own-brand suppliers.

4. Assessing and managing risk

During 2021-22, we established a formal risk management process across the Company, resulting in a Board Assurance Framework being prepared for Board.

As part of this ongoing work, MandM Direct has identified no risks to human rights within our own organisation. Therefore, the only potential risk of breach lies within our supply chain. As such, we have identified as partial mitigation, the need to update and reissue the ***Supplier Code of Conduct*** in autumn 2022. This redrafting will also reflect and accommodate the new relevant EU legislation.

5. Performance indicators

As part of our updated due diligence processes, we intend to develop a suite of key performance indicators to provide comprehensive and robust assurance that there is no violation of human rights, modern slavery, human trafficking and/or other international standards, anywhere within our supply chain.

6. Training

In order to ensure a high level of understanding of the risks of modern slavery, human trafficking and human rights across our business, we have a training plan to ensure that all relevant staff receive appropriate learning. Additionally, we validate that our business partners and importers provide corresponding training to their staff, suppliers and providers.

Signed:



Mike Tomkins
Chairman
MandM Direct Limited

24 October 2022