



Modern Slavery Statement FY 2025-26

Introduction

At Freemans Grattan Holdings Limited, Freemans plc and Grattan plc ("FGH"), we are committed to doing business in the right way.

Modern slavery, forced labour and human trafficking have no place in our business or supply chains. We recognise that these issues continue to exist around the world and we have a responsibility to identify, prevent and address any risks linked to our operations and suppliers.

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year ending 1st March 2026.

As part of the OTTO Group, we work in line with internationally recognised ethical sourcing standards and are members of [amfori BSCI](#), which promotes fair and safe working conditions across global supply chains. We are committed to minimising the risk of modern slavery and human trafficking within our business and supply chains and to acting ethically and with integrity in all our business relationships.



Our Business

FGH is a UK-based online retailer offering fashion, home, electrical and gifting products to customers across the UK.

Our supply chain includes both merchandise suppliers and service providers. Products are sourced from a number of countries including the UK, Turkey, China and India, while our non-merchandise suppliers provide services such as technology, logistics and professional support.



We understand that sourcing products globally can bring risks. Some countries, sectors and working practices present a higher risk of labour exploitation than others. Our approach is focused on identifying those risks and taking practical steps to reduce them.



Governance

Preventing modern slavery is a shared responsibility across our business.

Our Board oversees our approach, supported by colleagues across our Buying, Merchandising, People, Learning and Audit teams. A cross-functional Modern Slavery Committee meets twice a year to review modern slavery risks and emerging issues, monitor progress against our commitments, and help drive action to prevent and address modern slavery risks across our operations and supply chain.

Creating an open and honest culture is important to us. We encourage colleagues to raise concerns if something does not feel right and provide several ways to do so, including through line management, Risk Smart and our confidential Speak Up whistleblowing service.

Our Approach

Our approach to preventing modern slavery is based on four key principles:

- identifying and assessing areas of potential risk
- carrying out due diligence on suppliers and business partners
- providing colleagues with the knowledge and confidence to raise concerns
- monitoring and reviewing our controls to support continuous improvement



Our Supply Chain and Due Diligence

We have systems and controls in place to:

- Identify and assess potential areas of risk within our merchandise supply chain and supplier network
- reduce the risk of modern slavery and human trafficking occurring
- monitor suppliers and sites on an ongoing basis
- support and protect individuals who raise concerns.

All merchandise suppliers are required to commit to our Code of Conduct and the principles it sets out. Our Code is aligned to the OTTO Group's adoption of the amfori BSCI Code of Conduct, which covers areas including child labour, forced labour, freedom of association, working hours, fair pay, worker welfare and health and safety. This may include their own Code of Conduct and implementation processes or an independently conducted audit against recognised standards such as amfori BSCI, Sedex (SMETA) or SA8000.

Where suitable evidence is not available, we may require a factory to complete an independent social compliance audit before any business can begin. This is a mandatory part of our supplier approval process.

All new factories are reviewed by our QA Manager as part of onboarding. During this process, suppliers are made aware of our compliance requirements and the standards expected of them. Where additional assurance is required, audits are arranged before approval is granted.

The onboarding process is only completed once audit results and supporting documentation have been reviewed and confirmed as meeting our requirements.

Compliance is not the responsibility of one team alone. Our Buying teams are fully involved in the onboarding process and discuss ethical and compliance expectations with potential suppliers before trading begins. We also expect suppliers to apply these standards throughout their own supply chains and to have appropriate processes in place for managing subcontractors and other third parties.



Once approved, suppliers are subject to ongoing monitoring through audits, factory visits and regular engagement. Audits include reviews of:

- working hours
- wages and benefits
- worker welfare
- recruitment practices
- employment records
- modern slavery risks
- health and safety standards
- compliance with local law and recognised ethical trading standards.

Auditors also conduct worker interviews and review supporting documentation to help identify any potential concerns relating to labour practices or worker treatment.

In addition to audits, our Buying teams regularly visit factories throughout the year to maintain visibility of working conditions and supplier practices.

Where issues are identified, corrective action plans are agreed and monitored. We work closely with suppliers to support improvements and recognise that meaningful change can take time. However, where serious breaches remain unresolved, or where suppliers fail to demonstrate a commitment to improvement, we reserve the right to end the business relationship.

We recognise that modern slavery risks can differ by country, sector and employment practice. As part of our monitoring activity, we pay particular attention to known risk indicators such as excessive working hours, recruitment practices, use of agency labour and worker welfare. We continue to monitor developments in higher-risk sourcing regions and consider these factors when planning audits and supplier reviews.



Policies and Reporting Concerns

Our values of **Resilience, Empathy, Ambition, Commitment and Honesty** guide how we work and how we expect others to work with us.

Alongside these values, our Trademark Behaviours help set the standard for how we make decisions, work with others and raise concerns. They encourage colleagues to act with integrity, take responsibility and speak up when something doesn't feel right.

We operate a number of policies which support our commitment to preventing modern slavery, including:

- Whistleblowing Policy
- Bullying and Harassment Policy
- Code of Conduct
- Supplier Compliance Requirements

Anyone can report concerns through our Speak Up process and colleagues are protected when raising concerns in good faith. We are committed to ensuring that no individual suffers any detriment for reporting a genuine concern, even if it is later found to be unfounded. The importance of speaking up and acting responsibly is reinforced through our values and Trademark Behaviours, helping to create a culture of openness, accountability and respect across our business.



Training and Awareness

Awareness remains one of the most effective ways of identifying potential issues.

All new colleagues receive information on our values, behaviour expectations as part of their induction.

Modern slavery awareness training is provided to colleagues and covers the following areas:

- Understand what Modern Slavery is and what to do if you suspect it
- Recognise the role FGH and the Otto group have in identifying and reporting Modern Slavery
- Understand what responsibilities you and your colleagues have in regards to our Modern Slavery Policy.

This training is refreshed biannually to reflect current legislation and emerging risks. Through our parent company, OTTO Group, our Compliance team is part of a wider compliance network, enabling us to share best practice, discuss emerging risks and continuously improve our approach.

We also expect suppliers to make information about workers' rights available and accessible to their workforce, ensuring workers understand their rights, local legal protections and how to raise concerns.

Progress During 2025/26

Last year we committed to strengthening our approach in four key areas. Below is an update on the progress made.

Modern Slavery Awareness

Our commitment: Deliver a dedicated awareness campaign for colleagues.



What we did: During the year we supported Anti-Slavery Day through targeted colleague communications that highlighted the signs of modern slavery, reporting routes and the role colleagues play in identifying and preventing exploitation.

Training and Guidance Review

Our commitment: Review training and guidance to ensure it reflects current legislation and best practice.

What we did: Existing training materials remained in place throughout the year and continue to be delivered to relevant colleagues. A full review and refresh of content has been identified as a priority for the coming year to ensure materials remain up to date and reflect emerging risks.

Factory Audits and Supplier Monitoring

Our commitment: Continue auditing all factories during onboarding and complete regular follow-up audits based on risk.

What we did: We completed 30 audits across our Fashion and Home supply base during the reporting period.

Audits included worker interviews, documentation reviews and assessments of labour standards, working hours, welfare and modern slavery risks. Our team also continued to visit suppliers throughout the year and buyers maintained regular contact with factories through site visits.

Overall, compliance levels remained strong, with approximately 99% compliance achieved across audited sites.

All third-party suppliers continue to be reviewed as part of our onboarding process to ensure compliance expectations are understood before trading begins.

Whistleblowing Awareness

Our commitment: Improve awareness of whistleblowing routes across our supply chain.

What we did: Information explaining how workers can report concerns confidentially has been distributed to factories and incorporated into supplier onboarding packs. This ensures suppliers are aware of the channels available to raise concerns if they see something that does not look right.



Workforce Monitoring

During the year, we reviewed employment practices across our workforce, including agency worker arrangements, recruitment processes, pay practices and working conditions. We remain satisfied that appropriate controls are in place, including compliance with National Minimum Wage requirements and the fair treatment of all workers.

Our Priorities for 2026/27

While we have not identified any instances of modern slavery within our business, we recognise that preventing exploitation requires ongoing attention and continuous improvement.

During 2026/27, we will focus on the following priorities:

Review Working Hours and Workforce Wellbeing

We will review working time practices across our operational teams to better understand working patterns, rest breaks and any voluntary opt-out arrangements. This review will help us identify any risks linked to excessive working hours and ensure appropriate safeguards are in place.

Refresh Modern Slavery Training

We will complete a full review of our modern slavery training and guidance materials to ensure they remain aligned with current legislation, emerging risks and best practice.

Increase Awareness and Engagement

We will continue to support Anti-Slavery Day through colleague communications and awareness activity.

We will also explore additional opportunities to engage colleagues through learning sessions such as webinars or lunch and learn events.

Continue Supplier Monitoring

We will continue our programme of supplier audits, factory visits and onboarding reviews, taking a risk-based approach to monitoring and due diligence.



We will also continue to assess emerging risks within global supply chains, including issues such as excessive working hours in higher-risk sourcing regions.

Strengthen Governance and Reporting

We will provide bi-annual updates to our Executive Management Team on modern slavery activity, risks and progress against our commitments.

We will also continue to review our policies, procedures and controls to ensure they remain effective and proportionate.

This statement has been approved by the Board of Directors of Freemans plc and Grattan plc.

Ann Steer
Chief Executive Officer

August 2026