MODERN SLAVERY STATEMENT 2021-22

The Board of Freemans Grattan Holdings, Freemans Public Limited Company and Grattan Public Limited Company take the issue of Social Compliance very seriously and are unanimous in their desire to implement a strategy of monitoring all suppliers to ensure compliance to internationally recognised standards.

Freemans Grattan Holdings is a wholly-owned subsidiary of the OTTO Group in Germany and is a member of the Business Social Compliance Initiative (BSCI).

The BSCI is a standard monitoring and qualification system to improve the working conditions in the global supply chains of Retailers, Importers and Brand companies. Over 80 companies are members of BSCI, representing ten different countries in Europe and involving thousands of suppliers worldwide.

This statement is made under section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending **26th February 2022**.

OUR BUSINESS

We organise our business across three business units: **Freemans Grattan Holdings Limited**, **Freemans Public Limited Company** and **Grattan Public Limited Company.**

SUPPLY CHAIN

Our supply chain includes procurement for merchandise - typically fashion, homewares, electrical goods and gifts and non-merchandise, usually software and professional services. We engage an extensive network of business partners based in the UK, EU and the rest of the world with products principally sourced from the UK, Turkey, China and India.

The Otto Group is a Business Social Compliance Initiative (BSCI) member and monitors external and internal dealings against the BSCI Code of Conduct. This membership extends to Freemans Grattan Holdings, Freemans Public Limited Company and Grattan Public Limited Company.

The code of conduct we follow at Freemans Grattan Holdings is the OTTO code of conduct. This is the amfori BSCI code of conduct details of which can be found here

The BSCI is a standard monitoring and qualification system to improve the working conditions in the global supply chains of retailers, importers and brand companies.

We require all our business partners to comply with all national requirements and the minimum social requirements of the code covering:

- Child Labour \ Young Workers
- Forced Labour,
- Disciplinary Measures,
- Freedom of Association & Collective Bargaining
- Working Hours
- Working Contracts
- Compensation
- Working Conditions & Health & Safety

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We remain committed to preventing modern slavery or human trafficking in our supply chains or any part of our business. Our Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to try and prevent slavery and human trafficking from happening anywhere in our supply chains.

GOVERNANCE & CULTURE

The business is committed to continuous improvement of governance. We've established several cross-functional committees to manage compliance across the company.

We encourage and expect transparency from all staff and suppliers. We train our staff to raise risks and issues they encounter proactively. They can do this via speaking with management in their functions or raising concerns via the ERIS (Evaluation of Risks and Issues System).

In February 2022, we relaunched our company values. We communicated the new values (Resilience, Empathy, Ambition, Commitment, Honesty) via Executive presentations and workshops within divisions.

Our new values reflect the organisational culture we are seeking to cultivate. Honesty is pertinent to governance. Through our values, we actively encourage our staff to voice any concerns freely.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We have in place systems to:

- identify and assess potential risk areas in our supply chains
- mitigate the risk of slavery and human trafficking occurring in our supply chains
- monitor potential risk areas in our supply chains
- protect whistleblowers.

As part of our initiative to identify and mitigate risk, we require all merchandise suppliers to confirm their commitment to our Code of Conduct and its principles.

We also require them to provide documentary evidence to support this commitment. Such evidence includes a copy of their own Code of Conduct and implementation process or a copy of a current audit to either the ETI or SA8000 standard carried out by an independent third party company.

In the absence of any of the above, we reserve the right to request an audit by an internationally recognised company against the BSCI Code of Conduct. This audit is a pre-condition for starting any business with the supplier.

When onboarding new suppliers, factories are vetted by our audit manager. The factories are made aware of our compliance process and requirements. If they do not meet the criteria, our audit manager will arrange for the audit to take place.

We complete the onboarding process once we have the audit results and confirm that they are to our agreed level.

The Buying Team are fully aware of the process. They will discuss with any new suppliers before beginning the process, the premise being that we are all responsible for compliance.

We have formal, written policies and procedures encouraging staff to speak out about any concerns or risks. Our People Policies include a Bullying and Harassment Policy and the Whistleblowing Policy. These policies are in place to ensure that an individual can raise any concerns, in good faith, that Modern Slavery in whatever form may occur within our company or its supply chain. Individuals who raise such concerns are protected from any form of detrimental treatment even if they turn out to be a mistake.

In the 2021-22 Financial Year, we commissioned audits for 101 factories (57 of which supply our parent company, OTTO, and 44, which work directly with FGH).

We will only work with suppliers who achieve either BSCI A to C Grades or the equivalent Otto Group Standard results.

Except for one, the audits were satisfactory. We did not work with this factory.

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We maintain zero tolerance for slavery and human trafficking. We have a supply chain compliance programme in place to require all those in our supply chain and comply with our values and ethics.

To meet all requirements as outlined in our Code of Conduct and national laws, we require business partners to establish a set of management functions. Our code includes clear responsibilities, procedures and appropriate documentation to demonstrate compliance with

our Code of Conduct and national laws. The management is responsible for continuous improvement.

We require our business partners to establish and maintain appropriate procedures to select subcontractors based on their ability to meet the requirements of this standard, monitor their social performance, and maintain reasonable evidence that there is an improvement process.

We commit ourselves to observe and ensure the implementation of our code of conduct within our organisations and our business partners. For this purpose, the Otto Group, us or an authorised 3rd party may at any time and without further notice inspect all its business partners and subcontractors' sites for monitoring purposes.

Any Inspector will identify themselves as being authorised by the Otto Group or us upon entering the business partner's or subcontractor's premises. Preventing the inspector from entering despite a clear mandate amounts to a positively established violation.

We commit ourselves to act upon inspection findings that reveal the violation of any of the stipulations outlined in our code of conduct.

Business partners and their subcontractors are obliged to correct any deviations found during inspections and continuously improve social standards. We will give reasonable time for remediation as well as support and advice.

We will terminate business relations without further notice in cases where rights violations prevail under the condition that the breach has been communicated to the business partner, that a reminder has followed within a reasonable period and under the condition that the business partner has not brought forward justified reasons for a delay of implementation in conjunction with the sincere intention of attending to the matter as soon as possible.

TRAINING

To ensure a high level of understanding of modern slavery and human trafficking risks in our supply chains and our business, we have a robust process and we educate those staff accountable for product sourcing and supplier management on this procedure. The procedures ensure our compliance team have the final sign off for any new suppliers we onboard. Our compliance team is integrated into a wider compliance community via our parent organisation (OTTO). We use this community to review our practices and revise our procedures accordingly.

We ask that our Code of Conduct be freely accessible and understandable to all employees of our business partners and stipulate that employees shall receive training on their rights and obligations as defined by our Code and on applicable local laws.

The content of this Code is communicated to all business partners and their contractors to ensure that the required standards are effectively observed.

All new employees to our company are inducted and trained in the company values and our Whistleblowing procedures.

On October 2021 (anti-slavery day), we launched a Modern Slavery and Human Trafficking awareness article to raise awareness of Human Trafficking among our employees. The article includes resources and videos from the Gangmasters and Labour Abuse Authority and the UK Anti-Slavery Charity, Unseen. The resources raise awareness of the signs of slavery in our workforce and broader society.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

The public is informed about our social conduct issues and developments on an ongoing basis using the Otto Group Sustainability Report (available online and in print) as well as the website www.ottogroup.com.

This statement has been approved by the Board of Directors.

Signed



Chief Executive Officer

19h August 2022