

# Modern Slavery Statement.

2021/22.



**Alex Baldock**  
Group Chief Executive  
25th October 2022

“As a responsible business we’re committed to using our scale and expertise to be a force for good in the world. There is no place for forced labour and exploitation in any of our operations and we will continue to do right by our colleagues, customers and shareholders by working tirelessly to eradicate exploitation altogether.”



# Introduction.

Since the inception of the Modern Slavery Act 2015 ('The Act') we have been fully supportive of the objective of preventing modern slavery in businesses and supply chains around the world. We continue to believe that eradication requires raised awareness of modern slavery among both our colleagues and our communities, and that through collaboration we can drive good practice and transparency. Our business is committed to acting with integrity and leveraging our size and unique capabilities to do good. As a business trading across the United Kingdom & Ireland, the Nordics, Greece and Cyprus, with colleagues also in Hong Kong and the Czech Republic, combined with a wide-reaching supply chain, we know we can make a difference by taking positive action.

This statement covers our financial year ending 30th April 2022 and is our seventh statement on modern slavery and human trafficking. We strive to make continuous improvements to not only our understanding of risk but also to our actions to prevent the infiltration of modern slavery into our business.

With the continuation of Covid-19 measures enhancing health and safety, prioritising colleague wellbeing remained a business priority for both our own business and that of our suppliers. Face-to-face opportunities were still limited, in particular when foreign travel was required. The year has also seen further problems worldwide, such as the crisis in Ukraine which has resulted in more refugees and increased risk of human trafficking and modern slavery. Throughout we have strived to ensure that workers' rights remained front and centre of our business and supply chain.

This statement was approved by the board of Currys plc and is endorsed, approved and adopted by the following operating subsidiaries: Currys Group Limited, Currys Retail Limited, iD Mobile Limited, Carphone Warehouse Europe Limited, DSG International Holdings Limited, Currys Retail Group Limited, Currys Holdings Limited, DSG European Investments Limited, DSG Overseas Investments Limited and DSG Ireland Limited. The named subsidiaries are those with an annual turnover greater than £36m in 2021/2022, however the statement applies to all subsidiaries regardless of size.



## Our Approach

We continue to risk assess our business and supply chain, recognising the dynamic nature of risk and identifying areas where there is potential for modern slavery, assigning resources and mitigating where necessary. We have always advocated the value in collaboration, sharing best practice and experience with stakeholders who share the goal of preventing modern slavery. Our focus continues to be on tier 1 suppliers (our direct supply base) where we have the most influence and can achieve more immediate impact and, where appropriate, we want to support them in identifying and investigating risks in their own supply chains (as we have done with UK tier 2 waste & recycling and recruitment partners). With our tier 1 suppliers, which includes our outsourcing partners, we expect the robust standards we set on supplier auditing to be upheld, in line with our own rigorous supply chain due diligence process. Social purpose is one of our three strategic priorities on Environmental Social and Governance (ESG) and we will work with suppliers to give our colleagues and customers peace of mind that the products we sell are free from forced labour and exploitation.

# Governance and Commitment.

Responsible sourcing is central to our work to prevent modern slavery and is a regular agenda item for our ESG Committee, chaired by our Group General Counsel & Company Secretary and with Board and Executive Committee representation. Our Group Chief Executive has overall responsibility for the responsible sourcing agenda and actions. Our ESG Committee meets quarterly to maintain engagement with senior leadership throughout the year. Alerts raised during supplier background checks and the review of any new vendor applications that have been flagged as a potential risk falls under our Risk Committee.

Beyond modern slavery and human trafficking, responsible sourcing at Currys includes workers' rights, the environment (which includes topics such as the reduction of plastic packaging and energy consumption), supplier capacity building, anti-corruption and social impact. Continuing to grow our partnership with EcoVadis, one of the leading providers of business sustainability ratings, has allowed us to continue with our focus on this wider set of issues. EcoVadis's assessment of workers' rights and modern slavery focuses on 21 sustainability criteria, grouped into 4 themes, one of which is human rights and measures companies based on international standards including the Ten Principles of the UN Global Compact, the International Labour Organization (ILO) conventions, the Global Reporting Initiative (GRI) standards, the ISO 26000 standard, the CERES Roadmap, and the UN Guiding Principles on Business and Human Rights.

By inviting our UK&I and Greek suppliers to join EcoVadis over the last year, almost 50% of Group revenue comes from suppliers with an EcoVadis rating. This year we also joined the Responsible Business Alliance (RBA), a member organisation of 400 electronics companies across the supply chain and present in 120 countries, enabling us to: work collaboratively to share best practice in supply chain sustainability, mitigate against the risks of modern slavery by sharing our code of conduct, gain access to shared social compliance assessments and access the expertise of the Responsible Labour Initiative which highlights indicators of forced labour worldwide.

The focus of our Responsible Sourcing team is on supplier monitoring, internal and external stakeholder engagement, utilising tools such as EcoVadis and the RBA's online supply chain and corporate social responsibility management platform, working with organisations such as Slave Free Alliance (SFA), the RBA and the British Retail Consortium (BRC) and monitoring changes to legislation or sanctions in the territories where we and our suppliers operate.



## Key achievements in 2021/2022

- ✓ EcoVadis ratings available for nearly 50% of goods for resale revenue and 20% of goods not for resale spend across Currys plc.
- ✓ Joined the RBA and started to utilise their platform and working groups to help us gain further insight into supply chain risks.

“I am pleased that we have continued to expand our partnership with EcoVadis which helps us gain better visibility of the ESG performance of our global supply chain. We have also joined the Responsible Business Alliance, giving us a great opportunity to learn from and share best practice with other companies specific to our sector.

Whilst it would be impossible to say any supply chain is completely free from modern slavery, Currys take the subject and risks seriously and will continue to do so, taking appropriate steps and engaging and collaborating with subject matter experts to improve our own understanding.”

Simon Murray, Group Responsible Sourcing Manager

# Structure of Business and Supply Chain.

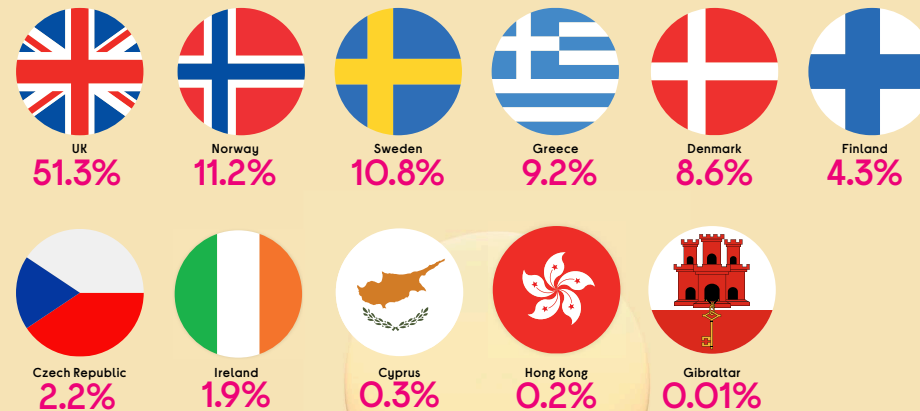
## Our Business

Headline Revenue:  
**£10,144 million**

### Number of stores

UK & Ireland <b>309</b>	Nordics & Greece	521
	Franchise	309
	<b>Total:</b>	<b>830</b>

32,000 employees based in 8 countries



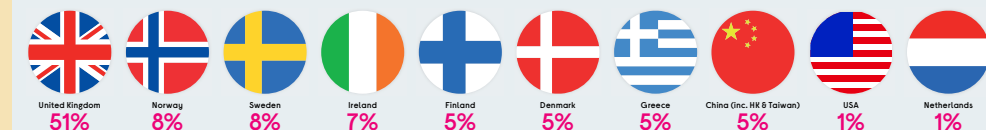
We are one of Europe's leading omnichannel retailers of technology products and services. We provide a complete solution for customers offering a comprehensive range of electronic and mobile products, connectivity and expert after-sales services. We are the market leader in every country in which we operate. In the UK & Ireland we trade as Currys; in the Nordics under the Elkjøp brand and Kotsovolos in Greece, full details of which can be found on our corporate website. Each business is supported by their own support centre (head office), distribution network and repair facilities, with each procuring goods for resale (i.e. products to be sold in our stores) and goods not for resale (i.e. service providers such as catering and cleaning, construction services and IT partners).

## Supply Chain

We source from around **10,000** tier 1 suppliers whose businesses are registered in **45 countries** with **96%** of them in the 10 listed below:

**13%** of suppliers are for products or services that are sold to our customers (goods for resale).

**87%** of suppliers are of goods or services not intended for consumers (goods not for resale).



### Own label and licensed brand suppliers.

Our own label and licensed brand operation, based in Hong Kong, sources products across many categories including domestic appliances and consumer electronics. We currently work with 89 suppliers across Asia and Europe. Auditing and risk assessment are integral to our supplier selection process and their ongoing relationship with us, and we have been carrying out this work for many years. We have taken advantage of this wealth of experience to understand our wider business and supply chain, and when creating our support functions, including the Responsible Sourcing team based in the UK.

# Policies in Relation to Modern Slavery and Human Trafficking.

In 2019 we communicated our Standards for Responsible Sourcing to all UK & Ireland and Greek suppliers and included reference to them alongside our Modern Slavery policy in supplier contracts. The Standards continue to be the cornerstone of our work to set minimum requirements in the areas of modern slavery, human trafficking, human rights, labour, environment, anticorruption and social impact. They make explicit reference to the Ethical Trading Initiative (ETI) base code and require our suppliers to work towards full compliance. The goal of the Standards is for continuous improvement, working with suppliers to improve their position rather than excluding them. However, if necessary, we may need to delist a supplier or terminate a contract in response to a related non-compliance. This year we will review and republish the Standards to ensure they remain relevant.

We recognise the impact of standards and policies is through compliance as well as colleague and supplier awareness. Our ongoing partnership with EcoVadis adds to our existing audit programme, compliance checks and workers' rights questionnaire. Through engaging third-party support, we will continue to highlight top performing suppliers in the area of ethics and modern slavery. Through the EcoVadis supplier assessments, supplier policies are externally verified rather than relying on self-assessment. We will continue to keep suppliers under review and add further measures to monitor compliance as required.

This year we published our Conflict Mineral and Child Labour Remediation policies as well as updating our Modern Slavery Policy, all of which set minimum standards for suppliers to meet. Our Conflict Minerals policy encourages our suppliers to make use of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to conduct their own supply chain due diligence. The policy also ensures suppliers source from refineries that are on the Responsible Mineral Initiative's Conformant Refiners list.

## Our key areas of focus for 2022/2023 include:

- ✔ Continue to highlight supplier best practice and to champion and reward supplier ethical behaviour.
- ✔ Review, and republish our Standards for Responsible Sourcing.

## Progress against 2021-2022 areas of focus:

2021-22 Area of Focus	Status	What steps we've taken this year
Highlight supplier best practice	Ongoing	The EcoVadis platform gives us a tool to measure suppliers against set criteria and understand what best practice might look like within the business areas we operate.
Conflict Mineral and Child Labour Remediation policies	Completed	Approved and published our Conflict Mineral and Child Labour Remediation policies.

# Due Diligence Process.

## Key activities during 2021-2022:

### Continue to roll out EcoVadis to Group suppliers

EcoVadis' sustainability ratings platform continues to help us go beyond our own supplier database and risk assessment, helping us to measure and improve supplier social, environmental, and economic performance. The platform gives us a thorough view of our suppliers, enabling us to assess supplier compliance against our Standards. Enhanced data is empowering us to target resources towards areas of higher risk, and to drive continuous improvement and sustainability impact. We have focused on key suppliers, with almost 50% of our revenue and 20% of our procurement spend now rated. Our Responsible Sourcing team provides monthly progress reporting and regularly review suppliers not on the platform with UK, Nordic and Greek commercial and procurement teams to identify, invite and then encourage new suppliers to complete their assessments at regular intervals throughout the year.

### Audit programme for own label and licensed brand suppliers

In 2019/20 we reviewed and enhanced our audit criteria for our own label and licenced brand suppliers based in China and the Far East. The new process has now been in place for over a year and we remain confident that the changes made reflect the risks to our business, suppliers and their employees. Suppliers are audited prior to selection and then on an ongoing basis, with the frequency of audits set between 6 months and 3 years dependant on previous performance. This year we completed 61 ethical audits, where we then work closely with relevant suppliers to monitor non-conformances (including excessive working hours as detailed below) and ensure issues are resolved to our satisfaction (detailed further in monitoring section below).

### Modern Slavery threat assessment of waste & recycling partners

As part of our membership of SFA (a best practice scheme that is run by Hope for Justice, a leading global modern slavery charity) we completed a threat assessment of tier 2 waste and recycling sites in conjunction with our tier 1 supplier. In 2019 we carried out desk-based assessments but, due to Covid restrictions, we were unable to conduct the follow up site visits in 2020/21. In June 2021 we completed the on-site assessments and were pleased to report that there were no significant concerns or risks of slavery within those businesses.

### Identifying trends/recurrences

The issue we most commonly find remains the occurrence of excessive working hours in countries such as China. We consider whether our working practices may impact and encourage these additional hours as well as continually working to address this with our suppliers. We have set own label and licenced brand suppliers a target for continuous improvement which is consistent with the RBA's Validated Audit Programme, reviewing corrective action plans and re-auditing as necessary. Whilst this remains an area with more work to be done, we're pleased with the improvements we continue to make.

## Our key areas of focus for 2022/2023 include:

- ✔ Continue inviting suppliers to join us on the EcoVadis platform.
- ✔ Drive further reductions in working hours for own label and licensed brand suppliers and continue to monitor our purchasing impacts.

2021-22 Area of Focus	Status	What steps we've taken this year
Continue rollout of EcoVadis sustainability assessments across the Group to increase share of revenue and spend covered and improve visibility of supplier performance	Ongoing	Onboarded a number of key suppliers across our Group

# Risk assessment.

Risk exposure is ever evolving and our business and supply chain assessments adapt accordingly. We gather intelligence about emerging risks through our industry collaborations including the BRC, RBA and SFA and target our efforts where they can make the most impact.

We have evolved our risk assessment process; in 2016/17 we focused on internal risks and distribution partners as they were identified as a sector that potentially had a high risk. That was followed up with contacting all our suppliers with a workers' rights questionnaire asking questions about age of workers, confirming worker ID, freedom of movement etc. We learnt that the time taken to contact thousands of suppliers and chase responses was not an effective use of our efforts, so we have progressed to assessing all suppliers on country of registration (using the Global Slavery Index risk rating) and type of business and then asking targeted questions to the suppliers identified as higher risk ensuring our resources are focussed on the countries, products/materials and industries where slavery is more prevalent. In 2020/21 we have furthered developed our risk assessment strategy by introducing the EcoVadis sustainability ratings platform to our Group, working to assess tier 1 suppliers in areas of social, environmental and economic performance to drive improvement and impact.

This year we have worked with SFA to review our governance, policies & procedures, due diligence and training regarding modern slavery. Overall, the report found that we have a 'strong commitment to address modern slavery', 'a solid set of policies' and 'a reasonable, proportional and collaborative approach to risk assessments' as well as 'good training provision'. It was also noted that our recruitment and employee selection frameworks "provide significant protection against the likelihood of criminals attempting to recruit victims of slavery into the organisation" and 'no evidence of modern slavery taking place' during the gap analysis.

Whilst these points are encouraging, there will always be more we can do to improve. The report also noted that improvements could be made in our response to incidents of modern slavery, by reducing reliance on a small number of team members. This will be addressed by documenting a formal escalation process to assist us in processing and escalating reports of modern slavery and ensuring the safeguarding of potential victims. It was also suggested that we conduct a 'deep dive' exercise with our Nordic and Greek recruitment providers. Both actions will be started in 2022/23.

**Below we have identified some areas we consider to be of higher risk:**

## Areas of Risk

**Human rights concerns:** the ongoing risk to workers' conditions is an area of concern and continued monitoring for our business. We engage with organisations such as the ETI, RBA and BRC on the topic to gain expertise and discuss experiences with other members as this continues to be challenging for many businesses. When applicable sanction lists are released or updated we contact our relevant suppliers for confirmation that they are not providing Currys with goods or parts that come from any entities named. All suppliers are risk assessed and our own label and licenced brands are audited before being contracted and then throughout the trading relationship by both our inhouse and specialist independent auditors. Where possible we will work with a supplier to help them improve their working practices but if the concern can't be resolved we will cease to trade with the supplier.

**Recruitment providers:** we reviewed our recruitment provider contracts in the UK to be assured that no subcontracting was taking place. Temporary labour contracts already prohibited the use of subcontracting, but in 2020/21 we also contacted our recruitment providers to ask directly and to dig deeper. We issued these suppliers with our Standards for Responsible Sourcing and respecified our expectations. After discussions, one supplier of temporary labour was unable to provide satisfactory assurances and we chose not to renew our contract with them. As mentioned above, in 2022/23 we will be conducting similar exercises with our Nordics and Greek businesses and their providers.

**High working hours in China:** high working hours continues to be an area of risk for our supply chain. We have made ongoing efforts to improve our audit questioning to advance data sources and we have also contacted own label and licensed brand suppliers based in China to stress our concerns and focus on collaborating with them to reduce excessive working hours. We set suppliers targets for continuous improvement and review corrective action plans, re-auditing where needed. Since we started to engage with suppliers we have seen the number of factories with high working reduce.

**Raw materials:** given the complexity of our supply chain, due to the number of tiers between us and raw material suppliers, we worked with the ETI and its membership to collaborate in this space and help identify high risk materials and/or components where we will need to focus efforts to get back to source. Going forward we will also be able to utilise our membership of the RBA and their Responsible Minerals Initiative.

Our Nordics business Elkjøp's own brand kitchen line Epoq relies heavily on stone and wood. We understand the risk of human rights violations and labour rights in the timber industry and therefore only use certified timber. Moreover, certain types of stone produced in African countries and in India have also been linked to human rights violations. In order to mitigate risk, we do not offer these materials in our range.



# Risk assessment.

## Areas of Risk

**Waste and recycling partners:** given the manual labour involved in waste and recycling and the high-profile modern slavery investigation 'Operation Fort', we recognised this as an area to explore further. In 2019 we asked SFA to conduct a Threat Assessment of tier 2 waste and recycling sites with the support of our tier 1 supplier. At that time we completed the desk-based exercise to select which sites to review in person but on-site assessments were unfortunately postponed due to Covid restrictions. In June 2021 we conducted these visits and, while some minor issues were identified, it confirmed the initial assessment that the risk remains low in this part of our supply chain.

**Countries of higher risk:** as a multinational business with a global supply chain, working with suppliers in areas of risk, we keep abreast of emerging issues through collaboration with the BRC, RBA and other organisations as well as identifying countries, companies and individuals flagged by the Global Slavery Index and/or international sanctions. This allows us to take targeted supplier engagement actions to mitigate concerns. We recognise that human rights violations occur in specific countries/regions related to our supply chain, and work with organisations such as the BRC and the RBA to share learnings and stay informed of the latest guidance with an aim to ensure our supply chain remains free from forced labour.

## Our key areas of focus for 2022/2023 include:

- ✓ Assess the risk of modern slavery for recruitment providers in our Nordic and Greek businesses.
- ✓ Develop a formal escalation process to respond to reports of modern slavery and ensure the appropriate safeguarding of potential victims.
- ✓ Utilise our membership of the RBA and their Responsible Minerals Initiative to gain a better understanding of the high-risk materials and components included in the products we purchase.

2021-22 Area of Focus	Status	What steps we've taken this year
Review of waste and recycling partners	Completed	Concluded the review by carrying out on-site assessments
SFA Gap Analysis	Completed	Conducted Gap Analysis and identified key activities for 22/23 and beyond as part of our ongoing plan
SFA Threat Assessment in our Nordics business	Amended	Due to the restrictions caused by Covid for foreign travel and on-site reviews, we kept in dialogue with all parties and considered the Nordics as part of our Gap Analysis with SFA. This has led to specific actions to review recruitment providers in 22/23
Understanding of high-risk components/materials	Ongoing	Discussions with ETI, RBA and our wider network to keep abreast of high-risk materials and locations

# Expert Advice and Collaboration.

We recognise that the issue of modern slavery and human trafficking requires collaboration across private and public sector organisations, countries and civil society. We welcome collaboration on the topic, learning from others as well as actively sharing our own experiences and best practice.



**British Retail Consortium:** (CSR Community & Ethical Labour Working Group): we regularly take part in discussions on human rights concerns related to topics such as the treatment of migrant workers and ethnic minorities.



**Responsible Business Alliance:** this year we are excited to have joined the RBA. With a focus specifically on the electronics industry, the issues they deal with align strongly with the risks faced in our supply chain. Membership will allow us to look deeper into our supply chain by providing access to shared supplier assessments, a wealth of tools and resources such as the Responsible Minerals Initiative and shared best practice on supply chain sustainability, and specific topics such as forced labour and working hours in China.



**Bright Future:** we remain proud members of Bright Future (Cooperative) Limited, with our own Group Responsible Sourcing Manager representing Currys on the board of directors. Bright Future offers survivors of modern slavery a pathway to paid employment and we have seen 6 candidates find work within our business and interviewed others decided on placements more local or better aligned to their employment ambitions. We continue to be committed to placing more survivors whenever possible.



**Slave Free Alliance:** membership gives us access to expertise around modern slavery in the form of in-house investigations, crisis response, due diligence review and training. This year we enlisted SFA to complete a Gap Analysis which recognised the good progress we have made while also making a small number of recommendations detailed throughout this report which will become part of our ongoing plan to address modern slavery.

We believe collaboration is key to building and maintaining strong, long-term relationships with our suppliers. We have traded with approximately 30% of our current own label and licensed brand suppliers for 10 years or more and over 60% for 5 years or more, allowing us to mutually benefit from these partnerships. We welcome greater collaboration with our suppliers, and this is an area we aim to build on as we collect better data on our suppliers and improve our ways of communicating with them to be more open so that any supplier concerns regarding risks of modern slavery can be shared and remediated immediately.

# Monitoring and Impact.

Our ways of monitoring action and impact are constantly evolving. Currently we have the following in place:

**Currys whistleblowing hotline:** this year one of the calls to our confidential hotline referred to modern slavery or human rights concerns; upon investigation it was found to be in relation to other issues. The individual involved was supported and their concerns were resolved.

**Distribution franchise whistleblowing hotline:** this year no calls were made in relation to modern slavery.

**High-risk supplier workers' rights questionnaire responses:** as part of our onboarding process, our questionnaire is sent to higher risk suppliers. Responses must be received and followed up (if required) before onboarding can be completed and orders placed.

**Own label and licenced brand audits:** we audit suppliers prior to selection and then on an ongoing basis, with the frequency of audits set dependent on previous performance. Our audit criteria include assessments for child/young labour, working hours, wages and deductions, overtime, working conditions and safety, freedom of movement and association, discrimination and disciplinary practices.

- Non-conformities in relation to our own label and licensed brand supplier factory audits: we engage directly with suppliers on non-conformities, ensuring issues are resolved to our satisfaction. In all cases we request a corrective action plan and work closely with the supplier to ensure non-conformances are remedied within an agreed timeframe.
- Red Result/Corrective Action Plan (CAP): an audit gives a red result if a supplier fails to meet satisfactory levels in relation to social and ethical standards. After engaging with them on remedial action, if it is impossible for the supplier to improve their performance or we do not see positive results, they will not be approved or will be delisted.
- Working hours: alongside the audits CAPs at individual factory level, we monitor trends in findings to drive impact. We continue to engage with suppliers on the issue of working hours; auditing and then reviewing CAPs and stressing our focus in this area. We continue to drive sustainable reductions with the long-term aim of supporting suppliers to make meaningful change for their workforce.



Our key areas of focus for 2022/2023 include:

- ✓ Continue monitoring suppliers through our improved, risk-based approach to due diligence.

2021-22 Area of Focus	Status	What steps we've taken this year
Enhanced risk-based approach to supplier monitoring.	Ongoing	With the development of our relationship with EcoVadis and the RBA we have a better understanding of the risk makeup of our supply chain allowing us to invest resource appropriately.

# Training and Awareness.

## Supplier Training

Given the scale and complexity of our supply chain, we see the best way of impacting change on modern slavery is challenging our suppliers to make changes in their own business and filtering those learnings down their own supply chains into our tier 2 and beyond, making suppliers realise how these changes could benefit their own business. We did not conduct any additional training with suppliers in 21/22, instead focusing on the EcoVadis platform and suppliers' ratings to help us get a better picture of suppliers understanding/compliance on a wide range of ESG issues including workers' rights/modern slavery. This analysis will help us to decide on appropriate future training.

## Colleague Training

Our strategy for modern slavery training involves raising awareness across all of our business operations and colleagues, giving confidence to our colleagues to flag any concerns, whether these be at work or in their communities. We know modern slavery thrives when it is hidden, and so it is essential to empower colleagues to understand the crime so that they can recognise the signs and know how to report concerns.

We will continue to deliver targeted training to colleagues where there is a higher risk of modern slavery occurring. To complement our distribution colleague training completed in 2020/21, we have created training for our colleagues in commercial roles, to improve their awareness of modern slavery and broader issues surrounding responsible sourcing to ensure this is considered in their purchasing decisions. The training will be issued to UK&I commercial colleagues in early 2022/23 and our colleagues in the Nordics are also working to adopt the training for their Elkjop business. We have also shared with our Greek colleagues and will support them to create a local language version. We will also be developing an enhanced version of the training for our own label and licensed brand commercial colleagues which will account for the additional risks associated with this area of our business.

## Our key areas of focus for 2022/2023 include:

- ✓ Roll-out commercial training module to relevant colleagues in the UK&I, Nordics and Greece and develop an enhanced module targeted at our own label and licensed brand teams based in the UK and Hong Kong.

2021-22 Area of Focus	Status	What steps we've taken this year
Targeted Supplier training	Completed	We identified our distribution franchisee operation for training and worked with our HR partners to support building modern slavery awareness into onboarding.
Targeted training for commercial colleagues	Ongoing	Worked with our learning and development teams to create a module to be issued to our UK&I, Nordic and Greek colleagues

“We recognise that modern slavery is a global issue, and we are committed to doing all we can to support its eradication through the steps we are taking to make meaningful change and champion best practice. This includes raising awareness of the issue, improving auditing and governance processes and collaboration with suppliers and partners.”

Paula Coughlan, Chief People, Communications & Sustainability Officer

# Key Future Steps for 2022-2023.

- ✓ Review, and republish our Standards for Responsible Sourcing
- ✓ Drive further reductions in working hours for own label and licensed brand suppliers and continue to monitor our purchasing impacts.
- ✓ Assess the risk of modern slavery for recruitment providers in our Nordic and Greek businesses
- ✓ Develop a formal escalation process to respond to reports of modern slavery and ensure the appropriate safeguarding of potential victims
- ✓ Roll-out commercial training module to relevant colleagues in the UK&I, Nordics and Greece and develop an enhanced module targeted at our own label and licensed brand teams based in the UK and Hong Kong



Any queries please contact:

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