

## Modern Slavery Statement

October 2017

### Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by N Brown Group plc and its' subsidiaries during the 2016-17 financial year.

N Brown is committed to reducing the risk of modern slavery in its' supply chain. A fundamental part of our CSR strategy is ethical trading and we hope to create more responsible products that our customers can enjoy with confidence.

Responsibility for ensuring that modern slavery does not exist in the operations and supply chain of N Brown sits with the CEO. To complement this and provide board level oversight we have a CSR Committee (a subcommittee of the N Brown Group Board) and have appointed Theresa Casey, General Counsel & Company Secretary, as Group head of CSR to oversee operational matters.

### Our business

N Brown Group is a leading digital fashion retailer with 140 years of experience. We offer our customers an extensive range of products, principally clothing, footwear and homewares, and our Financial Services offering allows customers to spread the cost of shopping with us. We are size inclusive, from 10-32 in Womenswear and S to 5XL in Menswear. Products include both own brand and branded. Almost 70% of our business comes from online sales with our second highest channel being the contact centre. We also operate a small number of stores spread throughout the UK.

Our key suppliers have active factory sites in 58 countries spread over Europe, South East Asia, the Americas, the Middle East and Africa.

### Policies

Our Ethical Trading Policy includes the principles from the ETI Base Code (<http://www.ethicaltrade.org/resources/eti-base-code>) which advocates against modern slavery.

As a responsible employer we adhere to UK employment legislation which we believe offers some protection against our workers being victims of slavery. All employee policies are currently being reviewed and will be amended, where possible, to provide greater protection against modern slavery to all workers.

We also have an effective Whistleblowing Policy which is available for employees to raise concerns including those around modern slavery.



## Due diligence

N Brown engages in comprehensive supply chain mapping and monitoring of all first tier own brand suppliers.

As advised in last year's Modern Slavery Statement the roll out of the new gatekeeper process was completed during the year. Following completion the business has focussed on strengthening the message regarding modern slavery within the process by reviewing and updating the documentation provided to suppliers.

All own brand suppliers have to sign up to a mandatory code of conduct which includes provisions promoting freedom of employment. This document also asks for suppliers to ensure sub-contractors meet these requirements.

Processes for branded suppliers are continually reviewed and a copy of each supplier's Modern Slavery Statement is requested as part of the on boarding process.

The root and branch review we reported on previously has also been completed. This resulted in an increased percentage of factories with current audits for our own label manufacturing sites. In addition a new team has been developed based in Dhaka, Bangladesh, to carry out factory inspections. These steps have increased the view we have over our supply chain.

## Risk assessment

We have assessed the risk of slavery occurring within our business. Similar to most retailers, the most likely source of slavery occurring in our business is via the product supply chain. We have attempted to mitigate this by increasing our knowledge of our suppliers' businesses & how they create the products they supply. For our own sourced products we endeavour to trace back to factory level. This allows us to satisfy ourselves, and our customers, that the products are not created as a result of slavery.

The level of risk each of the countries we trade in varies based on the political and economic climate in the country at the time. Our Ethical Trading Team monitors this and escalates any issues.

## Training

We educate all employees on modern slavery at every level and in every department of the business in a format appropriate to their role.

During the course of the year our N Brown Executive Committee received a detailed presentation on modern slavery. Members of staff who may visit factories have been trained on the ETI Base Code. All staff are required to flag any concerns they have when visiting factories to the Ethical Trading Team. We have also developed an online training course accessible to all employees to educate them on the basics of modern slavery.

### **Effectiveness**

N Brown engages with a number of leading organisations that advocate an end to modern slavery. We are members of the Ethical Trading Initiative and as such are obliged to report annually on supply chain performance against the ETI Base Code. We are involved with the Action, Collaboration, Transformation (ACT) initiative (<http://www.ethicaltrade.org/act-initiative-living-wages>) that aims to create circumstances where workers can avoid all forms of exploitation including modern slavery. We are also signatories to the UN Global Compact (<http://www.unglobalcompact.org.uk/>) in which we report against a set of criteria, shown below, including the elimination of all forms of forced and compulsory labour.



Involvement with these organisations demonstrates our willingness to work with others and be held accountable on this important issue.

We are pleased with the progress we have made on last year's statement, in particular the efforts to increase the visibility of our supply chain.

In our progress so far we are confident we have reduced the risk of modern slavery in our supply chains, however, we recognise this is an ongoing process and therefore look forward to reporting on further advancements next year.

Approved by the N Brown Executive Committee on 20 September 2017 and the N Brown Board on 10 October 2017.

Signed on behalf of the Board by Angela Spindler, CEO, N Brown Group plc

10 October 2017

**JDWILLIAMS**  
THE LIFESTORE

**JACAMO**

SimplyBe