

Modern
Slavery &
Human
Trafficking
Policy
2019/20



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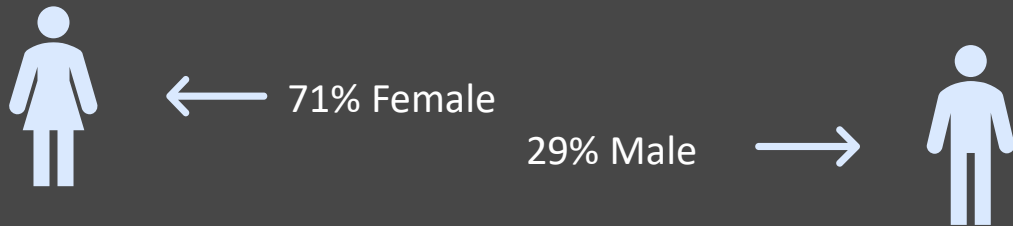
WHAT IS MODERN SLAVERY?

Modern Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our businesses and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

Many think of slavery as a relic of history, eradicated in the nineteenth century by the abolitionist movement. Unfortunately, slavery continues to flourish in the modern world. Modern Slavery refers to situations of exploitation that a person cannot refuse or leave, because of threats, violence, and coercion, abuse of power or deception. (1)

We are committed to acting ethically and with integrity in all of our business relationships and are taking steps to enforce effective systems and controls to ensure that no Modern Slavery or Human Trafficking occurs anywhere in our supply chain in the UK and internationally.

40.3 million
people in modern slavery in 2016



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About us...Pavers is one of the UK's leading shoe retailers, with a focus on comfort, style, quality and affordability. The business was founded by Catherine Paver in 1971, and remains family owned to this day.

Headquartered in York, we've grown significantly and now operate as an omnichannel retailer, selling our products via 180 Pavers stores nationwide and online via pavers.co.uk, catalogues and TV (Sky channel 678).

As a family owned company we appreciate good values, we believe that we should do the best that we possibly can for our customers, and be honest, reliable and trustworthy.

We pride ourselves in delivering to all of our customers, whether visiting one of our stores, calling our head office customer service department or ordering online, "the Pavers Experience," excellent value for money, great quality footwear, in pleasant surroundings and with exceptional service.



Our Policies

As part of our commitment to identify and mitigate risk, we build long standing relationships with our suppliers and make our expectations of acceptable business behaviour, clear.

By building these relationships, we are able to engage with our suppliers to ensure that they share our commitment and ethics. With the strength of our supplier relationships we are confident that our tier 1 suppliers to maintain this same relationship with their tier 1 suppliers and so forth.

Pavers have a zero tolerance approach to Modern Slavery and Human Trafficking and expect all those in our supply chain to take the same approach and to comply with our values, including any 3rd party brands who supply both our Pavers and Jones Bootmaker stores.

Any suppliers within our supply chain who are unable to comply with our code of conduct and Modern Slavery Polices and refuse to collaborate with us on implementing improvement strategies would have their contractual relationship terminated immediately.

Code of Conduct

Modern Slavery Policy



Code of Conduct

Our Code of Conduct is based on the Ethical Trading Initiative (ETI) Base Code which can be applied, fairly, to all nations.

This code is shared with all our current Tier 1 suppliers across our supply chain and with all our service providers which we intend to roll out across our labour providers, recruiters & distribution services for 2019/20.

We require our Agents to translate and ensure our Code of Conduct is communicated to all suppliers under their remit. Those factories operating outside of Agents we communicate directly with.

We ensure all employees have access to our policies via our Employee Binder located on our intranet which covers anti-bribery policies, grievance and whistle blowing procedures and form part of our mandatory induction process. We will continue to enhance and develop our policies through the coming year as we learn from our experiences.

We have recently partnered with Retail Trust to provide a support network for our employees to consult and provide them guidance on their wellbeing. Retail Trust provides a further forum for educating our employees on Modern Slavery and raising its awareness.



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Ethical Trading Initiative

Employee Binder

Retail Trust



Identifying Risk

We source our products from over 20 international countries with a supplier base in excess of 180. We have identified areas with the greatest risk of modern slavery and focused our efforts in ensuring a significant proportion of factories in these areas have completed our audit programme. Our focus for 2019/20 is to re visit these audits and ensure that standards are continuing to be met and roll out the programme to further suppliers. We plan to devise a scoring system to help improve our methodology for measuring suppliers. We collaborate and look to remedy any areas of concern through close communication and education.

We operate via a network of agents who represent the company in all our primary origin source bases. We instil our company virtues in our agents and ethical stance. We train them to the highest standard to share our values face to face with our factories. They regularly visit factories and provide feedback to our head office team. Acting as our representative they ensure factories are complying to our Code of Conduct.

Through 2018/19 we shared our Modern Slavery Policy / Code of Conduct with all our inbound transport providers and will continue to share updated versions of the policy through 2019/20.

One area we have identified as a potential risk in terms of service providers are our Recruiters and Labour Providers – we plan to share our code of conduct / ethical policies with them through 2019/20.

We ensure all our employees are aware of and abide by the Bribery Act 2010. We plan to host some specific tailored training for employees involved within buying and sourcing to equip them with the tools to identify practices that would contravene our code of ethics.



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Planned for 2019/20...

Continuation of Supplier Audits in high risk areas

Devise a scoring system to identify suppliers requiring improvement

Sharing Code of Conduct with Recruiters and Labour Providers

E-learning courses for employees on Modern Slavery, Human Trafficking & Anti Bribery

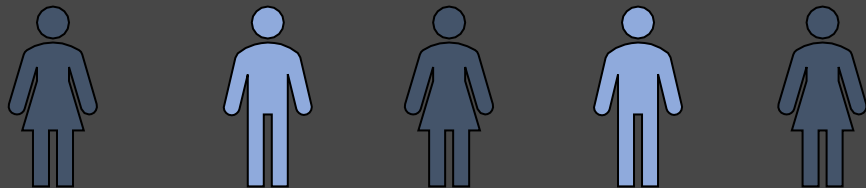


Due Diligence

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. We operate a transparent and open culture at all levels throughout our organisation and supply chain.

As a business we have recently introduced a Senior Operating Group (SOG) who directly report to the board on business operations, governance & risk management. The SOG meet on a monthly basis and operate as a steering group to discuss topics including Business Sustainability, Risk Identification & Modern Slavery.

Members of the group represent functional areas across the business and take responsibility for ensuring the business operates within accordance of our corporate governance structure.



Senior Operating Group

Corporate Governance





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Next Steps... 2019/20

| Actions | To Start | On Going | Completed |
|---|----------|----------|-----------|
| Include Modern Slavery Policy as part of employee induction | ✓ | | |
| Provide E-Learning 'Modern Slavery awareness' training to employees | ✓ | | |
| Share our code of conduct with labour providers and recruiters | ✓ | | |
| Continue with supplier audits in high risk geographic areas. | | ✓ | |
| Raise profile of the Bribery Act 2010 across the company. | | ✓ | |
| Develop a scorecard system to rate suppliers against our code of conduct. | ✓ | | |

Pavers Ltd are committed to introducing KPIs to develop, educate and raise awareness of Modern Slavery and Human Trafficking across our end to end supply chain. Our focus for 2019/20 is completing the above actions, reviewing our code of conduct updating where necessary and continuing with our programme of supplier audits.

Our focus is to collaborate and engage with all touch points across the chain to instil our company virtues and principles.

We can confirm that the information contained in this report is accurate and has been approved by the board of directors.

Stuart Paver
Managing Director

Louise Scarth
Head of Procurement & Supply Chain

