

FRASERS GROUP

# **MODERN SLAVERY AND HUMAN TRAFFICKING TRANSPARENCY STATEMENT 2022**

**FRASERS.GROUP**

# COMPLIANCE STATEMENT

This statement has been published in compliance with section 54(1) of the Modern Slavery and Act 2015 (the "Act"). It seeks to outline the steps taken by **Frasers Group Plc** and its subsidiaries (all together the **Group**)<sup>1</sup> for the year ending 24 April 2022 to detect and prevent modern slavery and human trafficking within its business and supply chains.

<sup>1</sup> This statement sets out the steps taken by Frasers Group plc, Sportsdirect.com Retail Limited, Brands Holdings Limited, SDI.com Fitness Parent Limited and their relevant subsidiaries that fall within the scope of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery (Transparency in Supply Chains) Regulations 2015.

# INTRODUCTION

There are an estimated 50 million people globally being enslaved with approximately 17 million of these being exploited in the private sector under conditions of forced labour. Modern slavery exists in supply chains around the world, from the cotton in our clothes and the minerals for our electronics, to the manufacturing, warehousing, shipping, cleaning and catering services along the supply chain.

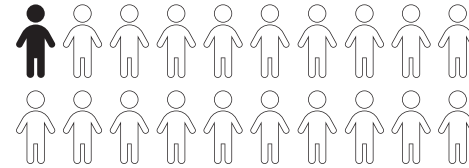
It has been acknowledged that there can be no guarantees of a slavery-free product, but we can and do make every effort to minimise slavery in our supply chains. We recognise that modern slavery is a growing global issue and we understand our responsibility to prevent and mitigate where possible the occurrence of human trafficking, child labour and forced or bonded labour in our business and supply chains.

We have adopted a zero-tolerance approach to modern slavery and human trafficking and take seriously any allegations of human rights abuse against people both in our organisation and in our supply chains. We have implemented and will continue to implement measures to ensure that slavery and human trafficking does not exist at Frasers Group or in any part of our supply chain.

Our continued commitment to our customers and stakeholders means we will always treat people in our business and supply chains fairly and with respect. As such, we aim to continuously review and improve our practices and policies to ensure that we have the most effective safeguards in place to prevent and mitigate the negative impacts of modern slavery and human trafficking. This statement details how our approach to business and human rights is helping to tackle modern slavery in our business and supply chains. It provides an update on our previous statement and details of our future commitments.



**1 in 10** Children are in child Labour



**1 in 20** Children are in hazardous child Labour



**US \$150 Billion** – annual trade value of Human trafficking



For every **1,000 people** in the world, **5.4 people** are victims of modern slavery



The estimates of the total cost of Modern Slavery to the UK economy for the year ending March 2017 was between **£3.3billion and £4.3billion**

# ORGANISATION STRUCTURE

Fraser's Group Plc is a publicly listed company incorporated under company number 06035106, governed by the Companies Act 2006 and regulated by Financial Conduct Authority. The Group consists of over **550 subsidiaries** which operate in over **20 countries**.

This statement covers all subsidiaries which have an obligation to publish a statement under section 54 of the Act. A full list of the subsidiaries can be accessed in the Group's latest **Annual Report**.

In addition to our obligations under the UK Act, our European subsidiaries are subject to additional Human Rights and Modern Slavery reporting requirements depending on their local legislation.

## FRASERS GROUP

FLANNELS

CRUISE

HOUSE OF FRASER

FRASERS

MISSGUIDED

JACK WILLS



18montrose



studio

EVANS  
CYCLES

GAME



# OUR BUSINESS AND SUPPLY CHAINS

Given the nature of the business, it is important that we undertake ethical business practices in line with our corporate social responsibilities and to ensure we have a sustainable business. The breadth of the business means that we not only face risks as an employer, but also risks in relation to our supply chains.

The Group is one of Europe's largest sporting goods retailers which also operates a diversified portfolio of the world's leading retail brands including premium lifestyle brands. We operate across five strategic business segments:

-  UK Sports Retail
-  Premium lifestyle
-  European Retail
-  Rest of the World Retail
-  Wholesale & Licensing

Our UK Sports Retail arm offers a complete range of sporting apparel, footwear and equipment through our predominant fascia, SPORTSDIRECT.com. In Premium Lifestyle, we are developing the Group's premium and luxury offering through the Flannels, House of Fraser, Jack Wills and Sofa.com fascias, along with Cruise and Van Mildert. Our European Retail arm provides us with the opportunity to tailor our proposition to the local markets in which we operate which includes the Republic of Ireland and continental Europe. In Rest of World Retail, we have 33 stores trading as SPORTSDIRECT.com in Malaysia. Our Wholesale & Licensing arm retains a portfolio of world-famous heritage brands and wholesale and licensing opportunities to partners internationally.



**30,000+**  
EMPLOYEES WORLDWIDE

**20+**  
COUNTRIES

**1,500+**  
STORES GLOBALLY

## OUR PARTNERS

The Group has partnerships with many well renowned brands who also act as a second line of safeguarding for the Group. Many of our partners also fall under s.54 of the Act and as such are required to have their own robust modern slavery policies and initiatives in place as well as publish an annual statement in line with the requirements of the Act. In order to fully assess how our modern slavery arrangements are complemented by our largest partners - it may be useful to visit their websites and access their modern slavery statements.

Our manufacturing partners who produce our textiles and clothing also adhere to strict protocols. We only work with factories which have valid satisfactory third-party social auditing factory reports from organisations such as Amfori (BSCI) or Sedex which include audits of workers involvement and protection, anti-discrimination, fair remuneration, Anti-child labour and other areas of concern for modern slavery. Our merchandising teams also make frequent visits to our partner factories to ensure standards are maintained and no human rights violations occur.

Our footwear partner is also committed to ensuring compliance with ethical trading procedures which also include minimising and eliminating human rights abuses within its supply chain and the factories it works with. They are also dedicated to ensuring that their factories undergo third-party ethical audits by recognised audit associations such as BSCI and SGS to ensure there are no breaches of local laws or human rights abuses. They ensure they observe ethical behaviours and local laws such as paying the minimum wage and enforcing the limits on working hours. To demonstrate the measures taken to ensure compliance, our footwear partner publishes an annual ethical trading statement. If you would like more information or a copy of this statement, please get in touch.

## PROCUREMENT

Frasers recognises that it has a responsibility and an opportunity to embed ethical procurement practices within both stock and non-stock operations. We aim to drive visibility, promote integrity and mitigate risk in our non-stock supply chain and business operations. In order to achieve this, we regularly review our due diligence processes and actively engaging with our vendors. We are also regularly review our Purchasing Policy and Procurement Procedures to ensure they incorporate the necessary safeguards to prevent human rights abuses and that we select vendors that are aligned with the Group's ethical values.

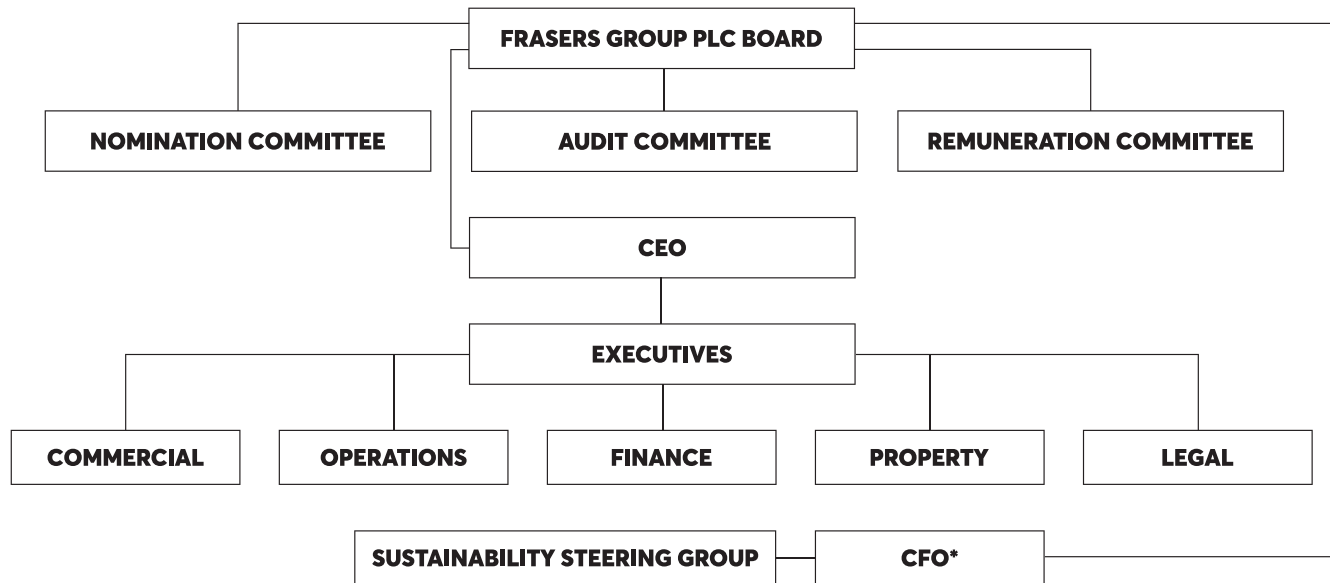
# GOVERNANCE FRAMEWORK

A strong governance framework including robust policies and procedures is key to effectively managing and mitigating the risks posed by modern slavery and other human rights issues. It is critical in ensuring we are meeting and exceeding our responsibilities as a responsible employer and retailer as well as the provisions of the Act.

To ensure that we are strengthening our governance processes, the Group regularly reviews our governance arrangements to ensure we retail a robust policy framework to address existing and emerging risks.

The Board is responsible for overseeing the policy framework and compliance measures whilst the Executive Team is responsible for communicating and implementing the appropriate measures outlined by the policies and ensuring the Group meets its human rights responsibilities.

The Group also has a sustainability steering Group (as a part of our ESG strategy) the executive sponsor, the Group CFO reports directly to the Board on behalf of the Group.



\*The CFO is the executive sponsor of the Sustainability Steering Group and reports directly to the Board.

**RISK ASSESSMENT**

The Group employs a traffic light system to categorise our risks. Our approach to risk assessment involves third-party auditing including ethical audits with third-party partners at our overseas warehouses as well as stakeholder engagement. Audits identify risks at factory level especially in regions where we are in direct control of the warehouses and working practices. These audits enable us to take immediate action and mitigate our risks across our supply chain.

Our risk framework is agreed and reviewed by the Audit committee whilst the Board reviews the effectiveness of these frameworks annually. Any significant matters that arise during the year outside the review period is reported to the Board.

**TYPES OF MODERN SLAVERY THAT POSES A RISK TO THE GROUP**



**CHILD LABOUR**









**FORCED SERVITUDE**

Fraser's has identified that the following Groups are more vulnerable to the risks of modern slavery in its most common forms:

- Migrant workers
- Young and child workers
- Agency, contract and temporary workers especially those subject to outsourced HR functions
- Female workers
- Minority Groups and refugees

Given the size of the Group as well as the geography over which the Group operates it is understandable that we are exposed to numerous risks.

Many of the risks we face are embedded in our:

-  Supply chains
-  Outsourced activities
-  Cleaning and catering suppliers
-  Corporate hospitality
-  Agency recruitment partners
-  General recruitment activities



**POLICIES & CONTROLS**

We regularly review our policies and policy framework with the aim of ensuring they remain robust and effective. Our policies are designed to help detect and prevent modern slavery and human trafficking within the organisation and currently cover the following areas:

-  Procurement and Manufacturing
-  Health and Safety
-  Recruitment and Employment
-  Whistleblowing
-  Anti-Bribery and Corruption
-  Risk Assessment & Management
-  Governance

The following departments are responsible for the day to day implementation of our policies and procedures which support us in meeting our human rights responsibilities:

**HUMAN RESOURCES**

People and Employment including contracting with third- party agencies

**COMPANY SECRETARIAT**

Whistleblowing and Governance Framework

**GROUP LEGAL**

Contractual terms and conditions

**COMMERCIAL**

Procurement and Supply Chain Management

**KPIS**

We continue to develop the framework and implementation of appropriate KPIs to ensure we continue to meet and exceed our goals and commitments.

**DUE DILIGENCE / TRANSPARENCY**

Modern slavery is a complex issue and takes many forms including: child slavery, human trafficking, forced labour, bonded labour, forced marriage and descent-based slavery. Many of these forms of modern slavery have the potential to impact the group. It is this potential impact that makes it a priority for the Group that we trade ethically and as such, we are committed to ensuring that we implement all the requirements of the Act and make every effort to safeguard the wellbeing of our people and that of the most vulnerable in society.

As part of our on-going drive to identify and mitigate the risks posed by modern slavery, we will continue to enhance our due diligence processes. We conduct due diligence within our supply chains and operations to understand where our risks lie, whether we have the appropriate controls in place and whether there have been instances of modern slavery issues detected within our organisation and supply chain.

The Group uses products and services which often have very complex supply chains and associated risks. We have taken steps to identify areas where there are risks of modern slavery occurring within our business and supply chains and we are working to eliminate that possibility.

We have embedded due diligence checks in our onboarding process for our suppliers as well as undertaking thorough background checks for our manufacturers and continuously monitor third-party actors in our supply chain.

The ethical audits our third-party suppliers and warehouses in high risk areas are subject to ensure that we are also addressing the risks in the regions where they operate including risks such as forced or excessive overtime, accommodation tied to employment and no access to grievance mechanisms within their work environment.

## KEY INDICATORS OF MODERN SLAVERY

We have identified the following as key indicators of modern slavery and have highlighted these to the workforce, so they can identify possible signs of modern slavery.

- Agency workers being asked to pay fees to obtain work
- Workers not having access to or control over their immigration or ID documents
- Salaries being paid into accounts not in the name of colleagues
- Colleagues living in overcrowded conditions
- Obvious signs of mental distress or fear of physical abuse
- Restricted movement at work or in an accommodation
- Obvious signs of physical abuse

We have made all colleagues aware that agency workers should **NOT** be required to pay **recruitment fees or deposits** for any work offered by the Group. We have also highlighted to our agency partners that deceptive recruitment practices will not be tolerated and may result in action being taken against them. Our partners are also aware that cash-in-hand, withheld or delayed payments are not acceptable, and our colleagues are encouraged to report any such instances of this practice.

If members of staff are subject to or have knowledge of a colleague having restricted movement at work or in an accommodation they are encouraged to speak to a senior member of staff or make a confidential report using our whistleblowing procedures.

We also encourage our employees to report any harsh or inhumane treatment they may have experienced or have knowledge of, occurrences of worker documentation being withheld as well as any instance of poor working conditions through our 'your company, your voice' initiative.

## RECRUITMENT & ONBOARDING

We aim to attract a diverse workforce who are passionate about what they do and reflect our values. We recruit, promote and reward people on merit, and do our best to promote equality, diversity and inclusion in all our working practices.

Although we directly employ many of our colleagues, we on occasion have to partner with agencies to fill the gaps that arise. We are clear with our recruitment partners about our policies which set expectations of behaviour and give clear paths of escalation and whistleblowing (for employees, contractors and suppliers).

We ensure we only partner with reputable agencies and we do not use nor permit recruitment fees. We always operate in a legal and ethical manner with our recruitment practices and ensure;

- Legal right to work within the given country is checked
- Suitable references are received
- Suitable identity documentation is available to the candidate (i.e. they have access to their passport or other similar legal document in their name). We do this by requesting that these documents are presented by the candidate
- Identity confirmation checks are also be carried out during the recruitment process.

Our full Recruitment Policy is available internally to our colleagues.

Our Equality, Diversity and Inclusion policy also sets out our commitment not to discriminate on the basis of a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership and national or ethnic origin. To make sure we meet this commitment, we ask candidates to voluntarily complete a (confidential) recruitment monitoring questionnaire when they apply for a vacancy. The information provided is separated from the application, so those involved in selection do not have access to it.

## TRAINING

We have a range of tools in place including videos and literature to educate colleagues about their rights and a number of communication channels, including an internal telephone hotline and comments boxes on site, for reporting any feedback or concerns. Anyone making a report can remain anonymous if they choose. We also continue to review and develop our colleague training, monitoring processes and evaluation of outcomes, and work with our employment agencies and other relevant bodies, including the Gangmasters and Labour Abuse Authority and the police, to support our training and knowledge.



As part of our elevation strategy, the Group has refreshed its training initiatives including our induction training which covers our expectations for colleague behaviour, colleague rights, what colleagues can expect of us as well as avenues they can utilise to provide feedback on the Group's employment practices. It also introduces new colleagues to essential policies such as



Equality, Diversity and Inclusion



Whistleblowing



Anti-Bullying, Harassment and Victimisation



Anti-Bribery and Corruption

All other Policies are available to colleagues on the intranet.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

To assess the effectiveness of the policies and controls we have in place, we will consider:

- the number of reports received from colleagues, the public, or law enforcement agencies which have identified modern slavery practices; and
- the awareness and understanding of modern slavery across the business, its supply chain and the distributor network.

The Group is not aware of any human rights breaches in the 21/22 financial year.

## ONGOING COMMITMENTS AND FUTURE COMMITMENTS

The Group commits to:

- continue to raise awareness around modern slavery and forced labour
- continue to promote transparent recruitment practices including:
  - ensuring all payments are made to bank accounts belonging to colleagues
  - developing and maintaining more robust recruitment policies
  - ensuring contracts are in place for all workers
- Continued ethical audits for our partners and risk assessments of our UK operations

We will also assess ways in which to enhance our supply chain transparency including:

- Supply chain mapping
- Undertaking a GAP analysis of our supplier contracts to ensure the terms reflect the requirements of the Act as well as the Group's commitments around Modern Slavery
- Strengthening our supplier governance

The Group will also assess the value of a partnership with anti-slavery organisations that will be able to provide expert advice and guidance on how best to protect our workforce and ensure the policies and procedures we have in place are robust enough.

We will also look at additional training initiatives to enhance training and awareness for managers and other colleagues who are directly involved in supply chain management and HR roles.

The Group also commits to having a Board appointed person who will be responsible for Modern Slavery.

## RESPONSIBILITY & ACCOUNTABILITY

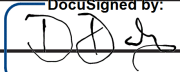
We recognise that everyone in our business and supply chains has a duty to be alert to the risks that modern slavery and human trafficking present. We encourage staff to report any concerns and are given the support to do so, and the Board and the Executive team are expected to respond to those concerns accordingly.

Our Executive Team takes responsibility for ensuring adequate resources are in place to ensure compliance with the requirements of the Act.

The Company Secretariat team is responsible for gathering the necessary information to draft the statement and present it to the Board for approval prior to its publication.

This statement was approved by the Board of Directors on 2nd December, 2022.

As part of the Group's commitment to transparency, this statement will also be published on the **modernslaveryregistry.org**

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**David Daly**

Chairman of the Board  
on behalf of the Board of Frasers Group Plc.