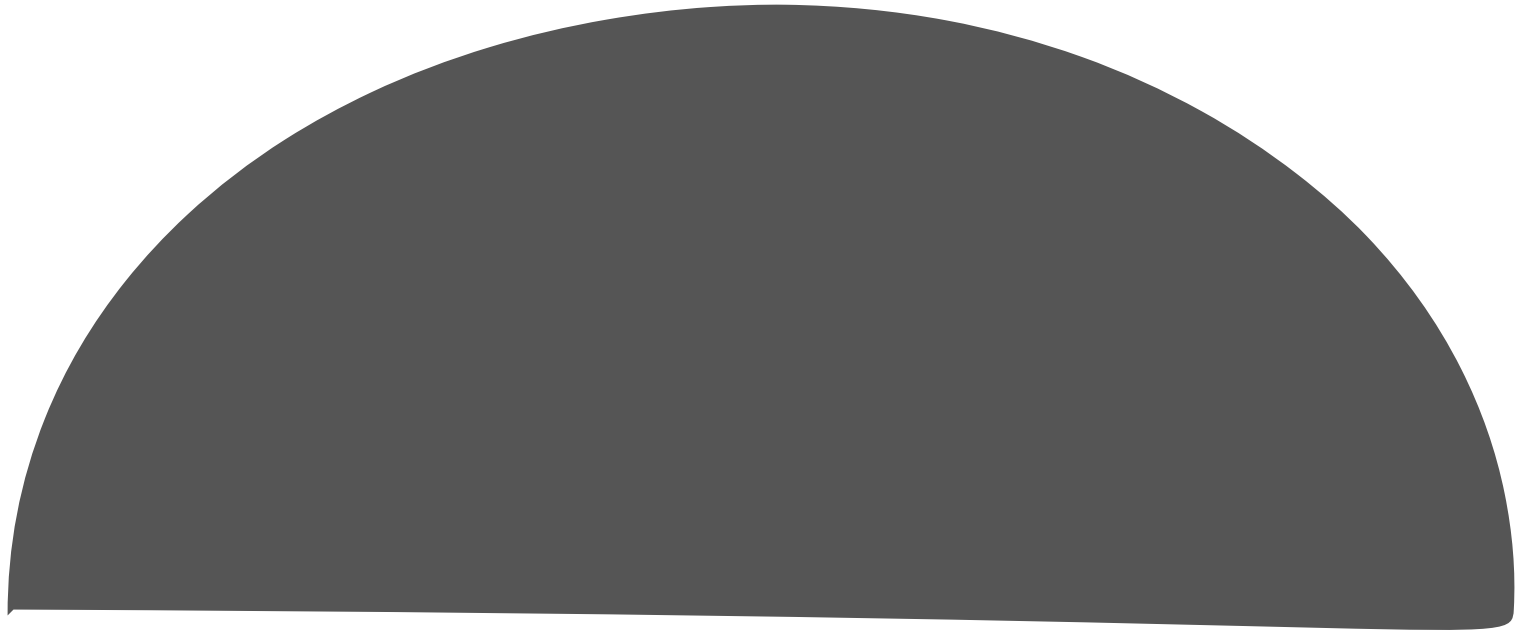


OLIVER BONAS

Modern Slavery & Human Rights Risks Report 2024





Our continued focus during 2023 has been on our own brand products.

Our Commitment

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People are at the heart of OB, our team members, our customers and the people all around the world, who make the fantastic products we sell. We believe in fair workplaces, where workers rights are respected and protected.

We are committed to driving positive change, for the welfare of people and the planet. To finding and preventing exploitation of human rights, including modern slavery, and to understanding the risks that may present.

We do this by:

- Outlining our requirements and expectations to new suppliers before we begin trading with them
- Working with our suppliers to map our supply chains, improve visibility of workers involved in making our products and trying to better understand our risks
- Developing effective monitoring programs and remedial plans to prevent, assess & eliminate risks
- Ensuring our policies, procedures and training are regularly reviewed and updated to ensure our team members are using responsible purchasing practices
- Training hiring managers and supervisors on indicators of modern slavery & how to raise concern

Our Approach & Governance

The responsibility for human rights due diligence, including modern slavery due diligence, sits with our People Director, Buying and Merchandising Director, Chief Operating Officer and the Leadership Team. The work is supported by relevant Heads of Department and teams.

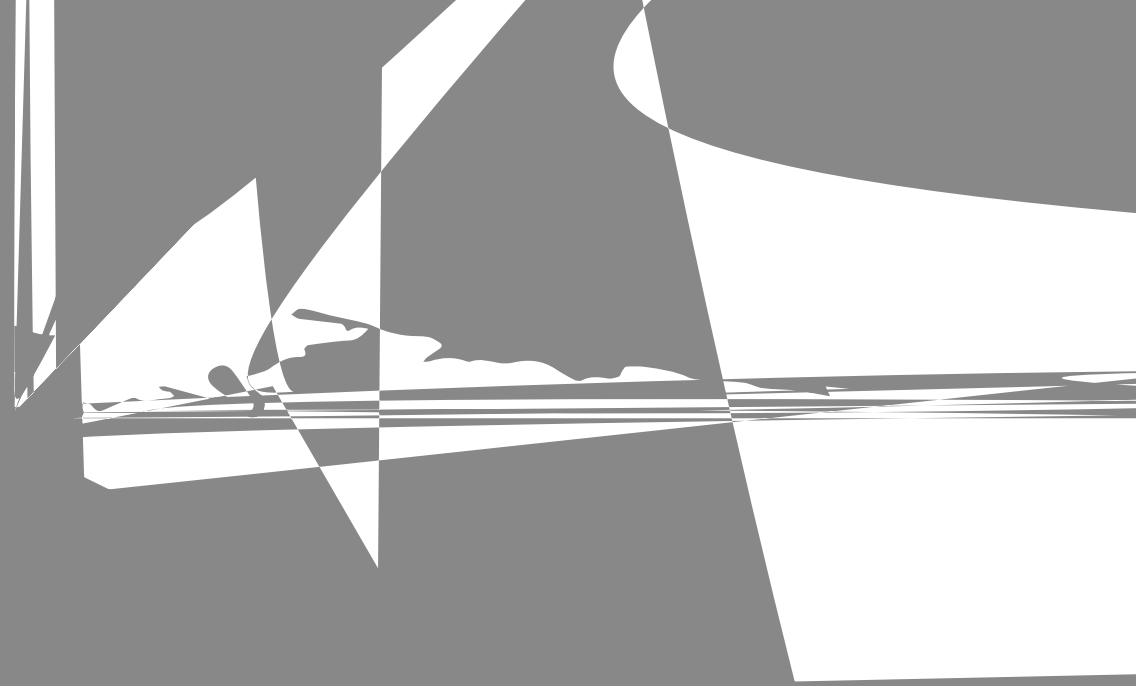
We have a formal escalation process in place to report serious issues affecting working conditions within our own operations and supply chain. When a high risk issue is identified through our factory monitoring program, a notification is sent out to the relevant Buyer/s and Tech/QA, Heads of Ethical Sourcing & Sustainability, Buying and the Buying and Merchandising Director. A discussion will then take place to outline the situation and agree an action plan ahead of communication with the supplier or external partner, depending on the situation. A remedial plan with timescales will be agreed with the supplier as well as the opportunity for them to request support with implementation.

Our ethical sourcing program focuses on our impact on people and planet and helps us understand our supply chain risks and our responsibility to act with due diligence for the protection of workers across our supply chains and operations. Ethical sourcing is integral to how we do business at Oliver Bonas and it's monitoring and due diligence is a shared responsibility across many different teams and departments. Our Head of Ethical Sourcing and Sustainability oversees the governance of our ethical trade program across all departments, including Ethical Trade, People (HR), Communications, Buying, Merchandising, Design, Technical and Quality.

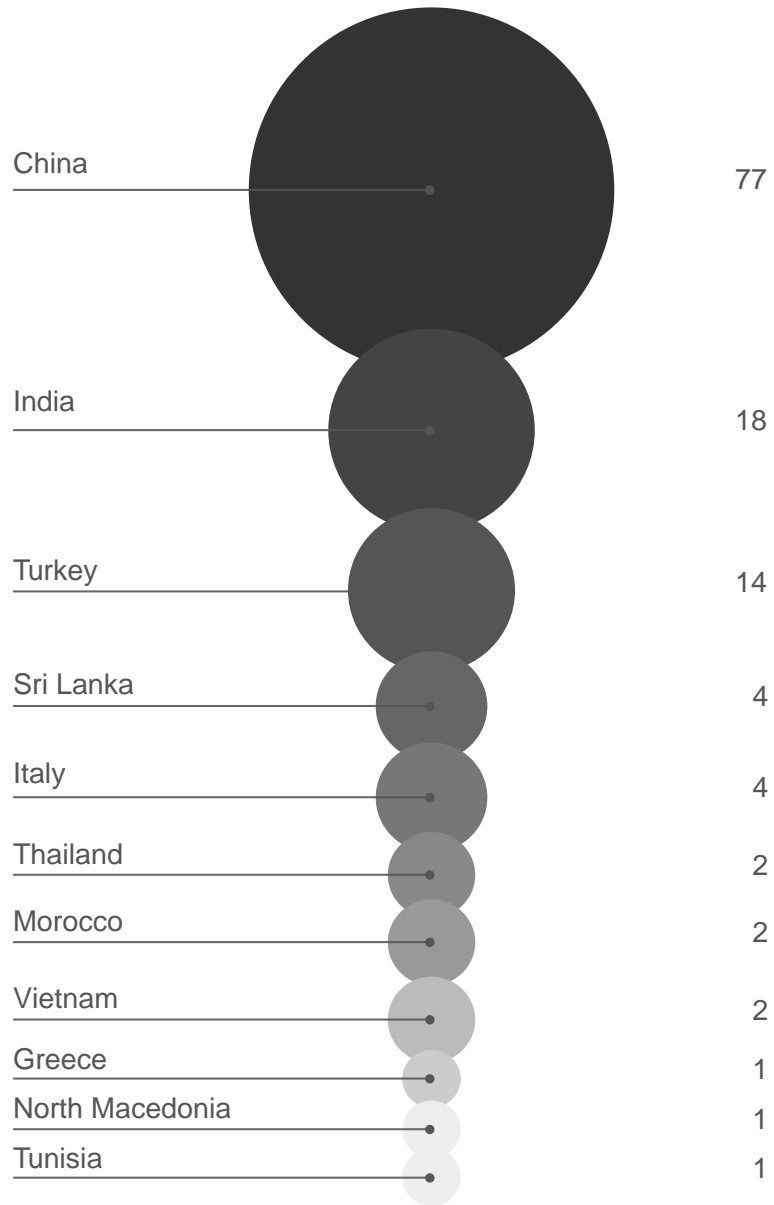
Our Own Operations

Oliver Bonas operates across three main business areas: our 85 stores; three warehouses; and Support Office. Our Support Office and two of our warehouses are based in Chessington, Surrey, we also have one warehouse in Andover, Hampshire. Our current headcount is just over 1600 perma-

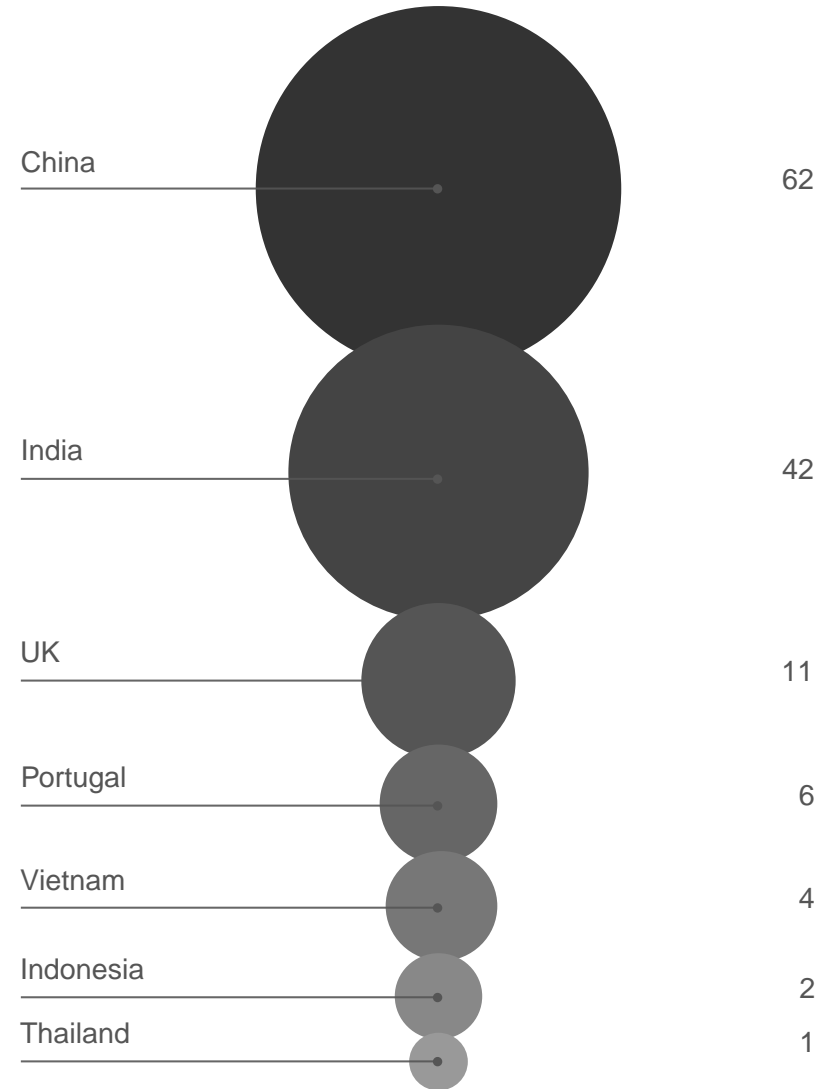
Our Supply Chain



Fashion Country Divide



Home and Gift Country Divide



Monitoring and Auditing

At each stage of our supply chain, there are risks which need to be managed. All factories producing Oliver Bonas products are subject to ethical trade assessments through either regular audits delivered by independent third parties, visits by the Oliver Bonas team or smaller more artisanal producers, via self assessment and direct engagement. Audits must cover the ETI base code principles and local law requirements.

Where our suppliers have already had an ethical audit completed at the request of another retailer, we are happy to use this to avoid the suppliers having to duplicate time and spend, if it meets our minimum requirements (reputable auditing company, approved framework, covers all the clauses

RISK

Freedom of association and collective bargaining

ETI base code clause 2 and ILO conventions C87, C98, C135, R143, C154

Employment is freely chosen, no forced labour

ETI base code clause 1 and ILO conventions C29, C105

No discrimination is practiced

ETI base code clause 7 and ILO conventions C100, C111 and R111

Working hours are not excessive

ETI base code clause 6 and ILO conventions C1, C30, C106, C14

Living wages are paid

ETI base code clause 5 and ILO conventions C131, C95

WHERE IS RISK MORE LIKELY (LOCATION /WHERE IN VALUE CHAIN)

In our own operations and in our manufacturing supply chains. Especially China, India and Turkey.

Vulnerable groups include union members and representatives, labour activists, students, migrant and temporary workers.

In our own operations and in our supply chains, especially beyond tier one, in key sourcing countries China, India and Turkey. In our operations in the UK.

Vulnerable groups include home workers, migrant workers, young workers, female workers, cotton pickers, refugees, minority groups and agency/temporary workers.

In our supply chains, especially in India.

Vulnerable groups include ethnic minorities or indigenous people, migrant workers,

Transparency

Working collaboratively is ingrained in how we operate, both at Oliver Bonas and with our suppliers. By working in partnership with other like-minded organisations we aim to achieve a greater impact. To enable industry collaboration and drive continuous improvements in our supply chains, we have published our Tier 1 factory list on our website since December 2022.

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Our Collaboration

As part of our commitment to strive to do business in a way that has integrity, is ethical and does not negatively impact others or the environment, we believe that organisations cannot achieve their goals alone. We are committed to working with other like-minded organisations to achieve greater scale, change and impact.

We continue to be full members of the Ethical Trading Initiative (ETI) which is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe.

We are an active member, working closely with other members on projects aimed at tackling key ethical trade issues and high-risk areas.



We are also members of Sedex, a collaborative platform for sharing responsible sourcing data on supply chains. We joined with the aim to reduce the administrative burden on our suppliers and after some initial research found Sedex was the most used platform within our supply base. The system allows us to view ethical audits, track corrective action progress and verification status, risk assess supplier self-assessment questionnaires using sophisticated risk model data and view workforce details such as employment type and gender breakdowns.



We work collaboratively with a range of other retailers and brands through the British Retail Consortium (BRC). We are an active supporter of the BRC Climate Roadmap to Net Zero and attend multiple working groups including one centred around ethical labour.

In addition to these formal industry initiatives, we also meet regularly with a range of peer retailers and brands in an informal setting, to discuss shared challenges and good practice on ethical sourcing and sustainability, and on a more direct basis should a query or concern arise on a shared supplier. By working collaboratively and transparently, we increase our leverage for change and share insight with our peers.



Training

We run an ethical sourcing training programme for all our team members, regardless of their position at OB. All current employees will read our Introduction to Ethical Trade training pack available through our online learning platform, Looop, which is included in our new employee induction process. In summer 2023 our in house ethical sourcing team delivered refresher training to all product team members covering worker welfare, human rights risks in our supply chain, what to look for when visiting factories and their responsibilities, as supply chain partners, to uphold responsible purchasing practices.

Internal Engagement

Ethical sourcing is not something for the Ethical Sourcing team alone. We continue to embed ethical sourcing and sustainability in how we do business via regular meetings, updates and training. We are committed to being a responsible business and see this as a shared responsibility.

Monitoring Process

At Oliver Bonas we are eager to continuously enhance and extend our ethical trading approach. A crucial part of that is ensuring we are working with the relevant stakeholders to tackle the global issue of modern slavery. Our modern slavery processes will continue to develop as we learn more from suppliers, other retailers, NGOs and multi-stakeholder initiatives such as the ETI. In order to assess the effectiveness of the actions we are taking; progress is measured using the following key performance indicators (KPIs)

KPIs*	ACHIEVED IN 2021	ACHIEVED IN 2022	2023 PROGRESS
Any Forced Labour non-compliances found in audits and actions taken in response	<p>Extended audit program to begin incorporating medium risk and tier 2 facilities</p> <p>Introduced in-depth self-assessment tool for sites where the standard audit methodology is not appropriate</p> <p>No forced labour non-compliances identified in 2021</p>	<p>Continued auditing of high and medium risk suppliers</p> <p>No identified non-compliances on forced labour in 2022</p>	<p>Continued auditing of tier 1 and 2 factories.</p> <p>No identified non-compliances on forced labour in 2023</p>
Number of suppliers signed up to our Supplier Code of Conduct	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded
Number of relevant staff trained	All new employees trained via Loop learning portal. All training resources are mandatory for new joiners	We continue to train new employees via Loop, our online learning portal.	<p>We continue to train new employees via Loop, our online learning portal.</p> <p>We delivered refresher training on Ethical Sourcing and Responsible Purchasing Practices for product team members during summer 2023. This included a module on Modern Slavery</p>
Number of factories audited	<p>During 2021 we changed our risk model and tier definitions. We are now working towards all Tier 1 and 2 sites having some form of social assessment (audit, visit or in-depth self-assessment)</p> <p>FASHION 100 Tier 1 sites 98 Assessed in 2020/21 2 sites awaiting assessment</p> <p>HOME & GIFT 112 Tier 1 sites 90 Assessed in 2020/21 22 sites awaiting assessment</p>	<p>FASHION 106 Tier 1 sites 102 Assessed in 2021/22 4 sites awaiting assessment</p> <p>HOME & GIFT 122 Tier 1 sites 123 Assessed in 2021/22 10 sites awaiting assessment</p>	<p>FASHION 128 Tier 1 sites 126 M 2 sites awaiting assessment 128 Tier 9sites</p>
Steps taken to educate and train our high-risk suppliers	The pandemic continued to impact on our supply chain this year. H&S and wages are still areas of focus for us. New online resources developed in 2021 designed to support and educate supplier.	Our new supplier portal contains new policies, guidance and tool-kits on a number of sensitive and complex worker issues. Suppliers can access resources and links to further guidance online. This includes a dedicated Modern Slavery Policy. Our ethical sourcing team make contact with any high risk suppliers to establish a plan	