



MODERN SLAVERY STATEMENT

FINANCIAL YEAR 2020/2021

FOREWORD

This is the first Modern Slavery Statement I have signed in my new role as CEO, and I'm proud of the progress we have made over the last year. Despite the continued impact of the COVID-19 pandemic and the global landscape we find ourselves in, we have continued to prioritise our due diligence efforts and raising awareness of the risks around modern slavery and human trafficking within our global teams.

As the business continues to grow at pace, it remains fundamental to ensure that we trade ethically and source responsibly. The Board and Gymshark Leadership Team are committed to embedding robust practices to prevent Modern Slavery and Human Trafficking from happening within our operations and our supply chains.

This is the fourth annual statement Gymshark has made in accordance with the Modern Slavery Act 2015 and the California Transparency in Supply Chains Act 2010. The statement covers the period from 1 August 2020 to 31 July 2021.

Ben Francis
CEO

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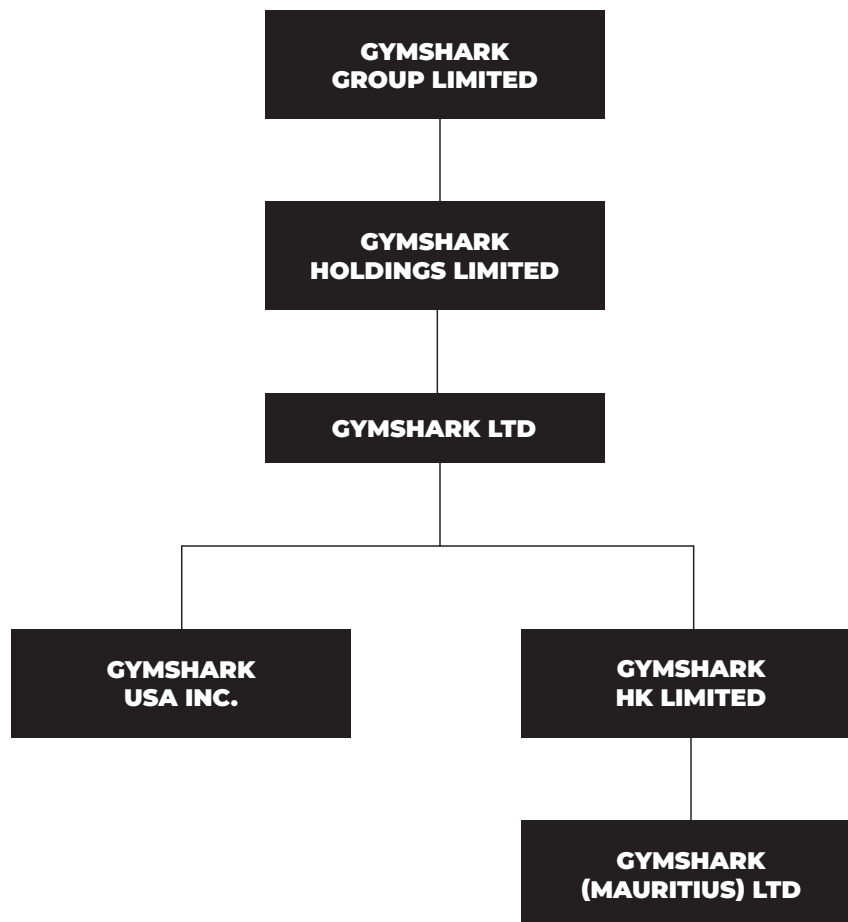
OUR ORGANISATION'S STRUCTURE AND SUPPLY CHAINS

ABOUT US

Gymshark is a conditioning brand, dedicated to creating functional training apparel, designing innovative performance technologies and building passionate, empowered communities.

Formed in 2012 in a garage in Birmingham, UK, Gymshark has emerged as a leading brand in our industry, with a worldwide family from over 180 countries.

We exist to unite the conditioning community.



Gymshark Group Limited is the parent company of the group.

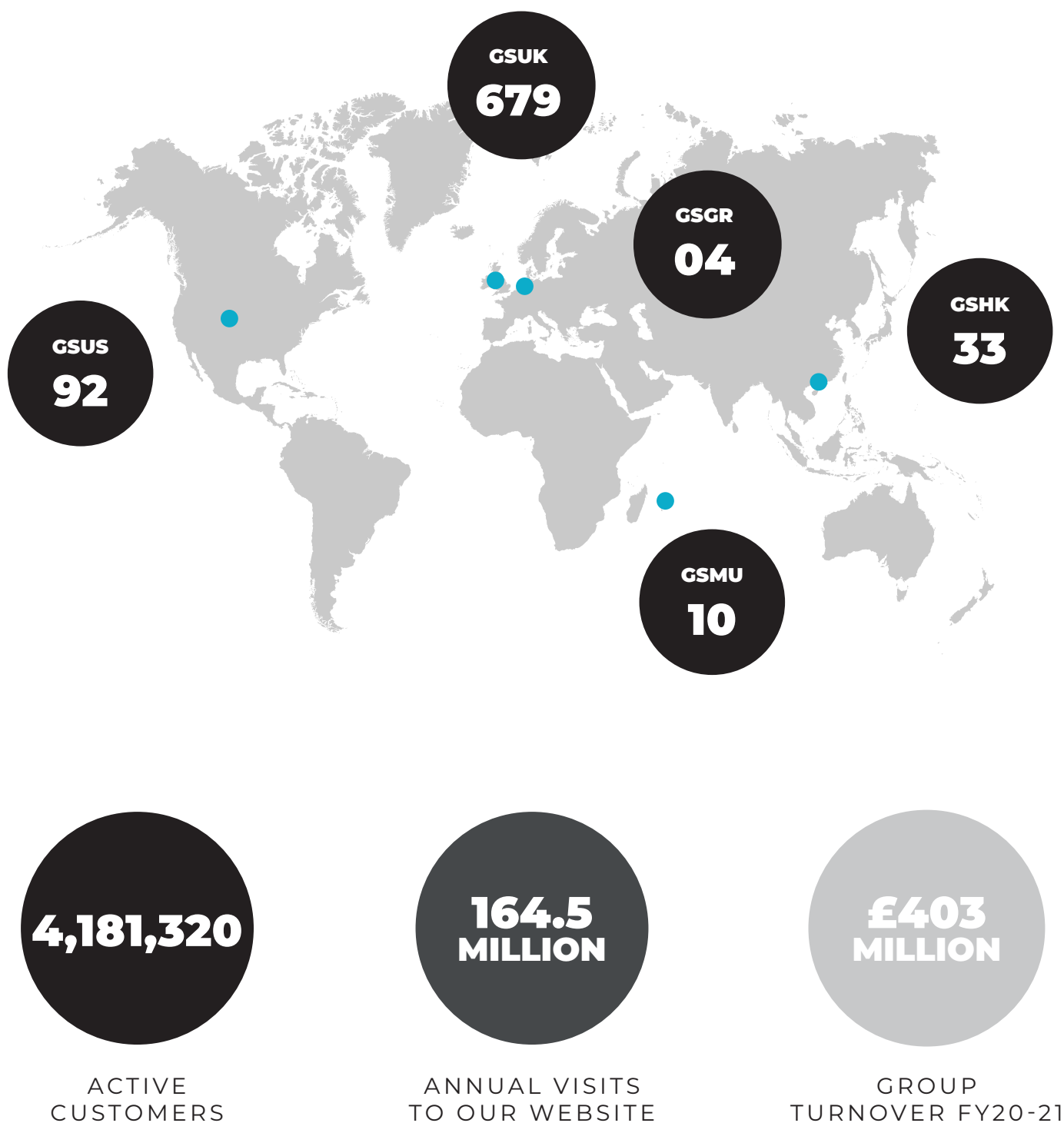
Gymshark Ltd's principal activity is the design, manufacture and global online sale of branded fitness apparel and accessories. Its business is based in the UK with headquarters in Solihull and a PR presence in London. We have a remote team in Germany who are responsible for the trading of the online store in Germany.

Gymshark USA Inc based in Denver, Colorado was incorporated in July 2019 transitioning from the provision of online support to operating as a fully trading entity in North America in its own right with effect from the summer of 2021.

Gymshark HK Limited and **Gymshark (Mauritius) Ltd** are sourcing offices based in Kowloon Bay in Hong Kong and Cyber City, Mauritius respectively. They act as a direct contact into the Group's product supply base. The Hong Kong office deals with suppliers based in the Far East, Vietnam, Cambodia, Taiwan, the Philippines, and China. The Mauritius office deals with Mauritius, Sri Lanka, Bangladesh, Turkey, Jordan, Italy, and Madagascar.

KEY STATS:

Employees at the end of July 2021:



KEY STATS:

Gymshark products are designed in-house at our head office, except for a small proportion of accessories and trims which are designed and sourced through agents. All our products are manufactured by our trusted supply partners.

Our product supply chain as of 31 July 2021:

**TIER
1**

Suppliers that manufacture our apparel and accessories. Accessories includes socks, bags, headwear, and equipment. Subcontractors of outsourced processes are included in tier 1.

**TIER
2**

Suppliers that make trims and fabric which are incorporated into the products manufactured by tier 1 suppliers

**TIER
3**

Suppliers that produce the raw materials we use in our apparel and accessories

LIVE FACTORY NUMBERS:

TIER 1 (GARMENT & ACCESSORIES)



TIER 2 (FABRIC & TRIMS)

TOTAL
WORKERS IN
SUPPLY CHAIN:

100,688

MALE:

41,943

FEMALE:

58,745

LOGISTICS

We are now operating out of 5 global regions in collaboration with our 2 chosen logistics partners; Bleckmann and Radial. As our brand grew and customer base extended globally, we identified the need to set up localised Distribution Centres (DC's) to reduce airfreight and offer a better customer experience.

BLECKMANN

Bleckmann were our first supply chain logistics partner, commencing a relationship with us in August 2017. The Gymshark People Team meet regularly with the Bleckmann HR Personnel to discuss planning as well as any challenges around labour welfare and recruitment.

UK – In February 2021, we moved our DC from Swindon to Lutterworth, due to outgrowing our original site which we had occupied since 2017.

Belgium – Our Rieme DC up until the USA expansion had been our main distributor to our global customer base. The automated site will continue to service our European and Rest of World customer base going forwards.

We have also optimised the use of 2 pop up DC's in Desteldonk, Ghent and Grobbendonk, Antwerp to serve our German customers during peak periods.

Australia – in April 2021 we went live with our first DC out of Melbourne in collaboration with a subsidiary of Bleckmann's long-term logistics partner Yang Kee Logistics.

RADIAL

Canada – In August 2019, we opened our first North American DC in Mississauga, Ontario to reduce delivery windows and improve customer experience for our North American community.

USA – In July 2021, we opened 2 DC's in the United States with our partner Radial, the first in Rialto, California and the second in Groveport, Ohio.

In FY20-21 we conducted assessments at 2 out of the 5 DC's as part of the Gymshark Shared Fitness Programme. In the next year, we intend for all DC's to fall into the scope of the Shared Fitness Programme (see below).

FREIGHT

Freight has faced unprecedented challenges because of the COVID-19 pandemic. When the Ever Given marine ship blocked traffic in the Suez Canal for almost a week in March 2021, it triggered a surge in freight rates. Demand for container shipping has grown during the pandemic, causing shortages in key sourcing locations adding to the existing backlog at ports due to COVID-19 and which further resulted in stock taking additional time to reach our DC's.

In response, we worked closely with our suppliers and our freight forwarding partners to provide visibility, plan and find proactive solutions to manage the current logistics challenges and lack of origin equipment.

In the next financial year, the Inbound Supply Chain Team intend to develop a report alongside the Sourcing Team's COVID-19 weekly update to the business, to inform on supply chain challenges, anticipate any delays and react accordingly.

OUR NON-PRODUCT SUPPLY CHAIN

Our non-product supply chain is divided into 3 categories:

- 1. Goods not for resale suppliers**
- 2. Internal contractors**
- 3. Outsourcing partners**

Goods Not For Resale suppliers

Products that are purchased for the purpose of running our business operations for example, office furniture, stationery, hardware, software etc are supplied by a number of external suppliers to our various group companies. The business also contracts with third parties for specialist consultancy or professional services where there is not sufficient in-house expertise or where additional capacity is needed.

Internal Contractors

During FY20-21, the Finance Team embedded a new process within the business which all employees must follow before working with contractors providing an array of consultancy services to the Gymshark group. All potential contractors are vetted by the Tax and People Teams against defined criteria to ensure that we are not inadvertently engaging with 'disguised employees'. This process was developed further to ensure that all transactions are 'arm's length transactions' whereby all employees are required to declare personal links to someone Gymshark conducts or is planning to conduct business with. This applies to employees across all Gymshark's teams and global offices.

Outsourcing Partners

We work closely with a number of key main service providers detailed below for our UK Campus who meet regularly with our Property Team.

SERVICE PROVIDER	SERVICE PROVIDED
First Mile	Waste Disposal
Thomas Franks	Food Contractor
Fidelis	Cleaning Contractor
Oktra	Building Contractor

Our offices in the US, Mauritius and Hong Kong are all serviced offices and no outsourcing arrangements existed as of 31 July 2021.

IMPACT OF COVID-19 ON THE BUSINESS AND SUPPLY CHAIN AND OUR ACTIONS

The last year was an exceptional one. COVID-19 caused unprecedented disruption and changes on a global scale. We had to learn to adapt quickly to the constantly changing situation and protect our colleagues across various offices. Our focus has been to work pragmatically and thoughtfully with our supply chain to overcome the challenges.

In the spirit of transparency, we have added a COVID-19 section to our modern slavery statement, which gives an overview of our actions during the pandemic. Although not mandatory, we believe it is necessary to update our community about our actions.

We prioritised safety over revenue and did everything we could to maintain normal business and support both the staff and the wider Gymshark community, to this effect.

We did not take up the UK Government's Coronavirus Job Retention Scheme (furlough scheme) in the UK or any such scheme across our office locations, nor did we use any government loans and continued with our paid internship programme.

- We extended work from home to all office staff globally (UK, Mauritius, US, Hong Kong) and helped employees with the cost of setting up workstations at home.
- In the UK, we followed government legislation and provided necessary PPE free to all employees inc., hand sanitisers, medical masks, gloves etc. In our UK offices we implemented several safety measures including one-way systems, socially distanced meeting rooms, partition screens, controls for the use of toilets, free/subsidised drinks/meals and office spaces and limited capacity to protect those employees attending site to conduct business critical activities that could not be delivered remotely.
- In our live construction sites, from a property and facility perspective, we continued to progress as this was allowed by the government in each of our locations (US & UK).
- Despite our gym closure, we continued to provide fitness to our employees and the Gymshark wider community with online at-home workouts. In addition to home-workouts, we offered stretching and meditation sessions to support the mental wellbeing of our staff.

Our warehouses run by Bleckmann, deemed a critical part of the economy for Belgium, stayed open with the 2-metre social distancing strictly followed with all appropriate PPE provided to workers to keep them safe.

Our DC in Canada implemented automated temperature thermal screenings, adjustments to working layouts and heightened hygiene and sanitation procedures to reduce risk.

Both internally in terms of Gymshark employees but also for the wider Gymshark community, we did everything we could to continue to promote our core brand values around uniting the conditioning community, bringing people together and promoting both physical and mental health.

Throughout COVID-19, Gymshark supported its supply partners by re-phasing orders to accommodate reduced capacities in our factories as a result of social distancing measures and absenteeism caused by the COVID-19 virus.

At no point has Gymshark fined supply partners for late deliveries prior to, or, throughout the COVID-19 pandemic.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Throughout FY20-21, Gymshark rolled out its first Vendor Agreement to our apparel and accessories suppliers which outlines our terms and conditions for the supply of goods. The Framework Agreement details the Vendor's obligations to comply with Modern Slavery and Anti-trafficking laws and the Gymshark Code of Conduct (COC) which is aligned with the FLA (Fair Labor Association) Workplace Code of Conduct and is based on the International Labour Association (ILO) standards. The agreement is signed both by the vendor and Gymshark's Sourcing Director on behalf of Gymshark.

Our COC is translated into 25 different languages identified to be spoken within our supply chain, namely Bengali / Turkish / Arabic / Chinese (Mandarin & traditional) / Creole / Albanian / Cebuano / Dutch / Filipino / French / German / Hindi / Indonesian / Italian / Malagasy / Nepalese / Punjabi (Pakistan) / Sinhalese / Slovenian / Thai / Urdu / Vietnamese / Khmer / English. Modern slavery and human trafficking are covered under the below sections of our Code of Conduct:

- Employment relationship
- No discrimination
- No harassment or abuse

- Work freedom of choice
- No child labour
- Respect Freedom of Association and Collective Bargaining
- Safe workplace
- Working hours and Overtime
- Compensation is fair
- The environment is respected

For next year we will add the requirements of monitoring and a commitment to continuous improvement within our COC.

We have an internal Anti-Slavery and Human Trafficking Policy which is applicable to Gymshark employees, addressing the prevention, detection and reporting of modern slavery in any part of our business or supply chains which is the responsibility of all those working for us or under our control.

We are currently in the process of developing:

- A specific external Modern Slavery Policy to supplement our existing internal policy and Code of Conduct
- Child Labour Policy & remediation process outlining the expectations from both Gymshark and supply chain partners
- A Whistleblowing Policy.

BUSINESS RISKS AND STEPS TAKEN

CHALLENGES AND CONTINUOUS IMPROVEMENT

CHALLENGE	GOODS NOT FOR RESALE (GNFR)
WHY IS THIS A CHALLENGE?	Goods not for resale (e.g. for company's own usage) have decentralised procurement responsibilities. While the supply chains are as complex as product supply chains, there are a limited number of controls which can make it susceptible to risks of modern slavery.
STEPS TAKEN IN FY20-21	We have mapped all our GNFR suppliers.
FY21-22 OPPORTUNITIES COMMITMENTS AND BEYOND	Embed a due-diligence 'know your counter party' process for all existing and future GNFR suppliers.

CHALLENGE	MIGRANT & AGENCY WORKERS
WHY IS THIS A CHALLENGE?	For migrant workers in any sector, the risk of modern slavery is high. Not being able to speak the local language of their destination country and a lack of understanding around their employment rights, can further increase their exposure and potential exploitation by labour recruiters.
STEPS TAKEN IN FY20-21	We are in the process of mapping agency workers throughout our supply chain including distribution centres. We have started to look at challenges suppliers face to recruit a migrant workforce. During factory visits, we arrange for interpreters who are able to speak with migrant workers to understand their challenges.
FY21-22 OPPORTUNITIES COMMITMENTS AND BEYOND	Fully map agency workers throughout our supply chain. Develop policies and procedures which protect and respect agency and migrant workers within our supply chain. Report to the board monthly the number of agency and migrant workers within the supply chain.

CHALLENGE	WOMEN WORKERS
WHY IS THIS A CHALLENGE?	For the large number of women in the supply chain, an absence of childcare facilities and lack of access to formal education may force them to work in an informal economy making them vulnerable to exploitation.
STEPS TAKEN IN FY20-21	We have mapped women working in the supply chain We have identified specific needs (e.g. childcare) in regions we source from and work with factories to address these.
FY21-22 OPPORTUNITIES COMMITMENTS AND BEYOND	Continue to map women workers in the supply chain to the level of management positions and regularly report these figures to the board. We will update our factory list by 31st March 2022 and include the gender split of the workforce.

CHALLENGE	WORKER REPRESENTATION AND LACK OF GRIEVANCE SYSTEMS
WHY IS THIS A CHALLENGE?	Lack of effective dialogue (formal or informal) between workers and management and an absence of grievance mechanisms can lead to an environment where workers are unable to raise concerns and speak out against any exploitation taking place.
STEPS TAKEN IN FY20-21	We have mapped the presence of worker representation and Collective Bargaining Agreements (CBA) in the supply chain .
FY21-22 OPPORTUNITIES COMMITMENTS AND BEYOND	Continue to work with tier 1 production facilities to ensure that there is some level of worker representation. For all tier 1 facilities, we will roll out the Grievance Mechanisms Toolkit and deliver training to build capacity for worker representation.

CHALLENGE	PURCHASING PRACTICES
WHY IS THIS A CHALLENGE?	Unbalanced purchasing practices can prevent supply chain partners from upholding our Code of Conduct and have potential for delayed wages to workers, forced or excessive overtime to complete orders, unauthorised subcontracting and precarious employment.
STEPS TAKEN IN FY20-21	We have delivered Responsible Purchasing Practices (RPP) to key stakeholders identified within the Foundation and Go To Market functions.
FY21-22 OPPORTUNITIES COMMITMENTS AND BEYOND	Roll out a Responsible Purchasing Practices Policy. Develop a cadence for vendor feedback and implement changes following the supplier survey. Continue to provide training on Responsible Purchasing Practices to key stakeholders and deliver refresher training.

DEVELOPING RISKS

Due to reported risks around cotton, we have developed a process to map the chain of custody of our products with the support of our supply chain partners.

In December 2020, the FLA (referenced below) made a statement announcing that no Participating Companies or Suppliers could source from Xinjiang, China.

As evidence we collate the proof of shipments and invoicing to ensure that cotton from Xinjiang is not entering our supply chain. Where documentation cannot be gathered, we procure proof of admissibility and continue to map cotton country of origin during the development of all new Gymshark products.

GYMSHARK'S DUE DILIGENCE PROCESSES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS

SHARED FITNESS PROGRAMME

We have developed a Shared Fitness Programme for product supply chain which seeks to understand and respond to the needs of all parties involved in the supply chain. We recognise manufacturing operations are complex and have their own challenges, rather than adding to existing audit fatigue, we based our approach on dialogue to build mutually beneficial relationships and understand best practices and shared challenges. The intention is to provide an atmosphere of open and productive exchange of ideas and information, focussed on continuous improvement and outcomes that benefit everyone.

We have visited supplier partners providing us with 85% of our product (FY20-21). The visits are conducted by our nominated third party to factories. During visits the consultants will speak directly to workers and management to understand and see both perspectives. Following the visit, we work alongside supply partners/factories to guide and support on agreed resolutions and developments for continuous improvement. We have so far visited supplier partners in Turkey, Cambodia, Bangladesh, China, Jordan, and Belgium. We have also conducted a virtual assessment in Australia to continue our due diligence process despite the challenges around travel during the COVID-19 pandemic.

In our next financial year, we plan to develop an internal escalation procedure to report to key stakeholders in the event of a 'Primary Needs violation'. Gymshark define primary needs as the basic needs that apply to everyone in the supply chain.

DUE DILIGENCE

In our FY19-20 Modern Slavery Statement we committed to including a regional risk assessment in our pre-sourcing due diligence processes. In FY20-21, the Ethical and Sourcing Teams successfully developed country specific factsheets for new sourcing regions that incorporated Human rights risks vs impact reporting into the pre-sourcing risk assessment process. The process has been developed to ensure that a vendor will not proceed to the next stage of onboarding without approval from the Ethical Team.

Our assessment processes do not stop at pre-sourcing and over FY20-21 we have developed our ongoing risk assessment and due diligence efforts in line with our Shared Fitness Programme.

All new suppliers to be onboarded, from manufacturing units to raw materials, undergo an assessment process to ensure they are aligned with our Code of Conduct which covers modern slavery and human trafficking. The tools we use to assess factories range from desk-based research, country risk assessments, third party audits, Social Labour Convergence Project and the Higg FSLM as well as our in-house developed Shared Fitness Programme. The scope of our due diligence programme covers tier 1 (apparel and accessories) and tier 2 (fabrics and trims) and extends to our logistics partners. All suppliers are expected to ensure that the Code of Conduct is upheld in their wider supply chain.

EXIT PROCESS

Gymshark's objective for responsible sourcing is to establish long-term partnerships with our suppliers. However, in the event of the need to exit a supplier/factory we will strive to exit in a gradual, transparent, and responsible manner to ensure minimal disruption to the supplier/factory's business. This process involves collaboration between the vendor and the Sourcing, Legal, Materials, Ethical and Sustainability Teams. In FY20-21, we drafted a responsible exit process which we plan to roll out in the next financial year, and we will share examples in our next statement.

VENDOR FEEDBACK

In the spirit of transparency and to work in true partnership with our supply chain partners, we offered our tier 1 and 2 vendors the opportunity to provide feedback on the below areas in November 2020:



PAYMENTS



PRICES



PLANNING



LEAD TIMES



DEVELOPMENT
PROCESS AND
COMMUNICATION

We have transitioned to a sourcing strategy of direct Vendor relationships and have moved away from agents across our apparel supply chain over the last few years. The survey was a valuable exercise to understand where we perform well and where we can make improvements in our ways of working.

The findings were presented to the Chief Product Officer and Product Directors in December 2020, who agreed there was a need to conduct training with internal teams for them to understand how in their roles they may unknowingly cause challenges further down the supply chain. For more information on the Responsible Purchasing Practices training, see 'capacity building section' below.

We plan to repeat this exercise on an annual basis going forward, and hold ourselves accountable.

PARTNERSHIPS

BITC

In September of 2020, we conducted a Materiality Assessment of the Gymshark business, supported by Business In The Community (BITC). Using data from a cross-section of our key stakeholders including customers, suppliers, athletes and employees we identified the key social and environmental topics that matter most to the business. Across all stakeholders, 'Fair Working Conditions' came out as the key priority and offers the mandate to the Ethical Team at Gymshark to continue their due diligence efforts to reduce risk and the associated impacts within the supply chain.

The Materiality Assessment identified the following 4 pillars as priority which underpin Gymshark's Sustainability Strategy:

1. Fair Working Conditions
2. Climate Action
3. Product Sustainability
4. Diversity, Equity and Inclusion

FLA

To help us in our efforts to be a responsible business and improve our due diligence processes for product suppliers, in 2019 we became a Participating Company of the Fair Labor Association ('FLA'). The FLA visited GSHQ in February 2020 to meet internal stakeholders and kick off our first year of onboarding. We have continued to meet with FLA representatives throughout FY20-21 monthly and report to them on Gymshark's progress against embedding the FLA's Principles of Fair Labor and Responsible Sourcing within the business and wider supply chain. Gymshark will complete an annual evaluation in August 2021 and will receive feedback in Q2 of the next financial year. Moreover, the FLA will schedule 4 Sustainable Compliance Methodology audits (SCI) across a random selection of Gymshark's suppliers in Q2 of FY21-22 to review Gymshark's due diligence efforts and provide accountability to its commitments. We look forward to sharing more with our community regarding the follow up and drive for continuous improvement in our next modern slavery statement.

We appreciate the FLA's guidance and support on our progress so far and will continue to strive for continuous improvement in areas where we can be better.

TRN

In FY20-21 we worked with The Reassurance Network Limited ("TRN"), to carry out Gymshark's Consultations in line with the Shared Fitness Programme. TRN have specialists located in Africa, China, Europe, South Asia and Southeast Asia who have a deep understanding of local contexts and regional specific challenges.

Zero Discharge of Hazardous Chemicals

We are friends of the Zero Discharge of Hazardous Chemicals (ZDHC) group, and share their mission to advance towards no release of hazardous chemicals in the textile supply chain. The vision of the ZDHC is widespread implementation of sustainable chemistry and best practices in the textile, leather and footwear industries to protect consumers, workers and the environment. It is our ongoing, indefinite commitment to implement the ZDHC's Manufacturing Restricted Substances List (MRSL) and the use of the ZDHC Gateway as part of our environmental promise.

Textiles 2030

In 2021 we joined Textiles 2030, a collaborative initiative that aims at driving circular economy in the apparel sector. Together with other brands, for our new products by 2030 we have committed to halve greenhouse gas emissions and reduce the water footprint by 30%.

Textile Exchange

As part of the above commitment, we are working to increase our use of recycled fibres as much as possible. For this reason, we have also joined the Textile Exchange '2025 Recycled Polyester Challenge' where we have committed to increase recycled polyester in our products and reach 100% recycled polyester by 2025.

As part of circular textile targets, we are going to work collaboratively to define good practice design principles, including durability, recyclability, use of recycled content and minimising waste, and set up partnerships to supply and use recycled fibres for new products, accelerating the commercialisation of fibre-to-fibre recycling in the UK.

Sustainable Apparel Coalition

Gymshark Ltd is a member of the Sustainable Apparel Coalition (SAC), which provides us with access to the Higg Index. The Higg Index provides us with a suite of tools to better monitor the social and environmental impacts across our supply chain which we utilise to measure and improve performance in partnership with our Supply Partners and internal teams.

The following tools relate to the 'Fair Working Conditions' pillar of our sustainability strategy however we also use the Higg Facility Environmental Module (FEM) and the Higg Product Modules in our work.

HIGG TOOL	HOW IS IT USED:
HIGG FACILITY SOCIAL & LABOR MODULE (FSLM):	<p>This tool helps to promote safe and fair social and labour conditions for supply chain workers all over the world. This is used to understand hotspots and reduce audit fatigue. Instead of focusing on compliance, time and resources are dedicated to making lasting systemic changes.</p> <p>Gymshark have requested both Tier 1 and Tier 2 manufactures to complete the FSLM self-assessment in 2021, and are aiming to reach 10% adoption across both tiers to reach the foundational requirements of our SAC membership.</p>
HIGG BRAND & RETAIL MODULE (BRM):	<p>Gymshark uses this tool to track, measure, and share our sustainability progress with value chain partners, consumers, investors, and other key stakeholders.</p> <p>We completed the self-assessment for the 2nd time in June 2021 and plan to verify the completed self-assessment by a 3rd party in Q4 2021.</p>

EFFECTIVENESS OF OUR POLICIES AND DUE DILIGENCE

Responsible purchasing practices are fundamental for working in close partnership with our supply partners and to be able to protect the human rights of workers. The sustainability and very success of the textile industry is dependent on identifying the needs and holding all those involved in the purchasing process accountable.

We have delivered training to key stakeholders within the Product, Merchandising and Finance Teams whose roles may touch on the supply chain and are working on a responsible purchasing practice policy and due diligence however this is just the beginning, and we have a long way to go. We need to face into challenges to ensure that our purchasing practices are not contributing to the violation of human rights of our supply chain workers whichever tier they work in.

CASE STUDY: RECRUITMENT FEES

In 2019 we became aware that in one of our Tier 2 fabric mills in Taiwan, workers had paid recruitment fees to secure their employment in the facility. Gymshark strongly promote the Employer Pays Principle (EPP) and throughout the following year we tried to gain visibility and verification that all fees to the recruitment agencies by workers had been back paid as well as a confirmation that the EPP would be followed in the future. Unfortunately, we were not confident in the documents provided nor the commitment from the supplier to the EPP, and as a result it was decided as a business to part ways with the supplier.

TRAINING AND CAPACITY BUILDING

Training and raising awareness internally remains a key priority for us not only on modern slavery but also to fully integrate the FLA principles into our business. To raise awareness, we:

- Introduce all new colleagues to the Fair Working Condition pillar at the time of onboarding
- Require a mandatory online modern slavery training module to be completed by all new starters which helps to develop better understanding of modern slavery and its impacts. Our online module was launched in December 2020 and has been attended by 743 colleagues until July 2021. We have a plan to introduce refresher training in FY21-22. In addition to the training, further resources and contact information for local hotlines - Non Governmental Organisations and government bodies - were shared on the business online learning platform; and
- We delivered Responsible Purchasing Practices training in April 2021 for key stakeholders within the Product, Merchandising and Finance Teams with the support of the Ethical Trading Initiative. The training helped to ensure that teams can support our supply partners in fulfilling all elements of the Code of Conduct through responsible planning and purchasing practices. The training was followed by a pre- and post-questionnaire to monitor the effectiveness. We have a further plan for refresher training in FY21-22.

FUTURE COMMITMENTS

- We will embed a due-diligence process for all existing and future Goods Not For Resale suppliers by July 2022.
- We shall develop a Human Rights Charter which protects and respects workers within our supply chain by March 2022.
- The Head of Sustainability will report on key sustainability metrics to the group's compliance committee and in the operational chiefs' packs on a quarterly basis.
- We will update our factory list and publish this on our website by 31st March 2022 which will include key worker metrics.
- We will continue to work with tier 1 production facilities to ensure that there is some level of worker representation and roll out the Grievance Mechanism toolkit.
- We will continue to provide training on Responsible Purchasing Practices to key stakeholders and measure the impact through a continuous supplier feedback loop.
- We will look for opportunities for Civil Society Organisation engagement and collaboration with multi-stakeholder initiatives.



CEO SIGNATURE

