

boohoo  
group plc

# MODERN SLAVERY STATEMENT

AUGUST 2022

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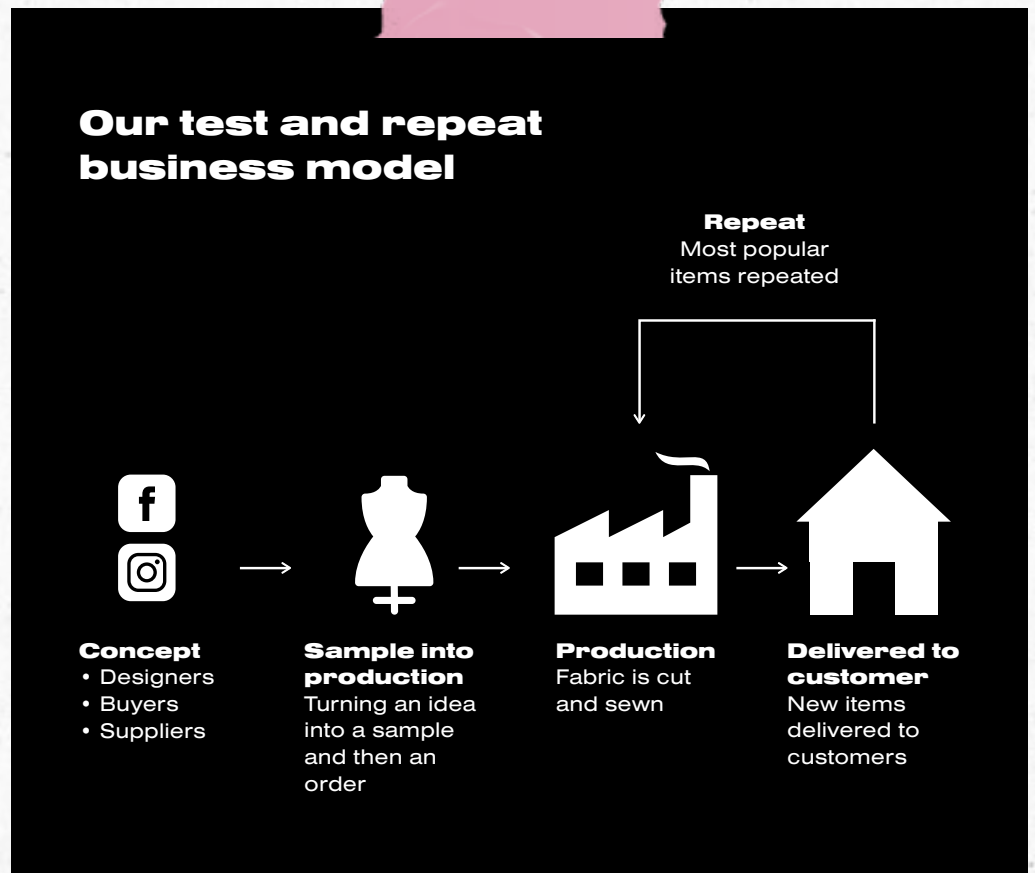
# OVERVIEW

This statement covers the FY22 reporting period from 1 March 2021 until 28 February 2022. It covers our own operations and product supply chains for all of our group brands. It should be read in conjunction with the previous 2021 Modern Slavery statement.

Across the group it is a business priority to uphold the human rights of the people who produce garments for our brands. We recognise the risks of complex global supply chains range from poor labour practices, human rights abuses and modern slavery.

We are committed to protect worker welfare and human rights throughout the Group's global supply chain by implementing processes, procedures and partnerships while managing brand reputational risk to support the Group's "test and repeat" business model.

We have used a (\*) to denote actions undertaken during FY21 (March 2020-February 2021). Where we have reported on actions in FY23 (March 2022 - February 2023) we have used (\*\*).





# FOREWORD



**Fashion supply chains are long, complex, and people are involved at every stage from farm to factory. The fashion industry faces challenges in transparency, health and safety, and human rights risks. Through the implementation of our own processes and key partnerships, we are committed to protecting the welfare of the people throughout the Group's global supply chain, empowering their valuable skills and upholding human rights.**

As a group of 13 brands I completely understand and recognise the importance of us using our size, scale and reach for good. Words can carry a lot of weight but action drives change. Our Agenda for Change Programme focused on driving actionable improvement across corporate governance, purchasing practices and broader support for suppliers across the garment industry. Over the last 18 months my team have worked incredibly hard to act on every one of our Agenda for Change commitments, which I am proud to say have been formally signed off as complete by KPMG.

As planned, we published our Global Factory List, became members of the leading UK auditing and improvement programme Fast Forward, and registered with the Open Apparel Registry (OAR) delivering interactive mapping of our global supply chain. In October 2021, we became a signatory of the International Accord. Closer to home, in Leicester we were proud to demonstrate our commitment to UK manufacturing with the opening of Thurmaston Lane, our "Manufacturing Centre of Excellence" delivering end to end garment production that will champion high workplace standards.

All of this would not have been possible without the combined commitment and dedication of my teams, both here in the UK and globally. But all of this work is only the end of the beginning, we have now embedded new procedures and practices into our daily operations, and we will continue to explore opportunities for partnerships and innovation that result in long term, measurable change. With a global supply base and diversity in the size and maturity of our suppliers, challenges remain. We are committed to continued supplier engagement to further drive improvements in our supply chain.

We have been working with Slave Free Alliance (SFA) for a number of years and this important partnership helps the group consider salient issues relating to human rights and modern slavery. To ensure high standards and transparency, this year's Modern Slavery Statement has been reviewed by SFA. SFA provided feedback that was on-boarded by the Group to improve our reporting."

**John Lyttle**

BOOHOO GROUP CEO



**GROUP BRANDS**  
13



**ACTIVE CUSTOMERS**  
19.9 MILLION



**SALES**  
£1.9 BILLION



**EMPLOYEES**  
5,901



**OFFICES**  
6 COUNTRIES



**DISTRIBUTION CENTRES**  
4 UK SITES - 1 US SITE, Expected  
Launch March 2023

# BUSINESS OVERVIEW

Founded in the heart of Manchester's historic textile district in 2006 by Mahmud Kamani and Carol Kane as boohoo, the Group today is home to a portfolio of innovative fashion brands targeting style and quality-conscious consumers with up-to-date and inspirational fashion. What started as one brand, growing extensively in the UK and internationally, is today a platform of multiple brands serving customers globally, generating sales in excess of £1.9 billion.

The Group's 13 brands design, source, market and sell clothing, shoes, accessories and beauty products targeted at 16 to 45 year-old consumers globally. In 2021/22, the Group had 19.9 million active customers. A test and repeat model is used by the Group. This means that we purchase small runs of new stock and if our customers like them we order more. We employ approximately 5,901<sup>†</sup> people directly across the Group and have offices in Manchester, London, Leicester, California, Miami, Prato, Paris and Istanbul. In July 2022, our Sheffield site became part of our distribution centre portfolio and is now under the ownership and leadership of the Group\*\*. As a result, we now operate four distribution centres: Burnley, Sheffield, Daventry, and Wellingborough.

In the last two years the business has grown its brand portfolio and doubled its workforce. This includes the acquisition of Debenhams which is an online marketplace that has allowed the Group to grow into new categories such as beauty and homeware. The Group also reinstated its wholesaling business, which will see the Group's brands sold via Very, About You, and the Alshaya Group operated under the Debenhams banner.

<sup>†</sup>Headcount as of 31st January 2022



## KEY HIGHLIGHTS

2021/2022

Below are the commitments we set in our 2021 Modern Slavery Statement to drive improvements in worker welfare in our supply chains.

We achieved our key commitments outlined below. In February 2022, KPMG formally signed off on the completion of our Agenda for Change programme: a series of commitments designed to strengthen our corporate governance, purchasing practices and our support for the garment sector more broadly.

### UK SUPPLY CHAIN PROGRAMME

- Continued with our enhanced UK supplier monitoring programme
- Conducted forensic reviews of UK suppliers to ensure business operations are compliant with local legislation\*
- Introduced Fast Forward, as our UK specific auditing methodology
- Opened Thurmaston Lane, our “manufacturing centre of excellence” in Leicester

### GLOBAL TRANSPARENCY

- Completed our international supply chain mapping of tier 1 factories
- Continued our auditing programme in partnership with an expert third party auditing company
- Published our global manufacturing list in September 2021 and republished in December 2021, January 2022, and August 2022\*\*

### STRENGTHENED STANDARDS

- Established responsible purchasing practices throughout the business, supported by a mandatory training programme for the Group’s buying, merchandising and design teams

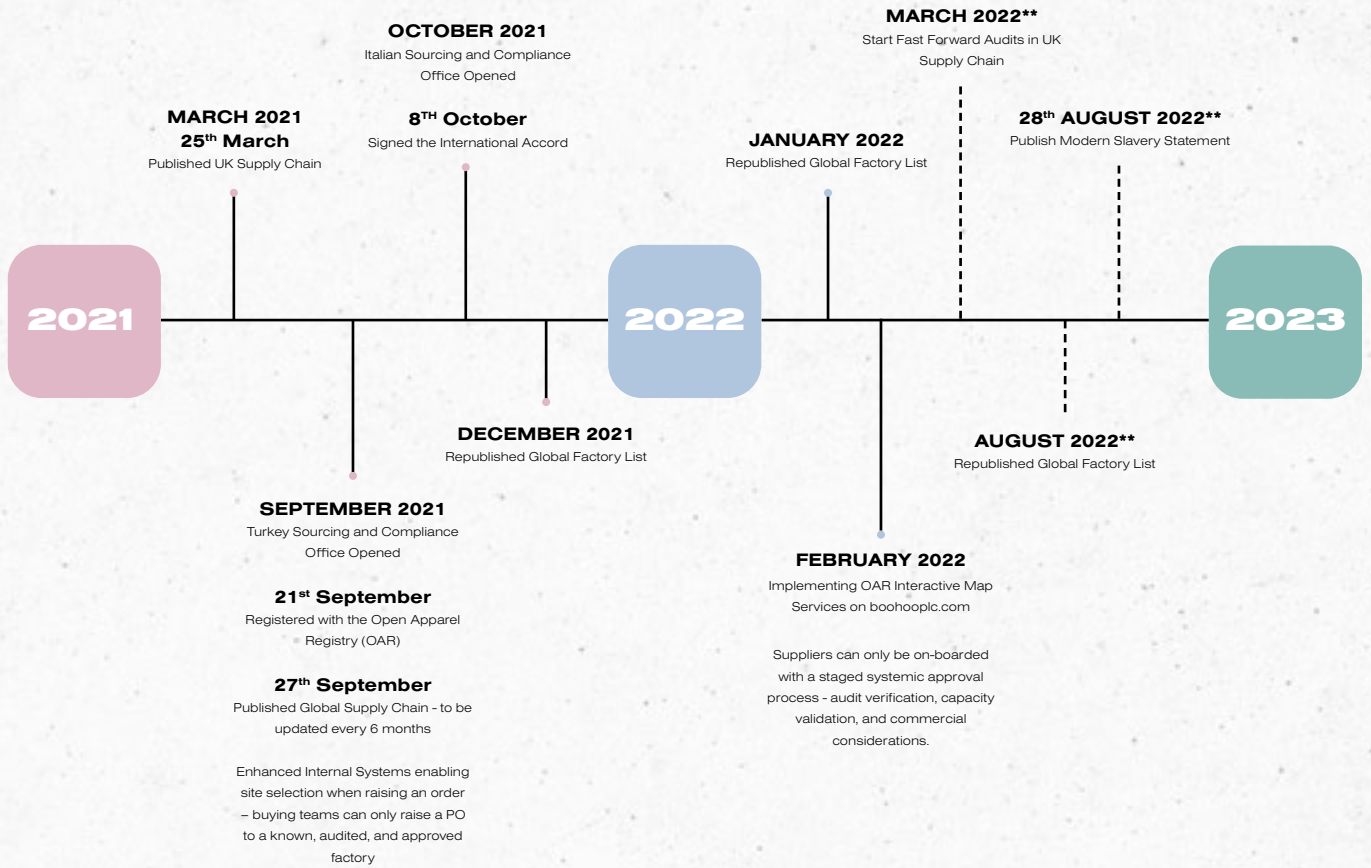
### STRENGTHENED TEAM

- Developed in-country sourcing, compliance and technical teams in Turkey and Italy

### GOVERNANCE

- Embedded a new governance structure to ensure that supply chain compliance is monitored and assessed at the highest decision-making level of the business
- Continued to proactively and regularly update a broad range of stakeholders including the UK Government, local UK MPs, local government, and NGOs

# HIGHLIGHTS

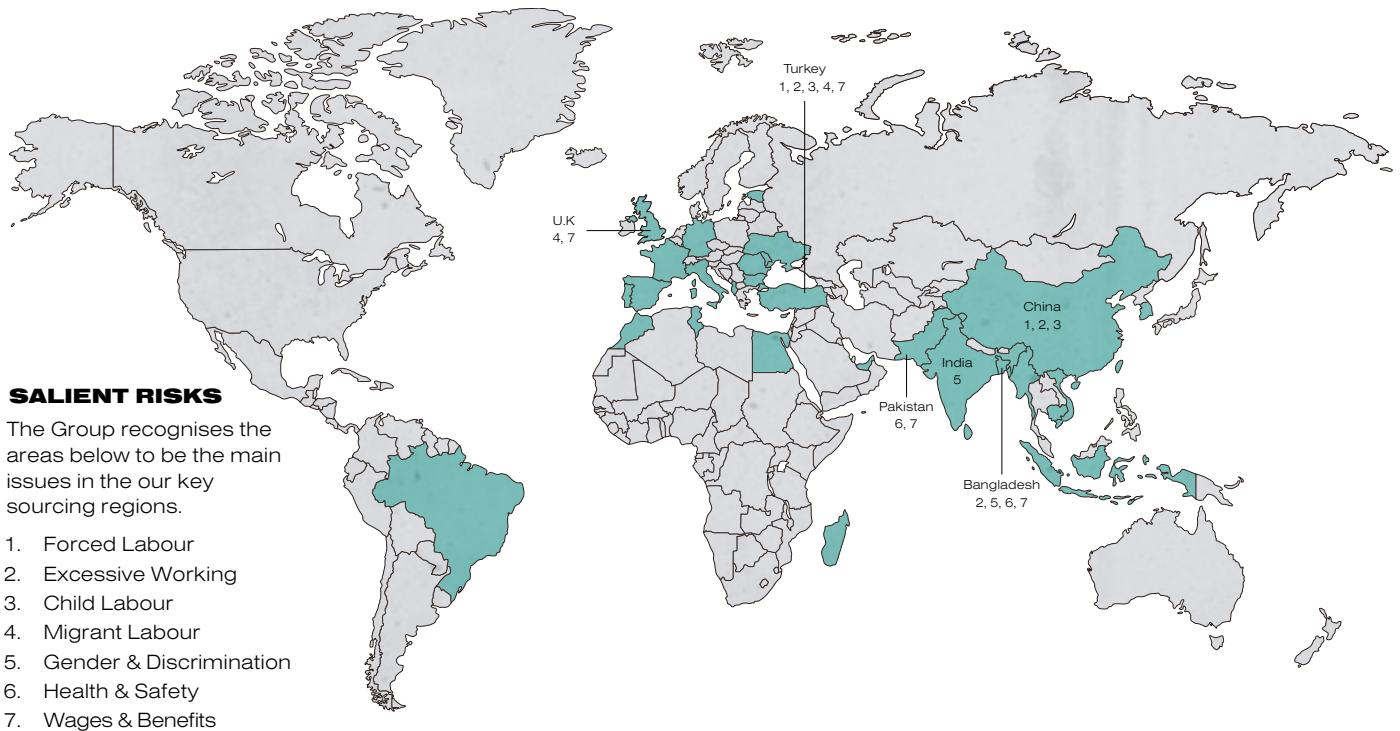


# SUPPLY CHAINS & TRANSPARENCY

**Unlike many other retailers, we source a large proportion of our products from suppliers based in the UK. However, manufacturers in Europe and Asia are also important to us. The factories that we work with range from small family run facilities, to larger higher volume units. We share the majority of these production units with many other high street retailers.**

On 25 March 2021, we published a list of our UK manufacturing sites. We published our Global Factory List on 27 September 2021 and republished the list in December 2021, January 2022 and August 2022\*\*. Our Global Factory List will be republished every 6 months.

We source from 29 countries. Our top six sourcing countries by volume are China, Turkey, UK, India, Bangladesh & Pakistan. We have identified salient risks in our top six sourcing countries as shown on the map below. See page 11 to learn more about how the Group manages risk.



GROUP TIER 1 GLOBAL SUPPLY CHAIN 31 JULY 2022\*\*

Albania	1	Estonia	1	Myanmar	1	Turkey	228
Bangladesh	71	India	157	Pakistan	78	Ukraine	3
Brazil	4	Italy	46	Portugal	9	United Arab Emirates	1
Bulgaria	4	Korea (South)	2	Romania	27	United Kingdom	80
Cambodia	7	Madagascar	2	Spain	7	Vietnam	15
China	487	Mauritius	2	Sri Lanka	10	<b>TOTAL</b>	<b>1286</b>
Cyprus	1	Moldova	6	Taiwan	2		
Egypt	1	Morocco	28	Tunisia	5		



## PRODUCT SUPPLY CHAINS

It is imperative that we work consistently across our sourcing regions and understand the scope of the sites used to create our garments in our product supply chain. We have mapped tier 1 of our global supply chain. The list has been published on our Group website and will be updated every six months.

TIER 1	TIER 2	TIER 3	TIER 4
Final production Finished goods	Processing (Garment related) Value added process	Fabric & Yarn Production	Raw Materials
Cutting	Printing e.g. placement printing	Fabric Mill incl. wet processing e.g. knitting, weaving, all over printing, fabric dyeing	Raw Material Production e.g. cotton farming
Sewing	Dyeing e.g. garment dyeing	Yarn Mill incl. wet processing e.g. spinning, yarn dyeing	
Finishing Including trims & components e.g. pressing, packaging, button hole attachment	Laundry/Washing e.g. garment washing	Fabric Trader	
	Embroidery	Yarn Trader	

**FULLY MAPPED**  
List updated every 6 months

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We have mapped tier 1 of our global supply chain. The list has been published on our Group website and will be updated every six months.

**Partial Mapping Commenced**

In tier 2 mapping has started across the following:

- UK Importer Sites
- UK Printers
- Turkey printers, dyehouses, and embroidery sites

**Partial Mapping Commenced**

In tier 3 mapping has started across the following:

- UK Importer Sites
- Turkey fabric suppliers
- Italy fabric suppliers

**Partial Mapping Commenced**

In tier 4 we have full traceability of the cotton we are growing in Pakistan with CottonConnect. See page 14 for more details.

## GOODS NOT FOR RESALE

The Group obtains goods and services from suppliers for business use. These are known as 'goods and services not for resale' (GNFR). GNFR covers indirect procurement categories such as professional services, travel, technology, software, human resource services, facilities management, logistics, utilities, consumables, marketing services, and capital goods. To ensure suppliers with strong standards and practices are selected, the process of procuring GNFR is overseen by the Group's procurement team, alongside the legal team and relevant business stakeholders. All suppliers are required to complete the Group's due diligence questionnaire that includes a modern slavery section. Responses to the due diligence questionnaire are reviewed by the Group's legal team.

## PRODUCT SUPPLY CHAIN PROGRAMME

In February 2021 the completion of the Groups Agenda for Change programme was formally signed off by KPMG and Sir Brian Leveson. This was the culmination of a significant amount of work to deliver the commitments that the Group made in 2020. A large part of this work focused on monitoring, measuring and ultimately strengthening the global supply chain and increasing transparency.

The work completed over the last two years has created a solid foundation upon which the Group will continue to build. The Group has recruited specialists who fulfill both compliance and sourcing roles in key sourcing countries - UK, Turkey, and Italy.

Our on the ground teams do more than simply ensuring that suppliers meet auditing standards. They build relationships with suppliers and work side by side with them to drive continuous improvement, deliver training, and offer guidance and support.

## PROCESS OVERVIEW



## IMPROVED STANDARDS

With the challenges of a global supply chain, the Group’s Code of Conduct and grading matrix have undergone an internal evaluation to ensure they are fit for purpose. These documents will form part of our strategic approach to respecting human rights across all territories the

Group sources from. The Code of Conduct is issued to all suppliers, and located on the boohoo Supplier Hub. Suppliers are required to submit an acknowledgment that they have read and understood the updated Code of Conduct.

In order for a supplier to be on-boarded by the Group there is a staged approval process. A supplier must provide confirmation of a verified audit. Our internal systems have been updated with a site selection requirement. An order can only be placed with a known, audited and approved supplier.

## POLICIES

Our corporate policies are made available on the Group intranet, boohooforyou. This includes corporate policies on human rights and modern slavery. Publicly disclosed corporate policies will be made available on the Group website in the upcoming year. See list below.

As part of our on going monitoring and due diligence process, we have developed policies for our suppliers to adhere to. Our policies are made available to suppliers through our Supplier Hub. There is also a section on the Group website that will include publicly disclosed supplier policies in the upcoming year. See list below.



## RESPONSIBLE PURCHASING PRACTICES

Our Group responsible purchasing practices (RPP) are a set of principles which we are comfortable operating our business by. The aim of the RPPs is to support our teams in doing the right thing, and ensuring we develop and maintain a commercial and ethically compliant buying and merchandising model.

# GOVERNANCE

The Group has established a new governance framework to provide increased oversight of key risks and strategic matters, with a particular focus on ESG. The aim is to ensure that the Group’s board (the “Board”) is focusing on the most significant strategic matters while still maintaining broad oversight of ESG opportunities and risks. The Executive ESG committee and sub-committees discuss key ESG activities aiming to drive and execute the Group’s sustainability strategy. The Board is cognisant of the need to maintain an appropriate level of oversight of Agenda for Change as it becomes business as usual.

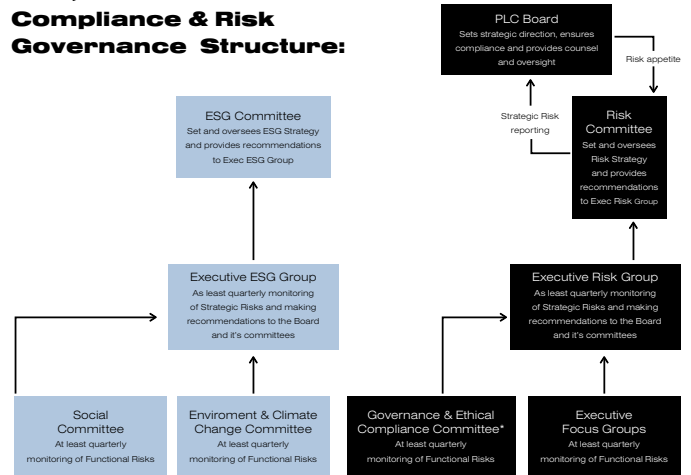
## MANAGING RISK

When KPMG formally signed off on the completion of the Agenda for Change programme, assurance over ethical sourcing risks and controls came under the remit of the Group’s Internal Audit and Risk team. The Internal Audit and Risk team provides assurance to the Risk Committee and the Board on the efficacy of ongoing risk management activities.

Additionally, the Group manages and governs modern slavery related risks via the Governance and Ethical Compliance Committee (GECC). The GECC reports into the Executive Risk Group and Risk Committee to ensure there is continuity of an appropriate level of Board oversight of Agenda for Change assurance and management. The GECC ensures there is robust supply chain management, particularly in relation to the structure and implementation of the Group’s supply chain risk strategy and risk management framework.

At a functional level, each business function is responsible for preparing and maintaining their functional risk registers and with the assistance of the risk team, identifying, assessing, managing and monitoring risks and reviewing emerging risks within their function. Each risk is assigned an owner through which ongoing activities, control measures and any actions related to that risk are updated. The risk management process is underpinned and documented across the group using a leading risk management software system introduced in the last financial year. The software enables the Internal Audit and Risk team, risk and control owners, accountable directors, and senior leadership real time access to up-to-date and accurate risk information at a strategic and functional level, as well as ensuring appropriate documentation and trend analysis.

### ESG, Ethical Compliance & Risk Governance Structure:



## WHISTLEBLOWING & GRIEVANCE MECHANISM

The Group places strong emphasis on workers voice in our direct operations and supply chain. We have mechanisms in place to ensure that employees and workers in our supply chain can speak out confidentially. It is the Group’s priority to create an open and supportive environment in its direct operations and supply chain where workers are able to address any suspected wrong doing, fraud, abuse and other unethical issues.

## UK SUPPLY CHAIN

Whistleblowing in the Group is independently managed through the Unseen Portal. Working with Unseen ensures that workers within our UK supply chain are able to speak out in confidence and with anonymity.

## DIRECT OPERATIONS

The Group launched Integrity Line, an employee Whistleblowing platform which is a safe place for employees to report concerns within the work place and feel protected doing so. With the Integrity Line employees can feel safe in filing a confidential and anonymous report via either telephone or the web portal. The Group’s internal whistleblowing escalation process was developed in partnership with SFA. SFA has also provided training to the Group’s escalation team.

### SPEAK UP!

We encourage our colleagues to speak up about unethical or illegal working practices such as bribery, bullying, harassment, fraud, incidents of modern slavery, data breaches or other issues that may concern them. We have launched Speak UP\*\*, a central hub on our internal intranet available to all Group employees that houses compliance related policies, procedures and information.

SpeakUp Contains Information on:

- Whistleblowing
- Fraud and Tax Evasion
- Slavery and Human Trafficking
- Share Schemes
- Bribery & Corruption
- Insider Dealing
- Gifts & Hospitality
- Data Protection

# GLOBAL RISK & DUE DILIGENCE

## GLOBAL RISK

We recognise there are salient human rights risks in the countries we source from that vary by location. It is imperative that we prevent slave and child labour and protect vulnerable groups such as female and migrant workers. With our top sourcing countries taking priority, we will focus on the most severe and likely issues when working with factories supplying the Group. See page 8 to see the salient risks identified in our top six sourcing countries.

### Case Study: In-Country Risk Turkey

Turkey is one of the Group's top sourcing countries. There is an ongoing migrant labour crisis in Turkey with Syrian, Afghan, and Ukrainian refugees. There is a work permit system in place for Syrian refugees that allows them to obtain formal employment. A similar system is in the process of being established for Ukrainian refugees. Currently, Afghan refugees experience the greatest challenges in obtaining work permits.

Many refugees seek unofficial employment in the Turkish garment sector where they are often subject to low wages and long working hours. The Group recognises that migrant workers are particularly vulnerable to the risks of modern slavery. The employment of individuals without the legal right to work in factories is a violation of the Group's [Code of Conduct](#).

In Turkey, the Group's in-country sourcing and ethical team, conducts factory spot checks and site visits in addition to engaging with suppliers to help them understand the vulnerability of migrant workers and the severity of the issue through training and guidance. The Group's in-country team also helps direct suppliers to NGOs for further support.

The Group is committed to upholding human rights of the people who produce its garments and will be identifying NGOs to work with in the upcoming year to further support in addressing these challenges.

## DUE DILIGENCE

As part of our global risk and due diligence assessment we have a robust on-boarding process for all new suppliers that join the Group. Each audit report is reviewed by the ethical compliance team and the compliance programme is overseen by the Group's GECC. Before on-boarding UK suppliers, financial due diligence checks are conducted.

All suppliers and factories must submit an audit report which meets the Group audit criteria. The Group's ethical

compliance team reviews each audit report to ensure that the Group's requirements are met and that any issues identified are remediated. See page 10 to learn more about our strengthened standards.

## GARMENT & TEXTILE WORKERS TRUST

Last year the group provided £1.1 million to set up an independent garment and textile workers trust (GTWT). The trustees decided that the first piece of work it should carry out was to instruct Nottingham University's Rights Lab - home to the world's leading modern slavery experts - to conduct a piece of research to answer seven key questions from the perspective of the people employed in the UK garment and textiles sector and those working closely with them.

The research is reflective of the challenges faced by the Leicester Garment and Textile Industry. Through a series of in-depth interviews, focus groups and questionnaires, the Rights Lab has gathered insight directly from frontline workers. These workers reflected the whole industry and not just the Group supply chain.

The results of the research point to key themes that increase worker vulnerability to exploitation in Leicester – widespread financial precarity due to low wages, limitations in worker employability, ineffectiveness of antiexploitation measures due to worker isolation, and continued employer disincentive to offer decent work. The research results will be used to outline the aims and objectives of the GTWT. The research report has been published and is available [here](#).

### Case Study: Wages

The Group takes breaches of its Code of Conduct seriously as exemplified by a recent incident. In July 2021, it was reported to the Group that while there was evidence garment workers were officially being paid minimum wage and statutory entitlements, an on-site manager was demanding a cash refund of a portion of the wages at a supplier site.

An investigation was undertaken by the Group's compliance team, Hope for Justice, and Slave Free Alliance to support the supplier in remediating the position of workers that had been forced to hand cash back to the on-site manager.

The Group reported this incident to the Gangmasters & Labour Abuse Authority (GLAA). There was a court hearing in which the former on-site manager was found guilty and convicted for slavery and trafficking risk order.

To prevent similar issues occurring in the future, the supplier has since embarked on its own change programme to ensure that such issues are identified and is sponsoring modern slavery training.

As a result of the collaborative remediation process, knowledge sharing took place on how to spot, and identify why these issues arise and how to prevent similar instances from happening again in the future.



## MONITORING

We have internal compliance teams conducting factory visits and spot checks in three of the Group’s key sourcing countries – UK, Italy, and Turkey. The purpose of spot checks is to work with suppliers to ensure they understand our Code of Conduct.

Bureau Veritas (“BV”) is the Group’s preferred global partner for conducting audits. In line with industry standards, the Group will accept audits undertaken within 12 months from 34 different audit bodies. BV converts existing audits that meet our criteria into a Group audit report format. The Group became members of Fast Forward in May 2021 and the audit programme started in our UK Supply Chain in March 2022\*\*.

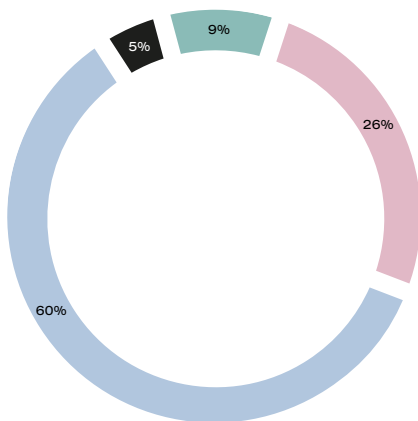
Prior to launch, 20.3% of the Group’s UK supply chain had already been through a Fast Forward audit. We intend on completing the Fast Forward audits in our UK supply chain by Q2 2023.

Once audited, a supplier receives a rating - excellent, good, fair, critical. Under our audit grading system, 95% of our tier 1 factories rated as excellent, good, or fair\*\*.

Audits that are graded red undergo a follow up audit with 30-60 days. Currently, 60% of audits graded critical have been evidenced as corrected. Any factories remaining with a critical grading are under close review. The key findings in the critical category are being used to inform our monitoring and compliance programme and guide the Group as we work with our suppliers to raise their factory standards across the globe.

For suppliers with fair and critical gradings we provide training to help them improve their performance. We also conduct regular meetings with suppliers as required to help suppliers understand how and why they need to remediate.

**Group Audit Gradings\*\***  
**18 July 2022**



Excellent Good Fair Critical

## TRAINING

In 2021, Slave Free Alliance (SFA) was commissioned to roll out modern slavery training to all operations of the Group. The training was tailored to different areas of the business to ensure that the content was specific to the roles of those employees. In total SFA trained 721 of 758 Group head office and distribution centre employees on Modern Slavery. New starters to the business are required to undertake virtual training as part of their induction programme.

The Group has also delivered internal ethical compliance training to all Group brands’ buying and merchandising teams. In total 461 of 572 employees have received this training to date and it will be used for future virtual sessions which will include new starters and those who were unable to join the previous sessions. This training supports the responsible purchasing practices work of our Agenda for Change programme.

In July 2021, Addleshaw Goddard LLP delivered “enhanced” antibribery training to 45 of 51 senior employees.

The Group became members of Fast Forward in May 2021. All UK manufacturing sites will be subject to Fast Forward audits in 2022 and will join the “Fast Forward Supplier Engagement Programme” to access labour standards training, online guidance and resources, and a collaborative network.

With the roll out of the Group’s Responsible Purchasing Practices, training was conducted across the business in November 2021 across Group brands.

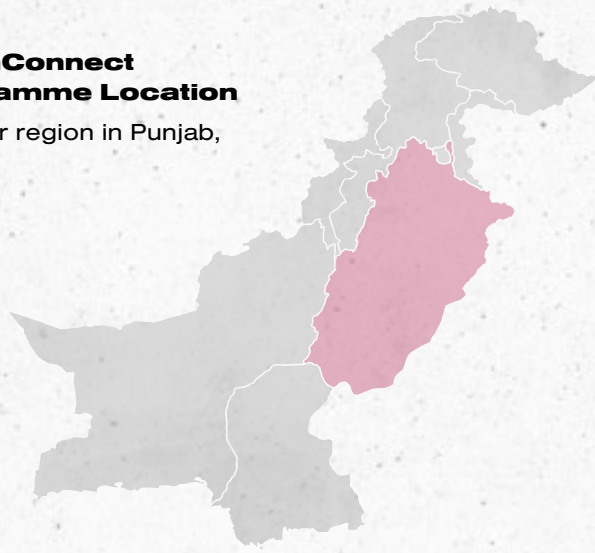
### Group Audit Gradings


- Excellent - Facility is performing to Group standards. Zero non-conformances identified.
- Good - Non-conformance issues considered to be lower risk e.g. unsanitary toilets, inadequate lighting.
- Fair - Major non-conformance issues e.g. excessive working hours.
- Critical - Non-conformance issues generally regarded as intolerable. Severe breaches of the Group Code of Conduct.

As of 18 July 2022, 95% of our tier 1 factories rated as excellent, good, or fair\*\*.

**CottonConnect Programme Location**

Rajanpur region in Punjab, Pakistan



Programme details: Year 2 2022-2023**		
	Number of Farmers	<b>2,254</b>
	Number of Villages	<b>74</b>
	Cotton Land (Acers)	<b>9,540</b>
	Actual Seed Cotton Production (MT)	<b>7,667</b>
	Actual Cotton Lint (MT)	<b>1,500</b>

## RESPONSIBLE SOURCING - COTTON

As of year-end 2021, cotton made up 31% of our Group fibre mix. Used across all 13 brands, cotton is an important material to the Group.

With global supply chains, cotton can be a difficult raw material to map especially as it is often blended with bales from different regions.

We understand that modern slavery persists in cotton supply chains. There are very serious, ongoing allegations of human rights abuses in the Xinjiang province of China in the persecution of the Uyghur minority group.

Our suppliers are aware that we will not accept products originating from the Xinjiang region. We do not believe that we directly engage with any factories in this region and do not knowingly source any fabric from this region. We have undertaken full mapping of tier 1 of our supply chain to understand where our goods are produced and will continue our work in supply chain transparency in the upcoming year. See pages 8-9 for more details.

Our cotton supply chain includes initiatives that support responsible cotton sourcing with a focus on farmers' livelihoods and reducing environmental impact.

### CASE STUDY 1: BETTER COTTON

We are members of Better Cotton. The mission of Better Cotton is to help cotton communities survive and thrive, while protecting and restoring the environment. Better Cotton seeks to ensure equal and respectful treatment and fair pay for all workers involved in cotton cultivation. Human rights abuses are violations of the Better Cotton

Standard and are not permitted on licensed Better Cotton farms. If an instance of forced or child labour is found, it is dealt with through appropriate corrective action. Better Cotton does not operate in regions where government-led, forced labour is found.



### CASE STUDY 2: COTTON CONNECT

We are working with CottonConnect growing REEL (Responsible, Environment, Enhanced Livelihoods) cotton across over 12,000 acres in Pakistan. The cotton produced is responsibly sourced and traceable. It is tracked through our supply chain, from village to garment with chain of custody using CottonConnect's proprietary, traceability software TraceBale.

Keeping cotton farmers at the centre, the REEL Cotton Training Programme works to improve cotton farmers' knowledge and business practices to enhance community livelihoods and reduce the environmental impact of cotton.

In Pakistan, the programme is currently being implemented in the Rajanpur region of Punjab with 2,254 cotton farmers (83% male, 17% female) across 85 villages\*\*.



# Thurmaston Lane Leicester

Thurmaston Lane, our Manufacturing Centre of Excellence, is an 85,000 square foot site located in Leicester. Thurmaston Lane offers end to end garment production and digital printing for our brands. The Group started production at Thurmaston Lane on 26 January 2022. We hope Thurmaston Lane will set the standard for UK garment industry and champion strong workplace standards. The facility will be used for supplier learning and development. The site is creating 170 jobs for the local Leicester community. It is also home to our Leicester based UK compliance team. Aligned with our boohoo PACT (Passionate, Agile, Creative, Team) values, Thurmaston Lane champions a diverse workforce, an employee committee, offers a number of employee benefits, and hosts engagement events. Our on-site human resources team has been engaging with garment workers to ensure they understand their entitlement to workers rights across paid leave, working breaks, and benefits.



## PACT VALUES

Our PACT values that seal the deal for the boohoo group

### PASSIONATE

Believing in the boohoo family and believing in ourselves. Loving what we do and being inspired to be the best we can be. Focused and committed to giving our customers the experience they want.

### AGILE

Staying ahead of the pack, embracing change. Moving fast and grabbing opportunities with both hands. Being lean, effective and efficient.

### CREATIVE

Being unique, aspirational and always boohoo. Doing it our way, not being afraid to be different. Creative thinking and design.

### TEAM

Listening and responding to create a place where everyone's contribution is important and valued. Building success through people and sharing in it together. Remembering to have fun along the way.



Thurmaston Lane Team

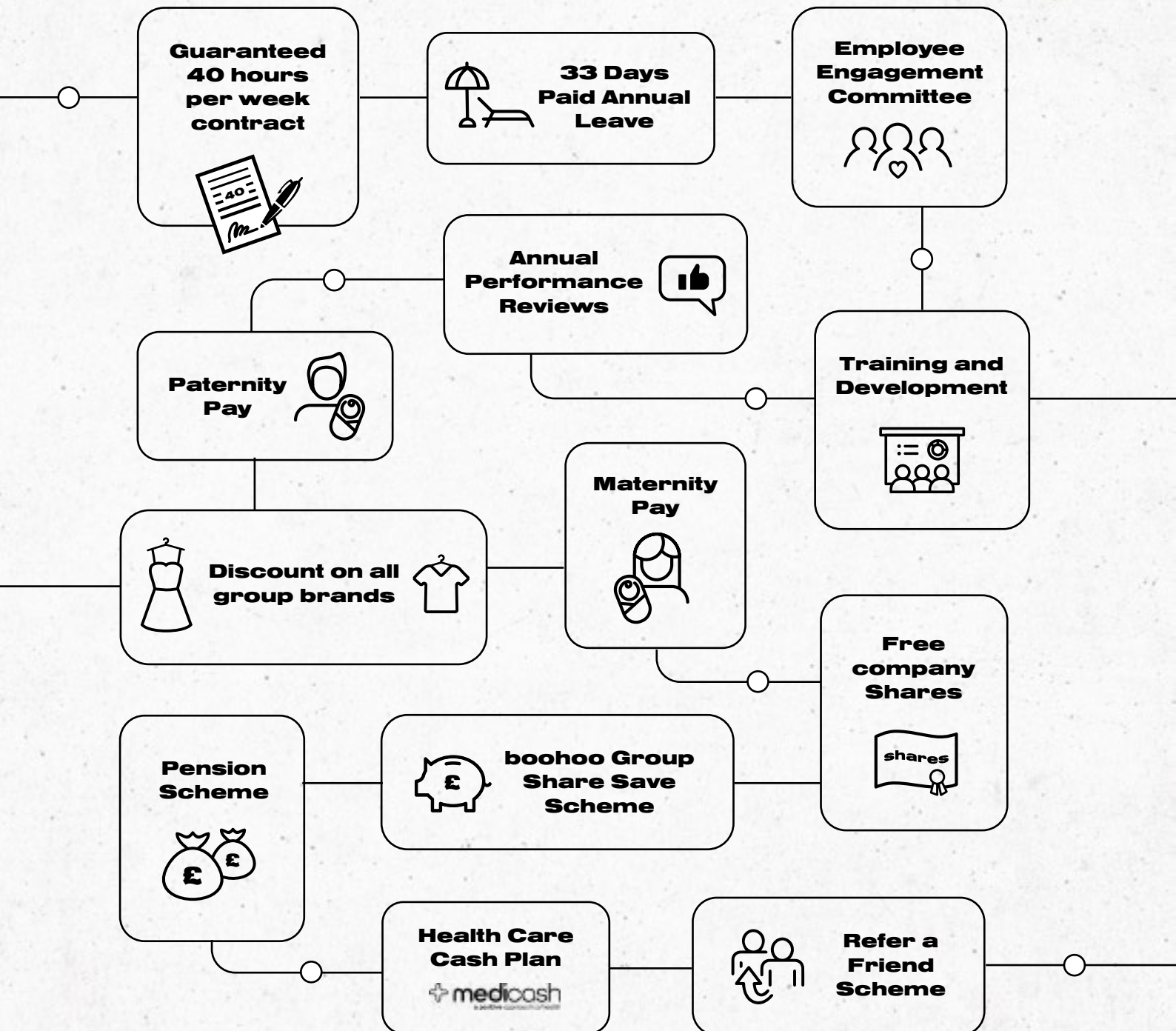


Thurmaston Lane  
Our "Manufacturing Centre of Excellence"



WELCOME TO  
boohoo  
group plc

# Thurmaston Lane Leicester





# EFFECTIVENESS

## REFLECTION

We are committed to protecting worker welfare and human rights throughout the Group's global supply chain. With the expansion of our ethical compliance teams on site in the UK, Turkey and Italy we have dedicated personnel conducting spot checks. We have cultivated stronger relationships with our suppliers that will also help drive continuous improvements.

In 2021/2022 we set commitments to drive improvements in worker welfare throughout our supply chains.

Highlights include:

- Completion of our Agenda for Change Programme
- Embedded key themes of Agenda for Change - corporate governance, purchasing practices, and support for the garment sector - into KPIs monitored across the business
- Strengthened our standards in our supply chains globally
- Mapped and published tier 1 of our global supply chain
- Implemented the Fast Forward audit methodology in our UK supply chain

## CHALLENGES

The Group has a large, global supply base that is diverse with respect to size and maturity. The factories that we work with range from small family operated facilities, to larger high volume units. With our strengthened standards, we are dedicated to bringing all suppliers who are committed to improving on the journey with us - through training, support, and consistent communication to further drive improvements.

We recognise there are limitations to audits as worker welfare issues are not always captured and systemic issues can persist. Having teams on the ground in key sourcing hubs like UK, Turkey and Italy mean that we can support our auditing programme with in person engagement and assessments. We hope to grow our presence in key sourcing hubs over the coming year.

### FORWARD LOOK:

In 2022/23 we are committed to further driving compliance performance.

Over the coming year we will:

- Increase supply chain transparency and continue to map our supply chain with a focus on Tiers 2 & 3 factories
- Publish ethical compliance and human rights policies on boohooplc.com
- Externally report on key findings from facility level assessments
- Continue supplier engagement to help drive improvements
- Assess salient human rights risks in our key sourcing countries
- Continue to improve the Supplier Hub
- Expand in-country sourcing and compliance teams in key territories

## BOARD ENDORSEMENT



Board Representative

31.08.2022

Date

# INDUSTRY ASSOCIATIONS

## & WORKING WITH STAKEHOLDERS



SLAVE-FREE  
ALLIANCE  
Working Towards a  
Slave-free Supply Chain

The Group has been members with Slave-Free Alliance (SFA) for four years. With our ongoing partnership, SFA supports our overseas offices with advice and Guidance on NGOs that can support with salient human rights issues. The Group meets quarterly with SFA.



fast  
forward

Building sustainable supply chains

The Group became members of Fast Forward in May 2021. Fast Forward is the UK's leading labour standards improvement programme



unseen

Whistleblowing in the Group's UK supply chain is independently managed through the Unseen Portal.



for Health and Safety in the Textile and Garment Industry

The Group recognises the work of the Bangladesh Accord and signed up to the International Accord in October 2021. The Group has 80 factories in Bangladesh and the countries being discussed for the International Accord to move into next are part of the Group's global supply chain.



The Group is a subscriber to the Better Buying Institute (BBI). boohoo.com will be completing the Better Buying Partnership Index (BBPI).\*\* With the results of this enrolment and supplier feedback, we will look at registering more brands across the boohoo group.

## LINKS

### REPORTING

We transparently report the progress we have made in our [2022 Sustainability Report](#).

### GLOBAL FACTORY LIST

Our global factory list is updated every 6 months. Our most recent list was published in [August 2022](#).

### 2021 MODERN SLAVERY STATEMENT

Our [2021 Modern Slavery Statement](#) was published in August 2021.

### SIR BRIAN LEVESON'S FINAL REPORT TO THE BOARD

[Sir Brian Leveson's Final Report](#) was published on February 2022.

### GROUP CODE OF CONDUCT

The Group's [Code of Conduct](#) is based on Ethical Trade Initiative (ETI) base code and outlines our standards of labour practices.