

Boden

MODERN

SLAVERY

STATEMENT



Modern Slavery Statement

Financial Year 1st January – 2nd January 2021 (FY2020)

As part of our continued commitment to ensuring ethical working conditions in our supply chain and operations, we fully support the legislation put in place for the prevention of modern slavery and human trafficking.

This includes:

UK legislation: Transparency in Supply Chains Provision (Section 54) of the Modern Slavery Act (2015)

USA California legislation: The California Transparency in Supply Chains Act SB657

Australia legislation: The Modern Slavery Act 2018 (Federal Act)

What is modern slavery?

Modern slavery is when one person possesses or controls another person in such a way as to significantly deprive that person of their individual liberty, with the intention of exploiting that person through their use, profit, transfer or disposal.

Modern slavery is an overarching term used to describe its various forms:

- **Human trafficking** – a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion
- **Forced and compulsory labour** – any work or services which people are not doing voluntarily and which is exacted under a threat of some form of punishment
- **Bonded labour** – any work or services demanded as a means of repayment of a debt or a loan
- **Slavery** – a situation where a person exercises (perceived) power of ownership over another person

Our FY2020 statement sets out Boden's current activity, and what plans we have in place to help tackle this issue both within our own supply chains and operations and to support stakeholder and industry-level activity to eradicate modern slavery.

This modern slavery statement has full sign off by the Executive Board.

Modern slavery is a long-term issue with no quick solutions. We recognise that our customers expect us to get this right so that they are confident when choosing Boden. We are committed to continuously improving

our practices to help support the eradication of modern slavery.

COVID-19

Despite the ongoing impact of the COVID-19 pandemic, including national lockdowns and bans on international travel, Boden and the suppliers we work with quickly adapted to new technologies and audit methodologies to ensure that we could continue to monitor risks and obtain assurance.

The pandemic highlighted the importance of supplier relations and, throughout the pandemic, we continued to honour our order commitments.


In line with our endorsement of the International Labour Organization's (ILO) [Call to Action](#) in the garment industry we ensured that we paid suppliers for all finished goods, goods in production and also materials purchased. We also made no changes to our payment terms, to ensure that suppliers were paid on time, in full and without delay and in some instances, we were able to help suppliers financially by paying them early.

Our Director of Sourcing and Supply Chain maintained and continue to have quick and effective open lines of communication through daily contact with suppliers about the status of business operations and future planning as well as talking through ongoing issues and how Boden could help resolve them.

In addition, we also conducted a COVID-19 supplier survey during the year to ensure that factories had identified those people that were most at risk of serious illness and had sufficient health and safety measures in place to safeguard them. This survey was shared with members of the Ethical Trading Initiative (ETI).

In 2020 Baptist World Aid Australia produced the Covid Fashion Report, which assessed 96 companies against six commitments to ensure positive steps were taken to safeguard workers during the pandemic. Boden was one of the brands that were able to demonstrate evidence of all 6 commitments.

Signed by

A handwritten signature in black ink that reads "P.O.S. O'Leary". The signature is stylized, with the first letters of each name part being larger and more prominent.

Paul O'Leary,
Chief Operating Officer,
J. P. Boden & Co. Ltd

Date: 05/05/2020

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06	Due diligence processes	<i>Process, Policy And Due Diligence</i>
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Our company and supply chain

Company

Boden is a British brand founded in 1991 with eight pieces of menswear on a kitchen table. Today the company employs approximately 1,000 people across its London head office, London (UK) stores, Leicester (UK) warehouse and call centre, Boston, MA (USA) office, Pennsylvania, PA (USA) Store and Pittston, PA (USA) warehouse and call centre. Boden began life as a mail-order business, and we are now a multi-channel brand, selling predominantly online as well as through catalogues, retail stores and several wholesale partners.

Supply chain

In total, we work with 81 suppliers, working with 150 first-tier factories that employ over 55,000 people, producing diverse product lines from dresses to handbags to baby grows across 15 countries. Since May 2018, we have published our first-tier factory list on our website. The latest factory list, published in February 2021, includes a breakdown of department, product category and gender at factory-level.

The map below shows you which countries we source from and how many factories we work with;



To manage the complexity of our garment and accessories supply chain, we work closely with suppliers, building long-term relationships where we can, in order to maintain our focus on traceability of production, working conditions, and quality. Boden's sourcing strategy has always been to maintain long term relationships with suppliers; we have been working with 43% of the suppliers for over 5 years and 22% for over 10 years.

Process, policy and due diligence

ETI and our Responsible Sourcing Commitment

In 2008, we joined the ETI in order to support the development of our programme and to have the opportunity to work collaboratively with the intention of ensuring better working conditions for workers across international supply chains.

The ETI base code is the foundation of our [Responsible Sourcing Commitment \(RSC\)](#), which we have had in place since 2008. Suppliers must commit to our principles of Responsible Sourcing as part of signing our terms and conditions (T&Cs), agreeing to “meet and strive to exceed Boden’s Supplier Responsible Sourcing Commitment and applicable policies as contained in the Supplier Manual, which gives guidance on Boden’s policy towards areas including (but not limited to) the health, safety, hygiene, minimum working age, working hours and remuneration of workers.”

Suppliers’ obligation to comply with our terms and conditions (T&Cs) are two-pronged. Firstly, it is a Boden requirement that all suppliers sign our T&Cs as part of the on-boarding process. Secondly, the Purchase Order (PO) raised with the supplier is a contract; by confirming the PO, the supplier thereby agrees to our contracted T&Cs in supplying that order.

Modern slavery legislation takes the ETI base code provision of forced labour a step further to include the impacts of human trafficking.

Boden are now public signatories of the Responsible Sourcing Network's cotton pledge against forced labour in Uzbekistan and Turkmenistan. For more information about these pledges, please follow [this link](#). There is also a section in Boden’s supplier manual clarifying our position on forced labour and child labour issues in Uzbekistan and Turkmenistan cotton production. Suppliers agree to not knowingly source cotton from these locations.

Our current policy for young worker requirements, child labour prevention and remediation is set out in the appendix of our [RSC](#).

Collaborations

Boden work with the following trusted partners in the prevention on modern slavery.

Ethical Trading Initiative (ETI)



The [ETI](#) is a leading alliance of companies, trade unions and non-governmental organisations (NGOs) that promotes respect for workers' rights around the globe. ETI's vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.

Business for Social Responsibility (BSR)



[BSR](#) is a global non-profit organization that works with its network of more than 250-member companies and other partners to build a just and sustainable world.

BSR envision a world in which everyone can lead a prosperous and dignified life within the boundaries of the Earth’s natural resources.

Better Cotton Initiative (BCI)



The [BCI](#) is a global not-for-profit organisation. It is the largest cotton sustainability programme in the world.

Together with their pTTHartners, BCI provide training on more sustainable farming practices to more than two million cotton farmers in 21 countries.

Ethica



[Ethica CSR Ltd](#) is a social compliance and ethical trading consultancy company founded by Ebru Gökbulut in 2016 which consists of local corporate social responsibility (CSR) experts. The company is located in Istanbul, Turkey and operates mainly in Turkey and Bulgaria.

Ethica



[&Wider](#) is an anonymous direct worker feedback initiative which conducts due diligence and monitoring of working conditions using worker engagement technologies. The &Wider system provides actionable results to drive material improvements in workers' lives and in the businesses that employ them.

Accountability and Governance

The responsibility for human rights due diligence, including modern slavery due diligence, sits with the Chief Operating Officer (COO), Chief Financial Officer (CFO) and the Executive Board. Their work is supported by relevant directors and teams, including the Director of Sourcing and Supply Chain, Responsible Sourcing and Compliance Manager, and the Legal Counsel. Boden's Responsible Sourcing strategy, including this Modern slavery statement, has full sign off by the Executive Board.

We have a formal escalation process in place if serious issues affecting working conditions are found within our supply chain. The escalation includes a briefing to the Director of Sourcing and Supply Chain and senior buying personnel with a proposed action plan for remediation with agreed timescales.

The Boden Risk and Compliance Committee was set up to discuss all potential risks across different areas of the business. Occurring quarterly, this meeting is attended by the COO, CFO and Executive Board, along with department heads from across the business including Responsible Sourcing. The agenda includes an update of issues discussed in the previous session and emerging risks. Any new concerns that have arisen from current risk assessments are addressed in this meeting and remedial actions agreed. Modern slavery risks areas are reviewed each time the committee meets, and progress updates are provided.

Implementation

Many people across the business support the implementation of Boden's modern slavery due diligence, including the Responsible Sourcing team, the People team, the Operations team and the Legal Counsel.

We share information about our [Responsible Sourcing programme](#) on the [Sustainability](#) section of our website, including our [Responsible Sourcing Commitment](#).

Assessing risks

Ongoing risk assessments

A number of factors heighten the risk of modern slavery occurring.

Modern Slavery risk factor	Those at risk in Boden's supply chain	Boden's work to protect workers' rights
Migrant labour	Migrant workers in Mauritius (from Bangladesh, Madagascar and India) who may face debt bondage for recruitment or travel costs	Boden was an active member of the ETI's Modern Slavery Working Group and took a multi-stakeholder approach to tackle these issues related to migrant labour. This ETI group is no longer active but we continue with stakeholders to monitor the risks.
Significant presence of refugees	Undocumented refugee labour in Turkey, particularly relating to Syrian refugees	<p>Continue to develop social dialogue in production sites; strengthening workers' access to effective worker representation.</p> <p>Boden employ a regional representative in Turkey who regularly visits the factories that Boden works with in order to drive improvement in working conditions</p>
Outsourced recruitment processes and the use of contract/agency/temporary employees	<p>Migrant workers in Mauritius (from Bangladesh, Madagascar and India) who may face debt bondage for recruitment or travel costs.</p> <p>Workers in our UK Warehouse and US Warehouse</p>	<p>Boden was an active member of the ETI's Modern Slavery Working Group and took a multi-stakeholder approach to tackle these issues related to migrant labour. This ETI group is no longer active but we continue with stakeholders to monitor the risks.</p> <p>Work with trusted labour agencies in recruiting temporary workers.</p> <p>Drive awareness of modern slavery with induction training at our warehouses, and displaying information posters in multiple languages detailing Boden's whistleblowing contact.</p>
Presence of young workers in regions of increased likelihood of child labour	Mill workers in the Tamil Nadu region of India being subject to Sumangali schemes	Boden was proud to be a member of the ETI's Tamil Nadu Multi stakeholder programme from 2012, which reached 25,191 female workers at risk. This program is no longer running due to work changing in India, but we remain actively engaged in the region, with stakeholders on the ground.

State-imposed forced labour	Ethnic and religious minorities	Boden has reiterated its stance on forced labour and is engaging with its supply chain to map the risks. We are also seeking advice from experts on how to mitigate those risks if forced labour is identified.
COVID-19 Global pandemic	Workers in our value chain	The pandemic truly brought to the fore the inequalities within the value chain. Boden is working with Multi-Stakeholder Initiatives (MSIs) and our supply chain to build back better and to help address some of these inequalities.

We regularly risk-assess our supply chain whether through reviewing audits or researching emerging risks based on the known or potential presence of the above indicators in the countries we are sourcing production from.

Risk assessment is also incorporated into sourcing processes and purchasing decisions. The Responsible Sourcing Team provides the Buying Teams with information about the ethical risk rating on each of their factories. Modern slavery risk is an integral component of a site's risk rating. Where factories are rated as high risk, the reasons behind the issues are explained as well as an action plan to remediate the concerns. Active engagement from the Buyers drives the changes.

The Responsible Sourcing Team uses a variety of tools to gather risk data including internal knowledge and expertise, commissioned country risk reports, local expertise, NGO research from the region, and our own research from credible and independent publicly-available tools. Suppliers and factories are then managed on a risk-basis, prioritising those at highest risk of human rights abuses including those related to modern slavery.

We have listed some of the publicly available tools we use to help us below:

- NGO Reports from [Oxfam](#) and [Anti-Slavery International](#)
- [Trafficking in Persons report \(TIP report\) US State Dept. 2019](#)
- [List of Goods produced by Forced and Child Labor US State Dept. 2018](#)
- [Walkfree Foundation](#)
- [Verité](#)
- [UN Universal Human Rights Index \(UHRI\)](#)
- [ILO \(International Labour Organisation\)](#)
- [Anti-Slavery International](#)
- [Connecting the Dots in Xinjiang: Forced Labor, Forced Assimilation and Western Supply Chains Report](#)
- [U.S. Department of Labor \(DOL\)](#)
- [Occupation Safety and Health Administration \(OSHA\)](#)
- [Fair Labor Standards Act \(FLSA\)](#)

Where required, for example where country/sector risk factors demonstrate a higher potential risk of modern slavery, we engage specialist expertise on the ground to support more in-depth assessments.

Human Rights risks

As part of our risk assessment on a global supply chain-level, we have prioritised the countries that we perceive to have a higher risk of human rights/modern slavery related issues occurring. Creating sustainable long-term improvement in working practices through collaboration with NGOs, Trade Unions, and other brands and retailers is essential to addressing human rights issues and exploitative practices. Where there is opportunity, we collaborate with other brands and retailers either through the ETI or as separate partnerships to mitigate the risk in these areas.

Amongst Boden's diverse product range, we have identified products that are at high risk of modern slavery which include those made using some elements of homeworking or hand embellishment. Homeworking can provide an essential lifeline to people where traditional job opportunities are inaccessible to them. Boden acknowledges the existence of homeworkers within the supply chain and is open and positive towards homeworking as part of the production process.

Boden's long-established work in implementing homeworker guidelines has been recognised by ETI, who [published a case-study of our work](#) in this space in 2010. Boden has a published Homeworkers Policy in the Appendix of our [RSC](#) which clearly explains our position on homeworking; including our commitment to homeworkers and suppliers who contract them, as well as our expectation of suppliers employing homeworkers. In addition to the policy, the Responsible Sourcing Team remain in regular contact with buying team and suppliers that employ homeworkers to monitor ongoing volume of homeworking in our range, and support wherever necessary.

We have focused on the following countries due to the level of assessed modern slavery risk: China, India, Mauritius, Turkey, the UK and the USA.

China

From our discussions with NGOs and collaboration with brands who also source from China, we understand the most common modern slavery risks in China to be: barriers to freely chosen employments; excessive overtime; child labour; and the significant restrictions on workers' ability to bargain collectively and form trade unions.

China is the world's second largest producer of cotton. Consequently, we were concerned by the allegations of state-imposed forced labour being reported in the media.

Cotton is Boden's most important raw material, making up around 80% of our range (sourced from around the world). With China being our biggest sourcing country with regards to number of factories, we need to ensure that our products are free of any forced labour.

To do this, we conducted a review of our supply chain to identify any links to companies associated to the forced labour allegations. No links were found. However, we continue to carry out due diligence in this area and plan to trace our cotton supply chain to farm level. These sector-wide risks of forced labour in China are not going away. We recognise that the response to these risks requires collaborative effort to gain meaningful leverage, and we must remain open and committed to collaboration in order to drive improvements in this space.

India

In 2011, [Anti-Slavery International](#) identified issues of modern slavery concerning Sumangali schemes (forms of bonded labour exploiting young women) in Tamil Nadu in Southern India. These illegal labour practices have been predominantly found at the raw-materials-processing-level of production where brand leverage can be limited and monitoring challenging.

To tackle these industry-level issues, a multi-stakeholder initiative called the [Tamil Nadu Multi-Stakeholder \(TNMS\) programme](#) was formed. It had three work streams: community engagement and awareness; legislative lobbying and reform; and training at the mill-level to empower the young female workers affected by these schemes.

Boden is proud to have supported the work of the TNMS programme since 2012, which reached 25,191 female workers. The key achievements of the programme in 2019 include:

- 2,211 new female workers included to receive training, with 13,145 previously recruited female workers continuing to receive ongoing support
- 25,191 female workers reached so far in total through the programme
- 1,103 peer educators empowered through training
- 367 middle management teams in 16 mills and factories trained
- 48 spinning mills and garment factories from 11 districts have been included in the programme
- Half a day training focusing on building self-esteem conducted for spinning mill workers in March 2019

In 2020 this programme came to an end, but we remain actively engaged in the region by continuing to review government and NGO updates, we are also seeking opportunities to collaborate.

Mauritius

Mauritius is a potential risk for issues relating to bonded labour due to excessive recruitment fees that migrant workers, particularly workers from Bangladesh, may have had to pay.

Remediating the issues relating to recruitment practices is more complex. This is an ongoing piece of work with no quick solutions. Boden continues to collaborate with the supplier jointly to drive greater transparency in recruitment practices.

In 2020, we were due to attend a conference held at the British High Commission in Mauritius, which included the workshop 'Migrant Workers: Driving collaborative approaches to protecting workers and promoting safe migration relating to recruitment fees', due to Covid-19 this didn't go ahead

We recognise that risk of modern slavery is an industry-level risk faced by thousands of migrant workers in Mauritius, and one we cannot tackle alone. Throughout 2020 we remained committed to multi-stakeholder collaboration.

Turkey

We identified Turkey as a high-risk country due to the Syrian refugee crisis, where millions of Syrians have fled Syria into Turkey. Although an increasing number of Syrian workers are officially registered to work in the apparel industry, there are a significant number of undocumented workers who are at risk of potential exploitation. This is particularly the case for young workers and female workers. This is an industry-level risk across Turkey so we wanted to work collaboratively, where possible, to address this as well as take action within our own supply chain to ensure decent working conditions for all workers employed.

To build on the work we did in 2019 and to help reduce the possibility of the exploitation of workers in 2020, we implemented and paid for a workers' rights project in Turkey, which comprised of a booklet that was printed in the local language and covered subjects such as Occupational Health and Safety, Emergency Preparedness (Fire Safety and Earthquake Safety), Calculation of Overtime Payment, Rights of Young Employees, Rights of Female Employees, Annual Leave, Other Leave (like marriage leave, etc.) amongst others.

UK

We recognise that risk is not limited to our global operations and modern slavery is very much present in the UK. We take time to realistically understand our local risks and take necessary actions. An area of risk is our Leicester warehouse. At the warehouse, we employ temporary/agency workers to support during peaks in workload. We work with [Encore Personnel](#) to recruit these employees.

Encore Personnel are licensed labour providers under both the [Gangmaster Licensing Act \(2004\)](#) and the [Association of Labour Providers](#). They have also signed up to the principles of the multi-stakeholder initiative, [Stronger Together](#), aiming to reduce modern slavery.

Information regarding Encore Personnel's modern slavery statement and **reporting mechanism** are available on their website.

To further mitigate risks, we have put several measures in place to drive awareness of this issue within the workforce at Boden's Leicester site (which includes the warehouse and a call centre). Modern slavery awareness is included in the induction training that all employees based at the site complete before starting work on the warehouse floor or in the call centre. The site also has Stronger Together posters and materials posted in prominent places. These are displayed in multiple languages and give several options for workers to be able to communicate an issue, including Boden's own whistleblowing contact email.

US

In the Pittston (Pennsylvania) warehouse and call centre, we use a number of temporary employment agencies to help with employment needs.

These agencies, along with Boden, are required to follow the federal laws under the US Department of Labor (DOL), which governs standards for wages, child labour and workplace health & safety, among other statutes.

Specifically, the Occupational Safety and Health Administration (OSHA) regulates the health and safety standards within the workplace to ensure safe working conditions. Under the Occupational Safety and Health Act of 1970, employers are required to comply with all health and safety standards in order to provide employees a safe workplace free from recognised and serious hazards.

In addition, the Fair Labor Standards Act (FLSA) governs the standards for wages and overtime pay, and requires employers to pay covered employees, who work in non-exempt roles, a wage of at least the federal minimum wage and overtime pay. The Act also contains Child Labor Provisions that protect minors and ensure that working conditions are safe and not detrimental to their health, well-being or educational opportunities.

Due to Covid-19 we are still undertaking works to increase our efforts around modern slavery training in our Pittston operations so that these meet the measures in place in our UK sites. We are aware that there is more to be done on this front and recognise the importance of modern slavery awareness in our US workforce.

Transparency & Traceability

During 2020, we updated the sustainability section of our website in order to better engage our customers on our Responsible Sourcing journey including transparency and traceability.

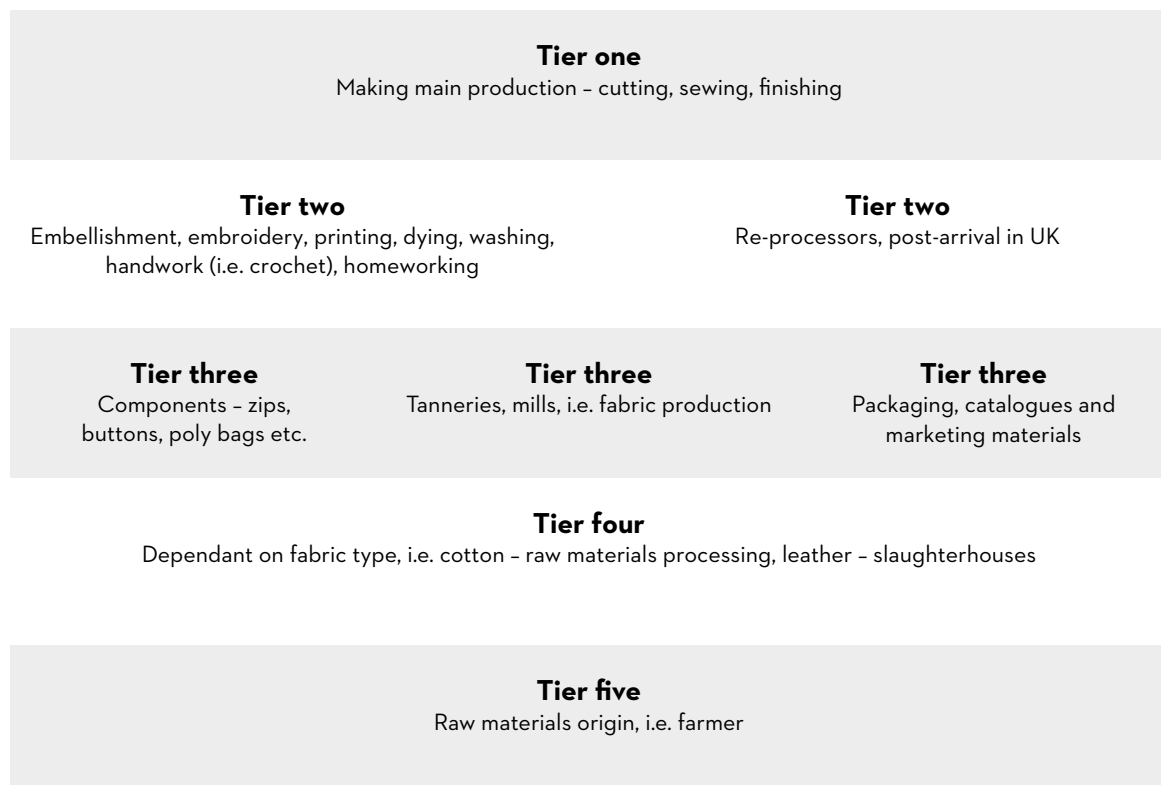
Since May 2018, we have published our first-tier factory list as part of our focus on transparency and we have made a commitment to update this list every six months. The list includes product category and gender breakdown at factory-level. Our audit demographic data is segregated and analysed by parameters including gender and ethnicity, as we know that women workers and migrant workers are rights holder groups prone to vulnerability and discrimination, which heighten risk of modern slavery.

The first tier of production (where the main processes for making the product happens) is only part of the story.

Understanding the extent of our supply chain risks means tracing the supply chain of our products as far as we can and understanding not only where risks of modern slavery and trafficking exist, but other potential salient human rights risks.

To support this, we gather as much detail about factory operations as we can. We are continuing to map and gather data on the second and third tiers and have a plan in place to map our wider supply chain.

We define our supply chain tiers as below:



MONITORING

First-Tier

All factories producing Boden products are subject to ethical trade assessments through regular audits delivered by independent third parties. Audits must cover the ETI base code principles and local law requirements.

Where possible, we share audits to reduce audit duplication. Our membership with Sedex supports this approach as it helps to limit the number of audits a site undertakes each year and therefore focuses resource on improving working conditions.

Beyond monitoring

Although monitoring is important, listening to and offering workers the opportunity to have their views heard is also very important. To this end, we have piloted different kinds of audits over the years to gather more information and feedback from workers.

In 2020, we piloted direct worker feedback at two sites with a company called &Wider which provides us and factory management with anonymous feedback on areas such as:

- Health and Safety
- Labour Rights & Freedom of Association
- Wages & Working Hours
- Physical Abuse or Confinement
- Worker Wellbeing

The information gathered opened up opportunities to work collaboratively with the factories involved in order to resolve any arising priorities. We have budgeted to add an additional seven sites in 2021. On average, each site will complete four surveys done via mobile phone (which &Wider call 'call cycles') spread throughout the year.

If serious issues are identified, in regards to health and safety, physical abuse or confinement and labour rights, we take a comprehensive approach, working with local expertise and NGOs on the ground who support the factory and the workers through the remediation and improvement process.

Our work in Turkey continues with our representative conducting periodic follow-up visits to ensure learnings are embedded into factory operations in the long-term, and a worker committee with equal representation is upheld.

Assessing conditions further down the supply chain

For many years, we have been informally visiting and assessing some of our second and third tier production units. Unfortunately, in 2020 with the advent of Covid-19 and the halt of international business travel this has stopped, however we continue to seek ways to formalise these assessments, and work collaboratively with suppliers and other brands on continuous improvement.

CASCADING KNOWLEDGE

Building knowledge in our business

Our Responsible Sourcing Team builds their knowledge in this area through external training, conferences and events, including ETI modern slavery and human rights training.

We also have our own internal training and awareness-raising programme that provides regular opportunities for learning for everyone in our business. This includes:

- A dedicated Intranet page with information about Boden's Responsible Sourcing strategy, including our RSC
- Mandatory annual eLearning on modern slavery, which is compulsory for all employees to complete
- Collaborate on a weekly newsletter distributed to the Senior Leadership Team (SLT) about ethical and sustainability headlines from the fashion and textile industry, including emerging and current risks in Responsible Sourcing

Topics delivered as part of the training that the ETI provided includes: the role of the ETI; ETI base code clauses and related working conditions; understanding a supply chain and the impacts business decisions can have; modern slavery; and human trafficking.

Building knowledge amongst our customers

This Modern Slavery Statement has been translated into French and German and will be published on our French and German websites. Although this is not a legal requirement, we consider it to be best practice in cascading modern slavery knowledge and making it accessible to customers in France, Germany and Austria which are important markets to Boden.

Building knowledge in our supply chain

To reach our wider supply chain, our supplier manual has a section on modern slavery in order to support suppliers' understanding of this topic. This document includes links to the [Anti-Slavery International website's resources](#) and recommended steps suppliers should take to prevent these issues at factory-level.

Monitoring progress

We are tracking progress and reporting through the following mechanisms:

- Quarterly Risk and Compliance Committee meetings - updates on activities and progress are shared and further actions put in place where needed
- Taking part in the annual Baptist World Aid Australia survey which produces the Ethical Fashion Report
- The ETI's requirement for annual reporting has been suspended as it is currently under review. Reporting is likely to be based on non-financial reporting and other public reporting requirements in order to reduce repetition in reports.

NEXT STEPS:

Due to the impact of COVID-19, our next steps remain largely unchanged and we will continue to focus on the below activities:

- Piloting a 'beyond audit' due diligence methodology with our top suppliers
 - Increasing access channels for workers to feedback views on working conditions. Using this information to build and revise our strategy, and to address and resolve differences
 - Mapping the supply chain of our top suppliers
 - Establishing the transparency down to tier three sites
 - Investigating mapping the supply chains of goods not for resale (GNFR)
 - Expanding the workers' rights booklets produced in Turkey to more countries within our supply base
 - Continuing to roll out externally provided modern slavery and purchasing practices training to Product teams
 - Implement modern slavery training for our people in the Pittston call centre and warehouse.
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Please note that at the time of publishing this statement, we are experiencing unprecedented impacts on our business from the ongoing coronavirus disease (COVID-19) pandemic, with our supply chain experiencing shut downs and resource shortages. If these continue we will focus on the 'Next Steps' listed above but they may be subject to delay.