

OLIVER BONAS

Modern  
Slavery Act  
2023

## Introduction

Our company values are “Work Hard, Play Hard and Be Kind” and we aim to Be Kind in every aspect of our company life. We strive to do business in a way that has integrity, is ethical and minimises the negative impact on others and the environment.

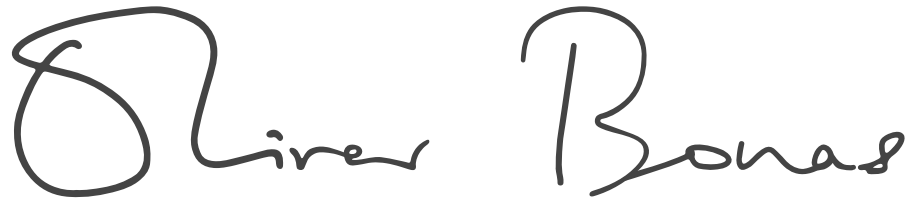
In 2015, the UK Government passed into law the Modern Slavery Act. In the last seven years, we have played our part and recognise we have a responsibility to prevent modern slavery and human trafficking throughout Oliver Bonas and in our supply chain.

This is our eighth MSA statement and was published in July 2024. This highlights the work we have undertaken to identify and eradicate modern slavery within our business over the previous financial year, January to December 2023. The statement was approved by the directors and leadership team at Oliver Bonas.

Signed

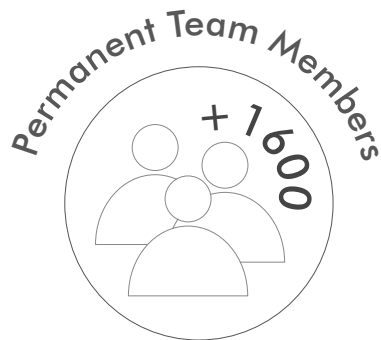
*Olly Tress*

Oliver Tress, Founder & Managing Director,  
Oliver Bonas Ltd, July 2024



Oliver Bonas is an independent British lifestyle store which has grown from a single shop opened by our founder, Olly, in 1993 to a brand which designs a range of inspirational fashion and homeware available in stores, across the UK, Ireland and online.

Oliver Bonas has evolved from Olly bringing back interesting pieces from his travels abroad as gifts for his friends and family, into an ever-expanding brand. Developed by a creative team of designers and buyers who incorporate Olly's exploratory spirit into our own fashion and homeware collections.



Olly still leads OB, but we now employ over 1600 permanent team members (employees). We are a growing privately owned independent company with 85 stores across the UK and Ireland and a successful website.

At Oliver Bonas, we are committed to sourcing the highest quality products from a range of countries with diverse cultures and economies. We value long-standing trusting relationships with our suppliers and commit to working in a transparent and open manner from the very start.

### Our suppliers fall into four categories:



Our continued focus during 2023 has been on our own brand products. We are working much more closely with suppliers of these products on the design, materials and selection of factories. We therefore have the greatest level of control. Our own brand products made up 90% of our product range in 2023.



# Our Commitment

## Our Commitment

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

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

We do this by:

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

## Our Approach & Governance

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

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

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

## Our Own Operations

Oliver Bonas operates across three main business areas: our 85 stores; three warehouses; and Support Office. Our Support Office and two of our warehouses are based in Chessington, Surrey, we also have one warehouse in Andover, Hampshire. Our current headcount is just over 1600 permanent employees. 73% of our overall workforce are based in our stores, 17% in our Support Office and 10% across our warehouses. At Oliver Bonas we have an in-house People team, led by our People Director. The team are responsible for developing the policies and procedures to support line managers in the management of their team this ensures high standards and the fair treatment of all our team members.

Our policies are accessible to all team members via our e-learning platform, Loop. In the event of any wrongdoing, we have both Whistleblowing and Speak Up policies to allow effective reporting and to enable appropriate action to be taken. All salaries are paid directly into bank accounts that are registered to the relevant team members and all new team joiners must have a home address and authentic National Insurance number before they can be offered employment. Our hourly paid team members are required to clock in and out of our HR system and all hours worked are monitored by our in-house Payroll team to ensure our business adheres to the UK Working Time Regulations.

## Auditing Our Operations

Each year we audit our people policies and update in accordance with any amendments to legislation.

## Recruitment Process

We adhere to all UK and EU employment legislation and conduct 'Right to Work' checks for all new team members through our applicant tracking system (ATS), Talent Funnel, using a third party Trust ID. All line managers receive comprehensive training on how to use the ATS system and it hosts all our applications. During our 2023 peak period we employ an additional 411 temporary team members and approximately 200 agency workers. The recruitment agencies we work with are all members of the REC (Recruitment and Employment Confederation) and hold the GLAA (Gangmaster & Labour Abuse Authority) license.

## Training

To support the development of our team members our in-house Learning & Development team design and deliver workshops and courses accessible by all team members on our learning platform, Loop. We also deliver a bespoke leadership programme annually for all Support Office and Warehouse Managers. In the past year we have reviewed and updated our culture workshops and induction processes, and have also delivered over 60 courses (face-to-face and online). We have made equity, diversity and inclusion (EDI) a key focus of our recruitment workshops and also created a Senior EDI Manager position to support our continued commitment to creating a more inclusive and diverse workplace.

# Our Supply Chain

We had 106 suppliers in 2023, covering 257 factories across the world.

## Combined Supplier Map

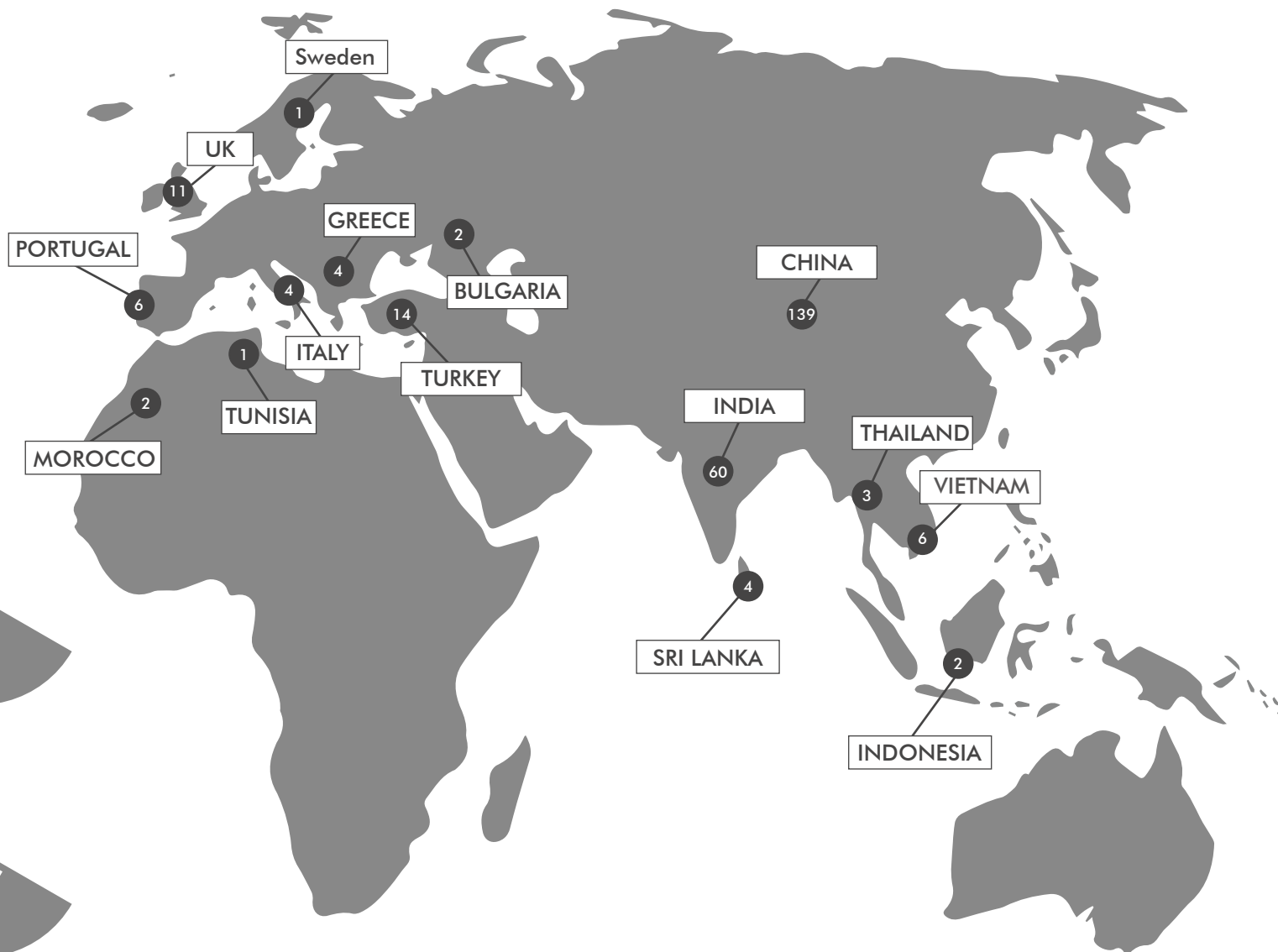


**Top Sourcing Countries**  
China, India, Turkey, UK,  
Vietnam & Portugal

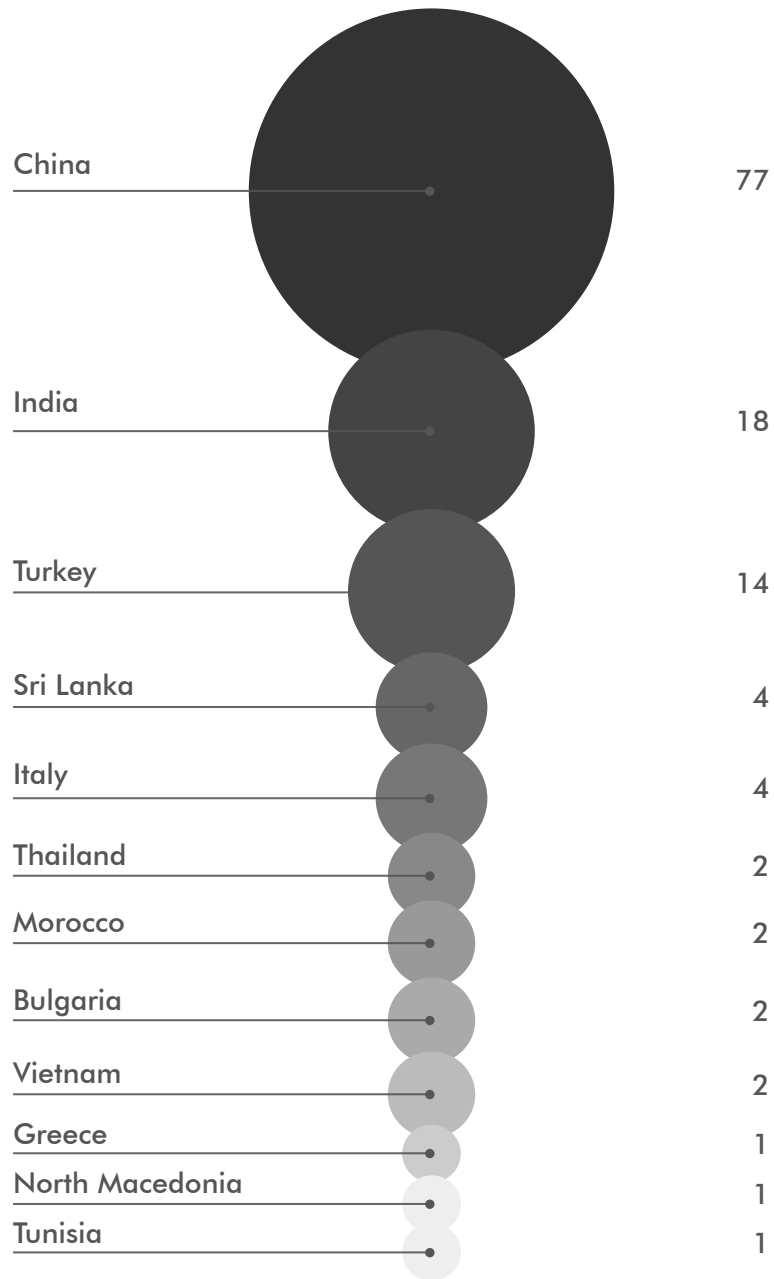
### Fashion



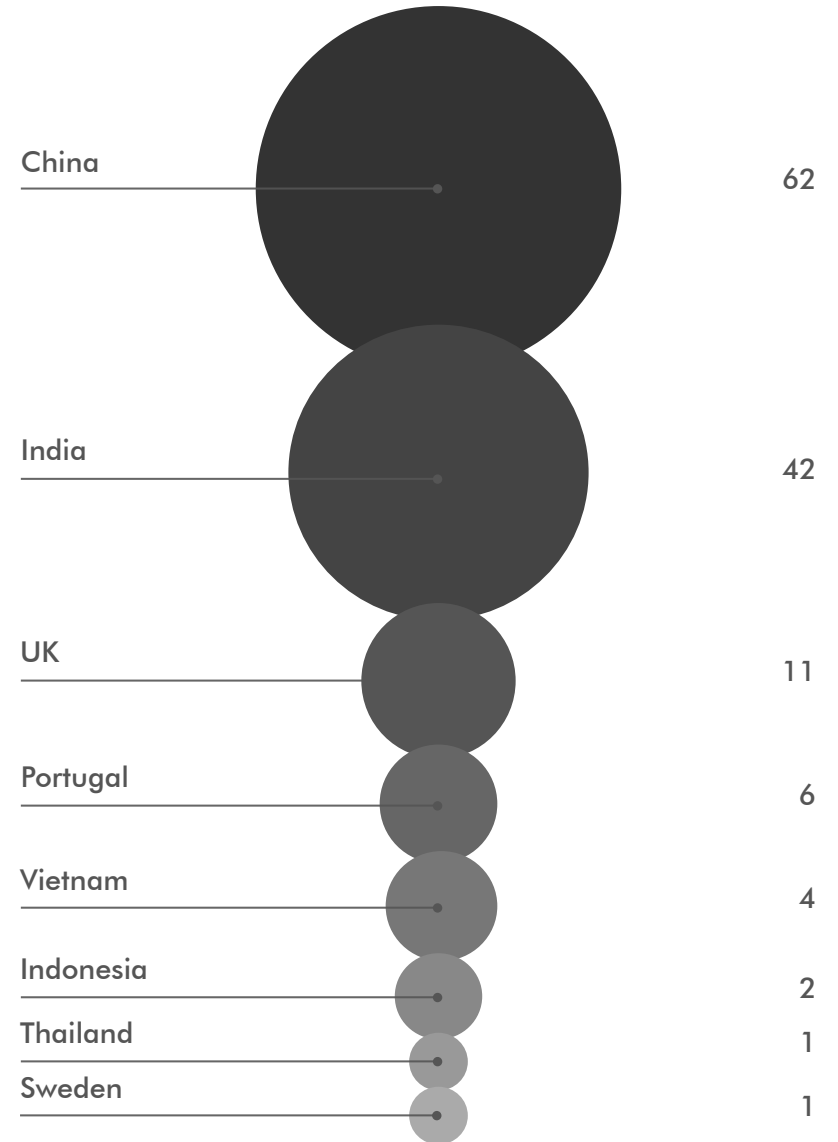
### Home & Gift



## Fashion Country Divide



## Home and Gift Country Divide



## Policy & Risk Assessment

Oliver Bonas is committed to respecting labour rights in our supply chain activities. Our Supplier Code of Conduct (Code) details the minimum standards we expect from any suppliers used to manufacture Oliver Bonas own brand products. Our Code is based on the ETI Base Code covering the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

This code outlines workers' fundamental rights and freedoms including the elimination of forced labour. We continually review this Code to ensure any new advancements are updated and communicated to our suppliers, we updated our Code of Conduct in 2022. In addition to these standards, suppliers must comply with all relevant local and national laws. If there is a conflict between national law and the Code, the supplier must adhere to the standard which provides the worker with the greatest protection.

We have communicated our requirement to our first-tier suppliers to ensure that they and their own suppliers implement these standards, as we recognise that human rights risks to be greater further upstream of the supply chain. As we engage deeper in our supply chain, we will seek to learn more about the most effective ways to enable access to remedy, in addition to encouraging good grievance mechanisms.

We recognise that human rights risks can appear anywhere in the supply chain but we understand it may be more likely in certain areas and scenarios. To address this, we have performed a risk assessment across our business to determine where we should be focussing our efforts. When assessing our suppliers, we investigate against certain criteria including geographical location, materials used, production process, our leverage/spend with the supplier, visibility of supply chain and the findings from their latest ethical audit. This will give a rating for all our suppliers of High, Medium, or Low risk which determines the priority and action to be taken.

## What are Salient Human Rights Risks?

The UN Guiding Principles state that salient risks are: The human rights at risk of the most severe negative impact through the company's activities and business relationships. This concept of salience uses the lens of risk to people, not the business, as the starting point, while recognising that where risks to people's human rights are greatest, there is strong convergence with risk to the business.

The Organisation for Economic Co-operation and Development (OECD) recommends that due diligence addresses actual adverse impacts or potential adverse impacts (risks) related to: human rights, including workers and industrial relations, environment, bribery and corruption, disclosure, and consumer interests.

Identifying our salient human rights risks therefore helps us prioritise our due diligence efforts by focusing on risks which pose the most severe and likely actual or potential negative impact on people across our value chain. This is layered on top of other due diligence and engagement programs that use our other risk indicators.

We utilise a range of sources to help us understand the salient risks in our production countries specifically according to ETI's 9 Base Code clauses:

- 1 Employment is freely chosen
- 2 Freedom of association
- 3 Working conditions are safe and hygienic
- 4 Child labour shall not be used
- 5 No harsh or inhumane treatment is allowed
- 6 Working hours are not excessive
- 7 No discrimination is practiced
- 8 Regular employment is provided
- 9 Living wages are paid

We use a variety of resources and tools to gather risk data including internal knowledge and expertise:

- The SEDEX Radar Assessment tool (which uses hundreds of different data sources)
- Human rights research reports published by NGO's & consultancy firms including but not limited to BSR, Human Rights Watch, Clean Clothes Campaign, Universal Human Rights Index (UHRI), the Asia Foundation and the International Labour Organisation (ILO)
- Verite's responsible sourcing tool

## Where are our highest risks?

We believe human rights and modern slavery risks are most prevalent:

- In our own brand product supply chains
- Where suppliers subcontract processes to other sites, especially those not declared to us
- In the production or extraction of raw materials
- In countries where these risks are higher e.g. China (state-imposed forced labour), India (restriction of freedom of movement), Turkey (large numbers of refugees)

During 2023 we focused our mapping on our four top sourcing countries: China, India, Turkey and Vietnam. Collectively these countries represent approximately 80% of our buying forecast.

The salient risks for these countries are mapped out in the table on the next page. We are using these risks to shape and prioritise the actions we roll out as part of our ethical sourcing program, which includes direct worker engagement. Policies and toolkits specific to salient risks have been published on our supplier portal so all suppliers can read and acknowledge their understanding and work with our ethical sourcing team on remedial plans.

## Salient Risk Table

RISK	DESCRIPTION	WHERE IS RISK MORE LIKELY (LOCATION/WHERE IN VALUE CHAIN)	POLICIES AND ACTION
<p><b>Freedom of association and collective bargaining</b></p> <p>ETI base code clause 2 and ILO conventions C87, C98, C135, R143, C154</p>	<p>The right of workers and employers to freely form or join organisations that promote and defend their interests at work, without interference from one another or the State.</p> <p>A voluntary process through which employers, and trade unions (or in their absence, workers' representatives) discuss and negotiate their relations and interaction at the workplace, such as pay and other terms and conditions of work.</p>	<p>In our own operations and in our manufacturing supply chains. Especially China, India and Turkey.</p> <p>Vulnerable groups include union members and representatives, labour activists, students, migrant and temporary workers.</p>	<p>Policies: Supplier Code of Conduct and Freedom of Association and Right to Collective Bargaining Policy. Suppliers are asked to review and sign before entering a business relationship with us.</p> <p>A non-retaliation letter should be posted in factories, a template is available for them in our supplier portal, and we provide a direct email address at OB for workers to contact us should those rights not be upheld.</p> <p>We encourage factories to implement worker committees, initially focused on H&amp;S to promote worker-management dialogue.</p>
<p><b>Employment is freely chosen, no forced labour</b></p> <p>ETI base code clause 1 and ILO conventions C29, C105</p>	<p>There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary.</p>	<p>In our own operations and in our supply chains, especially beyond tier one, in key sourcing countries China, India and Turkey. In our operations in the UK.</p> <p>Vulnerable groups include home workers, migrant workers, young workers, female workers, cotton pickers, refugees, minority groups and agency/temporary workers.</p>	<p>Policies: Homeworker Policy and Homeworker Guidelines - Tools and Forms. We encourage transparency and effective systems to manage homeworkers. Foreign Migrant Worker Policy to support suppliers and ensure systems are put in place to protect these at-risk workers. Anti-slavery and Human Trafficking Policy.</p> <p>All suppliers sign our Cotton Sourcing Policy and must declare cotton country of origin (region of origin if China), before products are signed off. We continue to work with other brands and industry groups to monitor this situation.</p>
<p><b>No discrimination is practiced</b></p> <p>ETI base code clause 7 and ILO conventions C100, C111 and R111</p>	<p>No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.</p>	<p>In our supply chains, especially in India.</p> <p>Vulnerable groups include ethnic minorities or indigenous people, migrant workers, female workers, those with disabilities.</p>	<p>Policies: Supplier Code of Conduct</p> <p>A site's capacity for preventing and managing discrimination is assessed during their social audit. Independent auditors will review the site's policies and procedures, assessing whether they cover the needs for all workers to be treated equally in all matters of employment. We are also monitoring the ratio of female workers and working with key suppliers to look at how many are in supervisory roles and the benefits of this.</p>
<p><b>Working hours are not excessive</b></p> <p>ETI base code clause 6 and ILO conventions C1, C30, C106, C14</p>	<p>Working hours and rest time that comply with national law, the ETI base code or collective bargaining agreements — whichever affords greater protection to the worker.</p>	<p>In our supply chains, especially in China, India and Vietnam.</p> <p>Vulnerable groups include all production workers, especially migrant workers.</p>	<p>Policies: Supplier Code of Conduct</p> <p>We conducted a supplier survey in Oct 2022 and delivered dedicated training on responsible purchasing practices to all product teams in 2023. The survey benchmarked us above industry average on all indicators but also helped highlight opportunities for improvement.</p> <p>We encourage suppliers to be transparent about working hours so we can discuss root causes if issues arise.</p>
<p><b>Living wages are paid</b></p> <p>ETI base code clause 5 and ILO conventions C131, C95</p>	<p>Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.</p>	<p>In our supply chains, especially in China, India and Turkey where the agreed minimum wage is significantly less than the defined living wage.</p> <p>Vulnerable groups include migrant workers, home workers, female workers.</p>	<p>Policies: Supplier Code of Conduct</p> <p>Workers wages are assessed as part of our factory monitoring program. Independent auditors review working hours records, production records and interview workers to verify wages and hours via this method called triangulation, designed to spot inconsistencies.</p>



# Our Supply Chain

## Monitoring and Auditing

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

Where our suppliers have already had an ethical audit completed at the request of another retailer, we are happy to use this to avoid the suppliers having to duplicate time and spend, if it meets our minimum requirements (reputable auditing company, approved framework, covers all the clauses in our Code). These audits will include site inspections, document reviews and confidential interviews with workers in their local language to determine if employment is freely chosen.

Where issues are identified we will work with the supplier to resolve the issue over an agreed timeframe providing as much support and guidance as needed. We want to improve the working conditions for those in our supply chains rather than walk away from issues found.

## Promoting Worker: Management Communication

We acknowledge and support the enabling right of freedom of association so that workers are aware of and can exercise their fundamental rights at work, and the role of legitimate trade unions in achieving mature industrial relations and addressing labour disputes and grievances. Our Supplier Code of Conduct and Freedom of Association and Right to Collective Bargaining Policy set out the standards we expect of our suppliers in relation to Freedom of Association, as well as commitment and responsibility of Oliver Bonas to ensuring that our practices don't interfere with our workers' ability to use these rights.

Together, we collaborate with our suppliers to give the workforce non-interference and non-retaliation letters that emphasise workers' right to unionise themselves as a group or committee. If any of the points stated on the non-retaliation letters regarding freedom of association and collective bargaining rights of the workers are not upheld, workers may choose to access the factory grievance system to look for remedy. If no remedy is available at the factory level, workers can contact Oliver Bonas through our dedicated email address.

We ask suppliers to post the non-retaliation letter on the factory noticeboards where workers can see it. When workers see both the supplier (their employer) and Oliver Bonas committing to these rights, we hope they will feel more confident in using these rights without fear of retaliation. The Freedom of association and right to collective bargaining policy can be found on our supplier portal: The Suppliers Guide to Working With OB.

We monitor and track alignment with the Supplier Code of Conduct and Freedom of Association and Right to Collective Bargaining Policy, by looking at whether the site has a trade union or worker representation and how many workers are covered through collective agreements by a trade union or other means. We require factories to supply documentary evidence, such as a copy of collective bargaining agreements, a list of committee members and minutes of meetings, election procedures, and registers of any grievance or suggestion boxes during the audits conducted as part of our factory-level due diligence.

## Modern Slavery Risks Identified in 2023

We continued our established factory monitoring program to assess working conditions and agree corrective action plans with factories. Identifying modern slavery via social audits is generally unlikely. There are limitations to the audit process, and these are very complex and hidden issues. That said, we continue to see the value in the audit program as an engagement tool and guideline for factories in ensuring they meet our Code of Conduct.

In 2023, a renewal audit of one of our bag suppliers in China identified inconsistent records which meant that working hours and wages could not be verified. This could be an indication of long working hours, insufficient rest time or overtime hours not being compensated correctly, so we immediately opened direct dialog with the supplier.

Due to the complexity of these risks and known salient risks in China, we agreed to jointly commission an independent labour specialist, appointed by us and known to work with other UK brands at the ETI, to conduct a management capacity building program with the supplier. The eighteen-month program consisted of meetings, site visits and regular communication to support factory management in understanding and implementing effective systems. They focused on effective wage and working hours systems, subcontractor management, reducing overtime and a Health & Safety self-monitoring system.



Working in this collaborative way has led to significant changes in comparison to the audit model that identifies issues but does not always support suppliers to address complex challenges. We continue to work closely with the supplier to monitor risks to workers and drive more effective monitoring down into their supply chain.

Working collaboratively with our suppliers is paramount to Oliver Bonas. We work on a continuous improvement basis with our suppliers and ask for transparency and co-operation in return.

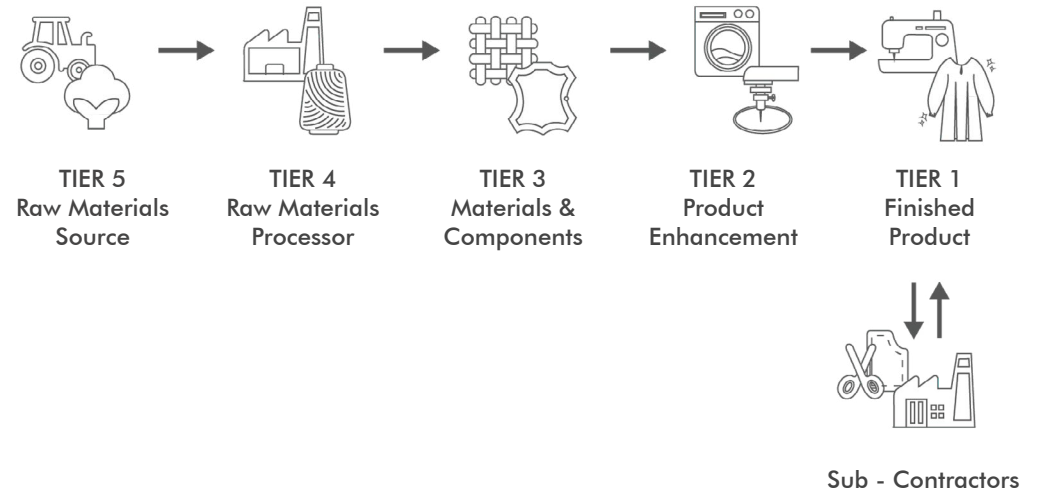
# What is Known & Our Plan

## Assessing conditions further down the supply chain

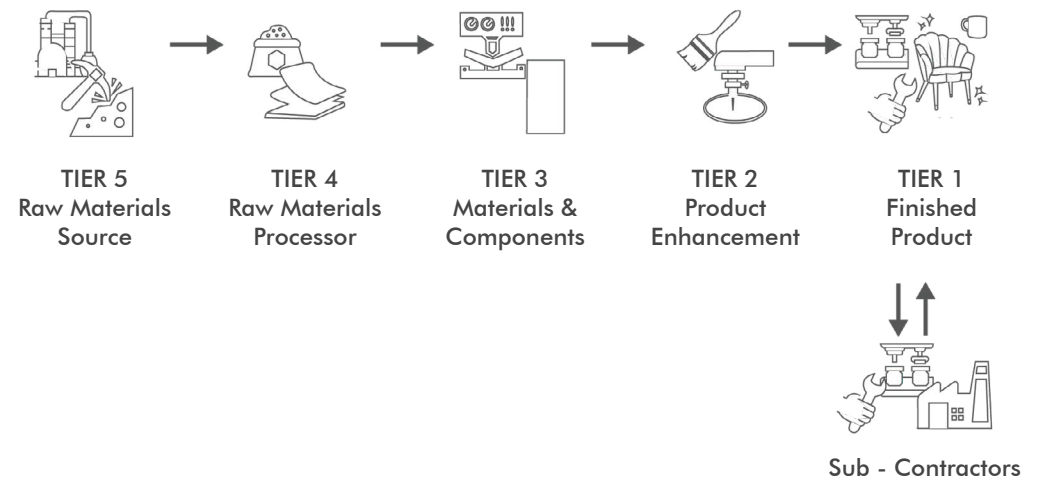
We have had an established factory set-up and monitoring program in place for tier one factories for a number of years, so most of our suppliers are familiar with our Code of Conduct requirements and expectations. We know that human rights risks are more prevalent up stream in supply chains, beyond tier one, therefore we have been actively working with suppliers to map and assess their supply chains since December 2021.

We use a risk matrix to prioritise due diligence action beyond tier 1. Some sites have had independent social audits, whilst others have completed self-assessments or had visits by the Oliver Bonas team. This has mainly focused on tier two sites, whilst we continue to map supply chains as far as we can.

## Clothing Supply Chain



## Furniture & Hard Goods Supply Chain



## Transparency

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

## Suppliers Guide to Working with OB

To support our suppliers and streamline communication, we developed a new supplier portal, to update and take all the information in our Supplier Manuals online and add a range of new resources on product, packaging, shipping, trading with OB and worker welfare. The ambition of the portal is to empower suppliers to get it right first time and give them access to resources/further reading on difficult and complex issues.

Worker welfare resources look at key topics relating to modern slavery and include updates to our ethical Code of Conduct, enhanced transparency of production, child labour policy, foreign migrant policy, homeworker policy and tool-kit, strike protocol/freedom of association policies and on anti-slavery and human trafficking policy. Suppliers will review and accept the policies online.

## Supplier Survey

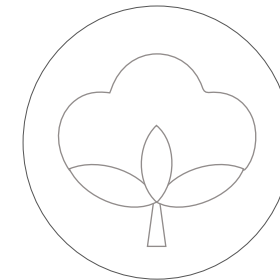
Asking suppliers to uphold high ethical standards and worker welfare is important, but it will only be possible if we do our bit and maintain responsible and collaborative trading relationships. We understand the impact our purchasing practices have on our suppliers and their workforce, so we asked our suppliers to complete an independent supplier survey to understand what it is like working with OB.

The Better Buying Partnership Index™ survey provides a consistent way to measure the impact of brands' purchasing practices on production and creates a space for meaningful, two-way dialogue on the topic.

The anonymised results benchmarked OB above the soft goods industry average on every question, which was reassuring. It also helped identify areas for improvement, like suppliers wanting more orders and better forecasting. The ethical sourcing team worked with product teams to agree an action plan that was communicated to suppliers through the supplier portal.

## Cotton Sourcing

There are ongoing concerns around the use of government sponsored forced and child labour in Uzbekistan, Turkmenistan, and Xinjiang, Uygur Autonomous Region in China. Whilst we do not source much cotton from China, we recognise this poses our most significant modern slavery risk. Oliver Bonas has banned the use of cotton from Turkmenistan, Uzbekistan and Xinjiang, China. This is outlined in our Cotton Sourcing Policy, which was updated in 2021 and sent to all suppliers for their agreement.



Following the UK Government's announcement of the measures put in place to ensure that British organisations are not complicit in, nor profiting from, the human rights violations in Xinjiang, China, we have put an increased focus on examining our supply chain in this region. We do not directly source any products or materials from Xinjiang and have carried out further mapping work to understand the risk beyond Tier 1. Suppliers of cotton products are also required to declare the country/region of origin of any cotton used in OB branded products. We continue to work with the Ethical Trading Initiative (ETI), British Retail Consortium (BRC) other retailers, trade unions and NGOs to try to understand and address the growing concern.



## Our Collaboration

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

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

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



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



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

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



## Training

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

## Internal Engagement

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

## Monitoring Process

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

KPIs*	ACHIEVED IN 2020	ACHIEVED IN 2021	ACHIEVED IN 2022	2023 PROGRESS
Any Forced Labour non-compliances found in audits and actions taken in response	Continued auditing of high risk suppliers  No identified non-compliances on forced labour in 2020	Extended audit program to begin incorporating medium risk and tier 2 facilities  Introduced in-depth self-assessment tool for sites where the standard audit methodology is not appropriate  No forced labour non-compliances identified in 2021	Continued auditing of high and medium risk suppliers  No identified non-compliances on forced labour in 2022	Continued auditing of tier 1 and 2 factories.  No identified non-compliances on forced labour in 2023
Number of suppliers signed up to our Supplier Code of Conduct	All existing and new own brand suppliers have signed our Supplier Code of Conduct (100%)  All recruitment agents signed our Supplier Code of Conduct (100%) and are members of the REC  All major logistics & haulage partners signed Supplier Code of Conduct (100%)	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded
Number of relevant staff trained	The pandemic prevented any face to face training with OB team members in 2020. However, our Induction Resources were updated so all new team members, regardless of role, were trained on our Ethical Trade and Modern Slavery standards	All new employees trained via Loopo learning portal. All training resources are mandatory for new joiners	We continue to train new employees via Loopo, our online learning portal.	We continue to train new employees via Loopo, our online learning portal.  We delivered refresher training on Ethical Sourcing and Responsible Purchasing Practices for product team members during summer 2023. This included a module on Modern Slavery
Number of factories audited	HOME & GIFT 15 of 58 High Risk Suppliers completed audits in 2020. All others were completed in 2019. None of these were virtual audits. Only 2 high risk suppliers on the Home & Gift supply chain have outstanding audits. These have been difficult to complete due to local and national lockdowns. Audits in Thailand are not currently possible.  FASHION 6 of 11 High Risk Suppliers completed audits in 2020. All others had audits in Q2 2019. Improvement journeys continue with one supplier. One outstanding audit is in Thailand where audits are not currently possible.	During 2021 we changed our risk model and tier definitions. We are now working towards all Tier 1 and 2 sites having some form of social assessment (audit, visit or in-depth self-assessment)  FASHION 100 Tier 1 sites 98 Assessed in 2020/21 2 sites awaiting assessment  HOME & GIFT 112 Tier 1 sites 90 Assessed in 2020/21 22 sites awaiting assessment	FASHION 106 Tier 1 sites 102 Assessed in 2021/22 4 sites awaiting assessment  HOME & GIFT 122 Tier 1 sites 123 Assessed in 2021/22 10 sites awaiting assessment	FASHION 128 Tier 1 sites 126 Assessed in 2022/23 2 sites awaiting assessment  HOME & GIFT 129 Tier 1 sites 120 Assessed in 2022/23 9 sites awaiting assessment
Steps taken to educate and train our high-risk suppliers	Given the pandemic, our focus was on two key issues: Health & Safety: ensuring that all suppliers were keeping team members protected and had covid-secure policies in place. Extensive information was provided to all suppliers and we received images and videos from factories of processes in place. Wages: ensuring all our suppliers paid their workers their due wages.	The pandemic continued to impact on our supply chain this year. H&S and wages are still areas of focus for us. New online resources developed in 2021 designed to support and educate supplier.	Our new supplier portal contains new policies, guidance and tool-kits on a number of sensitive and complex worker issues. Suppliers can access resources and links to further guidance online. This includes a dedicated Modern Slavery Policy. Our ethical sourcing team make contact with any high risk suppliers to establish a plan	Continued communication with suppliers through the supplier portal: The Suppliers Guide to Working with OB.  Significantly more travel to sourcing countries to conduct discussions directly with factory management, was possible compared to previous years

\*see previous years MSA for achieved in 2019 [here](#)