

OLIVER BONAS

Modern Slavery & Human Rights Risks Report 2024

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.

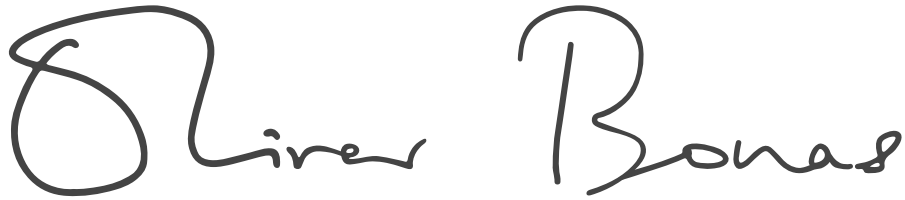
In 2015, the UK Government passed into law the Modern Slavery Act. In the last eight years, we have played our part and recognise we have a responsibility to prevent modern slavery and human trafficking throughout Oliver Bonas and in our supply chain.

This is our ninth MSA statement and was published in July 2025. This highlights the work we have undertaken to identify and eradicate modern slavery within our business over the previous financial year, January to December 2024. The statement was approved by the directors and leadership team at Oliver Bonas.

Signed

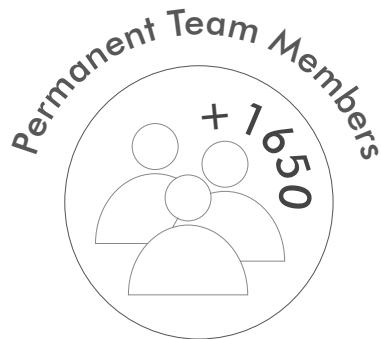
A handwritten signature in white ink that reads "Olly Tress". The signature is written in a cursive, flowing style.

Oliver Tress, Founder & Managing Director,
Oliver Bonas Ltd, July 2025



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 1650 permanent team members (employees). We are a growing privately owned independent company with 90 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 2024 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 89% of our product range in 2024.



Our Commitment

Our company values are the foundations of our business operations, placing our team members, customers, and suppliers who create the exceptional products we offer - at the heart of everything we do. We maintain a firm commitment to driving meaningful positive change while safeguarding the welfare of both our people and the planet through a comprehensive approach:

Strategic Approach to Human Rights Protection

Our dedication to identifying and preventing human rights exploitation, including modern slavery, is implemented through a robust, multi-faceted framework designed to understand, assess, and mitigate potential risks across our entire operational ecosystem. This approach encompasses:

Supplier Engagement and Due Diligence

- Establishing clear requirements and expectations for all prospective suppliers prior to initiating any business relationships
- Implementing mandatory online supplier induction programmes to ensure alignment with our ethical standards
- Collaborating with suppliers to map our supply chains, enhance visibility into worker conditions throughout our product manufacturing processes, and develop deeper understanding of potential risk factors

Risk Management and Monitoring

- Developing and implementing sophisticated monitoring programmes coupled with detailed remedial action plans to prevent, assess, and systematically eliminate identified risks
- Ensuring our policies, procedures, and training programs undergo regular comprehensive reviews and dates to guarantee our team members consistently employ responsible purchasing practices
- Providing training for hiring managers and supervisors on recognising indicators of modern slavery and raising concerns

Our Commitment

Governance Structure and Accountability Framework

The responsibility for comprehensive human rights due diligence, including modern slavery prevention measures, sits with our People Director, Buying and Merchandising Director, Chief Operating Officer, and the broader teams, ensuring accountability at every level.

Escalation and Response Protocols

We have established a formal escalation framework for reporting serious issues affecting working conditions within both our direct operations and extended supply chain. When high-risk situations are identified through our factory monitoring programmes, immediate notifications are distributed to relevant Buyers, Technical/Quality Assurance teams, Heads of Ethical Sourcing & Sustainability, Buying and Product Tech/Compliance. This triggers discussions to assess the situation, develop strategic action plans, and coordinate appropriate communication with suppliers or external partners.

Remedial Action Implementation

Our response protocol includes the development of detailed remedial plans with specific timescales, agreed upon in collaboration with suppliers, along with comprehensive support mechanisms to facilitate successful implementation. Our ethical sourcing programme maintains a dual focus on our impact on both people and planet, enabling us to understand supply chain risks and fulfill our responsibility to exercise due diligence in protecting workers.

Cross-Departmental Integration

Ethical sourcing represents an integral component of our business operations at Oliver Bonas, with monitoring and due diligence responsibilities shared across multiple departments and teams. Our Head of Ethical Sourcing and Sustainability provides oversight of our ethical trade programme governance across all departments, including Ethical Trade, People (HR), Communications, Buying, Merchandising, Design and Technical functions.

Oliver Bonas operates through three primary business areas: our 90 retail stores, three warehouses, and our Support Office. Our Support Office and two warehouses are based in Chessington, Surrey, with an additional warehouse in Andover, Hampshire. Our current workforce is just over 1,650 permanent employees, with 70% based in our store locations, 18% in our Support Office, and 12% across our warehouse operations.

Our workforce is 85% female', reflecting our commitment to diversity in employment.

People (HR Team)

At Oliver Bonas our in-house people team led by our People Director develop and implement all policies and procedures to support line managers in the management of their team. This consistent approach ensures the high standards and the fair treatment of all our team members. Our policies are accessible to all team members via our e-learning platform, 360L.

Reporting and Accountability Mechanisms

Team members who identify potential wrongdoing can report concerns through our established Whistleblowing and Speak Up processes, which facilitate effective reporting and ensure appropriate corrective action is taken.

Compliance and Verification Procedures

All payroll administration is conducted internally through our dedicated payroll team, with all salaries paid directly into bank accounts registered to individual team members.

All new employees complete mandatory right-to-work checks, and imposter verification checks are conducted by managers on a new team member's first day. For hourly-paid team members, work hours are captured and monitored through our integrated HR system clocking software, with all hours monitored by our payroll team to ensure adherence to UK Working Time Regulations.

Continuous Improvement and Auditing

We conduct comprehensive annual reviews at year-end to ensure our policies remain current and effective, supplemented by ad hoc amendments aligned with employment legislative changes and industry best practices.

Recruitment Framework

Our in-house recruitment team, led by our Talent and Acquisitions Lead, maintains responsibility for all recruitment processes and procedures, actively involved in Store Management, Support Office, and Warehouse recruitment. Store managers retain responsibility for their team member recruitment, with all vacancies managed through our Applicant Tracking System (Talent Funnel).

Verification and Compliance

All Right to Work checks are conducted through our ATS using third-party Trust ID verification, managers then utilise this information to conduct thorough imposter checks on a new team members' first day of employment.

Seasonal Workforce Management

During our peak period from October through January, we recruit over 550 temporary team members and approximately 300 agency workers. All recruitment agencies used for seasonal resourcing are certified members of the REC (Recruitment and Employment Confederation) and hold valid GLAA (Gangmaster & Labour Abuse Authority) licenses.

Training and Development

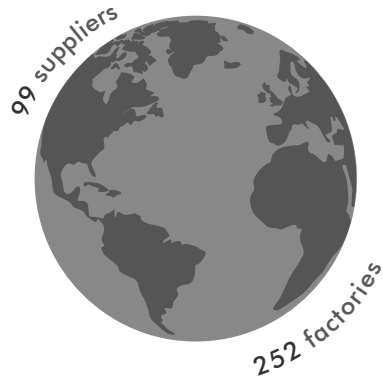
Our Head of Learning and Development and her team design and deliver extensive soft skills workshops and courses through a combination of in-person events and online learning via our 360L platform. We provide bespoke leadership and management courses alongside comprehensive induction programme for all new joiners to the business.

Across the past year we have included coaching into the development provided and over 50 courses were delivered across the business (face-to-face and online). Sexual harassment workshops are delivered to all managers in all business areas by our Senior EDI Manager.

Our Supply Chain

We currently source from 99 suppliers, using 252 factories in 14 different countries.

Combined Supplier Map

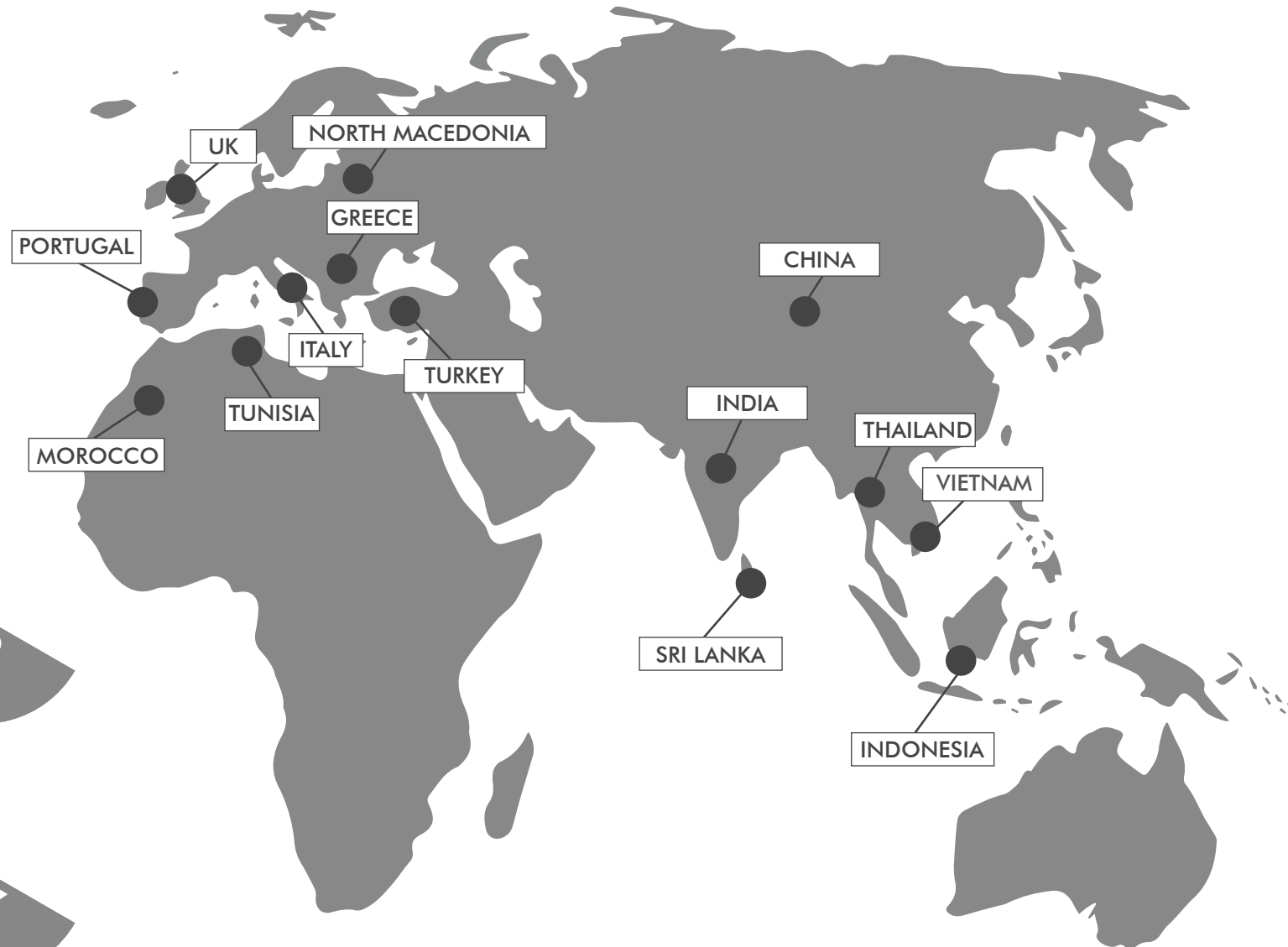


Top Sourcing Countries
China, India, Turkey, UK,
Vietnam & Portugal

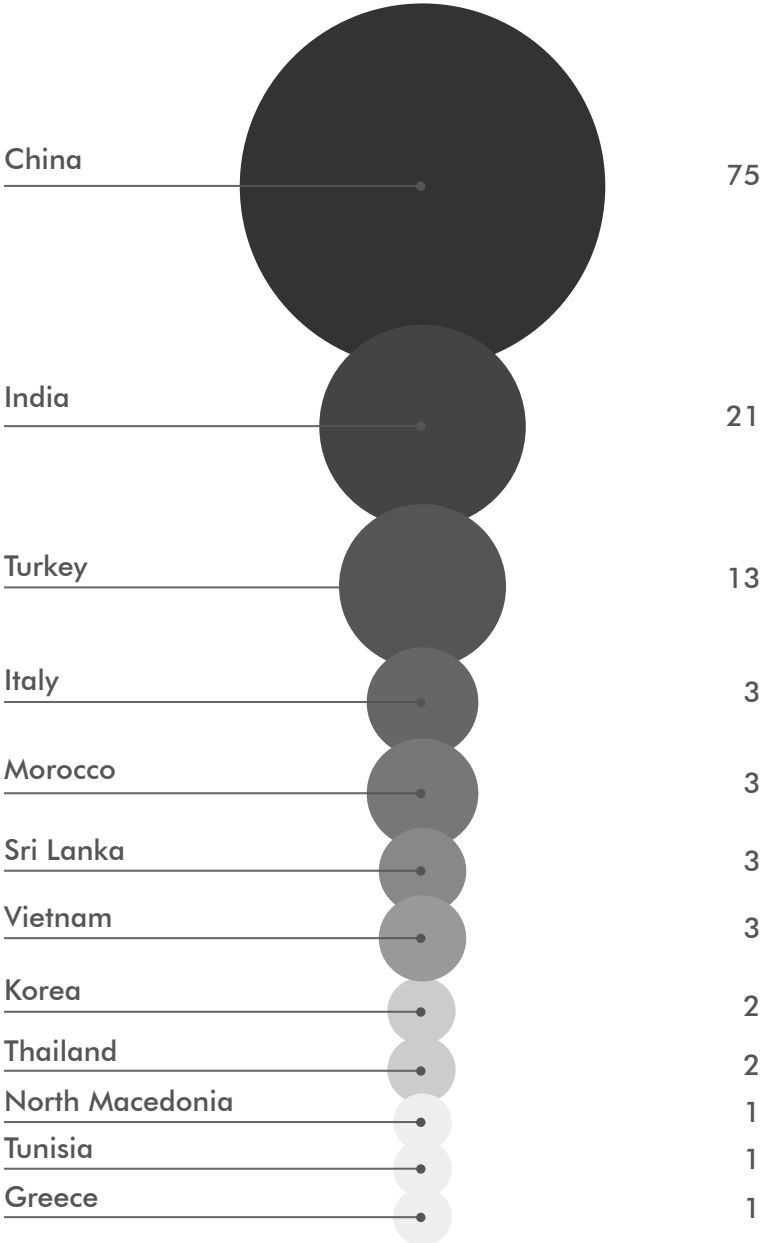
Fashion



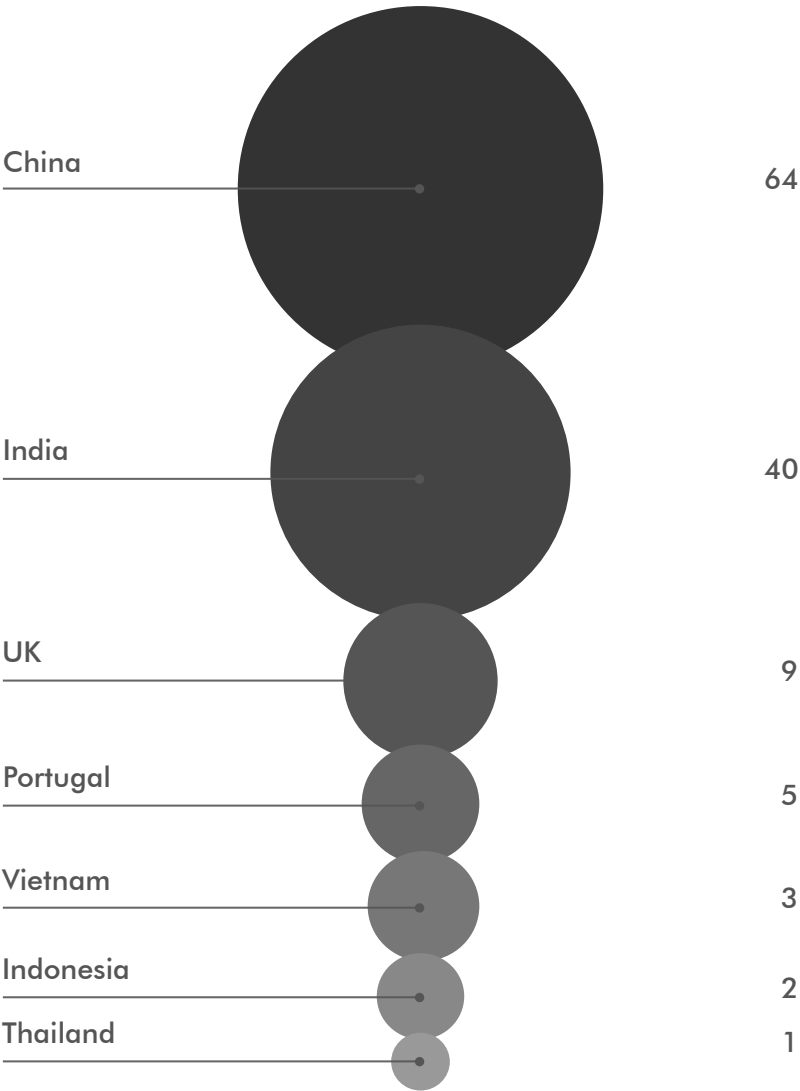
Home & Gift



Fashion Country Divide



Home and Gift Country Divide



Our Supply Chain

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

We use a variety of resources and tools to gather risk data including internal knowledge & 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
- The Ethical Trading Initiative forums, regional/risk updates and working groups

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 2024 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 programme, 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
Freedom of association and collective bargaining ETI base code clause 2 and ILO conventions C87, C98, C135, R143, C154	<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&S to promote worker-management dialogue.</p>
Employment is freely chosen, no forced labour ETI base code clause 1 and ILO conventions C29, C105	<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>We are exploring anonymous worker surveys as tool to identify circumstances which could indicate complex risks such as forced labour.</p>
No discrimination is practiced ETI base code clause 7 and ILO conventions C100, C111 and R111	<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>
Working hours are not excessive ETI base code clause 6 and ILO conventions C1, C30, C106, C14	<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>
Living wages are paid ETI base code clause 5 and ILO conventions C131, C95	<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 programme. 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.

China Landscape Assessment

In Spring 2024, Oliver Bonas collaborated with two other high street retailers to launch a collaborative Landscape Assessment Programme focused on China's apparel sector. This initiative aimed to build a clearer risk profile of the industry by analysing survey data from 1,327 workers across 12 workplaces in four provinces. The assessment covered a range of production processes, including cutting, sewing, embroidery, ironing/finishing, and packing, offering direct insight on working conditions and potential human rights risks.

The first survey cycle identified both sector-wide strengths and areas for improvement. Findings highlighted variations across different worker groups (such as by gender, ethnicity, and employment type) helping to better understand how known risks affect different populations within the workforce. The programme includes a second data collection phase scheduled for 2025. This phased approach allows us to build trust and increase participation in future survey cycles, which aims to deepen insights and drive more targeted, effective actions to strengthen worker protections and promote well-being across China's apparel supply chain.

Modern Slavery Risks Identified in 2024

We continued our established factory monitoring programme 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 programme as an engagement tool and guideline for factories in ensuring they meet our Code of Conduct.

In 2024 a routine audit of one of our clothing suppliers in China identified risks on several of our salient human rights/modern slavery risks including concerns around working hours, wage compliance, rest days, and worker protection. While no direct evidence of forced labour was found, the combination of these issues indicated a risk to workers. We took immediate action by working closely with the supplier, leveraging our commercial relationship to drive improvements. The buying, technical and ethical sourcing teams worked collaboratively with the supplier to explore the root causes of the issues and agreed a time bounded action plan, reinstating the importance of our Code of Conduct.



A follow up audit was conducted to ensure meaningful progress. The factory has invested in machinery which has enabled them to reduce the working hours, they have repaid the overtime correctly and ensured that all works are covered by appropriate insurance now. We will continue to monitor the site to ensure these improvements are maintained. This example highlights the importance of active supply chain engagement and the steps we can take to mitigate modern slavery risk where they arise.

What is Known & Our Plan

Assessing conditions further down the supply chain

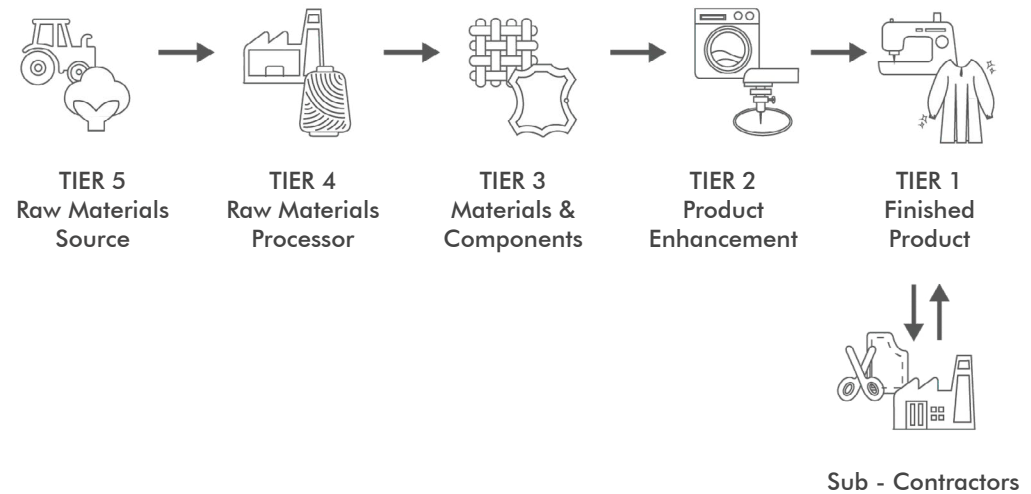
We have had an established factory set-up and monitoring programme in place for tier one factories for a number of years, so most of our suppliers are familiar with our Code of Conduct requirements and expectations. We know that human rights risks are more prevalent up stream in supply chains, beyond 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.

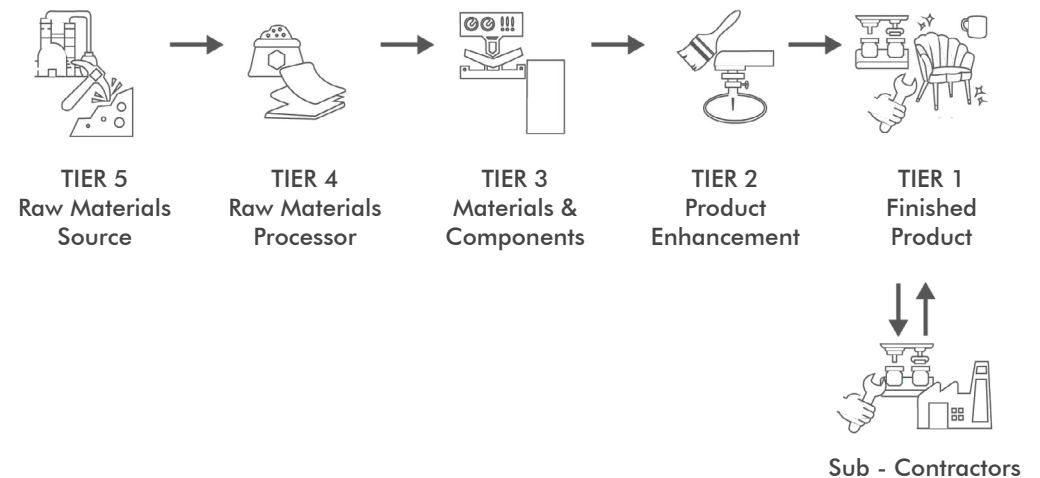
Key Supplier Programme

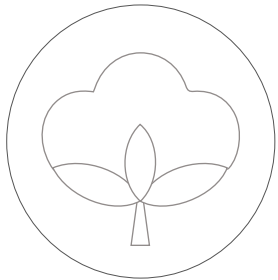
We launched the Key Supplier Programme in Summer 2024, to establish meaningful stakeholder engagement with a select group of our strategic suppliers. The initiative is designed to strengthen partnerships with our most valued suppliers by fostering deeper collaboration, mutual visibility, and shared accountability. Through strategic meetings and ongoing communication, we hope to align suppliers with our goals across Planet, Product, and People, empowering them to develop their own continuous improvement programmes. We are also using the forum to pilot new projects and prepare for new regulatory requirements. We are using a phased roll out to enable us to spend quality time with each supplier.

Clothing Supply Chain



Furniture & Hard Goods Supply Chain

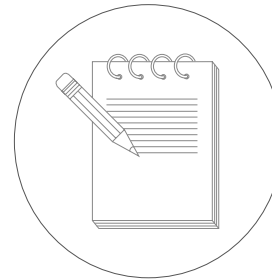




Cotton Sourcing

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, non 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. We have also set targets to increase our sourcing of environmentally preferred and certified cotton to ensure better traceability.



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.



**Ethical
Trading
Initiative**



Member



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.

Internal Engagement

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

Monitoring Process

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

KPIs*	ACHIEVED IN 2021	ACHIEVED IN 2022	2023 PROGRESS	2024 PROGRESS
Any Forced Labour non-compliances found in audits and actions taken in response	<p>Extended audit programme to begin incorporating medium risk and tier 2 facilities</p> <p>Introduced in-depth self-assessment tool for sites where the standard audit methodology is not appropriate</p> <p>No forced labour non-compliances identified in 2021</p>	<p>Continued auditing of high and medium risk suppliers</p> <p>No identified non-compliances on forced labour in 2022</p>	<p>Continued auditing of tier 1 and 2 factories.</p> <p>No identified non-compliances on forced labour in 2023</p>	<p>Continued auditing of tier 1 and 2 factories.</p> <p>No identified non-compliances on forced labour in 2024</p>
Number of suppliers signed up to our Supplier Code of Conduct	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded	Maintained compliance to 100% of new suppliers onboarded
Number of relevant staff trained	All new employees trained via Looop learning portal. All training resources are mandatory for new joiners	We continue to train new employees via Looop, our online learning portal.	<p>We continue to train new employees via Looop, our online learning portal.</p> <p>We delivered refresher training on Ethical Sourcing and Responsible Purchasing Practices for product team members during summer 2023. This included a module on Modern Slavery</p>	<p>We continue to train new employees via Looop, our online learning portal.</p> <p>We delivered refresher training on Ethical Sourcing and Responsible Purchasing Practices for product team members during summer 2023. This included a module on Modern Slavery. We continue to train all new employees via our online learning portal.</p>
Number of factories audited	<p>During 2021 we changed our risk model and tier definitions. We are now working towards all Tier 1 and 2 sites having some form of social assessment (audit, visit or in-depth self-assessment)</p> <p>FASHION 100 Tier 1 sites 98 Assessed in 2020/21 2 sites awaiting assessment</p> <p>HOME & GIFT 112 Tier 1 sites 90 Assessed in 2020/21 22 sites awaiting assessment</p>	<p>FASHION 106 Tier 1 sites 102 Assessed in 2021/22 4 sites awaiting assessment</p> <p>HOME & GIFT 122 Tier 1 sites 123 Assessed in 2021/22 10 sites awaiting assessment</p>	<p>FASHION 128 Tier 1 sites 126 Assessed in 2022/23 2 sites awaiting assessment</p> <p>HOME & GIFT 129 Tier 1 sites 120 Assessed in 2022/23 9 sites awaiting assessment</p>	<p>FASHION 135 Tier 1 sites 134 Assessed in 2023/24 2 sites awaiting assessment</p> <p>HOME & GIFT 122 Tier 1 sites 120 Assessed in 2023/24 2 sites awaiting assessment</p>
Steps taken to educate and train our high-risk suppliers	The pandemic continued to impact on our supply chain this year. H&S and wages are still areas of focus for us. New online resources developed in 2021 designed to support and educate supplier.	Our new supplier portal contains new policies, guidance and tool-kits on a number of sensitive and complex worker issues. Suppliers can access resources and links to further guidance online. This includes a dedicated Modern Slavery Policy. Our ethical sourcing team make contact with any high risk suppliers to establish a plan	<p>Continued communication with suppliers through the supplier portal: The Suppliers Guide to Working with OB.</p> <p>Significantly more travel to sourcing countries to conduct discussions directly with factory management, was possible compared to previous years</p>	<p>Continued communication with suppliers through the supplier portal: The Suppliers Guide to Working with OB.</p> <p>Significantly more travel to sourcing countries to conduct discussions directly with factory management, was possible compared to previous years</p>

*see previous years MSA for achieved in 2020 [here](#)