



**SELFRIDGES&CO**

**VALUING OUR PEOPLE, ENABLING THEIR SUCCESS**  
**MODERN SLAVERY STATEMENT 2017/18**



### 03 WHO WE ARE

### 04 ENSURING WE ARE ON TRACK

### 05 OUR APPROACH: OVERVIEW

### 06 OUR APPROACH: TEAM MEMBERS

### 07 OUR APPROACH: PEOPLE WORKING ON OUR SITES

### 08 OUR APPROACH: SUPPLIERS

### 09 OUR PARTNERSHIPS

### 10 ADDRESSING THE ISSUES

### 11 MONITORING THE EFFECTIVENESS OF OUR APPROACH



#### INTRODUCTION FROM THE MANAGING DIRECTOR, ANNE PITCHER

To deliver our vision of being the destination for the most extraordinary customer experience, we need to take care of those who help us achieve it. Our team members, brand partners and suppliers are all part of the Selfridges family and we treat them as such. We are proud of those who work for and partner with us. Their safety, security, wellbeing and happiness is as important to us now as it was when Selfridges was founded in 1909.

Modern Slavery in all its forms goes against everything we stand for as a family-owned, values-led business. We are committed to supporting the communities that we work with in collaboration to help eradicate the issue.

This update highlights the steps we have taken since our first Modern Slavery Statement. Over the last year we have focused on formalising our approach to understanding and mitigating Modern Slavery risk in our business and supply chain. We have created a Modern Slavery Working Group which oversees our Modern Slavery action plan to aid this. They report into our newly formed Sustainability Steering Committee, which consists of senior leaders from across the business, helping drive forward our approach to sustainable business.

Our Modern Slavery action plan is built on the fundamentals of our sustainability programme, "Buying Better, Inspiring Change". Last year we described the fundamentals of our approach, focusing on our supply chain due to the complexity and risk associated. This year we reviewed how we define the groups of people at risk across our business: those who work for us, those who work for a supplier on our sites and those who work for a supplier elsewhere. This redefinition helped us to take a more people-focused approach, prioritising the more vulnerable in our business and supply chain. We reviewed the policies and processes we already had in place for each of these groups, identified gaps and focused activity based on risk.

In addition to formalising and reviewing our risk approach, we have focused on internal communications to raise awareness of Modern Slavery. We have also reviewed and enhanced our reporting processes to help us monitor the effectiveness of our approach.

While we have made progress over the last year, and have deepened our reporting, we recognise we need to keep challenging ourselves to do more, to ensure we are focusing on the right areas and supporting our values.

A handwritten signature in black ink, which appears to read "Anne Pitcher".

Signed date: 1 February 2018  
Signed for and on behalf of the Selfridges Executive Committee



# WHO WE ARE

Selfridges, a world renowned department store, is part of the Selfridges Group. The Group consists of Brown Thomas and Arnotts in Ireland, Holt Renfrew in Canada, Selfridges in the UK and De Bijenkorf in the Netherlands. We mapped our business model and supply chain including identifying the groups of people who work for and with us. We then identified groups at higher risk of Modern Slavery. This helped us target our approach this year and beyond.



London



Manchester Exchange



Manchester Trafford



Birmingham

selfridges.com

**OUR VISION:**

To be the destination for the most extraordinary customer experience.

**OUR PURPOSE:**

To surprise, amaze and amuse - and everyone is welcome.

**OUR VALUES:**

We own customer experience, We share our knowledge, We show respect, We take responsibility and deliver, We lead and inspire.

## SUPPLY CHAIN

**Over 2,700 direct suppliers:**

- **Over 2,650 suppliers of goods and services not for resale:** Suppliers that provide goods or services that we use within our business and do not sell
- **Over 50 Selfridges Selection suppliers:** Suppliers that produce our own brand "Selfridges Selection" food products

**Over 2,900 indirect suppliers:**

- **Over 2,550 own bought suppliers:** Brand partners who we buy product from to sell in our stores or on our digital platforms
- **Over 350 concessions:** Brand partners who sell their product in our stores or on our digital platforms

## OUR BUSINESS

**4 stores:**

- Oxford Street, London
- Exchange Square, Manchester
- Trafford Centre, Manchester
- Bullring, Birmingham

**4 offices**

**1 online store**

**1 distribution centre**

**1 million products:**

- Fashion
- Beauty
- Home
- Accessories
- Food
- Selfridges Selection
- Restaurants

## OUR CUSTOMERS

**Over 150 million customers:**

- **Over 150 million customers from around the world visited our stores in 2017**

## PEOPLE WHO WORK IN OUR SUPPLY CHAIN

### Supply chain workers

Within our supply chain we prioritise people at higher risk of Modern Slavery based on information we obtain from Sedex, an external collaborative platform for sharing responsible sourcing data. Our risk assessment includes supplier inherent risk, including their location, types of products/services they supply, size and their own policies and practices.

## PEOPLE WHO WORK ON OUR SITES

**Directly employed by us:**  
3,000 - 3,500 team members

**Work for a supplier:**  
16,000 -20,000 people working with us via agencies, concessions, contractors and consultants

Due to the seasonal and flexible nature of our business, the number of people who we employ does change. We prioritise people at higher risk of Modern Slavery on our sites based on the type of role they have, for example cleaners, construction workers, security and facilities support, and also take into consideration the level of direct control and oversight we have.

# ENSURING WE ARE ON TRACK

Buying Better, Inspiring Change is our approach to sustainability. It is the umbrella under which we focus on sustainability and responsibility issues including those relating to Modern Slavery.

We have a clear structure in place to set strategic direction, to develop and implement plans, and to monitor progress across Buying Better, Inspiring Change. In line with this approach, we have embedded the responsibility for sustainability across our business, to ensure we collectively focus on these issues.

## EXECUTIVE COMMITTEE

Our Executive Committee, chaired by the Managing Director, is ultimately accountable for ensuring we are a responsible and sustainable business.

## SUSTAINABILITY STEERING COMMITTEE

In 2017 we set up a Sustainability Steering Committee with senior representatives from key areas of the business, chaired by our Managing Director. Meeting bi-monthly, the Committee agrees our strategic direction and monitors progress against key focus areas of Buying Better, Inspiring Change, including Modern Slavery.

## MODERN SLAVERY WORKING GROUP

To provide additional focus to the issue of Modern Slavery we set up a Modern Slavery Working Group this year, which is chaired by our Director of Retail Projects and Facilities Management. The Group meets fortnightly and owns the development and delivery of our Modern Slavery action plan including tracking progress against it.

*"We work collectively to be aware of and address the risks of Modern Slavery, to help ensure it does not exist in our own business and supply chain."*

## BUYING BETTER NETWORK

Our Buying Better Network meets fortnightly and includes representatives from each buying category. They help champion sustainability issues across their wider teams and with our brand partners. They focus on both the ethical practices of our brand partners and the sustainability of products we sell. They help ensure compliance with our policies and identify opportunities for us to collaborate further.

## AUDIT AND RISK COMMITTEE

The Audit and Risk Committee meet bi-annually to review all business risk including ethical trade, human rights and Modern Slavery in respect of both our business and our supply chain.

## DIRECTOR OF SUSTAINABILITY

Our Director of Sustainability oversees and drives our Buying Better, Inspiring Change programme as a whole. This includes setting the strategic direction, understanding key risks to our business and to those who work for and with us, ensuring appropriate policies and processes are in place and monitoring compliance.

## ETHICAL TRADE MANAGER

Our Ethical Trade Manager is responsible for monitoring and managing ethical trade risk across our supply chain. They provide technical support and advice to the Buying teams and manage our partnership with Sedex.





## OUR APPROACH: OVERVIEW

Our people really are at the heart of our business. Our values set out our responsibility to respect those who work for and with us; and our commitment to share knowledge to lead, inspire and deliver change. Our approach is based on our values and covers three closely related groups of people across our business and supply chain:

- People who are directly employed by us
- People who work for a supplier but are based on our sites
- People who work for a supplier elsewhere

We mapped our existing approach to managing risk for each of these groups of people. This allowed us to evaluate our progress, target things we can do better, and develop a plan of action. On the next three pages we detail this across the key areas and demonstrate the initiatives we have in place to build open and trusting relationships with these groups.



# OUR APPROACH: TEAM MEMBERS

The policies and processes embedded across our business help us ensure our team members are treated fairly, understand the expectations of them and know where to find support. There are key aspects of how we do business that relate to our approach to tackle Modern Slavery:

AREA	OUR APPROACH	ADDITIONAL STEPS TAKEN IN 2017/18	ACTIONS PLANNED FOR 2018/19
<b>POLICIES</b>	Our Code of Conduct and HR Policies set out our expectations of team members and our responsibilities towards them.	<p>We began a review of our HR Policies and practices to identify areas for enhancement in relation to Modern Slavery. For example:</p> <ul style="list-style-type: none"> <li>We specified that recruitment agencies should not charge recruitment fees to candidates</li> <li>We have included a restriction against having salary paid into a bank account in someone else's name</li> </ul>	We will continue this review of our policies against good practice and adapt where appropriate.
<b>ON-BOARDING PROCESSES</b>	We review our new team members' right to work as part of our on-boarding process.		
<b>MONITORING PROCESSES</b>	We have a grievance process for highlighting and addressing any team member concerns or issues.	We began monitoring key team member details to identify any unusual patterns. For example, checking for multiple team members with the same address, emergency contact or bank account details.	With new IT systems being implemented over the coming year, we will explore opportunities to further analyse indicators of potential issues.
<b>ESCALATING PROCESSES</b>	We have a dedicated whistleblowing and support line, our Speak Up Helpline. This is accessible 24 hours a day all year by anyone who works for or with us.	<p>We continued to monitor our Speak Up Helpline for indications of Modern Slavery.</p> <p>We also raised the awareness of it through a series of communications. These highlighted the number and explained its purpose including reporting issues relating to Modern Slavery.</p>	We will continue to raise the awareness of our Speak Up Helpline further as part of our 2018/19 communications plan.
<b>TRAINING AND COMMUNICATIONS</b>	<p>Every new team member attends our induction, the "Big Yellow Welcome" and new managers attend a Management Induction. These include an introduction to our sustainability programme, Buying Better, Inspiring Change.</p> <p>Our Buying Better Network and Buying teams have regular training and communications on Buying Better, Inspiring Change.</p> <p>Our Buying teams have access to a Buying Better App which highlights key sustainability considerations of suppliers and products.</p>	<p>In line with the commitments made in our last statement we have created and begun to roll out Modern Slavery training and communications, targeting key stakeholder groups:</p> <ul style="list-style-type: none"> <li>We added sections in the Big Yellow Welcome and Management Induction</li> <li>We created a separate briefing for all managers, focusing on our Retail Operations Managers, including signs to look out for</li> <li>We briefed our buying teams, including our Buying Better Network, to build their knowledge of the issues and support their conversations with our suppliers</li> <li>We have begun reviewing our Buying Better App to increase its use by our Buying teams. As part of this review we will be integrating Modern Slavery considerations</li> </ul>	We will develop more detailed training and communications for our team members, targeting those who work in higher risk areas.



# OUR APPROACH: PEOPLE WORKING ON OUR SITES

Those people who work on our sites, but are not directly employed by us, are governed by the suppliers who we engage with. How we engage with these supplier organisations is detailed overleaf. However, when on our sites we take additional steps to ensure these people are safe and treated fairly. Our managers help us support this community of people.

AREA	OUR APPROACH	ADDITIONAL STEPS TAKEN IN 2017/18	ACTIONS PLANNED FOR 2018/19
<b>POLICIES</b>	We issue our Ethical Trade Requirements to our suppliers as part of our Terms and Conditions. These Ethical Trade Requirements apply throughout our supply chain.		We will hold detailed discussions with our key suppliers who work on our sites, to understand their approach to tackling Modern Slavery including how they monitor wellbeing.
<b>ON-BOARDING PROCESSES</b>	We rely on our suppliers to ensure these people are eligible to work and are compliant with our policies and procedures. This is set out in our Ethical Trade Requirements.		
<b>MONITORING PROCESSES</b>	Managers in our business are responsible for those who they work alongside on site.	We created a separate briefing for all managers on Modern Slavery including signs to look out for and the need to support those they work alongside.	With new IT systems being implemented over the coming year, we will explore opportunities to further analyse indicators of potential issues.
<b>ESCALATING PROCESSES</b>	Our Speak Up Helpline is available to those who work on our sites.	We raised the awareness of our Speak Up Helpline through a series of communications. This highlighted the number and explained uses including issues relating to Modern Slavery.	We will continue to raise the awareness of our Speak Up Helpline further as part of our 2018/19 communications plan.
<b>TRAINING AND COMMUNICATIONS</b>	Those who work on our sites have to undergo a site induction.	<p>We designed a Modern Slavery briefing for contractors who work on our sites. This is to help raise awareness of the issue.</p> <p>We also designed a briefing for all our managers on Modern Slavery including signs to look out for when working with suppliers. The managers will cascade this message to their teams and those they work alongside, including our concession team members.</p>	We will develop more detailed training and communications, targeting those who work in higher risk areas.



# OUR APPROACH: SUPPLIERS

The brands and suppliers we partner with are carefully selected. We ask that they collaborate with us in a number of ways by encouraging them to partner with us to achieve our sustainability vision including through the relationships we build with them via our dedicated teams and through the terms on which we contract with them. It's important to us that everyone who works with us is fairly treated and supported.

AREA	OUR APPROACH	ADDITIONAL STEPS TAKEN IN 2017/18	ACTIONS PLANNED FOR 2018/19
<b>POLICIES</b>	We issue our Ethical Trade Requirements to our suppliers as part of our Terms and Conditions. They are based on the ETI Base Code and ILO Principles and include clauses on the unacceptability of forced labour, child labour, and harsh or inhumane treatment. These Ethical Trade Requirements apply throughout our supply chain.	We continued to issue our Ethical Trade Requirements to our suppliers. Our Buying teams continue to discuss our approach to ethical trade during buying conversations.	We will: <ul style="list-style-type: none"> <li>Investigate ways to highlight our Ethical Trade Requirements more proactively</li> <li>Ensure these requirements are issued to all suppliers we work with, especially where items are purchased by individuals outside of our Buying and Procurement team</li> </ul>
<b>ON-BOARDING PROCESSES</b>	We request that our suppliers join Sedex, the Supplier Ethical Data Exchange. Sharing responsible sourcing data via this collaborative platform helps us increase the visibility we have over our suppliers' ethical policies and practices.	We have issued revised communications and instructions on our partnership with Sedex this year. We have focused on encouraging our biggest suppliers, with whom we have on-going relationships, to provide us with visibility of their ethical practices via Sedex.	This is an ongoing conversation we are having with our suppliers. We will investigate other options to encourage them to join Sedex or share information with us.
<b>MONITORING PROCESSES</b>	We ask our suppliers to complete a Self-Assessment Questionnaire and provide us with access to their ethical audits through the Sedex platform.	<p>This year we have reviewed our risk assessment process. This included how we review the information provided to us in Sedex and the further action we take. We have also begun designing an audit approach with a third party provider specifically for our Selfridges Selection suppliers, who are often small businesses. This is targeted to support them to improve their practices in a pragmatic way.</p> <p>We launched a partnership with Positive Luxury which highlights brands with sustainability at their core on our digital platforms. This includes best practice management of environmental and social issues including forced labour.</p>	We will pilot our audit approach with our Selfridges Selection suppliers to gain further visibility of practices in our supply chain.
<b>ESCALATING PROCESSES</b>	We continued to monitor our Speak Up Helpline for indications of Modern Slavery.	We promoted our Speak Up helpline further to raise awareness of it and explain uses of it, including discussing issues relating to Modern Slavery.	We will promote our Speak Up helpline further to raise awareness of it and explain uses of it, including discussing issues relating to Modern Slavery.
<b>TRAINING AND COMMUNICATIONS</b>	We provide various communications to our suppliers on our sustainability vision and how we want to partner to achieve.	We provided a briefing to our Buying team on Modern Slavery including signs to look out for when working with suppliers.	We will roll out communications and training to our suppliers specifically on Modern Slavery.



# OUR PARTNERSHIPS

As we recognise collaboration is crucial to tackling issues surrounding Modern Slavery, we have continued partnering in key areas. We have also collaborated with new partners to enhance our approach.

## SUPPLY CHAIN TRANSPARENCY: SEDEX

We have partnered with Sedex, the Supplier Ethical Data Exchange, for over three years. We use this collaborative platform to gather responsible sourcing data from our suppliers.

"Over the last year we have continued to work with Selfridges in a number of ways: from updating supplier communications and training more of their team members, to ensuring their Sedex structure is easy to use for suppliers. We were pleased they could participate in our Sedex Stakeholder Forum and have joined our Self-Assessment Questionnaire Working Group. Selfridges have demonstrated they are committed to driving transparency across their supply chain and have taken further proactive steps to engage more of their suppliers. We look forward to continuing to collaborate with them."

**Jonathan Ivelaw-Chapman, CEO SEDEX**

## MODERN SLAVERY EXPERTISE: UNSEEN

Over the last year we have continued to collaborate with Unseen, a leading charity tackling Modern Slavery issues. We have sought their technical support and advice to help guide our activity effectively.

"We have again engaged with Selfridges this year as they have further progressed their response to the risks of Modern Slavery within their business and supply chain. We have co-developed communications to help raise the awareness of the issue, ensuring a targeted and clear message. We know that Selfridges takes its commitments to tackling Modern Slavery seriously and have formed a Working Group to help focus action. We remain pleased with the level of openness and transparency Selfridges shows. We will continue to partner with them as they continue to proactively target key risks in their business and supply chain."

**Justine Currell, Executive Director, Unseen**

## BRAND ENGAGEMENT: POSITIVE LUXURY

This year we launched a partnership with Positive Luxury, who highlight brands with sustainability at their core.

"We are delighted to partner with Selfridges. Using the Butterfly Mark to highlight brands which embody sustainability values helps provide transparency for customers. We are pleased Selfridges have integrated this labelling on their digital platforms. Selfridges is a valuable partner and one who is not afraid to disrupt the norm for the benefit of people and the planet."

**Diana Verde Nieto, Founder, Positive Luxury**

## RISK ASSESSMENT: DNV GL

We are proud to be working with DNV GL to help continuously improve our supply chain.

"We're working with Selfridges to enhance their approach to assessing sustainability-related risk in their supply chain. We look forward to supporting their progress towards demonstrating continuous improvement and effective management of their responsibilities in this area."

**Gareth Manning, Principal Consultant, DNV GL**





# ADDRESSING THE ISSUES

We believe it is important to be transparent about issues we find, what we do to support individuals that may be at risk of Modern Slavery, how we work with suppliers to resolve issues and how we learn from these to help prevent such issues happening again.

In our statement for 2016/17, we highlighted an issue where indicators of Modern Slavery were apparent. This year we are providing an update on this and highlighting another issue which has come to our attention.

## MINIMUM WAGE: ISSUE IN 2017

It was drawn to our attention that one of our suppliers had an issue within its own supply chain. The supplier was sourcing product from a manufacturing site where workers were paid below the minimum wage. This is in breach of our Ethical Trade Requirements which are relevant to all tiers of our supply chains and this was communicated to the Selfridges supplier.

The manufacturing site has since ceased operation and our supplier investigated the issue. Our Ethical Trade, Sustainability and Buying teams have worked together with our supplier to understand their own ethical standards and how they are ensuring our Ethical Trade Requirements are complied with across their business and supply chain. The supplier has taken a number of steps to improve its ethical trade approach including joining the Ethical Trading Initiative, investing in a local ethical trade team and joining Sedex to provide us with further visibility of their policies and practices. Discussions with our supplier are ongoing and we will continue to closely monitor their approach.

## WORKING HOURS, PAY AND FAIR TREATMENT: UPDATE ON ISSUE FROM 2016

**Reported in 2016/17 Modern Slavery Statement:** In the summer of 2016 we were contacted by individuals employed by a food concession (the concession business ran its own operation in Selfridges stores, managing its own suppliers and its people). These individuals wished to bring to our attention complaints regarding their working hours and pay, as well as some more general complaints about how they had been treated by the concession. Due to the nature of the complaint, we were very concerned and after investigation we quickly moved to terminate the concession relationship. We drew on external expertise and asked Unseen (one of the UK's leading Modern Slavery charities) to meet with these individuals. After interviewing them, Unseen made recommendations regarding the individuals' rights and options under the Modern Slavery Act, on the basis that their treatment could possibly amount to forced labour or exploitation.

Since we reported on this issue last year we continued to support the individuals involved as did Unseen. We also reviewed our processes to help ensure issues such as this don't reoccur. We issued further communications including an overview of Modern Slavery, highlighted some of the key signs to look out for and raised the awareness of our Speak Up Helpline.



# MONITORING THE EFFECTIVENESS OF OUR APPROACH

This year we reviewed the performance indicators needed to monitor the effectiveness of our approach. Once we had established those needed moving forward, we reviewed whether the procedures and associated data were robust and accurate enough for us to evaluate the effectiveness of our approach. This investigation unfortunately led to us discovering inaccuracies in our reporting, particularly in our supplier and Sedex data. We had previously understated the number of suppliers we work with and had inaccurately calculated the percentage which were registered on Sedex.

Following this, we employed an Ethical Trade Manager with a focus on supply chain visibility, risk management, and enhancing our reporting procedures. We engaged our finance team to help ensure this non-financial information was based on sound source data and the reporting procedures were robust. We also established reporting procedures for new performance indicators which were important to monitor such as number of people trained. We will continue to review our reporting and performance indicators as our approach matures.

## IN OUR BUSINESS:

**3,000 - 3,500**  
team members

**16,000 - 20,000**  
people working with us via  
agencies, concessions, contractors  
and consultants.

**100**  
number of team members trained  
(training started in January 2018)

**0**  
number of contractors trained  
(training starts in February 2018)

**27**  
total calls to Speak Up Helpline  
(compared to 5 in 2016) None  
of the calls were in relation to  
modern slavery

## SUPPLIERS:

**Over 2,700**  
direct suppliers  

- Goods Not For Resale
- Selfridges Selection


**Over 2,900**  
indirect suppliers  

- Own bought
- Concession

**11%**  
of Selfridges' suppliers registered on Sedex

This number includes:  
**100% of Selfridges Selection suppliers**





In accordance with section 54 of the Modern Slavery Act 2015, this document sets out Selfridges Retail Limited's ("Selfridges") Modern Slavery Statement for the year ended 31 January 2018. We have realigned our reporting with our financial year in order to more accurately capture the activity during the year.

For all comments or queries in relation to this document, please contact us at

[buyingbetter@selfridges.co.uk](mailto:buyingbetter@selfridges.co.uk)

BUYING  
BETTER  
/  
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