

Modern Slavery Statement 2021-22

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Introduction from the Managing Director, Andrew Keith



Despite the continued challenges of Covid-19, as a Selfridges community we have adapted, remained resilient and demonstrated huge agility in the face of an ever-changing world. These remain extraordinary times and we will continue to use our business as a force for good.

Our Modern Slavery Statement for the year ended 31 January 2022, sets out the steps we have taken and built on over the past year to prevent modern slavery from occurring in our business and supply chains. Selfridges continues to support the aims of the UK Modern Slavery Act and we are actively working to tackle the issue of modern slavery collaboratively with our partners, focusing on the areas where we can have the greatest impact.

During another year where customer preferences, our ways of working and outlook on the world have continued to rapidly evolve, our Vision to Reinvent Retail and our Purpose to imagine and create a more sustainable future for people and planet have never felt more relevant or important. Together with our Values, this framework has guided our actions and helped us in our decision making so we continue to lead with purpose and operate as a responsible retailer. Our commitment to ethical trade is core to this with products and services that are responsibly sourced. Together we want to change the way we shop and do business, inspiring our customers to make more sustainable choices with us.

Tackling modern slavery is a major part of this. During the past year we have further clarified and targeted our three focus areas of embedding standards, proactively investigating potential risks of modern slavery and raising awareness. We have expanded our risk-based approach including our brand partner and supplier due diligence. New online training has been rolled out for our team members and there has been a continued focus on our existing governance mechanisms, policies and ongoing engagement activities.

In the coming year we are committed to taking further action alongside our partners and suppliers to tackle modern slavery. Some of our planned initiatives include reviewing our policies, growing our due diligence as well as developing further communications and training. Together we must do whatever it takes to root out modern slavery, prevent exploitation and protect human rights.

A handwritten signature in black ink, appearing to read 'Andrew Keith'.

27th April 2022

Andrew Keith

Selfridges Managing Director

Signed for and on behalf of the Selfridges

Executive Committee

Who we are

Our business

Selfridges is more than a shop - it is a social space powered by imagination and innovation, with the aim of making our customers worlds brighter. We are part of a family of brands within Selfridges Group.

We offer our customers' extraordinary products, destinations and experiences across our four physical stores and digital platforms.

176.4 million visitors to our stores, website and app¹

£1.07 billion sales¹

1.1 million products

4 physical stores, **1** digital store, **2** offices, **1** distribution centre², **1** satellite returns centre², **3** call centres²

Our people³



We have approximately **3,000** team members

People in our supply chains³

In addition to those people who work directly for us, we have extensive supply chains which consist of millions of workers across their length and breadth, across three supply chain areas:



Private label and own-brand consumable suppliers: **~80**

We have a small select range of products and items which carry our name which we sell or use.



Third-party brand partners: **~3,000**

The majority of products we sell in store and through our digital platforms are from our third-party brand partners.



Procurement suppliers: **~1,900**

These are suppliers we directly engage with to provide the products and services which we don't sell but which keep our business going.

Over **7,500** people in our supply chain work alongside our team members on our sites. They include agency workers, contractors, concession staff and consultants. They aren't directly employed by us, but are managed by the brand partners and suppliers we contract with.

¹ This figure relates to FY20-21

² We do not operate our distribution and call centres, but work closely with our third party partners who do, to ensure seamless customer experience

³ Our supply chain and people figures are as of 31 January 2022

Vision and purpose

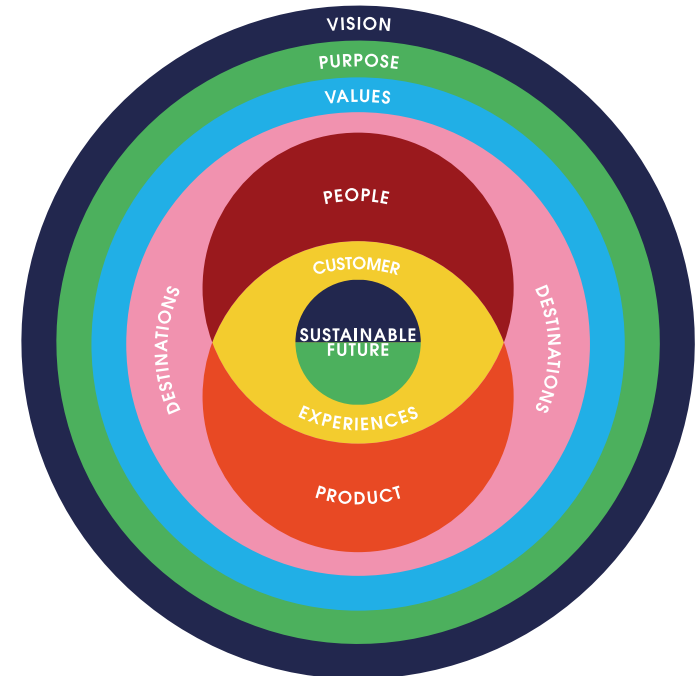
Our vision is to reinvent retail and our purpose is to imagine and create a sustainable future for our customers. We do this in a way that respects our world, builds trust and values creativity and innovation in everything we do.

Sustainable Future

Sustainability is at the heart of our vision, purpose and values. Our sustainability commitments underpin our ambitions to change the way we shop for the future and to change the way we do business.

Our sustainability framework, known as a Stairway to a Sustainable Future, helps us focus our work on environmental and social issues within our industry that we believe are imperative to address.

The framework sets out 17 goals which we will work towards, one of which focuses on managing ethical trade risks and encompasses our work to tackle modern slavery.



Our governance

Our approach to sustainability is governed and managed by a small number of groups and people across the business. These are committees made up of our senior leaders, who set strategic direction and help integrate sustainability across the business; working groups, who develop and implement plans; and team members, who provide and access technical expertise and champion sustainability.

These groups monitor key measures to help evaluate whether our approach is effective, to identify and tackle risks and issues, and to direct our future action including determining areas of potential improvement.

Risk Management Committee:

- Ensures the business risk management framework is effective, including monitoring activity in relation to the top 10 corporate risks. Modern slavery would be raised and discussed as a risk topic if a significant/ corporate level risk was identified and needed to be addressed.

Executive Committee:

- Has ultimate accountability for ensuring we are a sustainable and responsible business.

Sustainability Steering Committee:

- Agrees our strategic direction for sustainability and monitors progress against our 17 annual sustainability goals reported monthly in our Sustainability Dashboard.

Ethical Trade and Modern Slavery Working Group:

- Oversees activity across all ethical trade issues, engages wider stakeholders, ensures plans are developed and realised effectively.

Sustainability team:

- Helps set direction, works to develop and embed sustainable practices, collaborates and engages key internal and external stakeholders, and monitors progress against the Stairway to a Sustainable Future.

Selfridges Group businesses:

- Shares resources and ideas and align approaches where appropriate.

We also collaborate with external experts, other organisations and collaborative forums to supplement our knowledge and capacity, to further the development of our approach.

Stronger Together:

One of our key partners is Stronger Together, a business-led, multi-stakeholder, collaborative initiative. We partner with them to seek specialist support to help direct the development of our approach. Over the last year we have accessed their training and resources, completed their Progress Reporting Tool and Supplier Engagement Matrix. In the coming year we hope to work with them further to engage a selection of UK-based suppliers with their Tackling Modern Slavery in UK Business training.





“Selfridges has been a Sponsor of the Stronger Together UK Consumers Goods Programme since 2018. Through its sponsorship, Selfridges is supporting its colleagues and suppliers to build capacity to mitigate and remediate modern slavery in its operations and supply chains through access to guidance, resources and training. In 2022, we will be working even more closely to develop and deliver bespoke training for key categories of Selfridges suppliers”.

- Jantine Werdmuller von Elgg, Managing Director, Stronger Together

Risk assessment

To ensure we focus our efforts where they are most needed and where we can have the greatest impact, we take a risk-based approach, which we developed further this year.

We consider our two groups of people in relation to our level of **influence and control**; and the modern slavery risk associated with their **location** and the **industry sector** they work in.

1. Our people 
2. People in our supply chain   

Our people

Level of influence and control	We directly recruit and manage our team members; hence we have high influence and control.
Location	All of our team members are in the UK. The majority of our team members are also based on our sites, although remote working has increased during the COVID-19 pandemic.
Sector	The roles are in retail or central functions, which are lower risk areas.
Risk	Low
Focus	We will raise awareness of modern slavery issues, indicators and where to seek support or raise concerns.

People in our supply chain:

Private label and own-brand consumable suppliers

Level of influence and control	We directly select these suppliers and specify the goods they produce; hence we have the greatest influence and control over these supply chains.
Location	These suppliers do not work on our sites and some may operate from higher risk geographies. They are less visible to us day-to-day.
Sector	These suppliers span a range of sectors including food and drink production, packaging and print, some of which may be higher risk.
Risk	Medium - high
Focus	We will undertake more in-depth due diligence across select suppliers in this area as a priority.

Third party brand partners

Level of influence and control	We work with third party brand partners who manage these supply chains. We have less influence and limited control over these supply chains. Whilst we do have formal measures in place, including contractual requirements with our suppliers, we recognise that seeking meaningful assurance that issues do not exist and that measures are effective across all suppliers is challenging.
Location	Some of these workers may be based on our sites (concession partner retail team members), although largely these people will be based elsewhere and may be in higher risk locations.
Sector	These suppliers are generally in apparel, accessories, beauty, food and drink production. As the area of highest risk, we further consider risk and influence lenses that we can apply to help direct our additional action in sub-sets of our supply base.
Risk	High
Focus	We will conduct due diligence across select brand partners and raise awareness of modern slavery with workers based on our sites.

Procurement suppliers

Level of influence and control	We directly select these suppliers and specify the goods or services they offer to us, but we rely on these suppliers to operate on our behalf. Hence, we have strong influence and moderate control over these supply chains. There are a number of stakeholders involved internally, in addition to our Procurement team, who select and manage these suppliers.
Location	Some of these suppliers may work on our sites (including cleaners, construction workers and food services partners) or may work within higher risk geographies.
Sector	These suppliers span a wide range of industries including those which are higher risk such as distribution, couriers, waste management and security, food processing.
Risk	High
Focus	We will conduct due diligence across suppliers in higher risk sectors, and raise awareness of modern slavery with workers based on our sites.

Our risk assessment process is not static, it continues to evolve and be supplemented as the risk landscape changes. In addition to the risk assessment already detailed this year we also considered COVID-19, Brexit and potential issues that were brought to our attention through media reports, as discussed later in this report.

Approach

Based on our risk assessment we define the focus of our action across refined aims within three areas:

Policy
- Embedding standards

Due diligence
- Proactively investigating

Training and communications
- Raising awareness

We have an approach in place which consists of both measures which are consistent and relevant **for all** our team members and people in our supply chain, and those which are **specific** to key groups of people, tailored to the risks presented.

We continue to build on our **existing measures**, by taking additional action in **2021/22** and making commitments to further steps for **2022/23**.

Everyone

Everyone who works with Selfridges is covered by the fundamental standards and measures we describe below:

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Embedding standards	Selfridges Group Code of Ethics: Our Code of Ethics communicates the standards we set for ourselves; and the people, groups and partners we engage with; to help us achieve our vision and purpose.		Reviewing policies: We will review our policies and ensure standards are consistently applied and included at relevant points. Developing stakeholder map: We will identify the internal and external stakeholders, categorise them in terms of interest and importance and use this to continually inform our approach to stakeholder management.
Proactively investigating	Responsible managers: Managers in our business are responsible for the safety and wellbeing of those who work in their areas, whether they are Selfridges team members, contractors or concession team members. Escalation process: Our formal escalation process for ethical trade and modern slavery issues is integrated in our incident management process and provides clarity on the process to follow should material issues arise.		Testing escalation process: We will test the operating effectiveness of our escalation process and business response using a modern slavery specific scenario.
Raising awareness	Whistleblowing: Our Speak Up Helpline is a dedicated whistleblowing and support line. This is accessible 24 hours a day, all year, by anyone who works for or with us.	Stronger Together: Over the last year we have accessed Stronger Together's resources, completed their Progress Reporting Tool and Supplier Engagement Matrix.	Using Stronger Together resources: We will develop an action plan to better utilise the resources which Stronger Together offer including developing and hosting bespoke training.

Approach

Policy
- Embedding standards

Due diligence
- Proactively investigating

Training and communications
- Raising awareness

Our people

In addition to the measures we have in place for everyone, we also have the following specifically for our people.

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Embedding standards	People policies and processes: These policies and processes set out our expectations of, and our responsibilities towards, our team members. Our policies are provided to new starters, are referenced in inductions and are available on both our intranet and Workday, our remotely accessible HR system.		
Proactively investigating	Right-to-work: We review our new team members' right-to-work as part of our onboarding process. Our systems support checks on a person's right-to-work in the UK and any visas. Grievance process: We have a grievance process for team members to address any concerns or issues that they have.		
Raising awareness	Guides: Our team members are made aware of our policies and our Speak Up Helpline in our handbooks which also signpost information on sustainability. We also have learning sheets available on key sustainability topics including ethical trade and modern slavery. Targeted briefings: Our bi-monthly divisional meetings with the Buying teams ensure key groups receive relevant briefings on key sustainability targets and initiatives, including on our ethical due diligence process.	Rolling out e-learning: This year we rolled out our modern slavery e-learning module for our team members targeted at management and leadership teams in our stores. We have shared details of this with other businesses across Selfridges Group as part of our collaborative relationship.	Promoting e-learning: We will analyse e-learning completion rates and take action to promote it to targeted groups and potentially more widely.

Approach

Policy
- Embedding standards

Due diligence
- Proactively investigating

Training and communications
- Raising awareness



People in our supply chain

In addition to the measures we have in place for everyone, we also have the following specifically for people in our supply chain.

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Embedding standards	<p>Ethical Trade Requirements: Our Ethical Trade Requirements apply to our brand partners and suppliers, including contractors and concession partners and are part of our standard Selfridges' Terms and Conditions. These Ethical Trade Requirements include clauses on zero-tolerance of modern slavery, require compliance with local modern slavery legislation, are aligned with the ETI Base Code and ILO Conventions and apply across all tiers of our supply chain.</p> <p>Materials Commitments: We are ensuring that the most environmentally impactful materials used in every area of our business from shop-fits and packaging to products we sell are sourced from certified, sustainable sources by 2025. Some of the standards we strive to meet include requirements in relation to the fair treatment and practices surrounding supply chain workers. Read our material commitments here.</p>	<p>Trialling consistent Ethical Trade Requirements: We trialled a version of our Ethical Trade Requirements which is consistent with our sister businesses across Selfridges Group. This helps set common standards and is particularly helpful for suppliers who work with multiple businesses within Selfridges Group, to aid understanding and compliance.</p>	<p>Rolling out Selfridges Group aligned Ethical Trade Requirements: We will be rolling these out fully with our brand partners and suppliers over the coming year.</p> <p>Establishing minimum due diligence standards: We will determine the minimum due diligence expected for suppliers in higher risk sectors to conduct.</p>
Proactively investigating	<p>Contractor, concession, agency and supplier checks: We rely on our contractors, concessions, agencies and suppliers to ensure people working for them are eligible to work and also comply with our policies and procedures. This is set out in Selfridges' standard contract terms and our Ethical Trade Requirements.</p> <p>Due diligence: Our Buying and Procurement teams identify a selection of focus brand partners and suppliers, including those which are higher risk, and request they complete our Sustainability Self-Assessment Questionnaire (SAQ). We evaluate the responses and agree follow up actions where necessary.</p>	<p>Due diligence: We trialled an enhanced version of our Sustainability Self-Assessment Questionnaire (SAQ) which is consistent with our sister businesses across Selfridges Group to reduce supplier burden and increase efficiency and effectiveness.</p>	<p>Assessing new suppliers: We will start to develop a process to identify focus suppliers, including those which are higher risk, at on boarding stage. This will help us take the relevant due diligence action.</p> <p>Rolling out Selfridges Group aligned Self-Assessment Questionnaire: We will be updating the Self-Assessment Questionnaire we ask focus brand partners and suppliers to complete which will be rolled out across all Selfridges Group banners.</p>
Raising awareness	<p>Briefings: We provide various communications to our brand partners and suppliers on sustainability. Our sustainability teams continue to discuss our approach to sustainability and ethical trade and have specific sustainability discussions with our key brand partners and suppliers.</p>		

Approach

People in our supply chain

Policy
- Embedding standards

Due diligence
- Proactively investigating

Training and communications
- Raising awareness

In addition to the measures we have in place for everyone, and all suppliers, we also have the following specifically for private label and own-brand consumable suppliers, third party brand partners and procurement suppliers.



Private label and own-brand consumable suppliers

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Proactively investigating		Audit reports: We trialled requesting and reviewing third party audits. This has driven a more dynamic due diligence approach for this category, which considers the appropriateness of audits for this diverse set of suppliers.	<p>Mapping tier two suppliers: We will expand our understanding of our branded suppliers through beginning to map our second tier of suppliers.</p> <p>Conducting site visits: We will conduct site visits of a selection of our branded goods suppliers.</p> <p>Auditing packaging supplier sites: We will commission a third-party to review and/or conduct ethical audits of key manufacturing facilities of our branded packaging, to gain a snapshot of the practices in place, and additional steps needed.</p>



Third party brand partners

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Embedding standards	Concession team member approvals: Both Selfridges and concessions approve concession team members before they can work in store. Checks include written confirmation that the person's right-to-work has been checked. We also hold a store approval interview to ensure these individuals are aware of and will work in line with our values. All concession team members are registered on our People system.		
Raising awareness	Guides: Our concession team members are made aware of our Speak Up Helpline in our Concession Team Member Guide.		



Procurement suppliers

Focus	Ongoing action	Additional action taken in 2021/22	Additional action planned in 2022/23
Embedding standards	Procurement Policy: Our internal Procurement Policy stipulates sustainability and ethical trade requirements and expectations for selecting and managing our suppliers of goods and services not for resale.		Reviewing temporary labour provider requirements: We will review the current requirements and due diligence process for recruitment providers of temporary labour.
Proactively investigating	Goods and services not for resale supplier request for proposal: Our Procurement team have integrated standard sustainability questions including building our Ethical Trade Requirements into their tender process.		
Raising awareness	Contractor induction: Key contractors who work on our sites at certain times complete a site induction, which includes information on the risks of modern slavery.		Developing on-site communications: We will signpost whistleblowing channels to on site suppliers through posters.

Investigating issues

Our approach to understanding and investigating known breaches of our Ethical Trade Requirements, in particular cases of forced labour, considers both issues occurring on our sites alongside individual or industry-wide systemic issues affecting people within our supply chain not located on our sites.

Issues on our sites

Any issues including those related to on-site forced labour concerning people working for our suppliers and whilst unlikely, our own team members, could be raised via our Speak Up helpline, the UK Modern Slavery helpline or through our Human Resources team.

If an issue/incident were to occur, we will follow Selfridges' incident and crisis management process to determine who needs to be involved in the investigation. Each incident would need to be approached differently. The victims would remain the key consideration with regards to remediation.

Issues not on our sites

Individual issues

Individual off-site instances of forced labour are most likely to be raised to our attention by the supplier/brand partner themselves or investigative journalism reports.

If an issue were to occur, we will follow Selfridges' incident and crisis

management process to determine who needs to be involved in the investigation. When we become aware of individual potential issues within a partner's supply chain, we immediately contact the relevant brand partner or supplier. This is to understand whether or not the issue has arisen in the supply of any of our own goods and services and what steps they are taking to investigate the potential issues, to support any victims, and to remedy individual instances. Each case will be different and require us to consider various factors to determine our level of involvement and support.

Systemic issues

Systemic issues which indicate a risk of forced labour are most likely to be raised to our attention by the investigation of individual issues or investigative journalism reports. We consider how any issues may affect the focus of our risk assessment and due diligence processes. One example of this is spotlighted below:

Forced labour in the cotton industry

There are sadly systemic human rights abuses associated with cotton production throughout the world. Our self-assessment questionnaire identifies suppliers of cotton and asks for detail on provenance and processes in place to prevent the occurrence of forced labour. Depending on a brand or suppliers response, follow-up conversations are held accordingly.

Monitoring the effectiveness

Embedding standards

We set out standards we expect to be upheld in our policies, codes and requirements documents which cover a range of topics including modern slavery at relevant points. Anyone who works with us is able to report potential breaches of these via our Speak Up Helpline. We also monitor reports of potential breaches in other channels for example through media reports. Any issues which are reported to us are investigated.

Issues raised	2020-21	2021-22
Calls to the Speak Up Helpline	16	23
Calls to the Speak Up Helpline relating to modern slavery	0	0

Proactively investigating

We proactively conduct due diligence in areas of higher risk to provide assurance that we and our brand partners and suppliers are operating in line with our standards, and to direct action needed to improve practices where necessary.

Due diligence	2020-21	2021-22	2022-23 target
Focus brand partners and suppliers, including those defined as higher risk according to our criteria	535	456	-
Percentage of these brand partners and suppliers which have completed a Sustainability Self-Assessment Questionnaire	58%	64%	80%

Raising awareness

We raise awareness of the issue of modern slavery, how it relates to our business, key signs to look out for and action to take through training and communications with our team members, brand partners and suppliers.

Training	2020-21	2021-22	2022-23 target
Percentage of store leadership team members trained through modern slavery e-learning modules	-	59%	80%
Team members trained through Stronger Together Workshops	2	0	10
Individuals from brand partners and suppliers trained through Stronger Together Workshops	7	24	40

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 2022.

For all comments or queries in relation to this document, please contact us at sustainability@selfridges.co.uk

Selfridges Speak Up Helpline: 0808 234 7287 / www.selfridges.ethicspoint.com
UK Modern Slavery Helpline: 0800 012 1700 / www.modernslaveryhelpline.org/report

In addition to this statement our activities are also summarised in the Selfridges Group Modern Slavery Statement. This sets out the activities SHEL Holdings Europe Limited and each of its key operating businesses, of which we are one, have in place. Brown Thomas Arnotts, one of our sister businesses, has also published its own Modern Slavery Statement which provides further detail on its specific measures.

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