

Modern Slavery Statement 2020

Contents

02

Introduction from the
Managing Director

03

Who we are

04

Staying on track

05

Risk assessment

06

Policies

07

Due diligence
processes

08

Training and
communications

09

Collaboration

Introduction from the Managing Director, Anne Pitcher



This, our fourth Modern Slavery Statement, sets out the steps we are taking to prevent modern slavery in our business and supply chain and the progress we have made over the last year.

As a family-owned, values-led business, modern slavery in all its forms goes against everything we stand for. We are supportive of and uphold the aims of the UK Modern Slavery Act and our own Modern Slavery Statement 2019/20 sets out the steps we are taking to help prevent modern slavery from occurring in our businesses and supply chains.

Collaboration is key to tackling modern slavery and we are committed to working collectively with our brand partners and suppliers, with experts and as part of the retail industry and wider business community. Our approach, which is part of our sustainability programme, focuses on ensuring that appropriate governance mechanisms are in place, clear expectations are set for team members and suppliers, and key groups are engaged on the issue.

Crucially, we extend our collaborative approach and collective action to our supply chains (which pose the greatest risk due to limited visibility or direct control of their operations) to help protect everyone who works with us. Over the past year we have further strengthened our Ethical Trade Requirements, worked with our brand partners and suppliers to raise awareness and built a risk framework so that we can focus our efforts in the most effective way.

A handwritten signature in black ink that reads "Anne Pitcher". The signature is fluid and cursive, written in a professional style.

24th April 2020.
Selfridges Group Managing Director
Signed for and on behalf of the Selfridges Executive Committee

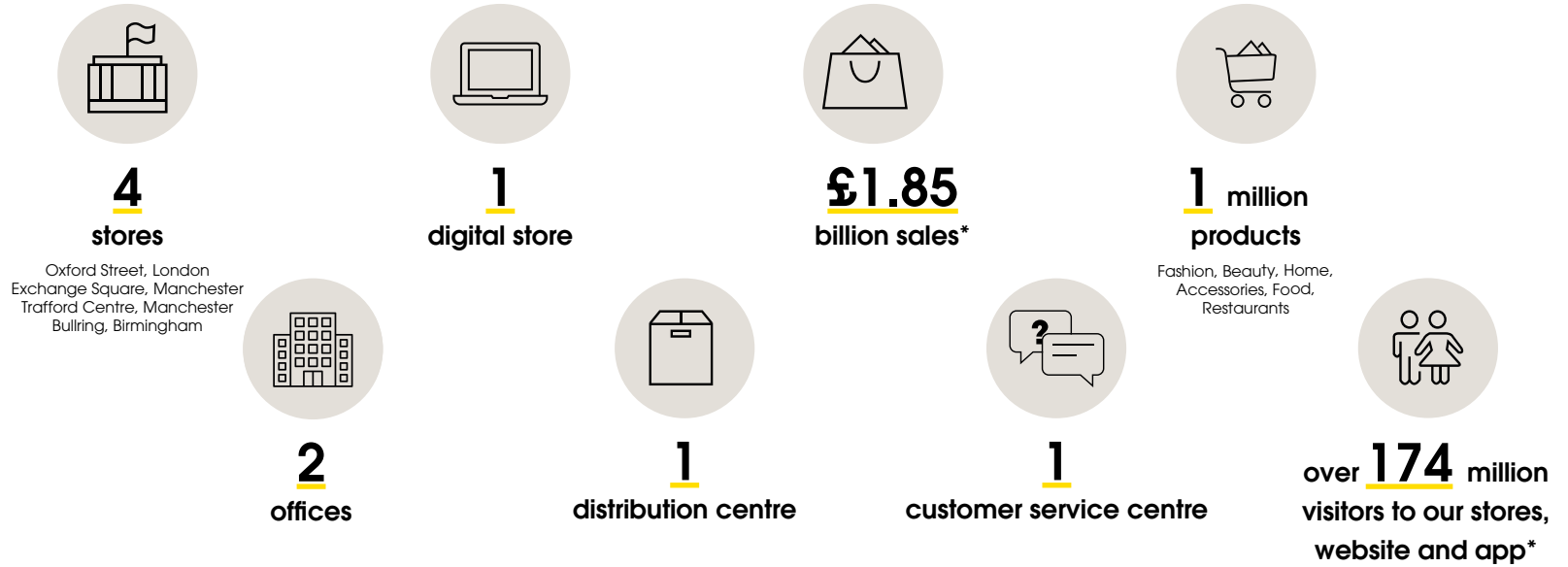
Key developments in 2019/20

- Updated our Ethical Trade Requirements (ETRs) to make more explicit reference to modern slavery and our due diligence expectations.
- Worked with team members who hold supplier relationships to ensure ETRs are built into commercial relationships.
- Developed a risk and due diligence framework to ensure compliance with our ETRs.
- Supported key suppliers through workshops delivered by Stronger Together.

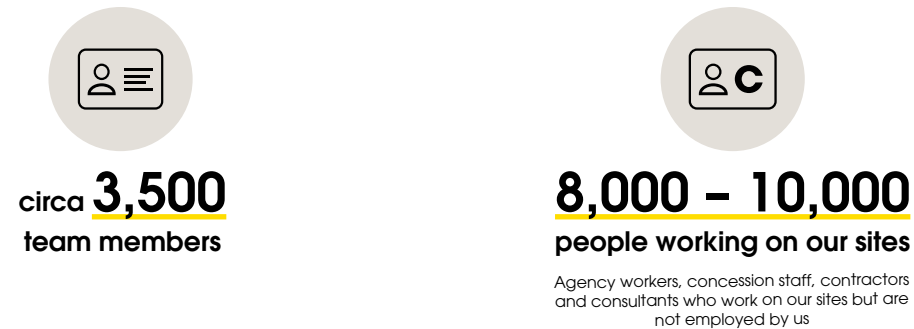
Who we are

Selfridges, a world-renowned department store, is part of the Selfridges Group, which provides extraordinary shopping experiences for millions of customers around the world. The Group consists of five iconic brands: Selfridges in the UK, Brown Thomas and Arnotts in Ireland, Holt Renfrew in Canada, and de Bijenkorf in the Netherlands.

Our business



Our people



Our supply chain



Staying on track

Buying Better, Inspiring Change is our sustainability strategy. It is split into four elements: Destinations, Product, People, Customer. This provides us with a structure to focus on key issues including modern slavery. Buying Better, Inspiring Change is governed and managed by a small number of groups in 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 our people, who provide technical expertise and champion sustainability across our business.

This year, we merged our Ethical Trade and Modern Slavery working groups to ensure our activity across all ethical issues is aligned. The working group meets fortnightly and retains a key focus on tackling modern slavery. It is chaired by our General Counsel & Company Secretary and consists of stakeholders from key areas of the business. We work closely with the other Selfridges Group businesses to share resources and ideas and to align our approach where appropriate.

Our governance



Risk assessment

To ensure we focus our efforts where we can have the most impact, we take a risk-based approach, which we further developed this year. We consider our people in three areas, each of which we have risk assessed and developed an action plan for.



Team members

Our team members include everyone who is directly employed by Selfridges, including those who work in our stores, in our head office and in our support centre. The modern slavery risks within our team member population are relatively low, due to the nature of the roles and the human resources policies, processes and controls we have in place.

For this group of people, our priority is raising the awareness of modern slavery issues, indicators and where to seek support.



People working on our sites

Alongside our team members, we have a number of other people who work on our sites, including 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. Due to seasonal demand, a high number of these people join our team in winter. In addition, we are aware that industries such as construction, cleaning, security and those that more commonly use temporary workers have a higher inherent modern slavery risk.

For this group, our priority is ensuring that the suppliers who manage these people have appropriate measures in place to tackle modern slavery and are actively promoting available support.



Brand partners and suppliers

In addition to those people who work directly for us and on our sites, we have an extensive supply chain and recognise that this is where our greatest modern slavery risk exists. Our brand partners and suppliers produce the products we sell in store and online, and the products and services we need to operate our business. We have extensive supply chains which include suppliers in countries and industries that are known to have higher incidence of modern slavery.

For our brand partners and suppliers, our priority is ensuring we set out clear expectations and that we engage and collaborate with our suppliers regularly, based on the risk in their supply chain.

2019/20 updates and 2020/21 plans:

We developed a risk and due diligence framework to ensure compliance with our Ethical Trade Requirements. We have designed this based on the level of control and influence, and hence potential impact we can have – taking more proactive steps with our own label suppliers, and product and service suppliers where we directly specify goods and services. This will be rolled out in 2020 and will include a toolkit to enable team members making purchasing decisions to evaluate risk in their categories. The framework's effectiveness will be evaluated by the Ethical Trade and Modern Slavery Working Group during the year.

Policies

HR policies: Our Code of Conduct and HR Policies set out our expectations of, and our responsibilities towards, our **team members**. These include specifying recruitment fees should never be incurred by an individual and salary payments must not go into bank accounts in someone else's name more than once and without written authorisation from the team member. These policies are provided to new starters with contracts, are referenced in inductions and are available on both our intranet and our remotely accessible HR system.

Ethical Trade Requirements: We work collaboratively to explain our requirements and understand how suppliers are able to meet those requirements. We issue our Ethical Trade Requirements to our **brand partners and suppliers, including contractors and concession partners** as part of our Terms and Conditions. These Ethical Trade Requirements include clauses on zero tolerance of forced labour, are aligned with the ETI Base Code and ILO Principles and apply across all tiers of our supply chain. These are discussed and referenced in brand partner and supplier conversations and with team members who liaise with these partners.

Contractor guidelines: We offer support for contractors in the form of our rigorous guidelines and encourage engagement to ensure compliance. When working on site, our contractors must abide by our Contractor guidelines which reference our zero tolerance of modern slavery.

Procurement policy: We have developed a new internal procurement policy that ensures greater oversight on ethical trade matters when selecting and managing our **suppliers of goods and services not for resale**.

2019/20 updates and 2020/21 plans:

- We reviewed the content of our Ethical Trade Requirements to ensure alignment with good practice. This included adding a specific clause on our zero tolerance of modern slavery and expectation of compliance with all relevant modern slavery legislation. These were reissued to all brand partners and suppliers.
- We will continue to build our Ethical Trade Requirements into tender processes before onboarding new suppliers and as part of ongoing contract reviews.

Due diligence processes

Onboarding

Right to work: We review our new **team members'** right to work as part of our onboarding process and our systems are automated to ensure right-to-work and visa statuses are up to date.

Contractor and agency checks: We rely on our contractors and agencies to ensure people working for them on our sites are eligible to work and are compliant with our policies and procedures. This is set out in our Ethical Trade Requirements.

Collaborating with concessions: Both Selfridges and concessions' own HR teams approve concession staff before they can work in store. We seek written confirmation that right to work has been checked for each concession team member. We also hold a store approval interview to ensure these individuals are aware of and will work in line with our values. All concession staff are registered on our HR system which includes their right-to-work information.

331 suppliers registered on Sedex with a complete SAQ

Sedex: We request that our **brand partners and 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 brand partner and suppliers' ethical policies and practices. Our Buying teams have targets on this requirement.

Monitoring

Grievance process: We have a grievance process for **team members** to address any concerns or issues that they have. In addition, our Speak Up Helpline allows **team members and anyone working on our sites** to raise concerns anonymously.

Proactive monitoring: We monitor key **team member** details via our HR system to identify any unusual patterns. For example, checking for multiple team members with the same address, emergency contact or bank account details. Key managers in our business are responsible for the safety and wellbeing of those who work in their areas, whether they are **team members, contractors or concession staff**.

For **brand partners and suppliers**, our due diligence tools include reviewing Sedex Self-Assessment Questionnaires, reviewing audits where appropriate and performing desk-top reviews of policies and processes. For example, this year we asked our logistics and warehousing partners to provide us with information on their policies and processes in relation to modern slavery, recognising the risk in these categories.

Escalating

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** and is promoted through team member guides, on payslips and in team member communications. 53 calls were made in total to the helpline this year (none relating to modern slavery).

During the year, we became aware of concerning reports of labour abuses in a factory associated with one of our brand partners. We immediately requested a detailed account of the investigation and its outcomes, including remediation which has been on-going with an ethical trade consultancy on the ground since the discovery. We have been assured that no current orders are in place with this facility and that future business will be evaluated when the actions are successfully completed. We will continue dialogue with the brand in relation to its due diligence of this site and all other production sites.

2019/20 updates and 2020/21 plans:

- We will continue to raise the awareness of our Speak Up Helpline and the UK Modern Slavery Helpline through general communications and also in our modern slavery communications.
- We are reviewing our approach to onboarding, monitoring and escalating to target our activity in areas of higher risk. We will fully roll out our new due diligence approach in 2020.
- We have asked Stronger Together to undertake an organisational performance assessment to independently verify our progress in tackling modern slavery.
- We will ask labour providers to declare that they meet Sedex's minimum standards for labour providers.

Training and communications

Inductions: Every new **team member and concession** employee attends our induction, "The Big Yellow Welcome". New managers across our business also attend a Management Induction. These both feature an introduction to our sustainability strategy: Buying Better, Inspiring Change. Those who **work on our sites** must undergo a site induction, which includes an awareness-raising video on modern slavery.

Team member guides: Our **team members and concessions** are made aware of our policies and our Speak Up Helpline in our handbooks which signpost information about modern slavery.

Buying team communications: Our Buying Better Network and Buying teams have regular communications on Buying Better, Inspiring Change, including issues relevant to their brand partners and suppliers such as modern slavery and the use of Sedex. They are provided with a range of communications materials to support briefings.

Training: We actively encouraged our suppliers in categories of higher risk to attend workshops delivered by Stronger Together. This year, 13 suppliers attended.

Targeted briefings: We provided more detailed briefings to key groups around our business, including our Ethical Trade and Modern Slavery

Working Group, Sustainability Steering Committee and Executive team.

13 suppliers attending Stronger Together workshops

Brand partner and supplier briefings: We provide various communications to our brand partners and suppliers on our sustainability requirements. Our Buying teams continue to discuss our approach to sustainability and ethical trade during commercial conversations and have specific sustainability discussions with our key brand partners.

2019/20 updates and 2020/21 plans:

- We will integrate modern slavery into or alongside our mandatory team member training courses, such as anti-bribery and corruption.
- We will further build Modern Slavery briefings into supplier conferences which we hold throughout the year in different categories. This year, we briefed our IT suppliers on our approach.
- We will continue to encourage suppliers to attend Stronger Together workshops, and will complement these by hosting sessions in-house.

Collaboration

Our collaborative partners

Stronger Together is a business-led, multi-stakeholder, collaborative initiative to provide practical knowledge and resources to tackle modern slavery in businesses and supply chains. We continue to partner with Stronger Together on the delivery of our action plan, to seek subject matter expertise, to engage in collaboration opportunities and to further develop our approach. In 2020 we will be participating in its programme in South Africa, which supports South African agri-businesses to address the risk of forced labour within their businesses and supply chains.



“As a multi-stakeholder initiative, we know leading businesses who want to tackle all forms of modern slavery will be most effective through collaboration. We look forward to strengthening our relationship with Selfridges through its participation in our programmes in the UK and in South Africa and working together to ensure the company is continuing to deliver progress in its approach to tackling modern slavery.”

**- Jantine Wermüller von Elgg,
Managing Director, Stronger Together**



Sedex, the Supplier Ethical Data Exchange, is an external platform used to access responsible sourcing information. We have partnered with Sedex for a number of years to increase transparency across our supply chain. We request our brand partners and suppliers share information via the platform and we benefit from participation in Sedex events and working groups.

“Selfridges has continued to be an active member of the SAQ Working Group, helping to shape the new tool that will launch in 2020. It has continually demonstrated its commitment to driving transparency across its supply chain and will be asking its labour providers to confirm their adherence to the Sedex minimum standards which it co-created last year. We look forward to continuing to collaborate.”

**- Simon McCalla,
CEO, Sedex**

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 2020.

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

Selfridges Speak Up Helpline: 0808 234 7287

UK Confidential Modern Slavery Helpline: 0800 012 1700

SELFRIDGES&CO