

# Due Diligence Policy



## **Commitment**

N Brown Group (“N Brown” or “the Group”) is committed to upholding human rights and taking active steps to prevent all forms of modern slavery and human trafficking across our operations, supply chains, and sourcing offices.

This statement sets out the actions we have taken to identify, assess, and mitigate risks of modern slavery. It reflects our continued commitment to transparency, accountability, and continuous improvement in protecting the rights of workers across our global value chain.

## **Due Diligence and Continuous Improvement**

N Brown Group recognises that addressing modern slavery is an ongoing responsibility. We are committed to transparency, accountability, and continuous improvement in how we manage human rights risks across our business and supply chains. Due diligence is embedded across our operations and is essential not only for compliance, but for upholding our values and maintaining trust as a responsible retailer. 9 Our due diligence activities include, but are not limited to:

- Mandatory e-learning modules for all colleagues on human rights and modern slavery awareness
- Targeted training and resources for product, financial services, and procurement teams, including sector-specific risk guidance
- Deployment of buying team travel packs to support risk identification during factory visits
- Responsible purchasing practice workshops to ensure teams understand how commercial decisions can influence ethical risks
- Monitoring of factory-level demographic data, including the gender and migration status of workers, to help identify potential vulnerability and inform follow-up action
- Regional salient risk reviews, supported by third-party audits, desk-based research, and supplier engagement
- Strengthened governance through our ESG Committee, supporting oversight and implementation of ethical trade initiatives
- Enhanced operational due diligence at our head office, distribution centres, and Republic of Ireland office, with a focus on high-risk sectors such as security, cleaning, warehousing, and waste services

Looking ahead, N Brown will continue to enhance its due diligence programme. In the future, we will continue to:

- Deliver collaborative workshops with product teams to deepen awareness of modern slavery risks and the role colleagues can play in mitigation
- Run supplier engagement sessions focused on strengthening grievance mechanisms—one of the most frequently underreported, yet critical, areas of worker protection  
Continue monitoring Freedom of Association across our Tier 1 supply chain and work with suppliers in lower-performing regions to introduce or strengthen worker representation systems
- Explore additional regional initiatives to address country-specific risks such as gender-based discrimination, health and safety, and ethical recruitment practices Through these actions,

we aim to build a more inclusive, transparent, and resilient supply chain that supports the rights and wellbeing of all workers involved in the production of our goods and services.

### **Policies & Governance**

Responsibility for ESG matters, including modern slavery risks, sit with the Operating Board. The Operating Board oversees ESG strategy, policies, and performance, to ensure the effective management of climate-related risks and opportunities in alignment with company values and best practice.

The Operating Board meets monthly and comprises several members of the Executive Leadership Team including the CEO and CFO and COO.

In line with industry protocol, we implement strict Gatekeeper processes for all new suppliers and new supplier sites overseen by The Director of Product. This director is also responsible for modern slavery risks in the supply chains of N Brown Group. The Ethical and Sourcing teams of whom hold specific objectives and specialised roles incorporating modern slavery mitigation report to this Director and to the CEO of Retail.

The COO is responsible for modern slavery risks in N Brown Group's own operations, focussing on recruitment and staffing as well as the management of associated risk in contracted agencies and third parties.

The Director of Supply Chain is responsible for modern slavery risks in NBG's value chain including delivery, logistics and warehousing, plus Goods Not for Resale.

Mandatory online modern slavery risk training is provided to all colleagues to ensure that all our teams properly understand modern slavery risks and their specific responsibilities.

- N Brown Group's Supplier Code of Conduct references the following terms: no exploitation or modern slavery, freedom of association and the right to collective bargaining, safe and healthy working conditions, no child labour, fair wages and benefits, no discrimination or harassment practiced, employment security and respectful treatment of workers.
- Our Supplier Charter and Supplier Terms and Conditions provide understandable and practical guidance on modern slavery risks to suppliers.
- We have free, accessible and independent whistleblowing helplines, available to all employees and contractors, for raising concerns including on modern slavery risks or issues:

### **Salient Risks in Supply Chain**

N Brown recognises that modern slavery can take many forms, including forced labour, unsafe working conditions, exploitative practices, and the restriction of basic labour rights. We assess these risks not only in terms of legality, but in line with broader international standards and our Supplier Code of Conduct, which sets expectations around freedom of association, health and safety, fair wages, and respect for all workers.

We define **salient risks** as those that are severe in nature, affect a large number of people, or are difficult to remedy, and where N Brown can influence outcomes through its sourcing practices and supplier engagement.

<b>Sourcing Country</b>	<b>Salient Risks</b>	<b>Due Diligence</b>
Bangladesh	Health & Safety (e.g. building and boiler safety); Gender- and ethnicity-based discrimination; Wage theft and exploitative contracts	Bangladesh is our largest sourcing country and presents high risks of unsafe working conditions, wage theft, and discrimination. N Brown is a long-standing signatory of the International Accord and supports remediation, inspections, and grievance mechanisms through the RMG Sustainability Council (RSC). We require all Tier 1 factories to be Accord-listed and demonstrate completion of corrective action plans. Our sourcing and ethical teams maintain regular engagement and conduct targeted reviews of contracts, wages, and workplace safety.
China	Excessive overtime (cultural pressure rather than policy); Limited freedom of association; Wage underpayment risk	Key risks in China include excessive overtime and limited freedom of association. While overtime is often recorded as voluntary, audit findings suggest workers may feel obliged to comply, with some evidence of falsified timekeeping. N Brown reviews working hour data in all audits and raises concerns directly with suppliers. Third-party partners also support with spot checks to verify alignment with legal and ethical standards.
UK	Migrant worker exploitation; Use of zero-hour contracts; Risk of underpayment (due to age-based minimum wage and agency labour)	Although a smaller sourcing region, the UK presents risks linked to underpayment, zero-hour contracts, and migrant worker exploitation, especially in logistics and agency employment. We conduct regular site visits and due diligence to ensure alignment with UK employment law. In FY25, we introduced updated onboarding materials for GNFR suppliers, reinforcing expectations around fair recruitment and working conditions.
India	Occupational health and safety (PPE, heat); Weak factory management systems; Low awareness of ETI Base Code	In India, salient risks include heat exposure, inadequate PPE, and weak management systems. N Brown works directly with suppliers to develop corrective action plans and address root causes of non-compliance. We also provide health and safety guidance for managing extreme heat and promote improved practices in line with the ETI Base Code.
Malaysia	Migrant worker vulnerability; Recruitment fee exploitation; Poor living conditions	Malaysia represents less than 1% of sourcing but remains under close watch due to risks affecting migrant workers, including unethical recruitment and poor accommodation. We require suppliers to disclose recruitment agencies and provide evidence of ethical hiring. Audits are reviewed for living conditions and document retention, and we prioritise suppliers with certifications that promote strong labour standards.
Turkey	Inadequate safety protocols; Forgery of legal records; Weak governance and corruption	In Turkey, risks relate to forged employment records and weak legal enforcement. We work with specialist auditors to validate payroll and timekeeping data and require all subcontractors to be pre-declared and approved by N Brown. Direct sourcing relationships are prioritised to reduce reliance on intermediaries and minimise subcontracting risks.

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