



Human Rights Policy

June 2026

OUR COMMITMENT

N Brown Group is committed to respecting, protecting and upholding internationally recognised human rights across our operations and global value chain.

We recognise our responsibility to prevent, identify and address adverse human rights impacts relating to our colleagues, customers, supply chain workers and communities connected to our business.

Standards we follow:

- The UN Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights
- The International Labour Organisation (ILO) Core Conventions
- The Ethical Trading Initiative (ETI) Base Code
- UK Modern Slavery Act 2015, UK Equality Act 2010, UK Health & Safety legislation
- UK GDPR and data protection law
- FCA Conduct Rules and Consumer Duty (where applicable to our financial services)

SCOPE

This Policy applies to:

- All colleagues, directors, contractors and agency workers
- All Group operations
- All suppliers, licensees, agents and business partners across our global value chain

Compliance with this Policy (and the Supplier Code of Conduct) is a contractual obligation for suppliers and business partners.

GOVERNANCE AND OVERSIGHT

Human rights oversight forms part of our ESG governance framework.

- The Board retains ultimate accountability for human rights and modern slavery risks
- The Operating Board oversees ESG risks, including modern slavery.
- Executive leaders have defined responsibilities for sourcing, supply chain, people, customer operations, risk and compliance, finance and data protection. Our teams collaborate to integrate human rights into business processes, training and assurance.

Further detail on governance, roles and responsibilities is set out in our **Modern Slavery Statement**.

HUMAN RIGHTS IN OUR OPERATIONS

We are committed to providing a safe, inclusive and respectful workplace.

Through our Colleague Code of Conduct and associated policies, we:

- Prohibit discrimination, harassment and bullying.
- Promote diversity, equity and inclusion.
- Uphold freedom of association and collective bargaining. Respect trade unions and worker representatives. Maintain safe and healthy working conditions and ensure compliance with working time legislation.
- Prohibit forced labour, child labour and exploitation.
- Ensure fair and transparent recruitment practices, equal opportunity hiring, lawful right-to-work verification, and a strict prohibition on recruitment fees and the retention of identity documents.
- Ensure pay practices are fair, transparent and compliant with applicable legislation and internal reward policies.
- Provide mandatory training on legal and regulatory obligations, including Modern Slavery.
- Uphold the FCA Conduct Rules where applicable.

All colleagues are expected to act with integrity and raise concerns where standards are not met.

SPEAKING UP AND PROTECTION FROM RETALIATION

We encourage open communication and provide confidential mechanisms for raising concerns.

Our Whistleblowing Policy:

- Applies to colleagues, contractors, suppliers and third parties.
- Provides internal escalation routes.
- Provides access to an independent, confidential reporting service (AAB).
- Allows anonymous reporting.
- Protects individuals who raise genuine concerns from retaliation.
- Sets out investigation and escalation processes, including Board oversight of serious matters

Individuals can raise issues through the Group's independent whistleblowing hotline at **AAB.uk**. AAB is an independent organisation that allows individuals to report concerns in confidence. It is available to all colleagues, officers, consultants, contractors and suppliers of the Group and other workers including agency workers, casual workers, volunteers and home workers.

Reports to AAB can be made confidentially and anonymously via any of the following process:

1. Via the AAB WEBSITE: <https://fileaconcern.org/nbrown>

2. Via TELEPHONE:

- UK: 0800 988 6818
- Ireland: 00800 9687 4357
- South Africa: 0800 990 094
- Bangladesh: 0800 990 094

We will treat all concerns seriously and investigate them fairly and professionally. Retaliation against anyone raising a genuine concern will not be tolerated.

CUSTOMERS & COMMUNITIES

We recognise that our human rights responsibilities extend to our customers and the communities in which we operate, including their wellbeing, privacy and fair treatment.

- Operate effective controls to identify and support customers in vulnerable circumstances, including through affordability assessments and responsible collection practices.
Deliver good outcomes for customers, including fair value, transparent pricing and clear, accessible communications.
- Safeguard personal data in accordance with UK GDPR and our Privacy Policy, maintaining appropriate information security and cyber security controls.
- Work towards accessible products, services and communications for diverse customer needs.
- Avoid unfair, misleading or harmful marketing practices, in compliance with consumer protection law and guidance from the Competition and Markets Authority (CMA)

HUMAN RIGHTS IN OUR SUPPLY CHAIN

We recognise that the most significant human rights risks may arise within global sourcing and manufacturing.

SUPPLIER STANDARDS

All suppliers must comply with our Supplier Code of Conduct, which requires:

- No forced labour, modern slavery or child labour.
- No worker-paid recruitment fees.
- Freedom of association and collective bargaining.
- Lawful working hours and fair wages.
- Safe and hygienic working conditions.
- No discrimination, harassment or abuse.
- Ethical recruitment and treatment of migrant, agency and young workers.
- Compliance with anti-bribery and corruption requirements.

Compliance is a contractual obligation. Suppliers must permit access for due diligence and cooperation in remediation where needed.

DUE DILIGENCE

We operate a risk-based due diligence framework, including:

- Onboarding due diligence for new suppliers, including ethical and legal checks
- Supply chain mapping across Tier 1, 2 and 3 for prioritised categories.
- Country risk assessment and high-risk region exclusions for own brand sourcing
- Investigation of undeclared subcontracting.
- Corrective action plans (CAPs) with time bound remediation, verification and escalation.

Further detail is published annually in our **Modern Slavery Statement**.

HIGH-RISK REGIONS

We maintain a list of high-risk regions from which we do not source own-brand goods due to persistent human rights concerns. These are reviewed regularly and published within our **Modern Slavery Statement** and **Responsible Sourcing Policy**.

REMEDIATION AND ENFORCEMENT

Where actual or potential human rights breaches are identified, we will:

- Investigate promptly and fairly.
- Require corrective action plans with clear owners and timelines.
- Monitor and verify remediation.
- Apply sanctions where appropriate, including disciplinary action up to and including dismissal or suspension, withholding of new orders or contract termination for suppliers.
- Escalate serious matters through governance channels, reports to legal authorities where required.
- Provide for, or cooperate in, appropriate remediation where we have caused or contributed to adverse human rights impacts, including access to grievance mechanisms, financial redress, safe return and wellbeing support as appropriate.

We recognise that remediation may require collaboration with suppliers, industry initiatives and civil society organisations.

TRANSPARENCY AND CONTINUOUS IMPROVEMENT

We are committed to transparency and continuous improvement.

We:

- Publish our Modern Slavery Statement annually.
- Participate in multi-stakeholder initiatives including ETI to address systemic risks.
- Publish Tier 1 supplier information monthly via Open Supply Hub.
- Review and update our policies annually.
- Track and disclose KPI's including factory audits, concerns raised and remediated, training completion, high risk region exposure and customer vulnerability support metrics.

Human rights risks evolve and we remain committed to strengthening our controls and oversight accordingly.

Policy Owner	Oliver Stockdale
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