



N BROWN GROUP PLC MODERN SLAVERY STATEMENT

October 2024

Commitment

N Brown Group plc (NBG plc) is committed to continuous improvement on the mitigation of modern slavery risks in our UK businesses, our sourcing offices and throughout our value chains.

This is our eighth annual Modern Slavery Statement. We hereby publish this statement as N Brown Group plc in accordance with the Modern Slavery Act 2015 (Section 54). The statement sets out the steps taken by N Brown and its subsidiaries during the financial period from March 2023 to February 2024. NBG plc's financial year-end pertaining to this statement is 28th February 2024 and I can hereby confirm that the publishing of this statement is in accordance with the relevant UK Government guidelines.

Statement publication date: 8th October 2024

This statement has been approved by the Board of NBG plc

Signed on behalf of the Board by Steve Johnson, CEO, NBG plc

8th October 2024

We are proud to be Headquartered in Manchester. Our city centre office employs 1155 in trading, operations, design, sourcing and logistics. We also have 548 employees, and 69 contractors based at our distribution centres in Oldham and Heywood. In total the business employs 1760 people. NBG plc also has offices in Ireland (26 employees) and Bangladesh (13 employees).

Organisational Structure

NBG plc is one of the UK's Top 10 digital retailers of clothing, footwear and homewares. In terms of our clothing and footwear proposition, we are proud to make size-inclusivity a cornerstone of our product offer. This gives us a unique position in the marketplace, which we believe defines both our business and our value proposition.

We continue to offer in-house credit terms through our Financial Services team which helps meet the specific financial requirements of our customers.

We have amazing brands including womenswear brands JD Williams, Simply Be and Ambrose Wilson, menswear brand, Jacamo and homewares brand Home Essentials.

Value Chain

We map, manage and monitor our value chain to ensure that modern slavery risks are better understood and mitigated.

As an important demonstration of our commitment to transparency, we publish (in conjunction with Open Supply Hub) an “NBG plc Factory List” on our [website](#) incorporating a full and comprehensive list of suppliers and factory locations.

We also work with independent providers of supply chain audit and risk assessment services to support us in achieving continuous improvement. The factory auditing programme in particular helps maintain adequate levels of transparency and dialogue on modern slavery risks and mitigation between NBG plc and our suppliers. NBG plc factory audits assess modern slavery risks by reviewing general worker terms and conditions, employment contracts including agency terms for temporary staff and contractors, pay, wages & hours, working conditions including Health & Safety and ethical business practices.

- NBG plc own brand products are sourced from 250 Tier 1 factories in 14 countries, the most important sourcing countries by volume are China, Bangladesh and India. Tier 1 suppliers are factories that are directly contracted by NBG plc to make products for NBG plc.

There are approximately 65,000 workers in NBG plc’s Tier 1 supply chain.

We have an ongoing commitment to develop the mapping and measurement of so-called “Beyond Tier 1 factories” including Tiers 2 and 3 factories. These include the sub-contracted facilities of Tier 1 as well as packaging, trims and any processing including embroidery, printing and all laundry. This also includes Tier 2 and 3 in hard goods.

Policies & Governance

To manage the effective mitigation of modern slavery risks, we continue to benefit from the support and contributions of NBG plc’s ESG Committee members. The plc Board have delegated the responsibility of ESG matters, including modern slavery risk, climate related matters, strategy and policy, in relation to ESG, to the ESG committee. ESG Committee is chaired by our Company Secretary and comprises of our Executive Leadership Team and other key stakeholders across the business.

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

The Chief People Officer is responsible for modern slavery risks in NBG plc’s own operations, focussing on recruitment and staffing as well as the management of associated risk in contracted agencies and third parties.

Responsibility for modern slavery risks in NBG’s value chain including delivery, logistics and warehousing, plus Goods Not For Resale is the responsibility of the Director of Supply Chain and the Director of Facilities. A further understanding and mapping of value chain risks will be undertaken by the business by end 2024.

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.

- NBG plc’s Supplier Code of Conduct references the following terms: no forced labour or modern slavery, freedom of association and the right to collective bargaining, safe and healthy working conditions, no child labour, fair wages and benefits, lawful working conditions, no discrimination 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 for raising concerns including on modern slavery risks or issues:

Email: report@seehearspeakup.co.uk

Website: www.seehearspeakup.co.uk/en/file-a-concern

Tel:

UK: 0800 988 6818

Ireland: 1 800 901 631

South Africa: 0800 990 094

Bangladesh: 00 44 121 629 0395

Risks in Our Supply Chains

- For the 12-months that this report covers, the top four source countries for highest risk of modern slavery were as follows: Malaysia, China, UK and Bangladesh. These are the same countries as documented in the previous year's report.

Other actions taken to mitigate modern slavery risks in the past year

We continue to ensure that N Brown's buyers, merchandisers, designers and sourcing teams engage in specialist dialogue on responsible purchasing practices.

Collaborations

In order to learn and share knowledge, NBG plc is a member of leading collaborative organisations with expertise in the mitigation of modern slavery risk including UN Global Compact Network UK, Ethical Trading Initiative (ETI), The International Accord for Health & Safety in the Textile and Garment Industry and the Open Apparel Registry in line with signing the Transparency Pledge.