



## **N BROWN GROUP MODERN SLAVERY STATEMENT**

**September 2025**

### **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, our ninth under the UK Modern Slavery Act 2015 (Section 54), sets out the actions we have taken during the financial year ending 28th February 2025 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.

This statement has been approved by the Board of N Brown Group and is published in line with the UK Government's guidance on modern slavery reporting.

**Publication date:** *11<sup>th</sup> September 2025*

### **Signed on behalf of the Board:**

Steve Johnson, Chief Executive Officer

**Date of signature:** *10<sup>th</sup> September 2025*

We are proud to be headquartered in Manchester, where our city centre office employs 1,009 colleagues across trading, operations, design, sourcing, and logistics. We also employ 461 people, plus 105 contractors, across our distribution centres in Oldham and Heywood. In total, N Brown employs 1,495 people, with an additional 25 employees based in our Republic of Ireland office.

### **Organisational Structure**

N Brown Group 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.

### **Policies & Governance**

Responsibility for ESG matters, including modern slavery risks, sit with the ESG Committee, a sub-committee of the Executive Leadership Team. The Committee 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 role of ESG Committee chair transitioned from the Company Secretary to the Chief People and Sustainability Officer, effective 1st of February 2025. The Committee meets quarterly and comprises several members of the Executive Leadership Team including the CEO and CFO.

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 Chief People & Sustainability Officer 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 and the Director of Facilities 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:

**Email:** [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

**Website:** [www.seehearspeakup.co.uk/en/file-a-concern](http://www.seehearspeakup.co.uk/en/file-a-concern)

**Tel:**

**UK: 0800 988 6818**

**Ireland: 1 800 901 631**

**South Africa: 0800 990 094**

For the financial year covered within this report, N Brown Group did not receive any internal whistleblowing or grievance incidents.

### **Ethical Recruitment and Employment Practices**

We are committed to ensuring that all recruitment and employment practices within our business and supply chain are fair, transparent, and conducted in a manner that upholds the dignity and rights of all workers. Specifically:

- All workers must be recruited voluntarily and through legitimate, ethical processes.
- No recruitment fees or costs are to be charged to workers, whether directly or indirectly.

- All employment terms must be clear, in a language the worker understands, and provided before work begins.
- Identity documents must never be retained to restrict worker freedom.
- We only work with labour agencies and recruitment partners who demonstrate compliance with ethical standards and applicable laws, including the Employment Agencies Standards Inspectorate (EAS) and Gangbuster & Labour Abuse Authority (GLAA) licensing where required.

### **Working Conditions and Wages**

We expect all work carried out across our operations and supply chain to meet or exceed legal and ethical standards for working conditions. Our commitments include:

- Ensuring all workers receive wages that meet or exceed the legal minimum in their jurisdiction and are paid in a timely manner.
- Promoting safe and healthy working environments that comply with UK Health and Safety legislation and, where applicable, international standards.
- Respecting workers' rights to rest, leisure, and paid holidays, in line with the Working Time Regulations 1998 and international norms.
- Prohibiting excessive working hours and ensuring that overtime is voluntary and compensated fairly.
- Supporting freedom of association and the right to collective bargaining.

### **Collaborations**

At N Brown, we recognise that collaboration is essential to addressing systemic risks such as modern slavery. We actively participate in several multi-stakeholder initiatives to share knowledge, strengthen our practices, and contribute to broader industry progress.

We are proud to be members of the following organisations with deep expertise in human rights and ethical trade:

- **UN Global Compact Network UK** – aligning our business practices with global principles on human rights, labour, environment, and anti-corruption
- **Ethical Trading Initiative (ETI)** – promoting workers' rights and responsible sourcing through shared frameworks and learning
- **The International Accord for Health and Safety in the Textile and Garment Industry** – improving factory safety, inspections, and grievance mechanisms in Bangladesh and other key sourcing regions
- **Open Supply Hub** – supporting supply chain transparency by publishing and maintaining a public record of our supplier base

Our participation in these initiatives reflects our ongoing commitment to transparency and to the global effort to eliminate modern slavery and exploitation across supply chains.

## Value Chain

At N Brown, we are committed to proactively mapping, managing, and monitoring our value chain to better understand and mitigate modern slavery risks across all tiers of our supply base.

As part of our transparency commitments, we publish a comprehensive list of our supplier factories in collaboration with Open Supply Hub. This publicly available list includes all Tier 1 manufacturing partners, as well as known Tier 2 and Tier 3 facilities involved in key production processes such as dyeing, printing, embroidery, trims, and packaging. As of this reporting period, we have mapped approximately 98% of our Tier 2 and 3 supply chain, with a target of achieving 100% visibility by end of H1 FY26.

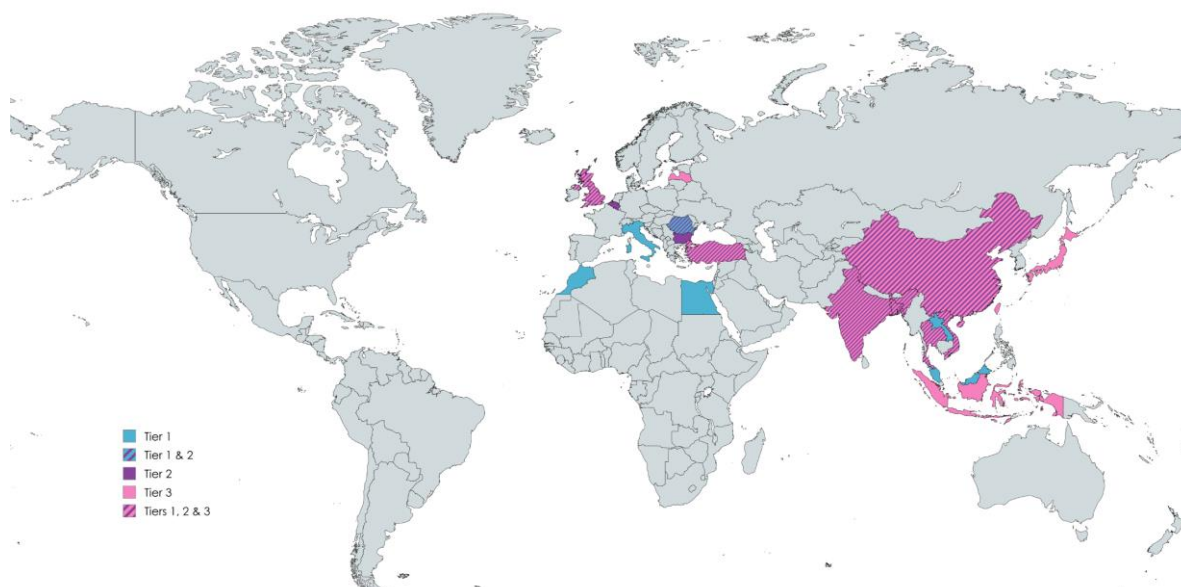
There are approximately 59,000 workers employed within N Brown Group's Tier 1 supply chain.

We partner with independent third-party organisations to conduct supply chain audits and risk assessments. These audits form a central part of our due diligence process, helping us maintain clear oversight and open dialogue with suppliers on working conditions, labour rights, and ethical business practices.

Under human rights, audits assess:

- Employment contracts, including those for agency and temporary workers
- Wages, working hours, and benefits
- Health and safety conditions
- Worker treatment and grievance mechanisms
- Indicators of modern slavery or forced labour

As of February 2025, N Brown sources own-brand products from 229 Tier 1 factories across 14 countries. Our highest-volume sourcing countries are Bangladesh, China, and India. Tier 1 suppliers are factories with which we hold a direct contractual relationship for the manufacturing of N Brown products.



**Figure 1:** Map of N Brown's Tier 1, 2 & 3 sourcing countries.

### **Identifying risks in Supply Chain**

At N Brown, we are committed to promoting safe, fair, and inclusive environments across our business operations and global supply chain. We recognise that the risk of modern slavery is dynamic and context-specific, and we use a multi-layered approach to assess and respond to potential and actual risks.

Our Ethical Trade team conducts regular regional risk assessments using a combination of internal data and external intelligence, including:

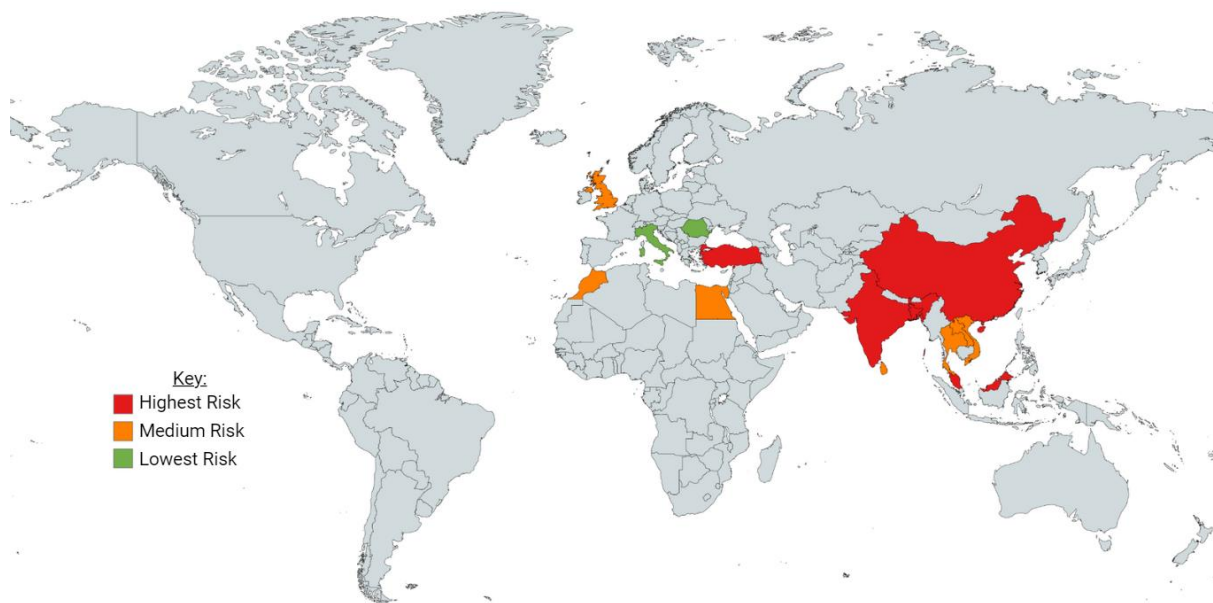
- Social audit findings
- Factory visits and on-the-ground partner insights
- Desk-based research and macro-environment monitoring
- Supply chain mapping (Tiers 1–3)
- Engagement with workers, suppliers, and civil society organisations
- Insights from binding agreements, including the International Accord and Ethical Trading Initiative

All suppliers of N Brown own-brand goods are required to provide a valid third-party ethical audit. These audits must be unannounced or semi-announced to ensure they reflect authentic working conditions and provide meaningful insight into potential indicators of forced labour or exploitation.

We also receive regular factory-level risk updates through our partnerships with organisations such as the RMG Sustainability Council (RSC) in Bangladesh and the Ethical Trading Initiative (ETI) in the UK. Based on these assessments, the areas within our operations and supply chain that carry the highest risk of modern slavery are:

- **The own-brand goods for resale (GFR) supply chain**
- **Subcontracted production, including unauthorised or undeclared facilities within Tier 1 factories**

In the reporting period March 2024 - February 2025, N Brown identified two cases of undeclared subcontracting in its own-brand GFR supply chain. As per our enforcement policy, non-negotiable financial penalties were issued to the offending suppliers, alongside corrective action plans.



**Figure 2:** Heat map of N Brown's tier 1 sourcing countries displaying risk of modern slavery.

N Brown maintains a regularly reviewed list of high-risk regions from which we do not source own-brand goods. These regions are excluded due to persistent concerns such as political instability, corruption, or widespread evidence of forced labour and trafficking. As of February 2025, this list includes:

- Afghanistan
- Belarus
- Bosnia & Herzegovina
- Burundi
- Central African Republic
- Democratic Republic of Korea
- Democratic Republic of Congo
- Haiti
- Iran
- Iraq
- Lebanon
- Libya
- Mali
- Myanmar
- Nicaragua
- Somalia
- South Sudan
- Sudan
- Syria
- Uyghur/Xinjiang (region of China)
- Venezuela
- Yemen
- Zimbabwe

### **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.

Sourcing Country	Salient Risks	Due Diligence
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.

### **Climate Change & Worker Risk in Value Chain**

N Brown recognises climate change as a growing risk that has both direct and indirect impacts on our operations and supply chain. As global temperatures rise, physical climate hazards such as extreme







heat, flooding, and drought may increasingly affect the safety, wellbeing, and productivity of workers, particularly in regions with existing infrastructure and governance challenges.

We view it as part of our duty of care to monitor how climate-related risks affect the environments in which our suppliers operate. While our understanding of this complex issue continues to evolve, we are taking proactive steps to improve data collection, scenario analysis, and the provision of clear guidance to our suppliers on managing and mitigating associated risks.

To better understand our exposure, we conducted a physical climate risk scenario analysis in FY24, covering key operational sites and strategic suppliers. This assessment, carried out in partnership with EarthScan™, evaluates our exposure to six key hazards across multiple time horizons and climate scenarios.

Three IPCC-aligned climate scenarios were used in the analysis:

- **Business as Usual (SSP5/RCP8.5):** High emissions continue unchecked through the 21st century
- **Emissions Peak in 2040 (SSP2/RCP4.5):** Emissions stabilise mid-century, broadly aligned with current national policies
- **Paris Aligned (SSP1/RCP2.6):** Emissions reduce in line with Paris Agreement targets

Risk Driver	Exposure and Potential Impact
Flooding 	Flooding risk refers to both coastal and riverine flooding. All our sites are considered to have a very low risk exposure to flooding.
Wind Risk 	Extreme wind events can occur during weather events such as storms, typhoons and tornadoes. These events could cause damage and disruption to our operations and the surrounding area can be seen in our supply chain territories in Vietnam and China.
Heat Stress 	Increased temperatures over a prolonged period could lead to a loss of productivity and increase operating costs due to higher energy demand for cooling, by 2050, our operations in Greater Manchester are exposed to high risk level. In the short term we see immediate risks along and towards the equator, territories such as Turkey, as well as more humid climates such as India, we are working with suppliers to mitigate accordingly.
Precipitation Risk 	Precipitation risk arises from exposure to extreme or exceptionally high volumes of rainfall. While most of our sites face very low to low-risk exposure, facilities in territories prone to wet seasons such as Bangladesh, China and India has been assessed with an extremely high-risk rating, primarily due to the potential for flooding and operational disruption.
Drought 	Droughts are expected to increase under the BAU scenario across the UK, but the risk level remains low. Supply chain partners across Bangladesh, Turkey and North Africa are exposed to a high level of drought risk, however this would have an immaterial impact on our direct operations.
Wildfire 	Wildfire danger refers to the potential intensity of an unplanned fire under certain conditions. A higher rating indicates that meteorological conditions are more favourable for triggering wildfires in areas with flammable vegetation coverage. Alongside sites in certain drier areas such as Turkey and India, one of our call centre sites in South Africa has an extremely high-risk rating for wildfire.



Supplier Physical Risk Screening		2025	2050
GFR	Combined Risk Rating	Very High	Very High
	Main Risk Driver	Precipitation Risk	Precipitation Risk
	Second Risk Driver	Drought	Heat Stress
GNFR	Combined Risk Rating	Medium	High
	Main Risk Driver	Heat Stress	Heat Stress
	Second Risk Driver	Precipitation Risk	Drought

Our goods-for-resale (GFR) suppliers (primarily located in Southern and Southeast Asia) remain highly exposed to the physical impacts of climate change. Extreme precipitation is the most significant risk driver in these regions, posing threats to production continuity, factory safety, and the fulfilment of customer orders. In contrast, our goods-not-for-resale (GNFR) suppliers, which are largely UK-based, face similar climate risk profiles to our own operations. Here, heat stress is the most prominent concern, particularly in relation to workplace safety and cooling-related energy demand. To mitigate against present heat stress challenges, we are giving supportive guidance to our Tier 1 manufacturing partners on the risks of heat stress to factory workers and to have consistent stable temperatures below the threshold in their facilities. This advice is in line with the National Collaborating Centre for Environmental Health (NCCCH). As our understanding of global climate change impacts of our value chain grows, we will continue to act proactively on mitigating and addressing these challenges with our partners to reduce the potential impacts and risk against value chain workers.

### **Freedom Of Association**

Freedom of Association (FOA) and the right to collective bargaining are fundamental principles in upholding labour rights and identifying risks associated with modern slavery. N Brown monitors the presence and functionality of FOA mechanisms across its own-brand goods-for-resale (GFR) Tier 1 supply chain. These include trade union representation, worker committees, and grievance reporting systems that allow workers to raise concerns safely and without retaliation.

In regions where FOA is legally supported, we work with suppliers to encourage active worker participation and ensure that effective structures are in place. This includes engagement on how worker voice mechanisms are established, managed, and communicated within the factory environment.

In China, where legal restrictions limit formal FOA, N Brown only works with trusted suppliers who can take a collaborative approach and adopt alternative worker representation models in line with international expectations. In such cases, we continue to engage with suppliers on practical ways to strengthen worker voice and ensure concerns can be raised and addressed transparently.

### **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.

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 2025, we will:

- 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.

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