
TFG Brands (London) Ltd
Modern Slavery Transparency Statement
Financial Year 2021 - 2022

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Foreword

Whilst our approach to promote and defend human rights continues to be strengthened by our commitment, and determination to put people and the planet first, modern slavery continues to infiltrate international borders and global supply chains, with every country in the world far from eradicating this abhorrent crime.

We stand firm in our condemnation of all forms of modern slavery and the exploitation of people for personal or commercial gain. TFG Brands (London) Limited (hereinafter “TFG Brands”) is committed to respecting, protecting and advocating for the human rights of all stakeholders who are involved in our operations.

In the face of a challenging 2021, we have seen crises threaten human rights and increase the risk of forced labour, particularly for those who are already most vulnerable in our societies. A combination of extreme and sudden weather events, and long-term climate change is negatively affecting many of the most vulnerable people in the poorest countries in the world. The start of 2022 saw the invasion of Ukraine by Russia, unleashing the biggest conflict in Europe since the second World War, and presenting a real risk of human trafficking and exploitation. The effect of the COVID-19 pandemic continues to be felt by many people and businesses, with the disadvantaged and vulnerable still most affected, while global supply chains continue to be significantly disrupted, from raw material shortages to increased freight costs.

Now more than ever, industry collaboration across supply chains is essential to respond to the increased risk of exploitation in business operations and global supply chains. We continue to collaborate

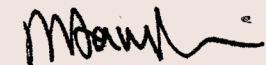
with multi-stakeholder initiatives such as the [Ethical Trading Initiative](#) and value our strategic partnership with [Anti-Slavery International](#), as well as working alongside our industry peers. These partnerships allow TFG Brands to increase its leverage and strengthen multi-stakeholder collective action to identify, prevent and respond to forced labour in global supply chains, with the aim to improve overall working conditions and reduce inequality. This is not just about living up to requirements to respect human rights, it’s also about strengthening the foundations of business.

Advocating for stronger human rights due diligence, TFG Brands also signed a joint [statement](#) with 35 other companies, investors and business associations, encouraging the UK Government to introduce a Mandatory Human Rights and Environmental Due Diligence (mHREDD) law, that would be accompanied by consequences strong enough to ensure that businesses who fall within the scope of the legislation, carry out mHREDD to a high standard, and that victims have access to justice.

We see opportunities for positive change in all that we do, and this is felt in the TFG Brands company values. Embedded across our business, these values guide and inspire us to act responsibly and with as little impact on people and the planet as possible. We embrace our responsibility to evolve for a better future, which is demonstrated in setting science-based targets to reduce our emissions and reach net zero no later than 2050, in line with the [Paris Agreement](#)*. We establish meaningful relationships across our business, strengthening our ability to assess, identify and prevent human rights abuses. We actively participate with our key external partners to drive inclusion, innovation, and best practice.

And we champion critical thinking to inspire each other and take accountability.

Together, these values are key to strengthening our collective action in tackling the scale of modern slavery and upholding our commitment to human rights.



Justin Hampshire
Group Chief Executive Officer, TFG Brands (London) Limited.

Commitment Statement

As a purpose-led business that aims to put people and the planet first, TFG Brands promotes and defends the human rights of those who help make and sell our products, and services. This is a collective effort, and everyone involved in our operations has a responsibility to uphold this fundamental value.

*TFG Brands has committed to reduce its absolute scope 1&2 emissions (market-based) by 95% by 2030 from a 2019 base year. TFG Brands has committed to increase its annual sourcing of renewable electricity from 0% in 2019 to 100% by 2030. TFG Brands has also committed to reduce its absolute scope 3 GHG emissions from purchased goods and services and upstream transportation and distribution by 30% over the same timeframe. These targets have been submitted to the Science-Based Targets Initiative (SBTi) for validation, due in Spring 2023.

Modern slavery

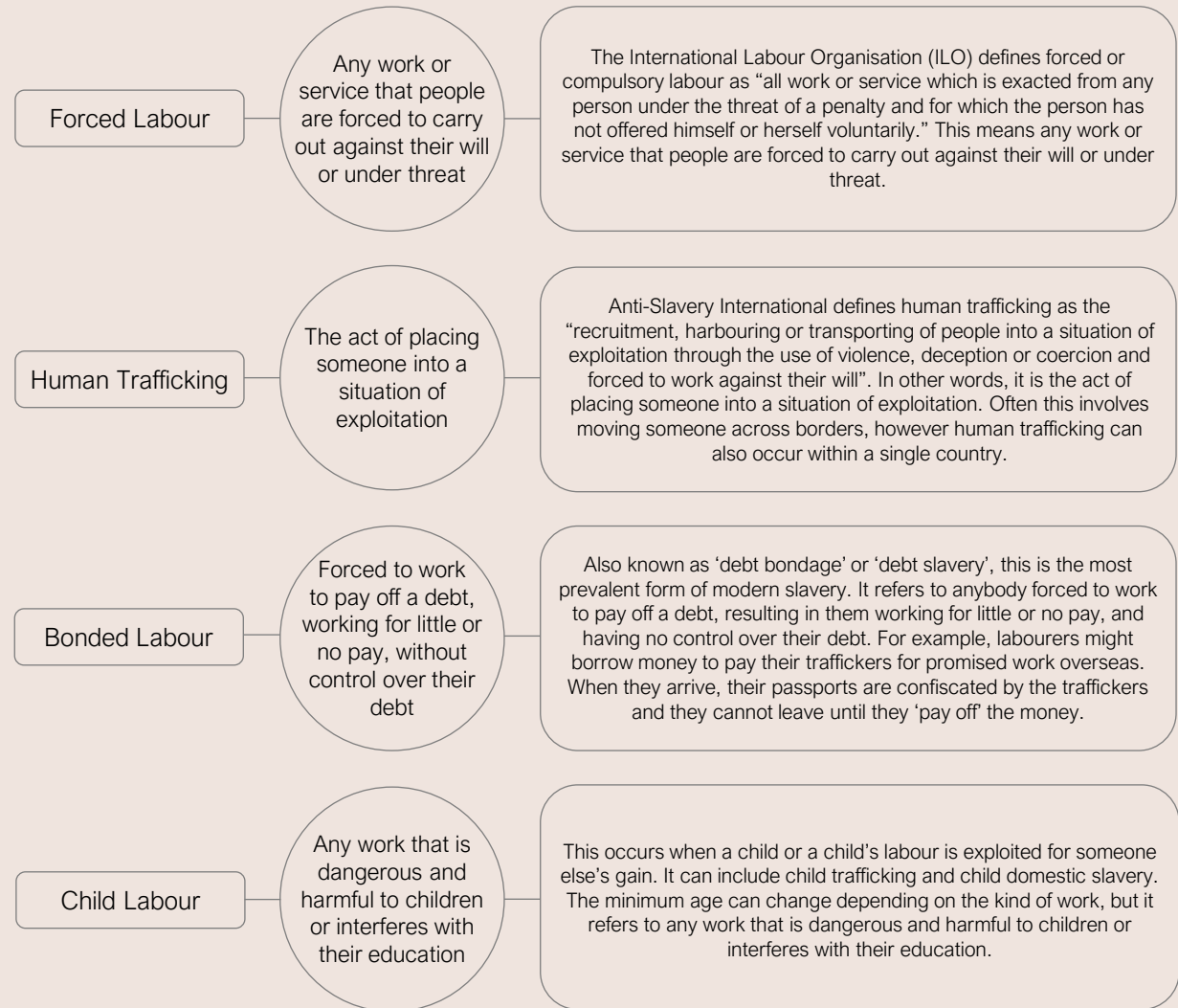
About 150 years after most countries banned slavery, millions of men, women and children are still enslaved. Contemporary slavery, as defined in the 1956 UN supplementary convention, takes many forms, including debt bondage, servitude, child slavery, forced labour and human trafficking.

Anti-Slavery International defines modern slavery as “exploitative labour that places one person in the control of another”. Slavery thrives on every continent and in almost every country and is still prevalent in the fashion industry and other labour-intensive industries.

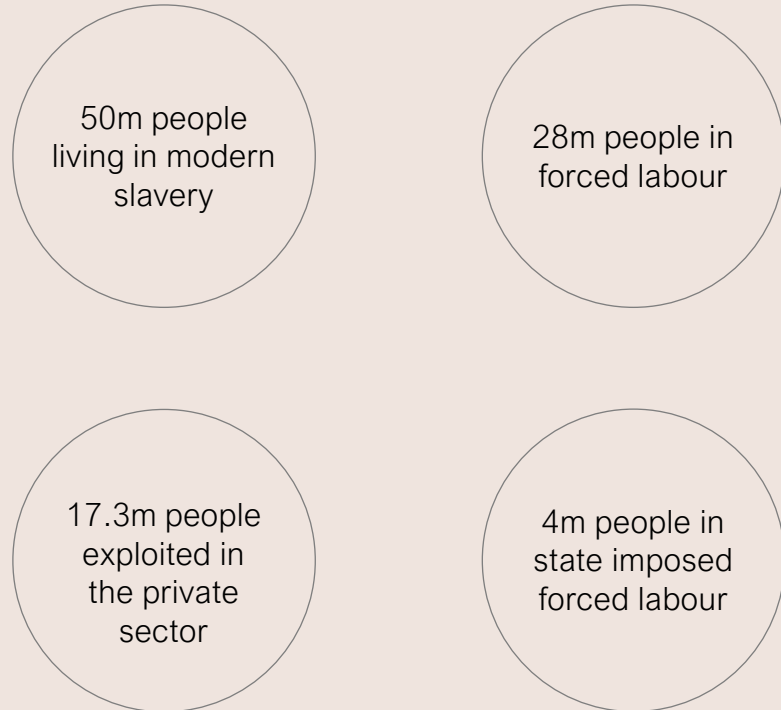
Modern Slavery is a violation of human rights where victims are denied their basic rights to dignity, freedom and security. Victims are trapped in a situation where they are often powerless and vulnerable, and therefore unable to leave because they are subject to deception, mental and/or physical abuse, threats and punishment.

TFG Brands is committed to respecting, protecting and advocating for the human rights of all the stakeholders who are involved in our own operations. As such we accept that it is our responsibility to support transparency and integrity, to be proactive in resolving problems and to collaborate with others to protect the human and labour rights of workers.

To help us identify better what to look for, we have broken down modern slavery into four key areas.



Key facts



Slavery is now less about people literally owning other people - although that still exists - but more about being exploited and completely controlled by someone else, without being able to leave. ILO estimates that 50 million people are living in modern slavery worldwide. Below is a summary of some key statistics.

Who does modern slavery affect?

Modern slavery exists anywhere in the world and can affect people of any sex, age, or race. Modern slavery most commonly affects people who are vulnerable and at risk of being taken advantage of – such as someone living in poverty, or someone from a community that is discriminated against (for example migrant workers). A typical scenario features someone who is enticed to accept a job offer abroad that turns out to be very different to that what was promised and then remain bounded to the organisers of the scheme, often referred to as 'gangmasters'.

Challenges in the supply chain

The lack of transparency and traceability across the fashion global supply chains is a major challenge. This means that it is extremely difficult to know how many people are working directly or indirectly in fashion supply chains, and the conditions that they are working in.

Modern slavery takes place at different stages of the supply chain, and across all industry sectors. In labour-intensive industries such as fashion, products are touched by many pairs of hands before they reach final consumers. While first tier factories are often audited in long supply chains, many secondary tiers are not, which makes it difficult to assess with certainty that modern slavery is not present.

Modern slavery in a global context

International NGOs

Non-governmental organisations (NGOs) have a big impact on modern slavery legislation and awareness. They provide research and data about the current impacts of modern slavery, helping businesses and governments to take action and manage risk.

Our partner [Anti-Slavery International](#) is the world's oldest anti-slavery charity, founded in 1839. They advise governments on legislation and were part of the development of some of the world's major anti-slavery laws. They work with us to help identify slavery in global supply chains by advising on the best ways to stop slavery practices.

TFG London also refers to the [Global Slavery Index](#) and its interactive data maps that list countries according to the number of people in modern slavery, and analyses government actions in response to this issue. It was created by the [Walk Free Foundation](#), whose mission to end slavery in all forms.

Global legislation

Legislation aimed at preventing modern slavery and enhancing human rights due diligence have been rapidly spreading right across the world. This is as demand grows for companies to publicly disclose their efforts to address slavery and human trafficking in their supply chains. Following the UK Modern Slavery Act 2015, new and upcoming global legislation includes:

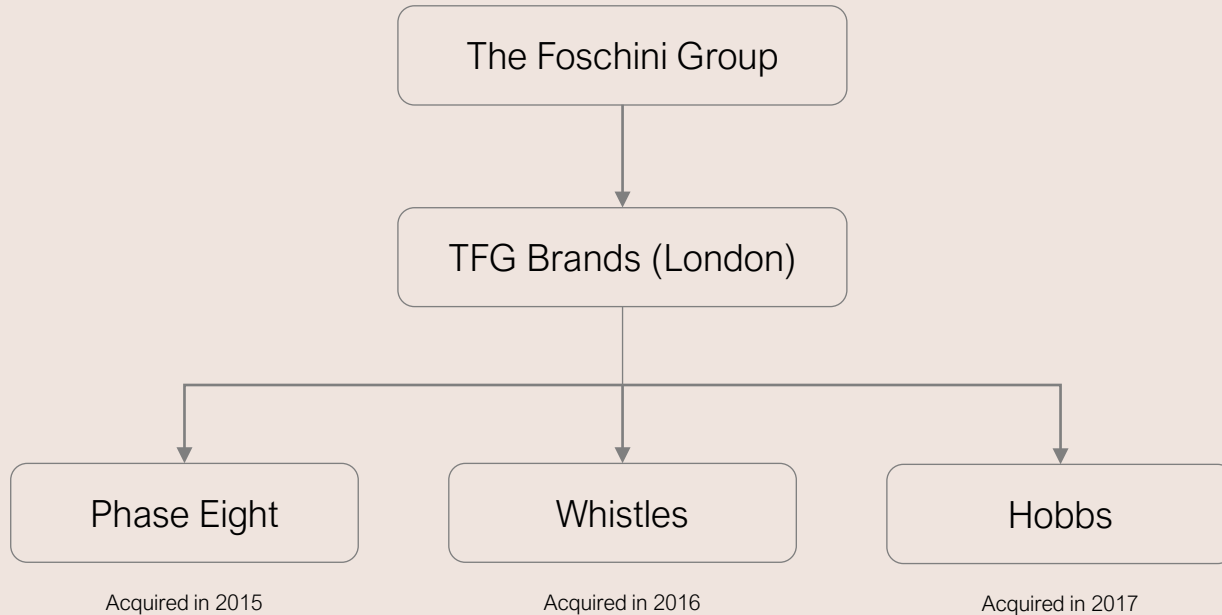
- EU commission proposal for a directive on due diligence
- French law on duty of vigilance
- German law on supply chain
- Norwegian law on transparency
- Dutch proposal on responsible business conduct
- Austrian motion for a resolution on supply chain
- Belgian proposal on duty of vigilance
- Canadian Bill C-262
- US FABRIC Act
- California Garment worker protection act

In addition, we are also seeing legislation on import control on forced labour products, such as the US Withhold Release Order (WRO), The Uyghur Forced Labour Prevention Act (UFLPA) and the upcoming Australian Custom Act.

We welcome the EU proposal on control measures banning forced labour products from reaching its consumers, as well as legislation on human rights due diligence and corporate accountability.

We expect more countries to follow the UK's lead in setting up similar legislation to curb modern slavery, however it is worth noting that international provisions for decent labour standards have already been outlined and legislated in most countries around the world.

Our business



Headquartered in London, TFG Brands (London) is owned by The Foschini Group Limited (“TFG”) a leading publicly listed South African retail group.

TFG first entered the UK market (forming TFG Brands) through the acquisition of the premium womenswear brand Phase Eight in January 2015. Since then, the premium womenswear brands Whistles and Hobbs have been added to TFG Brands.

Each brand focuses on a different customer and style, from the contemporary designs at Whistles to understated British elegance at Hobbs and exclusive occasion and daywear collections at Phase Eight.

TFG Brands is headquartered in London, sharing offices with Phase Eight. TFG Brands is establishing a retail presence with 1 solus store and employs 358 people across both central teams and retail roles.

As of 31st March 2022, TFG Brands employs 2,251 people – directly for either TFG Brands, Hobbs, Phase Eight or Whistles – working in central teams, and throughout our retail locations, in both part-time and full-time roles.



Phase Eight is a premium British brand; the go-to destination for empowering, feminine style that inspires. Founded in 1979, Phase Eight design clothes and accessories for all areas of life - from special occasions to weekend looks.

Acquired by TFG Brands in 2015, Phase Eight is headquartered in London with its customer services operations and Distribution Centre (DC) based in Rochester, Kent. Phase Eight has a strong international retail and online presence, operating in 14 territories across 318 solus stores and concessions. Phase Eight employs 812 people. Phase Eight's DC is operated by a third-party logistics company, who employs 81 people on the Phase Eight contract.

Phase Eight manufactures its product in 87 first tier factory sites across 12 countries. Phase Eight's factory relationships are managed through an external network of 63 suppliers, of which 27 are direct and 36 are agents. Phase Eight top 10 sourcing countries are China, Romania, Turkey, India, Portugal, Greece, Italy, Sri Lanka, Indonesia, and Spain, representing 99% of purchased volumes this year.



Whistles is a multi-channel fashion brand, selling apparel, footwear and accessories in timeless, intelligent designs for modern women.

Acquired by TFG Brands in 2016, Whistles is headquartered in London, with a customer services team in Rochester, Kent. Whistles DC is located in Hemel Hempstead and operated by a third-party logistics company who employs 36 people on the Whistles contract. Whistles has a strong retail and online presence, operating in 4 territories across 137 solus stores and concessions. Whistles employs 351 people.

Whistles manufactures its product in 81 first tier factory sites across 14 countries. Whistles' factory relationships are managed through an external network of 56 suppliers, of which 27 are direct and 29 are agents. Whistles top 10 sourcing countries are China, Turkey, Portugal, India, Mauritius, Spain, Sri Lanka, Italy, Vietnam and Tunisia, representing 99% of purchased volumes this year.

WHISTLES



Founded in 1981, Hobbs is a premium British womenswear brand offering clothing, footwear and accessories.

Acquired by TFG Brands in 2017, Hobbs has a headquarters and a DC in London, with a customer services team in Rochester, Kent. With a strong retail and online presence, Hobbs operating in 9 territories across 215 solus stores and concessions. Hobbs employs 730 people.

Hobbs manufactures its products in 89 first tier factory sites across 16 countries. Hobbs' factory relationships are managed through an external network of 64 suppliers, of which 28 are direct and 36 are agents. Hobbs top 10 sourcing countries are China, North Macedonia, Turkey, India, Sri Lanka, Portugal, Vietnam, Indonesia, Mauritius and Romania, representing 95% of purchased volumes this year.

HOBBS
LONDON

Sourcing landscape

Collectively, TFG Brands manufactures products through a global network of 183 external suppliers (of which 28 are shared) across 20 countries and in 257 first tier production sites (of which 20 are shared).

Further to its first-tier suppliers, TFG Brands continues to map its subsequent supply chain tiers which provide subcontracted and homeworking processes, as well as fabrics, trims, yarns and raw materials. Each brand does not have direct relationships with these suppliers and are managed via their first-tier suppliers. All brands source their fabrics, components, and raw materials through the same network and in-house.

Representing 96% of purchased volumes during the 2021-2022 financial year for its tier-one suppliers, TFG Brands combined top 10 sourcing countries are China, Turkey, Romania, India, Portugal, North Macedonia, Mauritius, Sri Lanka, Italy, and Vietnam.



Global Slavery Index

This table illustrates our first-tier sourcing landscape ordered by prevalence of modern slavery according to the [Global Slavery Index Map 2018](#) and purchased volumes for 2021-2022.

*Substantial gaps in data exist for the Arab States region and Gulf countries in particular. These gaps point to a significant underestimate of the extent of modern slavery in this region. As a result, the country-level estimates presented here are considered very conservative and should be interpreted cautiously.

**Substantial gaps in data exist for the Central and East Asia subregions where, with the exception of Mongolia, surveys cannot be conducted for reasons such as (i) survey is only delivered face-to-face, (ii) survey is delivered only in the main language which many migrant workers do not speak, or (iii) national authorities would not, or were unlikely to, consent to the module on modern slavery. Unlike several countries in Western Europe where no surveys were conducted, none of the countries in these subregions were identified as sites of exploitation by respondents in the 48 countries where surveys were implemented.

Country	Estimated Prevalence of Modern Slavery (victims per 1,000 population)	TFG Brands Purchased Volumes 2021-2022
North Macedonia	8.7	3%
Greece	7.9	1%
Turkey	6.5	15%
India	6.1	6%
Lithuania	5.8	<0.1%
Indonesia	4.7	1%
Vietnam	4.5	1%
Bulgaria	4.5	0%
Romania	4.3	7%
China**	2.8	54%
Portugal	2.5	5%
Italy	2.4	1%
Spain	2.3	1%
Tunisia	2.2	<0%
Sri Lanka	2.1	2%
United Kingdom	2.1	<0.1%
Brazil	1.8	>0.1%
Netherlands	1.8	<0.1%
United Arab Emirates*	1.7	>0.1%
Mauritius	1	2%

Our supply chain

Our supply chain is divided into two channels:

- Products for re-sale online and in stores, including the brands' branded products and other third-party brand products.
- Non-stock items and services, including outsourced customer deliveries, logistics, IT, cleaning, customer care and catering.

Each brand under the TFG Brands group designs and develops their own branded products from offices in London, while finished goods are manufactured by an established network of third-party factories.





At brand-level, the sourcing team is comprised of the design, fabric sourcing, buying, merchandising and technical departments, who take ownership of their sourcing landscape and supply chains. At Group-level, the CSR and sustainability team work alongside the sourcing teams to ensure that direct and indirect suppliers are assessed and selected based on ethical and sustainable credentials, together with commercial criteria as outlined in the due diligence section below.

Non-stock items and services are managed by the procurement team and, where applicable are supported by the CSR and sustainability team, as well as the legal team.

Directed at group-level, TFG Brands follows the ETI Human Rights Due Diligence (HRDD) framework which is used to address and mitigate modern slavery risks, while driving the agenda forward at brand-level, across all departments, including both supply chain channels.

Through this due diligence process - which in some cases is enhanced - we carry out a risk assessment across our manufacturers and non-stock suppliers, as well as relying on the specialist advice offered by our strategic partner, Anti-Slavery International.

Each brand's supply chain is defined as follows:

Tier	Definition	Example	Hobbs	Phase Eight	Whistles
1	 Primary production site	Assembly of finished goods before being shipped to brand. Processes such as cutting, stitching, QC, packing are conducted.	Fully Mapped	Fully Mapped	Fully Mapped
2	 Dye-houses, Fabric mills, trims & Subcontractors or homeworking	<u>Dye-houses</u> : fabric dyed and finished if not at fabric mill <u>Fabric Mill</u> : yarn woven/ knitted into fabric <u>Trims</u> : Buttons, zips and labels <u>Subcontractors & homeworking</u> : secondary processes conducted outside of the primary production site such as embroidery, embellishment, printing and in some cases, stitching	Partially Mapped*	Partially Mapped*	Partially Mapped*
3	 Yarns	Spinning of raw material into yarns	Not Mapped	Not Mapped	Not Mapped
4	 Raw Material	Cultivation or extraction of raw material, such as farm, forest, ranch	Not Mapped	Not Mapped	Not Mapped

*Since our last statement, TFG Brands have updated its supply chain tier categorisation with the aim to simplify and unify with industry peers and best practice. As a result of this change, our tier 2 suppliers have been downgraded from 'fully mapped' to 'partially mapped' which is due to the combination of previously categorised tier 3 suppliers. Full tier two mapping is due to be complete no later than Spring 2023.

Policies

As part of our ever-evolving ethical trading strategy based on the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [ETI Human Rights Due Diligence Framework](#), we have developed our operational policies with the view of respecting, protecting and remedying the human and labour rights of all that work on our behalf.

TFG Brands policies relate to our commitment to adopt the UNGPs, to benefit all those who work on behalf of the brands. Our core policies include our [Supplier Code of Conduct](#), the [Migrant Workers Employment Policy and Implementation Guidelines](#), [Guideline for employment and integration of people displaced from Ukraine](#), [Cotton Procurement Policy](#), [Homeworkers Policy](#), [Neptune Declaration](#), [Maritime Labour Convention 2006](#) and the [Young Worker and Child Labour Policy](#).

Our Supplier Code of Conduct ('Code of Conduct') is aligned with the Ethical Trading Initiative ('ETI') base code, with elements of the SAI SA8000 Standard:2014. It outlines the minimum social and environmental standards we expect each factory – and its sub-suppliers - to meet and our expectations regarding the working conditions in which our products should be manufactured.

Our Migrant Workers Employment Policy and Implementation Guidelines set out the supplier requirement to protect, respect and remedy the rights and welfare of migrant and contract workers, some of the most vulnerable to exploitation and modern slavery. Within this policy, TFG London endorses the [Employer Pays Principle](#), which reflects the [Dhaka Principles for Migration with Dignity](#).

Implemented this year and in response to the Russian invasion and ongoing conflict in Ukraine, TFG Brands played a key role in developing the ETI guidelines for employment and integration of people displaced from Ukraine. This policy provides guidance on how to support the employment of refugees and displaced people, with secure, decent, safe and fair work with mainstreaming of gender considerations in mind.

Our cotton procurement policy outlines TFG Brands position on human rights and labour standards in the sector, focused on the cultivation and processing of cotton fibre, including on cotton farms as well as spinning and ginning facilities. It does not however, address the environmental impacts of cotton production in either the fibre, yarn, fabric or garment processes.

Our Homeworkers Policy communicates our position towards homeworking in our supply chains, providing support to our supply chain partners. Homeworkers exist in our supply chains and we are supportive of this. The majority of homeworkers are women who are balancing paid work with domestic and family responsibilities with few practical alternatives to provide income. We are committed to working alongside our suppliers to sustain homeworkers' employment and making their work as regular as possible, while contributing through our purchasing practices to improved rights, income, and working conditions.

The Neptune Declaration on Seafarers Wellbeing and Crew Change aims to promote and protect the welfare of seafarers. It was launched in response to the crew change crisis, which has resulted in around 400,000 seafarers stranded on ships because of coronavirus-related travel bans.

The Maritime Labour Convention 2006 aims to establish minimum working and living standards for all seafarers working on ships flying the flags of ratifying countries.

Our Young Workers and Child Labour Policy prohibits the recruitment of child workers in our supply chains and outlines remediation guidelines.

Finally, other policies that relate to the prevention of modern slavery are our Anti-Bribery Policy, Whistleblowing Policy and Equal Opportunity Policy.

Due diligence

Governance

TFG Brands is overseen by an Operational Board of Directors – made up of 8 members - which meets monthly and engages advisory teams to provide support on areas that include brand strategy, sustainability, ethical trading and modern slavery, among other topics.

Our environmental and social purpose is represented and advocated for by the CEO and the CFO, while the Head of CSR and sustainability provides a direct advisory role to these functions and the Operational Board of Directors.

In addition to this leadership representation, the CSR and sustainability strategy is integrated into all decision-making, with each department having specific impact-focused objectives.

Responsibility for policies, training, risk assessment and enhanced due diligence on modern slavery is held by the CSR & sustainability team who work cross functionally to embed responsible business practices across the business.

Risk assessment and management

Modern slavery depends on multiple factors and TFG Brands has identified key elements that pose a risk of modern slavery in global supply chains. As such, TFG Brands applies these considerations to its own assessment of risk to broaden its understanding of what can contribute to modern slavery.

External factors

- Poverty
- Lack of well-paid, safe jobs
- Discrimination against vulnerable people and minority groups
- Poor local laws and lack of enforcement
- Corruption of government agencies, businesses and collusion
- No regulation of recruitment agencies

Business models

- Short lead times
- Unrealistic expectations
- Speed and price that precede ethical standards
- Delayed payments
- Sub-contracting
- Extended and complex employment relationships
- Use of labour recruiters and brokers

Due diligence

The Global Slavery Index has found that there are two main key risk drivers:

- Repressive regimes where the government puts population to work (e.g. North Korea)
- Conflict situations where laws, social structures, and normal protection systems are not working (e.g. the refugee crisis in Syria)

At the same time some industry business models can have a direct effect on increasing the risk of modern slavery occurring in our supply chain.

Since participating in the Better Buying programme in 2018 and completing training in collaboration with Better Buying and the ETI, our sourcing team were able to review anonymised supplier feedback on purchasing practices that assessed 7 key stages, from planning and forecasting to payment terms and cost negotiations. This programme was aimed at scrutinising brand-level purchasing practices and assessing how our business model might impact supply chain partners, with the goal to improve supplier relationships and ensure there were no barriers in the supplier's ability to adhere to terms and conditions and operate efficiently, while providing a safe working environment.

Originally conducted by Whistles in 2018, this year Phase Eight, Hobbs and Whistles will participate in a 2-year, multi-stakeholder initiative programme to further strengthen their responsible purchasing practices.

We are currently looking to expand this work by adding a climate change lens, as we acknowledge that a just transition in the garment industry is only possible by taking into account both social and environmental issues. Climate change will contribute to a rise in sea levels and extreme weather events, which will impact suppliers and factories located in areas that are vulnerable to sea level rise. We perceive this as an imminent threat, and are working with the ETI and academic organisations on how to best mitigate possible job and income losses due to sea level rises.

We believe that business model related factors must be tackled hand-in-hand with our suppliers. It must be a joint effort, where parties involved trust each other and reciprocate with honesty and openness.

We recognise the fashion industry's continued importance to employment and economic development in global supply chains. Building on the foundations of stronger social dialogue and guaranteed worker protections is needed - together with enhanced investments in physical and human capital – to encourage long-term enterprise growth and productivity, and the only viable way to build a human-centred future for the industry, one that is both sustainable in the long run and delivers a more equitable deal with broader benefits for all actors in the supply chain.

We continue to monitor areas of our business where there is migrant labour, high presence of refugees, marginalised people, home workers, young workers and a risk of the use of child labour, contract and temporary workers, women workers, and outsourced recruitment agencies.

We refer to the [UK Gangmasters and Labour Abuse Authority \(GLAA\)](#) that has a detailed list of risk factors to watch out for among the workers in our operations and supply chain. These include indicators across:

- Restricted freedom
- Behaviour
- Finances
- Working conditions
- Accommodation
- Appearance

Due diligence

We recognise that certain countries within our own operations may have one or more of these modern slavery risks and as such, we have divided them into three different categories of high, medium and low risk and allocated appropriate priorities. This differentiation was based upon assessing causes and contribution, direct and indirect impacts as well as level and influence, according to the prevalence of modern slavery as highlighted in the Global Slavery Index map.

Our priority focus is currently on product manufacture and raw material cultivation and processing. However, in recent times we have addressed state-enforced examples of modern slavery, that have led us to develop specific policies and tools, which allow us to investigate further where issues arise, as well as forging strategic partnerships with organisations and coalitions.

We utilise expert research and advice from specialists to further investigations with our suppliers or to raise awareness of potential risks. At the same time, we value our partnerships with key NGOs, such as Anti-Slavery International, suppliers, other brands and multi stakeholder platforms such as the Ethical Trading Initiative, working together on pre-competitive ground to find a common solution to salient issues.

Since mapping tier-one of our supply chain, TFG Brands has invested in the digital platform, [Segura](#), which allows us to extend our mapping beyond the first-tier. Using transactional data to provide additional assurances, Segura is supporting us to reach our ultimate goal of obtaining transparency down to raw materials.

By contributing to the [Open Apparel Registry](#), we are joining our industry peers to resolve an important challenge that the industry has been struggling with for several years – the lack of single facility identifier for factories in the apparel supply chain. We believe this development is key in our industry and will support current and future brand and stakeholder collaborations on an array of activities at factory level, ranging from joint remediation to collaborative capacity building activities.

“Anti-Slavery International has been working with TFG through our business advisory work to identify risk within their supply chains and to mitigate it through a worker-centred approach.”

TFG is a valued partner of Anti-Slavery International, with whom we work to call for systemic change within the fashion industry and to address the root causes of forced labour.”

Eloise Savill – Private Sector Advisor



Training and collaboration

We continuously provide updates and raise awareness of salient modern slavery risks internally to both our procurement and operations teams, as well as our Board of Directors and work collaboratively to find solutions to mitigate these issues.

At the same time, we continue our longstanding partnership with industry peers participating in a series of events throughout the year on topics such as forced labour and human rights abuses in the Xinjiang Uyghur Autonomous Region, the Russian invasion of Ukraine, as well as the Sri Lankan political unrest.

Small brands working group

This working group was born from the need to collaborate among similar size brands and retailers as a result of the Covid-19 pandemic, and to this day it proves to be an invaluable platform in which ethical trading teams exchange resources, knowledge, practices and intelligence, as well as enabling us to identify where leverage can be gained through opportunities to collaborate.

Academic research projects

Over the past year we continue to contribute to modern slavery related research projects led by distinguished UK and US universities, sharing our case studies and experience in mitigating risks, as well as outlining ongoing challenges and existing limitations.



Our key partners



The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Their vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.



Anti-Slavery International first identified slavery in supply chains as a key issue in the fight against slavery over two decades ago. They tackle modern slavery in supply chains through research, advocacy and engagement with business.



The Open Apparel Registry (OAR) is an open source map and database of global apparel facilities, their affiliations and unique OAR IDs assigned to each facility.



The International Transport Workers' Federation (ITF) is a democratic, affiliate-led federation recognised as the world's leading transport authority. They fight to improve working lives and help their members to secure rights, equality and justice.



British Retail Consortium (BRC) is the trade association for UK retail businesses, whose purpose is to make a positive difference to the retail industry and the customers it serves, today and in the future.



QuizRR helps suppliers and buyers in building a common knowledge platform, a safe workplace, trust, transparency and dialogue for all employees at all levels in the supply chain. QuizRR provides a fun, fast and flexible training tool for measurable impact.



HomeWorkers Worldwide works to support homeworkers and their organisations in their struggle for rights and respect.



The Coalition to End Forced Labour in the Uyghur Region is a coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China, known to local people as East Turkistan.



Sedex is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains.

Actions taken

Last year we set ourselves some challenging targets and commitments to tackle modern slavery. Whilst this year we have struggled to make noticeable progress on our longer-term objectives - in part due to recently presented risks, which have required our urgent attention - we remain focused to deliver on our commitments, and to tackle them with the same integrity and detail as demonstrated in the actions taken during this reporting period.

As identified during our due diligence process, the most pressing and salient modern slavery risks were found within the acceleration of climate change and its negative effects on human rights, the mass displacement of people due to the invasion of Ukraine and the continuing COVID-19 pandemic.

Right now, climate change is negatively affecting many of the most vulnerable people in the poorest countries in the world, having a destabilising effect on urban and, in particular, rural communities. In many parts of the world the effects of climate change are exacerbated by economic activities that cause environmental degradation. Together these factors worsen pre-existing socio-economic vulnerabilities, deepen exclusion and marginalisation, drive displacement and migration, and heighten the risk of modern slavery for children and adults.

Together with the Ethical Trading initiative (ETI) and its member companies, Trade Unions and NGOs, TFG Brands is involved in a 4-year programme aimed at protecting human rights at work, alongside mitigating the impacts of climate change. Through Social Dialogue and applying Decent Work and Just Transition principles, this programme aims to shape pathways and build bridges for a future that is people centred, respects human rights at work and includes workers and their representative bodies, for the good of workers, business and the planet. With urgency, this year we have focused on adopting the Just Transition principles and have participated in modelling projects.

In addition to working with the ETI, last October, together with 35 other signatories across leading businesses, investors and business associations operating in the UK, we encouraged the Government to play a positive role in building a more resilient and sustainable post-pandemic economy that works for all. To realise this ambition, we have called on the government to introduce a new legal requirement for companies and investors to carry out Mandatory Human Rights and Environmental Due Diligence (mHREDD). We believe that the requirement to prevent abuse of human rights and environmental harm in global operations and value chains would deliver on the Government's commitments to the levelling up agenda and to the transition to a net zero economy, as well as establishing Global Britain as a leader in setting standards for renewed and sustainable prosperity worldwide.

Actions taken

Reaffirming our commitment and the urgent need for mHREDD, in September 2022, TFG Brands again added our support alongside other businesses, investors and civil society organisations, writing to the Prime Minister to introduce legislation.

As the conflict intensifies in Ukraine, and the number of displaced people increases, we recognise that our focus, and the focus of global NGOs, charities, and other organisations, need to shift from short-term humanitarian relief to longer-term sustainable assistance, aimed at the responsible inclusion of displaced people into host countries and their economies. For many who have been displaced by the war, finding employment will be crucial to ensure their economic survival and social integration. Displaced populations face a variety of barriers and risks. The lack of documentation, access to information and language barriers, can put them at higher risks of various forms of labour exploitation, including human trafficking.

Over the last year, we've continued to implement TFG Brands commitments, which includes looking at how a worker's income can be severely impacted by the payment of recruitment fees. We continue to see this as a high risk and are working with peer companies and expert organisations to support the development of responsible recruitment markets and effective human rights due diligence systems to combat forced labour.

The COVID-19 pandemic continues to be felt in our own operations, and in our supply chains with our direct suppliers suffering varying degrees of the pandemic – some more severely than others - and for some, their circumstances have changed significantly.

The strong relationships we forge with our suppliers – in most cases over several years – have afforded us a great deal of resilience. Our commitment to put human and workers' rights first, as well as leaning on the support of our strategic external stakeholders, have succeeded in allowing us to navigate through these challenging times together.

As we recover and rebuild, we recognise the need for new binding standards which benefit all and promote sustainable growth. mHRDD is key to ensure that efforts by companies that respect people and the planet, both during and after the COVID-19 recovery, are not undercut by the lack of a uniform standard of conduct applying to all business actors.

In addition, if the stated aims of international commitments such as the [UN Sustainable Development Goals](#), the [Paris Agreement](#) and the [Global Compact for Safe, Orderly and Regular Migration](#) - and the many other international human rights agreements - are to be achieved, this fundamental shift is urgently required.

We have included updates in this statement, and for full transparency we have summarised our progress against each modern slavery risk, commitment and progress in the subsequent pages of this report.

Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Migrant Workers</u></p> <p>Migrant workers paying recruitment fees might be trapped in bonded labour and be subjected to substandard employment terms.</p> <p>Recruitment agencies are often in between the employer and the worker, leaving the worker at risk of deceptive or coercive recruitment practices.</p> <p>It is often difficult for migrant workers to understand their rights and terms of employment.</p> <p>Countries of highest risk for TFG Brands are Mauritius, China and Turkey.</p>	<p>Developed our Migrant Workers Employment Policy and Implementation Guidelines.</p> <p>Conducted an extensive impact assessment of Whistles Mauritian factory.</p> <p>Supported suppliers in implementing the 'employer pays principle' according to which no worker should pay for the cost of recruitment.</p> <p>Joined ETI Mauritius Migrant Labour caucus group.</p> <p>Lobbied Mauritian and Bangladeshi governments to address migrant worker protection within government-to-government agreement.</p> <p>Participated on the event 'Migrant Workers: Driving Collaborative Approaches Towards Responsible Recruitment' in Mauritius, bringing together key stakeholders to discuss challenges in managing labour migration, and agree on a common framework for improving worker protection in Mauritius and beyond.</p> <p>Partnered with Quizrr to offer digital training solutions, developed in collaboration with global brands, suppliers, experts and NGOs, to educate workers in our Chinese supply chain on migrant issues, including migrant parenting.</p>	<p>TFG Brands are committed to building on existing policies and projects to date, whilst continuing collaboration with all stakeholders involved for the improvement of migrant workers' rights protection globally.</p>	<p>In Mauritius, we supported the establishment of a Migrant Resource Centre (MRC), belatedly inaugurated in February 2022, where migrant workers can receive information on their rights, including through monthly awareness raising sessions, accurate information and advice on their circumstances, and support to access remedy whenever their rights were violated.</p> <p>The MRC was created with the support of Mauritian trade union Confédération des Travailleurs des Secteurs Publique et Privé (CTSP), the local IndustriAll Global Union affiliate, and our partners at ASOS as a free-of-charge service for migrant workers, accessible for them in their native languages. Since the start of its operations in 2020, the MRC delivered awareness raising sessions to over 1,000 migrant workers and handled 120 employment-related grievances, affecting over 2,000 workers. 63% of these grievances are now resolved.</p> <p>We encouraged our suppliers to share information related to the MRC among all factory workers.</p> <p>We continue to advocate for better protection of migrant workers' rights in Mauritius, and participated to two workshops and a roundtable event with global brands organised by Anti-Slavery International and ASOS, together with Mauritian suppliers and other key stakeholders.</p> <p>In addition, we asked our suppliers to share among their workforce the use of the Just Good Work (JGW) Mauritius app, (whose development was funded by ASOS) an easily accessible and informative app piloted with migrant workers and available in English, French, Bangla and Malagasy that provides migrant workers with an overview of life and work in Mauritius, as well as key contact points where to reach out to for help, including to contact the MRC.</p> <p>See 'Refugees and Displaced workers' for more detail on how we are addressing risks associated with Ukraine.</p>



Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Refugees & Displaced Workers</u></p> <p>Refugees are particularly vulnerable to exploitation and trafficking, as well as forced labour and debt bondage.</p> <p>Often, they do not have access to legal aid or support on the ground, making them more vulnerable to exploitation.</p> <p>Over 10 years ago the conflict in Syrian began to displace civilians into neighbouring countries and beyond. Still without long term solutions, the presence of refugees in both Turkey and Greece continues to be a risk within our supply chains.</p> <p><u>Ukraine focus:</u> Since the Russian invasion of Ukraine in February 2022, more than 8 million people have fled Ukraine and crossed into neighbouring countries. For many who have been displaced by the war, finding employment will be crucial to ensure their economic survival and social integration.</p> <p>Displaced populations face a variety of barriers and risks. The lack of documentation, access to information and language barriers, can put them at higher risks of various forms of labour exploitation, including human trafficking.</p>	<p><u>Ukraine focus:</u></p> <p>Respected the requirements of the sanctions imposed, taken actions in response to the invasion and have terminated all direct sales and relationships with Russia.</p> <p>Conducted enhanced human rights due diligence to assess the immediate adverse human rights impacts on workers.</p> <p>Engaged with suppliers to address the ethical recruitment of workers affected in Ukraine, abroad, and in neighbouring countries. As such, together with ETI and Anti-Slavery International TFG Brands created guidance on how to support the employment of refugees and displaced people, with secure, decent, safe, and fair work and with gender considerations in mind.</p> <p>Engaged with our suppliers in Ukraine's neighbouring countries to better understand and assess the impacts of this conflict on their own operations and workers, while demonstrating support for equal access for employment for displaced workers from Ukraine once settled, and implemented ETI guidance to ensure fair pay and mitigate the risks of exploitation.</p>	<p><u>Ukraine focus:</u></p> <p>We are deeply concerned about the Russian invasion of Ukraine and stand with all the people who are suffering as a result of the violence. We have supported humanitarian efforts by raising funds to provide aid towards the unfolding refugee crisis and offered support to our teams who may be directly or indirectly affected by the conflict.</p> <p>We have taken actions in response to the invasion and have terminated all direct sales and relationships with Russia.</p> <p>As events unfold, we have enhanced our due diligence measures to monitor our existing supply chains in Ukraine's neighbouring countries, to prevent and mitigate human rights risks and impacts in these regions as a result of the huge influx of refugees and displaced people.</p> <p>We will continue to evaluate the situation and are in communication with relevant stakeholders and strategic partners on the actions we are taking. We join all those around the world who are calling for Russia to end its invasion and for peace.</p>	<p>Development in this area will be reported on in the upcoming FY 2022/2023 modern slavery statement.</p>



Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Child Labour and Young Workers</u></p> <p>Children and Young Workers are more vulnerable to exploitation and contemporary forms of modern slavery, also due to lack of robust HR practices in place to ensure their age.</p> <p>Countries of risk identified are Turkey and India.</p>	<p>Added robustness to our Child Labour and Young Worker policy and communicated this to all our suppliers.</p>	<p>TFG Brands is committed to uphold our due diligence duty to respect human rights and we advocate for a legal duty to be firmly embedded at every level of every supply chain, covering every worker and every child.</p>	<p>We welcome the historic achievement of the elimination of state-imposed forced labour in the 2021 Uzbek cotton harvest.</p> <p>However, we also believe that the choices made by governments now are at a crossroad and will either make or break the lives of millions of children. That is why we will continue to advocate for social protection as one of the most powerful measures to prevent child labour, providing families with income security in difficult times.</p>
<p><u>Contract and Agency Workers</u></p> <p>There is insecurity in the status of contract workers, which leaves them more vulnerable to exploitation.</p> <p>Recruitment agencies create an additional layer between workers and the employer and do not guarantee a great deal of transparency, as well as potentially exposing workers to exploitative practices</p> <p>Areas of risk identified are Turkey, India and UK.</p>	<p>Developed our Migrant Workers Employment Policy and Implementation Guidelines.</p> <p>Developed a modern slavery risk assessment for our supply chain and our distribution centre.</p> <p>Conducted contract, agency and temporary worker risk assessment across our top ten sourcing regions.</p> <p>Collaborated with a leading NGO to develop training programmes on modern slavery for our DC.</p>	<p>Further our risk assessment of supply chain to identify where other potential risks lie, including home workers.</p> <p>Develop risk mitigation strategy for contract and agency labour in our supply chain.</p> <p>Continue our collaboration with leading NGO to extend awareness to our supply chain.</p> <p>Refresh training sessions on modern slavery in our distribution centres.</p>	<p>This year we partnered with Anti-Slavery International, with whom we will formally develop risk mitigation strategies to tackle workers' rights infringements related to contract and agency labour in our supply chains, Anti-Slavery International will also be our official partner to deliver ad hoc training sessions on modern slavery at both our distribution centres and central offices.</p>



Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Female Workers</u></p> <p>Women are particularly vulnerable to exploitation, human trafficking and bonded labour. Areas of risk identified are all our sourcing regions.</p>	<p>Participated in a series of ETI learning events to further develop understanding and share practical examples of how gender equality can be integrated into an ethical trade programme.</p> <p>Started applying a gender lens to human rights due diligence by initiating a gender mapping exercise of our supply chain to identify hotspots.</p>	<p>Prioritise areas of focus, stakeholder engagement especially with suppliers, workers, local representatives, NGOs.</p> <p>Establishing the right partnerships to support us with this work to ensure female workers' voices are heard.</p>	<p>Due to the pandemic outbreak and our need to shift priorities to manage limited resources, we continue to delay this area of focus.</p>
<p><u>Workers' Rights Awareness and Social Dialogue</u></p> <p>Millions of workers in global supply chains are unaware of their basic rights. Around the world, millions of people work in global supply chains and too many of these workers endure abuses such as poor working conditions, including minimum wage violations; forced overtime; child labour; sexual harassment, exposure to toxic substances and other extreme occupational hazards; and retaliation against workers who attempt to organise. Workers facing these abuses often lack awareness of their human and labour rights and access to complaints mechanisms and whistle blower protections.</p>	<p>With the purpose of capacity building with increasing knowledge and measurability in global supply chains, we have partnered with QuizRR to offer digital training solutions, developed in collaboration with global brands, suppliers, experts and NGOs, to educate workers in our Chinese supply chain.</p> <p>The modules of this digital training include:</p> <ul style="list-style-type: none"> • Rights and Responsibilities • Worker Engagement • Wage Management • Migrant Parenting 	<p>With this three-year scalable capacity building programme, we commit to:</p> <ol style="list-style-type: none"> 1. Improve social dialogue & engagement between workers and management 2. Measurability year on year 3. Shared knowledge 4. Secure safe & decent workplaces 5. Enable sustainable change 	<p>As we launched the programme, the pandemic outbreak slowed its progress due to lockdown and the shutdown of factories.</p> <p>However, as restrictions lifted over 2021, we were able to enrol 2 facilities, training a total of 946 workers over several modules including:</p> <ul style="list-style-type: none"> • Rights and Responsibilities • Worker Engagement • Wage Management • Migrant Parenting <p>Of the workers included in the programme, 572 were female and 374 were male, across different levels of employment. 27 of the workers were managers, 257 supervisors and 662 were production workers.</p>

Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Purchasing Practices</u></p> <p>Purchasing practices can prevent supplier compliance with company codes of conduct and put at risk the lives and dignity of workers in supply chains. While poor purchasing practices have led to many problems, including child labour and employee retrenchment, many of their negative effects fall into four categories:</p> <ol style="list-style-type: none"> 1. Failure to pay wages and benefits required by law and buyers' codes of conduct 2. Use of excessive overtime, some of which may be forced 3. Unauthorized subcontracting to unsafe facilities with poor working conditions 4. Increase use of temporary labour making employment more precarious 	<p>Whistles voluntarily participated in the Better Buying programme, a global initiative that provides retailers, brands, and suppliers a cloud-based platform to obtain data-driven insights into purchasing activities.</p> <p>Better Buying's transparency fosters sustainable partnerships and mutually beneficial financial results and other outcomes.</p> <p>Anonymous supplier ratings of buyer purchasing practices are aggregated, scored, and made available to the participating retailers, brands, and suppliers with the goal of accelerating change and industry-wide improvements across supply chains.</p> <p>Whistles benefited from the Better Buying Responsible Purchasing Workshop. The objective of the workshop was to raise awareness on the link between purchasing practices and labour standards in our supply chain and to develop a strategy and action plan.</p>	<p>Applying the lessons learnt from the Better Buying initiative, we are extending the Responsible Buying training to both Hobbs and Phase Eight.</p> <p>In addition, we are setting up a purchasing practices taskforce to take forward the suggestions and recommendations that emerged from the workshop.</p> <p>Redrafting the Job Descriptions and KPIs for buyers to ensure that ethical trade commitments are included in their performance metrics.</p> <p>Reviewing our Terms and Conditions to ensure they are aligned with our values and standards.</p> <p>Exploring developing a Buyers code of conduct to match the suppliers code of conduct.</p>	<p>Following on the work we have conducted with the Better Buying initiative and the participation in the ACT Purchasing Practices Self-Assessment (PPSA), in collaboration with Carnstone, this year we will be joining the ETI MSI Working Group of the Common Framework for Responsible Purchasing Practices (CFRPP).</p> <p>Through the 'Learning and Implementation Community' (LIC) we will take new steps towards progress in our purchasing practices, develop solutions and share learning with peers, experts and supply chain partners.</p> <p>The overall desired outcome of the community is improved purchasing practices, in order to give scope for improved supply chain working conditions. While the approach and solutions may differ among the participating companies, the aim is that at the end of the 2-year process:</p> <ul style="list-style-type: none"> • We will have taken steps to translate framework practices into business practices, in a way that works with our business model. • we have a proposal to present to internal teams on potential feasible changes that could be made, with case studies and relevant information to back that up, ideally building on changes that have been trialled through the course of the community's duration.

Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Homeworkers</u></p> <p>Homeworking is an important aspect of the world economy, present in a huge range of sectors and countries.</p> <p>Homeworkers themselves form an essential part of the supply chain. Not only do they carry out specialised and intricate work that often cannot be mechanised cost effectively – such as embroidery, beading, finishing and packing – but they also provide much-needed flexibility in production.</p> <p>Despite their value in the supply chain, homeworkers usually have very poor working conditions (low pay, insufficient and irregular work). They can be very vulnerable as their employment status may be unclear, and so they may not receive basic entitlements such as holiday and maternity pay, social security benefits and job security.</p> <p>They are often the main breadwinner for the household, and don't have the opportunity to earn money outside the house.</p> <p>Areas of risk identified are India, as well as Turkey, Spain and Portugal.</p>	<p>We have identified presence of homeworkers in our supply chains in Turkey, Spain, Portugal and India.</p> <p>As a result, we are working with suppliers and will seek the support of experts on the ground to identify specific locations of homeworkers in our supply chain and help improve their working conditions.</p> <p>This process is strengthening the relationships with suppliers, by developing trust and openness.</p>	<p>We acknowledge that improving labour conditions for homeworkers is a complex issue.</p> <p>Under a revised homeworker policy, we commit to:</p> <ol style="list-style-type: none"> 1. Communicate our position on homeworking throughout our company, to those who supply to us, and those we supply to 2. Ensure the presence of homeworkers in the supply chain will not lead to the relocation of work or cancellation of orders 3. Work with our suppliers for the sustainable improvement of labour conditions within, homeworkers in our supply chains. We will aim to do this by following the guidance set out in the ETI Homeworker Guidelines 4. Explore the opportunity to forge partnerships with local experts in risk regions, starting from India, to seek specialist support in addressing this issue 	<p>We have devised a homeworking policy, which recognises the equality of homeworkers and provides permission to suppliers to disclose homeworking.</p> <p>To do this we consulted the Home Workers Worldwide toolkit, which provides clear and actionable suggestions on how to promote transparency and enable due diligence.</p> <p>In addition, we will be working with our suppliers and homeworker organisations to map their supply chains down to the level of homeworkers.</p> <p>We also recognise that there is a clear need for active efforts on behalf of a range of other actors, including state authorities, to support recognition of homeworkers and other marginalised workers.</p>



Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Maritime Crew Change Crisis</u></p> <p>Due to ongoing COVID-19 restrictions, large numbers of seafarers are having to extend their service on board ships after many months at sea, unable to be replaced after long tours of duty or be repatriated via aircraft to their home countries. This is a growing humanitarian and economic crisis affecting over 300,000 forgotten seafarers now stranded on board vessels worldwide who have completed their contractual tour of duty and have been prevented from returning home stating restriction of movement.</p>	<p>We made our transport partners aware of the IMO protocols, in relations to:</p> <ul style="list-style-type: none"> • Protocols for joining a ship (From a seafarer's place of ordinary residence in one country via aircraft to join a ship in a seaport in another country), and • Protocols for leaving a ship and repatriation (From a ship in a seaport in one country via aircraft to a seafarer's place of ordinary residence in another country) <p>We requested a detailed map and actions taken to support the IMO protocols that aims to protect seafarers during the pandemic.</p> <p>We approached ITF to help us decipher the data outlining our global logistics routes and vessels and verify whether there had been any human rights infringements perpetrated on board of any of the vessels listed on the map.</p> <p>We requested that our shipping agent agree to:</p> <ul style="list-style-type: none"> • Accept the MLC 2006 and cascade it down to its own partners along the supply chain. • Accept the IMO industry recommended Framework of Protocols for ensuring safe ship crew changes and travel during the coronavirus (Covid-19) pandemic. • Liaise exclusively with partners members of ITF in order to retain verifiable data access. <p>We asked ETI to form a member's working group on this specific issue as well as set up an Expert Support Network (ESN) to provide advice and knowledge on human and labour rights in the logistics sector. We also requested that the ESN would work on a tool or framework which could support members in applying due diligence to address the crew change crisis</p> <p>Ukraine focus: The conflict in Ukraine brought huge disruptions in logistics networks and impacted heavily on its workers. As the country faced borders closure, many transport workers working abroad were prevented from repatriating. As economic sanctions imposed on Russia were applied, Ukrainian and Russian seafarers saw wages blocked, Military conscription of 18–60-year-old Ukrainians and Russians triggered another sea change crisis, while Ukrainian truck drivers shortage increased.</p> <p>We commissioned another annual vessels report from ITF and the findings were as follows:</p> <p>The ITF found that of the 158 vessels identified to be used to ship goods by TFG during 2021, a total of 124 vessels are covered by ITF-approved collective bargaining agreement (CBA) or ITF-acceptable collective bargaining agreements (CBAs).</p> <p>This means that seafarers have access to the protections and recourse offered by a negotiated agreement between the owners/operators of the vessels on which they work and a trade union that is affiliated to the ITF. However, there were a further 34 vessels that did not have acceptable agreements.</p>	<p>Continue to map our logistics routes as part of our supply chain mapping due diligence.</p>	<p>As we continue to implement our policies outlining our mandatory requirements related to human rights due diligence in the shipping industry, we recognise that there are still many links in the chain that are not perfect and are working alongside our logistics partners to address this and continue to advocate for the rights of seafarers globally. We are doing this by not only being vessels of positive change, but also by continuing to bring our case studies to life through participative dialogues on platforms like the UN Global Compact Modern Slavery roundtable, the Ethical Trading Initiative Logistics workstream and other channels like the 'Voices' podcast by the Institute for Business and Human Rights.</p>



Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Forced Labour in the Xinjiang Uyghurs Autonomous Region</u></p> <p>Millions of Uyghurs and other ethnic-minorities have been detained in re-education camps and forced to work in factories in Xinjiang, as well as transferred to areas outside of Xinjiang under a government-led labour transfer scheme.</p> <p>Mounting evidence has indicated that Uyghurs and other ethnic minorities are being employed under conditions of forced labour in factories supplying international apparel brands and retailers.</p>	<p>Accelerated our supply chain mapping to target cotton suppliers with the aim of reaching tier 5, raw materials.</p> <p>Engaged with suppliers to determine origin of cotton and level of risk. Classified all suppliers sourcing cotton in China as high risk and called directly to discuss three main areas.</p> <p>Request that supplier provide mapping from farm, ginner and spinner back to province.</p> <p>Although we hold annual data on factory workers, ensure the factory is not engaged with any labour transfer schemes from Xinjiang.</p> <p>Determined the supplier's current commitment if they were sourcing from Xinjiang.</p> <p>Implemented a policy banning Xinjiang cotton and if the supplier was sourcing from Xinjiang, they planned a gradual exit.</p> <p>Suppliers signed a declaration confirming that they have not found any evidence, nor hold any suspicion, of involvement of exploited XUAR workers within their supply chains.</p> <p>Signed the Call to Action to end Forced Labour in the XUAR.</p>	<p>Publish a report about our findings and actions, that can be read here.</p> <p>Work towards our commitments to the Call to Action</p> <p>Partner with Anti-Slavery International to seek expert advice.</p>	<p>In June 2020, Anti-Slavery International and other allies launched the Coalition to End Forced Labour in the Uyghur Region, of which we are active member signatories.</p> <p>This coalition is now made-up of over 400 rights groups and investors from over 40 countries, united to end state-imposed forced labour in the Uyghur Region.</p> <p>The Coalition launched a call to action to companies, on what steps they must take to end all links with Uyghur forced labour.</p> <p>The new US Uyghur Forced Labour Prevention Act, entered into effect in June 2022, is a huge win for this campaign.</p>

Modern Slavery Risk and Definition of Issue	Steps Taken	TFG Brands Commitment	2021-2022 Progress Update
<p><u>Non-Stock Suppliers</u></p> <p>We recognise our responsibility, and opportunity, to embed ethical purchasing practices to include non-stock suppliers of goods and services.</p>	<p>We are mapping and conducting a risk assessment of our top suppliers of goods and services, to include freight handling, distribution, order fulfilment and returns processing.</p>	<p>TFG Brands recognises that it has a responsibility and an opportunity to embed ethical procurement practices within both stock and non-stock operations.</p> <p>We aim to drive visibility, promote integrity and mitigate risk in our non-stock supply chain and business operations.</p>	<p>We plan to launch an enhanced tender-qualification criteria, including specialised questionnaires and other business information as part of our due diligence review, working alongside our procurement teams, to better understand human rights and modern slavery policy maturity within non-stock suppliers.</p>

Next steps

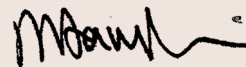
Since it was ratified, the Modern Slavery Act has been an opportunity to embed greater understanding of human rights within our supply chain and to expand awareness of the issue internally across departments, sharing accountability.

We have committed to set science-based climate targets and have developed a decarbonisation strategy for our operations and supply chain, with the ultimate goal to reach net zero by 2050. Whilst this is critical to halt the impacts of climate change, we face some tough decisions whilst remaining committed to ensuring that we deliver a just transition and take a human rights-based approach to our climate change mitigations.

Enabling workers in our supply chain to realise their fundamental human rights remains a core ambition, and in the coming year, we look forward to expanding our work on freedom of association outside of transport and logistics, strengthening this principle throughout our first-tier supply base.

We commit to collaborate further with industry peers, NGOs, trade union and through our multi-stakeholder dialogue to address issues that are at the root cause of contemporary slavery and human rights breaches.

This Modern Slavery Statement was prepared by the TFG Brands CSR and Sustainability team and approved by TFG Brands London Operational Board of Directors on 30th September 2022.



Justin Hampshire, Group Chief Executive Officer,
on behalf of the TFG Brands (London) Operational Board of Directors.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps TFG London has taken during the 2021/2022 financial year (the “Year”) to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business, and the additional steps we plan to take in 2022 and 2023.