



Modern Slavery Statement

October 2018

Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by N Brown Group plc and its subsidiaries (together "N Brown") during the 2017-18 financial year.

N Brown is committed to reducing the risk of modern slavery in its supply chain. A fundamental part of our Corporate Social Responsibility (CSR) strategy is ethical trading and we hope to create more responsible products that our customers can enjoy with confidence.

Responsibility for ensuring that modern slavery does not exist in the operations and supply chain of N Brown sits with the CEO. To complement this, we have a CSR Committee (a subcommittee of the N Brown Group Board) and Theresa Casey, as Group Head of CSR, oversees operational matters.

Our business

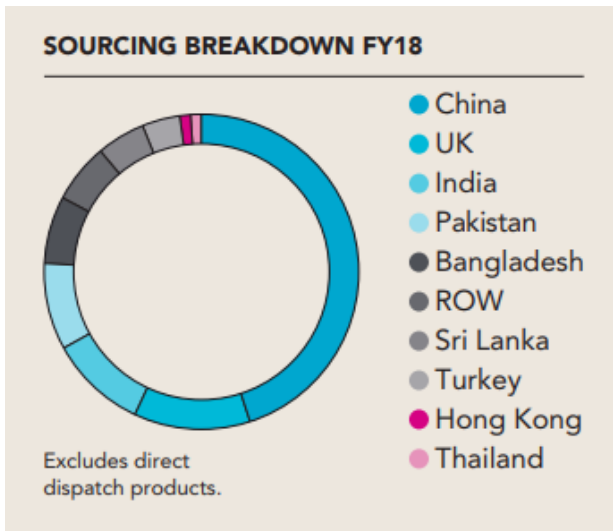
An expert in fashion that fits and flatters, N Brown is one of the UK's leading digital online retailers, with 140 years of experience. Our key brands are: JD Williams, Simply Be and Jacamo. Group revenue is 922m.

We are all about democratising fashion and are size and age inclusive, focusing on the needs of underserved customer groups, including those on-size ranges over 20+ and age 50+.

We offer an extensive range of both own label and branded products, predominantly clothing, footwear and homewares, from an international platform.

At our headquarters in Manchester we design, source and create our products employing over 2,600 people across the UK, predominantly based at our Manchester head office and our fulfilment Centre in Shaw, Oldham.

We have 686 active factory sites based in the UK, Europe and Asia who supply multiple product categories. We do not own any factories, but we do have longstanding relationships with the majority of our supply base that we have worked with for over 5 years.



China continues to be our biggest sourcing territory, particularly for homewares. By sourcing more of our clothing supply chain closer to home we have been able to achieve improved in season flexibility and planning, delivering shorter lead times and key seasonal products to the customer at the right time.

Our Approach

We recognise slavery risks and understand that the activities we undertake can impact the livelihoods of a significant number of people. We are working towards even better transparency in our supply base by building sustainable relationships through our “3 pillars” strategy.

Three pillars, one passion

Corporate Social Responsibility

Our strategy is designed to embrace the three CSR pillars: ‘All People’, ‘One Planet’ and ‘Every Product’.

It aims to fully align our ethical policies with our commercial activities, achieving tangible results and benefits for all our stakeholders.

To find out more:

www.nbrown.co.uk/sustainability



Policies

As a responsible retailer & employer we are committed to ensuring that there is no slavery or human trafficking in our organisation or supply chain.

Our Ethical Trading Policy embraces the principles of the ETI base code which advocates against modern slavery and can be found in our Code of Conduct.

We adhere to UK employment legislation which we believe offers some protection against our workers becoming victims of slavery. Our employee policies have been reviewed and amendments made where necessary.

We have also updated all our Supplier Terms and Conditions to ensure that we have clearly documented standards in place to protect against the risk of modern slavery.

We continue to maintain an effective Whistleblowing Policy which is available to any employee to raise concerns including those around modern slavery.

Due diligence

N Brown engages in comprehensive supply chain mapping and continues to maintain all first-tier own brand supplier data whilst building up transparency at Tier 2. This is an ongoing process to ensure that as we grow we mitigate risk and build trusted transparent supply chains.

Our Gatekeeper process, which was rolled out last year, has been strengthened further.

All factories are required to complete a social audit as part of our onboarding process. This desktop-based review is followed by a visit or as appropriate to ensure that, where corrective actions plans have been identified, these are completed and evidenced.

All own brand suppliers are required to sign up to a mandatory code of conduct which includes provisions promoting freedom of employment. These requirements extend to suppliers', sub-contractors.

Risk assessment

N Brown recognise that as a multi-product retailer there is risk of Modern Slavery in the product supply chain. We continue to risk assess and build transparent, traceable relationships with suppliers allowing us to satisfy ourselves and our customers that our products are not created as a result of slavery.

A risk assessment highlighted that our Goods Not For Resale process needed to be improved in relation to 3rd party services.

As a result, we sent updated information on Modern Slavery, containing links to our own resources, to all our third-party suppliers; including IT services, security services, cleaning services & delivery services. To date, we have collected more than 60 statements and updates from our service providers which we are in the process of reviewing.

Training

We continue our programme to educate and update all employees on modern slavery. This includes updates to the CSR committee and PLC Board. Employees who may visit factories are trained on the ETI Base Code and are encouraged to flag any concerns they have when visiting factories to the Ethical Trading Team. This allows greater visibility and supports effective risk assessment.

Effectiveness

N Brown engages with a number of leading organisations that advocate an end to modern slavery. We are members of the Ethical Trading Initiative (ETI) and as such, we are obliged to report annually on supply chain performance against the ETI Base Code. We are involved with the Action, Collaboration, Transformation (ACT) initiative that aims to create circumstances where workers can avoid all forms of exploitation including modern slavery. We are also signatories to the UN Global Compact (UNGC) in which we report against a set of criteria including the elimination of all forms of forced and compulsory labour. We continue to collaborate with other retailers in working groups as part of ETI and UNGC.

We have also sponsored the UNGC Sustainable Development Goals Roadshow raising the awareness of the goals and advising how business can implement them into their core business. Involvement with these organisations and working groups demonstrates our willingness to work with others and to be held accountable on this important issue.



We are pleased with the progress we have made on last year's statement, particularly in relation to our efforts to strengthen visibility and improve processes in the risk assessment of 3rd Party services.

We are confident that we have reduced the risk of modern slavery in our supply chains, but we recognise that this is an ongoing process. We look forward to continuing to improve transparency with our supply chain and working collaboratively with our key partners and working groups.

Approved by the N Brown Board on 9th October 2018

SJA

Signed on behalf of the Board by Steve Johnson, CEO, N Brown Group plc

9 October 2018

N BROWN
Where fashion fits!

JDWILLIAMS
THE LIFESTORE

JACAMO

simply be.

ambrose*
Wilson

fashion

FIGLEAVES

HIGHMIGHTY

HOUSE of BATH
HOME OF INSPIRATION

Marisota
FROM JDWILLIAMS

PREMIER MAN
SIZE AND FIT EXPERTS