

**TFG Brands (London) Ltd**  
Modern Slavery Transparency Statement  
Financial Year 2022 - 2023

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# A Message From Our CEO and Head Of CSR & Sustainability

Upholding our commitment to respect and advocate for the human rights of everyone involved in our operations remains a key strategic priority for TFG Brands.

We continue to see complex global challenges including climate change and extreme weather events due to global warming, inflation, and economic downturn, as well as on-going warfare. These challenges deepen existing vulnerabilities where exploitation may occur, as well as intensifying pressure on planetary boundaries, communities and livelihoods, affecting many millions of people around the world.

These testing circumstances are met by TFG London with a renewed commitment to continue to evolve our strategic approach to ensure that the rights of the often unseen individuals whose hard work across many different countries allows us to trade, are respected.

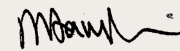
Our efforts continue to be demonstrated in the work we have undertaken this year to protect the rights of workers in our supply chains, from marginalised homeworking communities, through to seafarers, and transport and logistics workers, which we are pleased to share in this statement.

We are guided by our core values as a business and personally to act responsibly and to minimise our impact on the planet. Our teams across the organisation are encouraged to work collaboratively, cross functionally and with our

supply chain partners to uphold these values and to continue to contribute fully in pursuit of this goal. As can be seen from the report which follows, important progress is being made and we should be encouraged by this progress to continue to push ahead and do more.

As a team we stand together in our dedication to tackle modern slavery and remain committed to eradicating this abhorrent crime.

I would like to recognise and thank the wider team for their focus and determination in supporting this important work which sits at the core of our business.



**Justin Hampshire**  
Group Chief Executive Officer



In times of crisis it is sadly the world's most vulnerable people who are hit the hardest. We recognise this and the fragility of human rights, the protection of which are hard work throughout the world.

We accept our responsibility to act fairly, to be proactive in resolving problems and to collaborate with others to respect and uphold the human rights and labour standards of workers throughout our supply chain. This is reflected by our putting human rights and labour standards at the centre of our sustainability strategy. We reaffirm our responsibility to act with integrity and transparency.

Over the last year we have continued to enhance measures to identify, mitigate and prevent risks of modern slavery, as well as to take account of other potentially negative impacts on human rights in our business operations and supply chains, as the [UN Guiding Principles on Business and Human Rights](#) affirm.

We have also developed companywide pathways towards decarbonisation aligned to the Paris Agreement and validated by the [Science-Based Targets initiative](#).

We believe that building trusted partnerships with suppliers, enhancing transparency and taking a long-term approach in order to protect the planet for tomorrow is good citizenship as well as good business. This means treating everyone fairly and with respect for mutual benefit, as well as ensuring

our actions today meet this longer term objective.

We also recognise that our long-standing partnerships with key multi-stakeholder initiatives and non-governmental organisations such as the Ethical Trading Initiative, Homeworkers Worldwide, Anti-Slavery International and the International Workers' Transport Federation are key in supporting our approach and efforts.

Our role presents us with many opportunities to have a positive impact in all that we do, embracing a growth mindset that supports everyone who works for or with us. Ultimately, we cannot green the economy without a just transition in mind, in a way that is as fair and inclusive as possible to everyone concerned, creating decent work opportunities and leaving no one behind.

This statement outlines where we have directed our efforts and the steps we have taken to implement our enhanced human rights due diligence with a particular focus on modern slavery.



**Francesca Mangano**  
Head of CSR and Sustainability



## Respecting Human Rights and Labour Standards in our Supply Chain

Alongside setting out a clear commitment on human rights and labour standards, we recognise it is only through meaningful relationships with our supplier partners that we can begin to better understand what is required to improve working conditions and environmental practices in our supply chains. As such, we seek to uphold these four key principles.

### Clear Expectations

Before establishing a relationship, we set out our commitment to ethical trade, as well as the requirements our suppliers must meet to support this aim. As our journey towards responsible purchasing practices evolves, we are committed to collaborate with our suppliers, ensuring our actions enable them to meet our requirements and expectations, achieving mutual business success, with the aim to raise standards and improve working conditions as our relationship develops.

### Support and Guidance

We provide support and guidance to our supplier partners to help them understand and meet our requirements. This includes putting in place the policies and procedures to ensure our supply chains are equipped to protect and respect human rights and labour standards, as well as being environmentally responsible. This is supported by regular site visits, as well as the principle of continual improvement.

### Open Communication

We are committed to continually evolve and improve our ways of working, ensuring our relationship with supplier partners is based on open and honest dialogue, gaining feedback so we can reflect and adjust our own standards and behaviours where needed.

### Responsible Purchasing Practices

We are undergoing a thorough and methodical review of our purchasing practices, participating in the [Common Framework for Responsible Purchasing Practices](#), in partnership with our suppliers and with the guidance of the [Ethical Trading Initiative](#). At the end of the two-year programme, our aim is to have equal partnerships with our suppliers, formalised by a two-way code of conduct that ensures both parties comply with a set of agreed requirements, with the overarching aim to improve working conditions for workers in our supply chains.

# Policies

As part of our ever-evolving ethical trading strategy, which is 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 rights and labour standards of all who work on our behalf.

TFG Brands core policies relate to our commitment to adopt the UNGPs, and include our [Supplier Code of Conduct](#), [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](#).

## Supplier Code of Conduct

Our Supplier Code of Conduct is aligned with the Ethical Trading Initiative base code, with elements of the SAI SA8000 Standard:2014 and outlines the minimum social and environmental standards we expect each factory – and its sub-suppliers - to meet.

## Migrant Workers Policy and Implementation Guidelines

Our Migrant Workers Policy sets out the 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 Brands endorses the [Employer Pays Principle](#), which reflects the [Dhaka Principles](#) for Migration with Dignity.

## ETI Guidelines for Employment and Integration of People Displaced from Ukraine

Established in response to the Russian invasion and ongoing conflict in Ukraine, TFG Brands played a key role to develop 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.

## Cotton Procurement Policy

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 ginning and spinning facilities.

## Homeworkers Policy

Our Homeworkers Policy communicates our position that homeworkers exist in our supply chains, and we are supportive of this, as well as providing support to our supply chain partners to sustain homeworkers' employment and making their work as regular as possible.

## Neptune Declaration on Seafarers

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 resulted in around 400,000 seafarers stranded on ships because of coronavirus-related travel bans.

## The Maritime Labour Convention 2006

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

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

Finally, other internal policies that relate to the prevention of modern slavery are our [Anti-Bribery Policy](#), [Whistleblowing Policy](#) and [Equal Opportunity Policy](#).

## Our Business



Headquartered in London, TFG Brands 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, and more recently the homeware brand, Inside Story has been added to the group’s portfolio.

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

TFG Brands is headquartered in London, sharing offices with Phase Eight and Inside Story. TFG Brands is establishing a retail presence, operating in 2 territories with 3 solus store and employs 507 people across both central teams and retail roles.

As of 31st March 2023, TFG Brands employs 2,168 people – directly for either TFG Brands, Hobbs, Inside Story, Phase Eight or Whistles – working in central teams, and throughout our retail locations, in both part-time and full-time roles.



## Phase Eight

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 Medway, Kent and Hemel Hempstead. Phase Eight has a strong international retail and online presence, operating in 15 territories across 273 solus stores and concessions. Phase Eight employs 581 people. Phase Eight's DC is operated by a third-party logistics company, who employ 146 people on the Phase Eight contract.





# WHISTLES

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 Medway, Kent. Whistles' DC is located in Hemel Hempstead and operated by a third-party logistics company who employ 69 people on the Whistles contract. Whistles has a strong retail and online presence, operating in 8 territories across 146 solus stores and concessions. Whistles employs 396 people.





# HOBBS

LONDON

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

Acquired by TFG Brands in 2017, Hobbs has a headquartered in London, with a DC and customer services team in Medway, Kent. With a strong retail and online presence, Hobbs operates in 10 territories across 209 solus stores and concessions. Hobbs employs 681 people. Hobbs' DC is operated by a third-party logistics company, who employ 70 people on the Hobbs contract.



## Inside Story

Inside Story is an exciting, new-to-market, contemporary, homeware brand with an emphasis on style and quality.

Launched online in February 2023, the collection is beautifully curated, from our handcrafted, exquisite cushions and throws sourced in India; indulgent scents and elegant soy wax candles hand poured in the UK; to our bedding and towel ranges favouring luxurious, hotel-quality thread counts and super soft cottons.

With a growing presence online, Inside Story operates in the United Kingdom, with its headquarters in London and with a DC and Customer Service in Kent. As of 31st March 2023 Inside Story employ 3 people. Inside Story's DC is operated by a third-party logistics company, who employ 1 person on the Inside Story contract.

# Our Governance

Upholding our commitment to respect the human rights of everyone in our operations remains a priority in our business.

The CSR and Sustainability team reports directly into the TFG Brands Operating Board, which oversees the governance of responsible business practice. The CSR and Sustainability team's principal role is to establish, implement and evolve the sustainability strategy, aimed at reducing the company's impact on people and the planet, while reflecting the company's purpose, vision and values.

The team also play a part in establishing and strengthening the business's engagement with its community of stakeholders including customers, suppliers and colleagues, as well as government on sustainability and corporate responsibility matters.

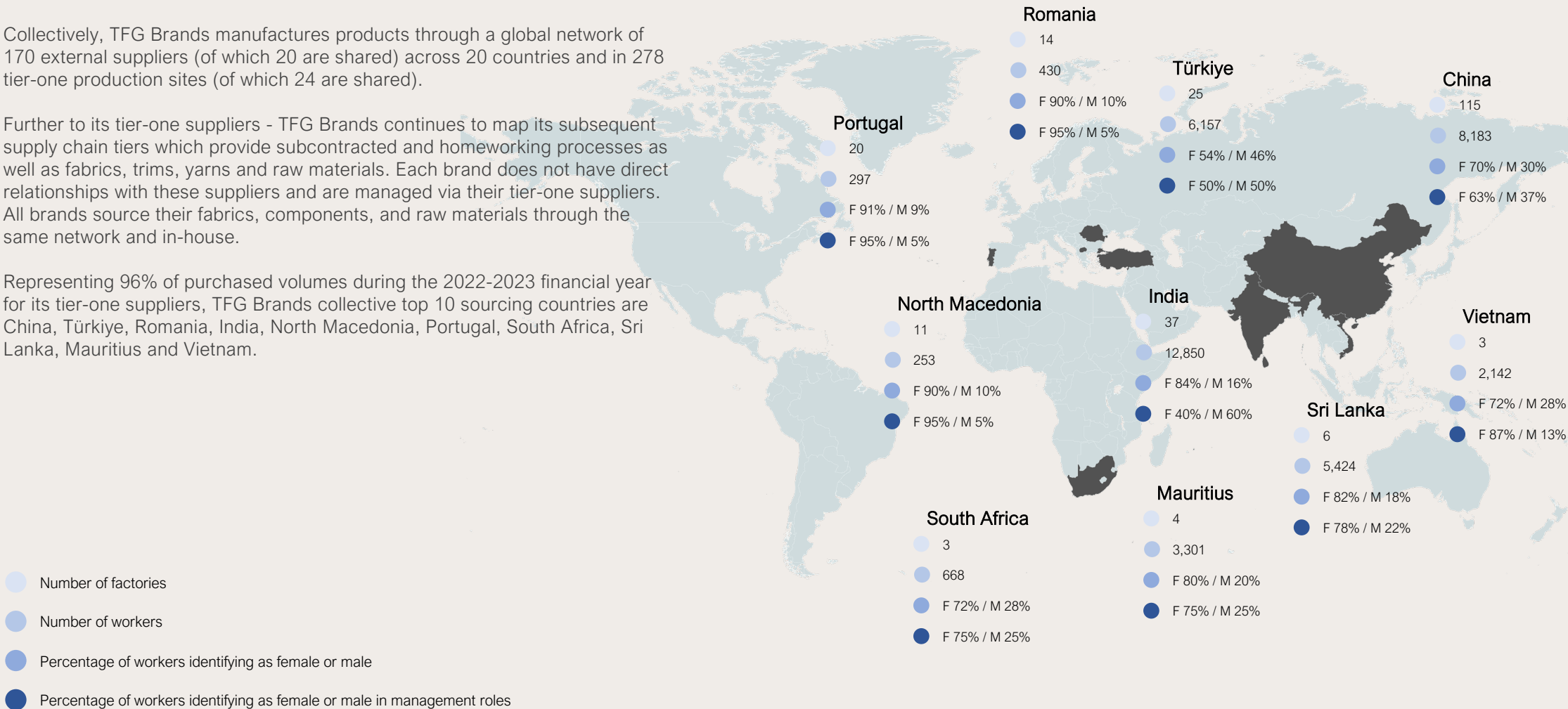


# Our Sourcing Landscape

Collectively, TFG Brands manufactures products through a global network of 170 external suppliers (of which 20 are shared) across 20 countries and in 278 tier-one production sites (of which 24 are shared).

Further to its tier-one 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 tier-one suppliers. All brands source their fabrics, components, and raw materials through the same network and in-house.

Representing 96% of purchased volumes during the 2022-2023 financial year for its tier-one suppliers, TFG Brands collective top 10 sourcing countries are China, Türkiye, Romania, India, North Macedonia, Portugal, South Africa, Sri Lanka, Mauritius and Vietnam.





# Our Sourcing Landscape

## Phase Eight

Phase Eight manufactures its product's in 88 first tier factory sites across 12 countries. Phase Eight's factory relationships are managed through an external network of 60 suppliers, of which 45% are direct and 55% are agents. Phase Eight's top 10 sourcing countries are China, Romania, Türkiye, India, Indonesia, Italy, Vietnam, Bulgaria, Sri Lanka and Spain, representing 99% of purchased volumes this year. The Phase Eight first-tier supplier list can be found [here](#).

## Whistles

Whistles manufactures its product in 100 first tier factory sites across 18 countries. Whistles' factory relationships are managed through an external network of 62 suppliers, of which 48% are direct and 52% are agents. Whistles top 10 sourcing countries are China, Türkiye, India, Portugal, Mauritius, Vietnam, Spain, North Macedonia, Romania and Morocco, representing 98% of purchased volumes this year. The Whistles first-tier supplier list can be found [here](#).

## Hobbs

Hobbs manufactures its products in 91 first tier factory sites across 15 countries. Hobbs' factory relationships are managed through an external network of 62 suppliers, of which 65% are direct and 35% are agents. Hobbs' top 10 sourcing countries are China, North Macedonia, Türkiye, India, Romania, Sri Lanka, Portugal, Morocco, Brazil and Mauritius, representing 98% of purchased volumes this year. The Hobbs first-tier supplier list can be found [here](#).

## Inside Story

Inside Story manufactures its products in 6 first tier factory sites across 4 countries. Inside Story's factory relationships are managed through an external network of 6 suppliers, of which 100% are direct. Inside Story's sourcing countries are South Africa, Portugal, India and the United Kingdom, representing 100% of purchased volumes this year. The Inside Story first-tier supplier list can be found [here](#).

Country	Est. prevalence of modern slavery (victims per 1,000 population)	TFG Brands purchased volumes 2022-23
Türkiye	15.6	12%
North Macedonia	12.6	4%
Bulgaria	8.5	<1%
India	8	6%
Romania	7.5	8%
Indonesia	6.7	<1%
Sri Lanka	6.5	2%
Lithuania	6.1	<0.1%
Brazil	5	<1%
Vietnam	4.1	2%
China	4	52%
Portugal	3.8	4%
Italy	3.3	1%
South Africa	2.7	2%
Spain	2.3	1%
Morocco	2.3	<1%
Tunisia	2.3	<1%
United Kingdom	1.8	<1%
Mauritius	1.5	2%
Netherlands	0.6	<0.1%

The table below illustrates our first-tier sourcing landscape ordered by prevalence of modern slavery according to the [Global Slavery Index Map](#) and purchased volumes during the 2022-2023 financial year.

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 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 product.
- **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 works 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 - supported by the CSR and Sustainability team, as well as the Legal team.

Each brand's supply chain is defined as illustrated in the table opposite.

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 &amp; 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

We recognise that increasing supply chain transparency and traceability continues to play a pivotal role in driving change, as well as responding to salient risks. As we progress on our journey, TFG Brands has expanded its partnership with Segura Systems to enhance transparency in our supply chains, adding additional assurance on our mapping efforts beyond tier 1. Working in collaboration with our first-tier supplier partners, TFG Brands is now mapping its second-tier production sites, components, packaging and services used across all products via a multi-tier declaration function, that is confirmed with the second-tier supplier in real time, adding greater assurance to our efforts. This is reflected in the tier-two status.



# How we Identify Salient Risks

The identification of our salient human rights risks is part of a wider enhanced due diligence process to manage and respect human rights. Our approach goes beyond compliance and builds on years of effort to better understand where there is most risk of human rights abuses occurring and their impacts.

On an annual basis, we conduct a human rights risk assessment to help us better understand, manage and respond to the risks in our supply chains.

Directed at group level, TFG Brands follows the [ETI Human Rights Due Diligence \(HRDD\) framework](#) and [UN Guiding Principles for Business and Human Rights](#) which is used to assess, identify, monitor and mitigate all human rights risks. Through this due diligence process - which in some cases will be enhanced - we carry out a risk assessment across our manufacturers and non-stock suppliers, as well as collaborating with our strategic partners, including the [Ethical Trading Initiative](#), [Homeworkers Worldwide](#), [Anti-Slavery International](#) and the [International Workers' Transport Federation](#) to gain external expert guidance and advice.

Due to the complexity of global supply chains and in order to prioritise our resources, it is important that we are able to understand the wide range of human rights impacts we may be connected to. This includes examining risks related to our business model, the products we make and our sourcing and purchasing practices, as well as our global sourcing landscape.

Our footprint is linked to an extensive range of supply chain stakeholders, from farmers and producers, to traders and manufacturers. For many of them, we hold indirect relationships due to the complex nature of supply chains, however our future sourcing ambitions extend across the entirety of our supply chains, encompassing both direct and indirect relationships.

By contributing to the [Open Supply Hub](#), 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 garment factories in apparel supply chains. 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.

In the spirit of continuous improvement and recognising that the risks people in our supply chains are exposed to are changing, we are working to develop a more sophisticated and systematic assessment, as well as prioritising the potential human rights impacts that we could cause, contribute to, or be connected to across our supply chains.

The direct and indirect effects of climate change will have significant implications for the people and communities in our supply chains. Our enhanced saliency assessment will also seek to identify and prioritise the evolving issues that have the potential to cause the greatest harm to people connected to our business, now and increasingly in the future.

As we progressively work towards identifying our salient issues, we will evolve our existing human rights commitments and advance targets which will challenge our business to drive meaningful progress on human rights.

The below table illustrates the The United Nations Guiding Principles on Business and Human Rights criteria which we follow.

The United Nations Guiding Principles on Business and Human Rights				
Severity				
Scale	Scope	Remediability	Likelihood	Transition
How grave or serious the adverse human rights impact would be, considering both the potential direct impact, for example on the right to life, and the indirect knock-on impact on other rights.	How many people are or could be affected by the adverse human right impact.	How hard or possible it would be to remediate the human rights violation, once it has occurred.	The likelihood of the risk occurring based on prevalence, country and industry context and audit data.	How are rights affected by physical and transitional climate change impacts.

## Our Partners

We value our partnerships with NGOs, Trade Unions and Academia, as well as other brands and multi stakeholder platforms such as the Ethical Trading Initiative and the British Retail Consortium, working together to find a common solution to salient issues.



The Ethical Trading Initiative 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.



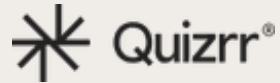
The Open Supply Hub is an open source map and database of global apparel facilities, their affiliations and unique OSH IDs assigned to each facility.



The International Transport Workers' Federation 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 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.



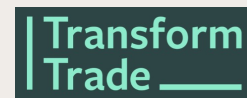
Quizrr helps suppliers and buyers in building a common knowledge platform, a safe workplace, trust, transparency and dialogue for all employees at all levels in the supply chain. Quizrr provides a fun, fast and flexible training tool for measurable impact.



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



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



Transform Trade works for trade and climate justice. In South Asia and East Africa, they partner with farmers, workers and artisans to help them benefit from more sustainable and equitable trade. In the UK they advocate and campaign for changes to business practices and government policy.



Segura Systems delivers market leading solutions to retailers and brands, focused on helping them to achieve ethical, sustainable and compliant multi-tiered supply chains.



The Multi-Stakeholder Initiative Working Group on Responsible Purchasing Practices has collaborated to develop the Common Framework for Responsible Purchasing Practices and works on promoting the uptake and implementation of the Framework, and on influencing relevant policy.

## Training

We recognise the importance training plays in tackling modern slavery and other forms of human rights abuses. As such, we provide updates and raise awareness of salient modern slavery risks internally to both our procurement and operations teams, as well as our operating board and external partners and work collaboratively to find solutions to mitigate these issues.

Reflected in our actions taken, this year we have increased awareness within our teams and beyond on the subjects listed opposite.

## Responsible Logistics

In partnership with the [International Transport Workers' Federation](#), we raised awareness of the human rights risks affecting transport workers in our supply chain, among our logistics and procurement team, and we will extend this training to our third-party logistics partners on an ongoing basis.

## Responsible Warehousing

In partnership with [Anti-Slavery International](#) and our third-party logistics partners, we have raised awareness of the risks related to responsible recruitment in our distribution centres in the UK. This work continues, with phase two of the programme continuing over the course of 2023 and 2024.

## Responsible Purchasing Practices

By participating in the [Common Framework on Responsible Purchasing Practices](#), we are educating our product teams on the negative impacts that poor purchasing practices have on our suppliers and the working conditions of their workers.

## Academic Research Projects

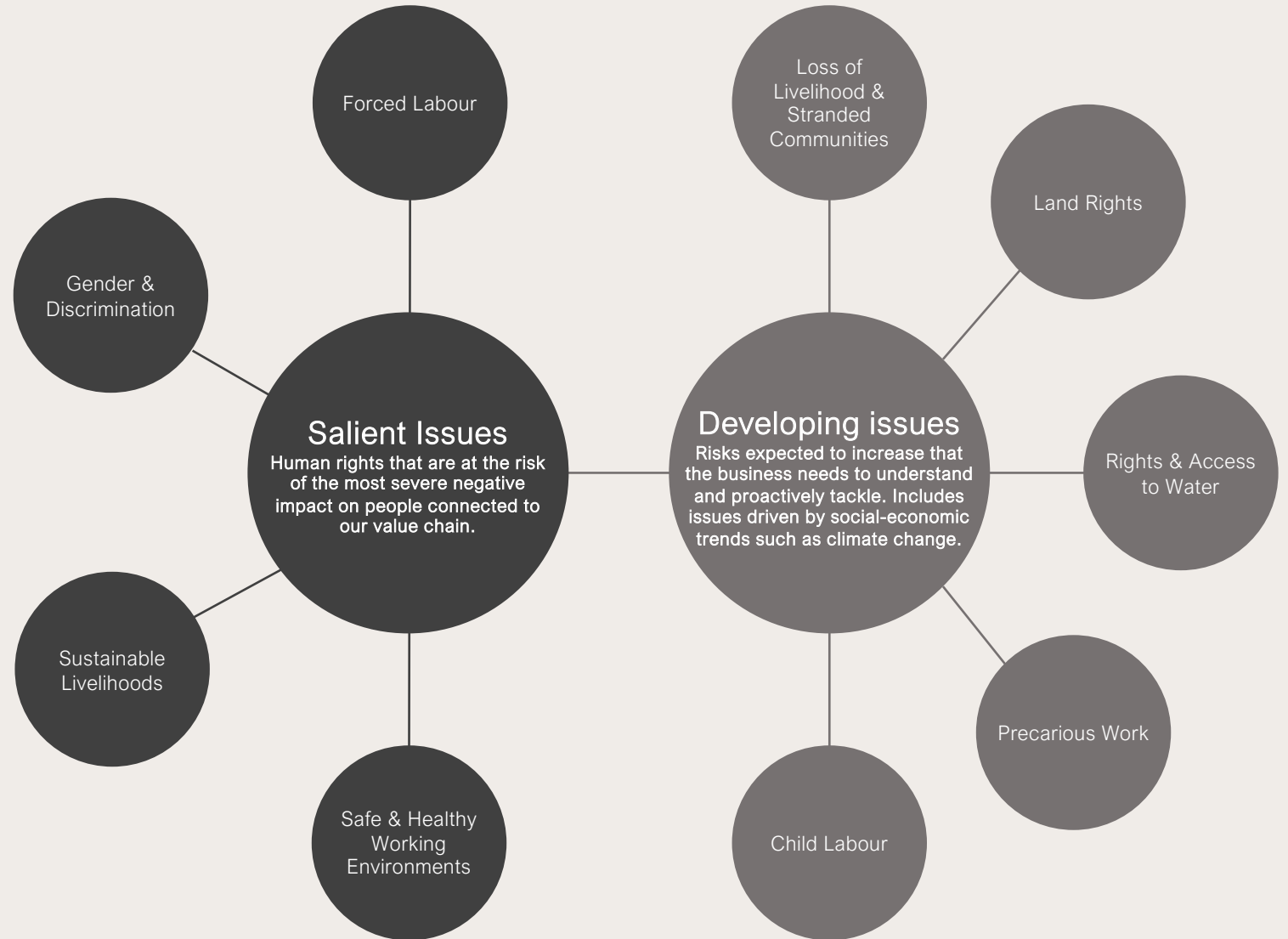
Over the past year we continued to contribute to modern slavery related research projects led by distinguished UK and US Universities, sharing our case studies and experience in responding to and mitigating risks, as well as outlining ongoing challenges and existing limitations.

# Salient Issues

At TFG Brands, we source a wide range of raw materials across different countries, from multiple suppliers. Each of these routes and commodities presents unique challenges and requires specific commitments and targeted action.

As part of our annual risk assessment and due diligence process, we conduct assessments of our supply chains and sourcing practices to identify our salient environmental and human rights risks.

These risks represent the most severe potential negative impacts on people and the planet that could arise as a result of our business' operations and supply chains. By prioritising our salient environmental and human rights risks, we can better understand, manage, and respond to these risks and build on our long-standing commitments to address them.



# Salient Issues

## Salient Issues

Forced Labour				
Gender & Discrimination				
Sustainable Livelihood				
Safe & Healthy Working Conditions				

The prioritisation of our salient risks also takes into account our effort in supporting the United Nations Sustainable Development Goals as illustrated above.

## Developing Issues

Loss of Livelihood				
Land Rights				
Rights and Access to Water				
Precarious Work				
Child Labour				



## Actions Taken

At TFG Brands, we have a long track record of respecting and championing human rights, as well as responding to issues in our supply chains - from advocating for fair recruitment of migrant workers in Mauritius, to responding to the crew change crisis during the Covid-19 pandemic, mapping and assessing risks for homeworkers in India, and ensuring the responsible employment of workers in our distribution centres in the UK.

Over the past year we have continued to embed measures to assess, identify, monitor and mitigate the risk of modern slavery in our business and supply chains. From proactively investigating potential risks and strengthening our due diligence to raising more awareness on the topic.

The outcome of our enhanced human rights due diligence identified key areas with high risks of modern slavery, including migrant workers, the presence of third-party labour recruitment agencies and a high level of contract and agency workers, as well as a predominantly female workforce, low-level awareness of workers' rights, low pay, and irregular work.

We recognise that crises heighten the risk of all forms of modern slavery, and one of the greatest we currently face – the climate crisis – is no exception, with millions of people around the world facing the crippling impact of a warming planet. Global warming, paired with unjust or insufficient climate action are exasperating forms of marginalisation and discrimination against members of our societies. The most affected are women and girls, children, as well as people already living in poverty.

As such, we strongly advocate for a just transition. A just transition doesn't just help advance climate action, it also helps advance progress against the UN Sustainable Development Goals (SDGs), notably those related to affordable and clean energy, decent work and economic growth, reduced inequalities, and responsible production and consumption.

As part of our efforts to extend a just transition to all

partners in our supply chain, this year TFG Brands announced a partnership with the International Transport Workers' Federation (ITF) in a first-of-a-kind agreement, committing to enhanced human rights due diligence in our transport and logistics supply chain. Our partnership with ITF started at the height of the seafarers humanitarian crisis triggered by the pandemic, and we hope that we can join forces with other industry peers to eradicate human rights abuses affecting all transport workers.

We also implemented measures to include the reduction of greenhouse gas emissions across our supply chains and operations in line with the objectives of the Paris Agreement and the Science Based Targets initiative (SBTi).

While in recent years there has been increased action by some countries to address forced labour risks within business and government supply chains, not enough is done to address purchasing practices. We continue to work collaboratively to improve our purchasing practices, taking steps towards developing solutions and sharing learning with peers, experts and supply chain partners, as well as calling for mandatory Human Rights & Environmental Due Diligence (mHREDD).

Over the course of the financial year 2023, we have focused on some of the salient risks we identified, whilst making progress on others that we previously reported on. The subsequent pages provide a summary of this past year's efforts.





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With over 80% of global trade transported through the shipping industry, it is the backbone of trade and one of the keys to the success of the global economy. However, it has also been identified as being vulnerable to risks of modern slavery. These risks can often be compounded by seafarers originating from regions with human rights and corruption challenges, as well as the fragmented nature of global regulation for the sector and the limitations and reduced visibility of conditions on board, complex supplier arrangements and a lack of awareness from shipowners about their responsibilities on board.

The Covid-19 pandemic brought the maritime supply chain into the spotlight as hundreds of thousands of seafarers were stranded on ships. Alarmed by these reports, we approached the International Transport Workers' Federation (ITF) for support to better understand the situation on ships carrying our cargo. Collaborating with the ITF on an initial investigation, helped us to take key steps in our supply chains to address this issue.

Our relationship has since evolved, with TFG Brands becoming the first fashion retailer to partner with the ITF to cooperate on preventing, mitigating, and addressing human rights risks for transport workers in its supply chain.

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 is much more work to do and we continue to work alongside our logistics partners to address this, while advocating for the rights of seafarers and transport workers globally.

More details on this strategic partnership can be found in the recently launched ITF Human Rights Due Diligence Guidance Respecting The Human Rights Of Seafarers In Global Supply Chains.



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“ITF has been an invaluable partner of TFG Brands since the start of the Covid-19 pandemic, initially collaborating to address the seafarers’ humanitarian crisis and helping to shine a light on an area of our supply chain where we had limited visibility.”

Justin Hampshire, Chief Executive, TFG Brands London

”TFG London has taken the bold and necessary steps to address the human rights issues that occur from factory to customer. We commend their leadership and encourage all brands to work with unions to expose the unseen human and labour rights abuses in their supply chains.”

Steve Cotton, General Secretary, International Transport Workers’ Federation

Salient issues relate to  
Healthy & Safe Working  
Environment and  
Sustainable Livelihood.



The United Nations Guiding Principles on Business and Human Rights

Severity				
Scale	Scope	Remediability	Likelihood	Transition
Critical	High	High	High	High

# Responsible Warehousing

United Kingdom

Changes in the global economy over recent decades have led to the emergence of a new warehousing sector in many parts of the world. Driven by the integration of supply chains across borders, as well as the increased importance of lean logistics, hubs for managing the flows of goods have become integral.

People employed in warehouses often face low pay, excessive and unpredictable working hours, unmitigated health and safety risks and barriers to organising collectively to improve their working conditions. There is insecurity in the status of contract workers, which leaves them more vulnerable to exploitation. 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.

This year we collaborated with our strategic partners Anti-Slavery International (ASI) to assess the salience of human rights risks at our third-party UK distribution centres. Our focus on distribution centres was decided due to the logistics sector being identified as a high-risk area for a number of modern slavery risks, including the presence of migrant workers, the presence of third-party labour recruitment agencies and the high number of contract and agency workers, a predominantly female workforce and low-level awareness of workers' rights.

Our work with ASI included a commission to carry out a high level risk assessment at our distribution centres, using a worker centred methodology, with the primary area of focus for the assessment to be risks in relation to recruitment practices of both permanent and agency workers.

**Aim**  
The research and engagement conducted by ASI was a scoping exercise to identify the salience of risks at a high level, informing the appropriate next steps for more in-depth due diligence, investigation, as well as delivering training and corrective actions where needed.

**Scope**  
The scope of the assessment extended to all employees directly contracted and assigned to work on the TFG Brands account. It included both permanent and agency workers, and both management and non-management staff members. The scope did not extend to any sub-contracted onsite staff.

**Approach**  
Stakeholder engagement is a core part of effectively assessing the human rights risks in any supply chain. Bringing the voice of workers to the forefront in the process adds credibility to a business' human rights due

diligence, as well as helping to ensure the appropriateness of any actions being planned or taken. ASI's approach to engaging stakeholders is worker-centred and participatory in nature.

ASI will continue the second phase of this work to include onsite sub-contractors, as well as additional training and corrective actions where needed during the course of the 2024 financial year.

“Anti-Slavery International has been working with TFG to assess the salience of human rights risks in their UK Distribution Centres. We took a worker-centred approach, with on-site stakeholder engagement, to develop appropriate and effective actions informed by workers' experiences. We will continue to focus on distribution centres through our valued partnership with TFG over the next year, working in collaboration to drive systemic change within the sector.”

Eloise Savill, Private Sector Adviser, Anti-Slavery International

Salient issues relate to  
Healthy & Safe Working  
Environment and  
Sustainable Livelihood.

3 GOOD HEALTH AND WELL-BEING

8 DECENT WORK AND ECONOMIC GROWTH

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

## The United Nations Guiding Principles on Business and Human Rights

Severity				
Scale	Scope	Remediability	Likelihood	Transition
High	High	Medium	Medium	Low



# Homeworkers Risk Assessment

India



Around 75 million people work in the textiles and garment sector worldwide, with the majority being women. Millions work from home or in small, informal workshops, often producing for domestic markets but also taking on subcontracted orders for the larger factories that supply international brands.

Recent analysis of the Indian Labour Force Survey found that 4.7 million female home-based workers are engaged in the Indian apparel and textile sectors, and the latest ILO study on homeworking around the world notes that, in 2019, there were 260 million homeworkers making up 7.9% of the global labour force, rising to 11.5% for women.

This reflects the fact that many women workers, particularly in countries or communities where traditional gender roles are predominant, view homeworking as the only feasible way to combine earning an income with their domestic and caring responsibilities, particularly once they marry and start a family.

Homeworking is an important aspect of the global economy, present in a huge range of sectors and countries. Homeworkers themselves form an essential part of the supply chain. Not only do they carry out specialised and intricate work that often cannot be cost effectively mechanised – such as embroidery, beading, finishing and packing – but they also provide much needed flexibility in production.

Despite their value in the supply chain, homeworkers usually have very poor working conditions such as low pay, insufficient and irregular work. They can be extremely vulnerable as their employment status may be unclear, and so they may not receive basic entitlements such as maternity pay, social security benefits, holiday entitlement and job security.

To address the human rights risks identified, we consulted the [Homeworkers Worldwide \(HWW\) Toolkit](#) to develop our longstanding homeworking policy, which recognises the role of homeworkers and encourages suppliers to disclose homeworking, without repercussion.

# Homeworkers Risk Assessment

India

“HWW welcomes TFG’s recognition of the contribution that homeworkers make to their supply chain. By adopting a clear policy that commits to supporting suppliers to improve transparency and working conditions in homeworker supply chains, they have built trust along their supply chain, enabling them to reach the homeworkers.”  
Lucy Brill, Director, Homeworkers Worldwide

Our policy also provides clear and actionable suggestions on how to promote transparency and enable greater due diligence.

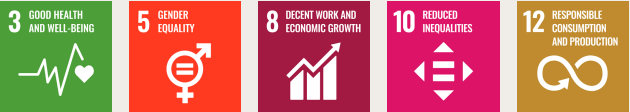
Attending regular site visits is a key action as part of our approach in addressing human rights and labour standards in our supply chain and during a 2020 visit to one of our embellished garment supplier in India, we had the opportunity to meet skilled homebased artisans, based in Sikandrabad.

In addition, we acknowledged the presence of homeworkers in Bareilly, a town more than four hours’ drive from Delhi, and surrounding villages. In agreement with our supplier, we remained committed to documenting the homeworkers’ situation, and if necessary, implementing changes, to ensure that working conditions met minimum transparency and labour standards.

To this end, we have partnered with two NGOs, HWW and Transform Trade (TT) on a supply chain mapping project. The two NGOs agreed to support this process as part of the EU co-funded Hidden Homeworkers programme, with TT providing on the ground expertise interviewing supply chain stakeholders in India, and HWW managing the overall project management, based on their experience of delivering similar projects in other supply chains.

We are currently in the process of finalising this report and the outcome and recommendations will be finalised at the end of September 2024 and presented internally to our product team, with progression and outcomes included in the next modern slavery statement.

Salient issues relate to Gender & Discrimination, Healthy & Safe Working Environment and Sustainable Livelihood.



## The United Nations Guiding Principles on Business and Human Rights

Severity				
Scale	Scope	Remediability	Likelihood	Transition
Critical	High	High	High	Medium

# Responsible Purchasing Practices

All Sourcing Regions

Responsible purchasing practices are a key tool in reducing negative impacts on workers in supply chains. They have the potential to support and enable improved working conditions, such as the implementation of living wages, as well as enabling better planning and business sustainability for suppliers.

There is growing evidence that poor purchasing practices have contributed to and even driven human rights issues in supply chains. This trend prevails even where issues such as low wages and long working hours are prohibited in those same companies’ own human rights policies and standards.

Studies by the [International Labour Organisation](#), [Better Buying Institute](#) and the joint [Ethical Trading Initiatives](#) amongst others have evidenced this connection.

In October 2022 we began our participation in the Common Framework for Responsible Purchasing Practices (CFRPP), alongside the Ethical Trading Initiative and other multi-stakeholder initiatives.

Through the ‘Learning and Implementation Community’ and across five key principles (including integration and reporting, equal partnership, collaborative production planning, fair payment terms and sustainable costings) we take new steps towards advancing our purchasing practices, developing collaborative solutions, as well as sharing learnings with peers, experts and supply chain partners.

The overall desired outcome of the community is improved purchasing practices, with the overarching aim to improve supply chain working conditions for garment workers. While the approach and solutions may differ among the participating companies, the aim at the end of the 2-year process is to adopt more responsible practices. Our key focuses include:

### Equal Partnership

We have taken steps to translate the framework principles into business practices, with the involvement of our suppliers to improve our ways of working in a way that benefits both parties.

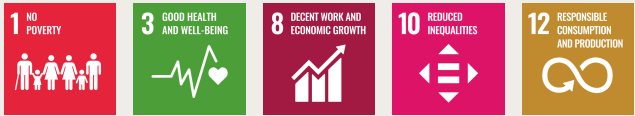
### Two-Way Code of Conduct

Supporting our work to translate the framework principles into business practices, we recognise the importance to hold both parties accountable, agreeing on key commitments designed to enable improved working conditions for garment workers.

“There is increasing recognition of the impacts purchasing practices can have on supply chain working conditions. To address these potential impacts, brands need to assess their own commercial practices and consider whether these are empowering their suppliers to achieve the labour standards expected of them. The work of the LIC provides a great opportunity to build trust and communication with suppliers, develop the rapport between internal teams, and find creative ways to improve systems and integrate sustainability into the brands’ day-to-day operations.”

**Elisa Shepherd, Senior Advisor Business Practices, Ethical Trading Initiative**

Salient issues relate to Gender & Discrimination, Healthy & Safe Working Environment and Sustainable Livelihood.



## The United Nations Guiding Principles on Business and Human Rights

Severity				
Scale	Scope	Remediability	Likelihood	Transition
High	High	Low	Medium	Low



## Next Steps

We stand committed to tackle modern slavery, continuing to enhance measures to assess, identify, monitor and mitigate risks in our business and supply chains, working towards eradicating this abhorrent crime.

By putting human rights and labour standards at the centre of our sustainability strategy, our focus areas for the forthcoming year will advance our goals to respect human rights and improve working conditions throughout our supply chain, from farmer to seafarer.

### Monitor and mitigate key areas with high risks of modern slavery

This year we identified our logistics supply chain, warehousing operations, home-based work used in our products, as well as purchasing practices as areas that carry high risks of modern slavery. We have outlined the steps taken to address these risks and we will continue to take this work forward, providing updates to each in our subsequent statement.

### Evolving how we identify salient risks

In the spirit of continuous improvement, we will continue our work to develop a more sophisticated and systematic saliency assessment, enabling better identification and prioritisation of the potential human rights impacts that we could cause, contribute to, or be connected to across our supply chain. We will evolve our existing human rights commitments and advance targets which will challenge our business to drive meaningful progress on human rights, transparently reporting on our assessment and most salient risks in our next statement.

### Embedding greater transparency

We recognise that increasing supply chain transparency and traceability continues to play a pivotal role in driving change, as well as responding to salient risks. We are excited to expand our partnership with Segura in the forthcoming year, delivering the multi-tier declaration function across the group. We will continue to map second-tier production sites, components, packaging and services used across all products, adding greater assurance to our efforts. In addition, we will continue to contribute to the Open Supply Hub on a seasonal basis, with the aim to support stakeholder collaboration on activities at factory level, ranging from joint remediation to collaborative capacity building activities.

### Developing our gender responsive HRDD

We remain committed to enhance our gender responsive approach to human rights due diligence, by refining our supply chain mapping and analysis of sex disaggregated data. We will focus on enhancing our factory audit programme to scale up data and improve workers

representation and social dialogue, as well as addressing gender-based violence.

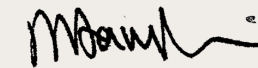
### Continue to foster our partnerships

We value our partnerships with NGOs, Trade Unions and Academia, as well as other brands and multi stakeholder platforms. We will continue to foster our relationships in the year ahead, working together to find a common solution to salient issues.

### Progress our training programme

We recognise the importance training plays in tackling modern slavery and other forms of human rights abuses. As such, we will continue to provide updates and raise awareness of salient modern slavery risks across our business working collaboratively to find solutions to mitigate these issues. For the year ahead we will focus on responsible purchasing practices, responsible warehousing and responsible logistics.

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 18<sup>th</sup> October 2023.



Justin Hampshire, Group Chief Executive Officer, on behalf of the TFG Brands (London) Limited 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 2022/2023 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 2023 and 2024.

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