



## **TFG London Modern Slavery Act Transparency Statement**

### **Financial year 2019-2020**

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 2019/2020 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 2020

This year sees TFG London publish its first group modern slavery statement. This choice reflects the harmonisation in the due diligence approach taken to address modern slavery collectively, in our supply chain and own operations. Our holistic framework demonstrates our commitment to respect, protect and remedy human and labour rights infringements of all at work.

## 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.

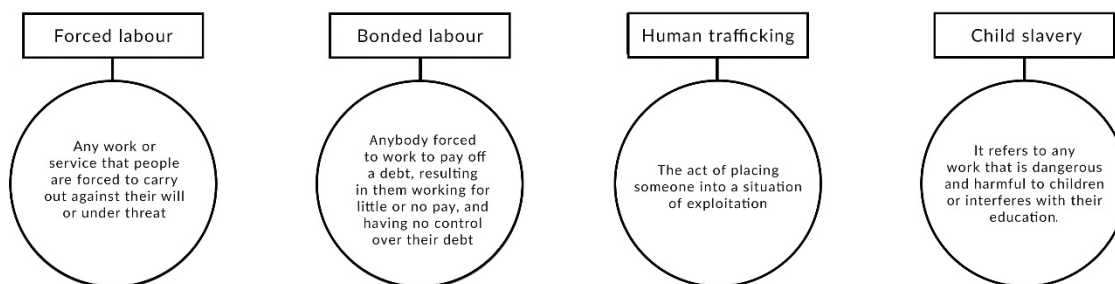
Anti-Slavery International defines modern slavery as “exploitative labour that places one person in the control of another”. Slavery thrives on every continent and in almost every country and is still prevalent in the fashion industry and other labour-intensive industries.

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 London 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.

## What is Modern Slavery?

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



### Forced labour

The International Labour Organisation (ILO) defines forced or compulsory labour as “all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.” This means any work or service that people are forced to carry out against their will or under threat.

### Human trafficking

Anti-Slavery International defines human trafficking as the “recruitment, harbouring or transporting of people into a situation of exploitation through the use of violence, deception or coercion and forced to work against their will”. In other words, it is the act of placing someone into a situation of

exploitation. Often this involves moving someone across borders, however human

trafficking can also occur within a single country

promised work overseas. When they arrive, their passports are confiscated by the traffickers and they cannot leave until they 'pay off' the money.

### **Bonded labour**

Also known as 'debt bondage' or 'debt slavery', this is the most prevalent form of modern slavery. It refers to anybody forced to work to pay off a debt, resulting in them working for little or no pay, and having no control over their debt. For example, labourers might borrow money to pay their traffickers for

### **Child slavery**

This occurs when a child or a child's labour is exploited for someone else's gain. It can include child trafficking and child domestic slavery. The minimum age can change depending on the kind of work, but it refers to any work that is dangerous and harmful to children or interferes with their education.

### **Some key facts**

Today slavery is 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.

Anti-Slavery International estimates that around **40.3 million** people are involved in forced labour at any given time. Below is a summary of some key statistics, estimated by ILO.

**10 million**

children are in slavery across the world

**1.5 million**

people are in slavery in developed economies

**16 million**

slavery victims are exploited in economic activities

**4.8 million**

people are forced into sexual exploitation

**4.1 million**

people in slavery are exploited by governments

**\$150 billion** US\$

illegal yearly profits by forced labour in private economies

### **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 bonded to the organisers of the scheme, often referred to as ‘gangmasters’.

### **Why is it an issue?**

A report by the Walk Free Foundation has found that the fashion industry contributes more money toward modern slavery than any other sector apart from tech. A 2016 report into Corporate Leadership on Modern Slavery found that of 71 leading retailers in the UK, 77% believed there was a likelihood of modern slavery occurring at some stage in their supply chains.

The lack of transparency and traceability across the fashion global supply chains is a major challenge. This means that it’s extremely difficult to know how many people are working directly or indirectly in fashion, 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 the 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, formed in 1839. They advise governments on legislation and were part of the development of some of the world’s major 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 is to end slavery in all forms.

### **Global Legislation**

Modern Slavery Act legislations have been rapidly spreading right across the world as demand grows for companies to publicly disclose their efforts to address slavery and human trafficking in their supply chains. As well as the UK Modern Slavery Act 2015, global legislation includes:

- The California Transparency in Supply Chain Act 2010

- The US Dodd Frank Wall Street Reform and Consumer Protection Act 2010
- The Singapore Prevention of Human Trafficking Act 2014
- The French Duty of Vigilance Act 2017
- The Australian Modern Slavery Act 2018 ('New South Wales Act')
- The Australian Modern Slavery Bill 2018 ('Commonwealth Bill')
- The Dutch Child Labour and Due Diligence Law 2019

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

## About TFG London

Headquartered in London, TFG 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 London) 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 the Group. 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 London directly employs 252 people who work across all three brands, both in head office and retail concessions.

Location	Number of Employees
Head Office	92
Retail Concessions	160

Below, we have outlined the operations of each of brand under TFG London.

### Hobbs

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

Acquired by TFG London in 2017, Hobbs is headquartered in London along with its distribution centre (DC) and has a strong retail presence, operating in 15 territories across 255 solus stores and concessions. Hobbs directly employs 1,175 people as detailed below.

Location	Number of Employees
Head Office	149
DC	93
Retail Sites (UK & ROI)	837
Retail Sites (Int)	55
Hobbs Italian Shoe Factory	41

### Phase Eight

Founded In 1979, Phase Eight is a premium British womenswear brand producing clothing, footwear and accessories. Phase Eight has two sister brands, Studio 8 launched in 2015 and Damsel in a Dress relaunched in 2017.

Acquired by TFG London in 2015, Phase Eight is headquartered in London with its customer services operations based in Kent. Phase Eight has a strong international retail presence, operating in 25 territories across 557 solus stores and concessions. Phase Eight directly employees 1,683 people as detailed below.

Location	Number of Employees
Head Office	167
Retail Sites (UK, ROI & Int)	1,516

Phase Eight's DC is based in Kent and operated by a third-party logistics company, who employ 200 people.

## Whistles

Whistles is a multi-channel fashion brand, selling apparel, footwear and accessories for the contemporary woman.

Acquired by TFG London in 2016, Whistles is headquartered in London and has an additional customer services team in Rochester. Whistles has a strong retail presence, operating in 12 territories across 175 solus stores and concessions. Whistles directly employees 658 people as detailed below.

Location	Number of Employees
Head Office	109
Retail Sites (UK & ROI)	494
Retail Sites (Int)	55

Whistles DC is located in Hemel Hempstead and operated by a third-party logistics company, who employ 58 people.

## Sourcing Landscape

Across its three brands, TFG London manufactures products through a global network of 168 external suppliers (of which 39 are shared) across 19 countries and in 316 first tier production sites (of which 44 are shared). Further to its first tier suppliers, TFG London's three brands have fully mapped their second tier 'primary process' suppliers providing processes such as stitching, cutting, quality control and packing. 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.

Collectively, TFG London sources from 21 countries, of which the top 5 are China, Romania, Turkey, Macedonia and Italy, representing 84% of purchased volumes in the year. The table below illustrates the overall 21 sourcing countries, by purchased volumes and prevalence of modern slavery according to the [Global Slavery Index Map](#).

Country	Prevalence of modern slavery (ranking out of 167 countries)	% of Purchased Volumes
Macedonia	25	5%
Greece	27	1%
Philippines	30	<0.1%
Mauritius	34	1%
Turkey	48	10%
India	53	4%

Country	Prevalence of modern slavery (ranking out of 167 countries)	% of Purchased Volumes
Romania	81	18%
China	111	46%
Portugal	120	4%
Morocco	121	0.5%
Italy	122	5%
Spain	124	1%

Nepal	55	<0.1%
Lithuania	59	0.1%
Indonesia	74	1%
Vietnam	77	1%
Bulgaria	78	0.7%

Sri Lanka	130	1%
United Kingdom	132	1%
South Korea	137	<0.1%
UAE	148	0.2%

## Hobbs

Hobbs manufactures its products in 113 first tier factory sites across 15 countries. Hobbs' factory relationships are managed through an external network of 73 suppliers, of which 43 are direct and 30 are agents. In addition to its external network of suppliers, Hobbs operated its own Italian shoe factory however, in December 2019, Hobbs ceased operations, a decision taken in conjunction with the Italian management team following a strategic review of the operations and approved by the regional Union. Hobbs' approach to manufacturing ensures that world class facilities are selected, with the top 5 sourcing countries being China, Macedonia, Italy, Romania and Turkey, representing 88% of purchased volumes this year.

## Phase Eight

Phase Eight manufactures its product in 143 first tier factory sites across 15 countries. Phase Eight's factory relationships are managed through an external network of 77 suppliers, of which 41 are direct and 36 are agents. Phase Eight top 5 sourcing countries are China, Romania, Turkey, India and Indonesia, representing 91% of purchased volumes this year.

## Whistles

Whistles manufactures its product in 104 first tier factory sites across 11 countries. Whistles' factory relationships are managed through an external network of 57 suppliers, of which 45 are direct and 12 are agents. Whistles top 5 sourcing countries are China, Turkey, Portugal, India and Mauritius, representing 89% of purchased volumes this year.

## TFG London 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 brands' products.

**Non-stock items and services**, including outsourced customer deliveries, logistics, IT, cleaning, customer care and catering.

All brands under the TFG London group design their own brand's products in their head office in London and are manufactured by third party factories.

The sourcing department (comprised of technical, buying, merchandising and design teams) manage the brands' supply chains. The CSR and sustainability team work across the group to support its sphere of influence, collaborating with the sourcing department to ensure that product and raw



material suppliers are selected based on ethical and sustainable credentials, together with commercial criteria.

The brands non-stock products and services are managed by the procurement teams, supported by the CSR and sustainability team, as well as the legal team.

Each brand has a modern slavery mechanism in place that is steered at group level and set up to drive the modern slavery agenda forward across all departments, looking at both supply chain channels. Through this mechanism, we carry out a risk assessment across our manufacturers and non-stock suppliers. Each brand's supply chain is defined as follows.

Tier	Definition	Example	Hobbs	Phase Eight	Whistles
1	Main Production Site	Factory that cuts, makes and trims Whistles products and ships to brand	Fully mapped	Fully mapped	Fully mapped
2	Primary Process Subcontractor	Provider of one or more processes e.g. stitching, cutting, packing, QC and shipping to tier one supplier	Fully mapped	Fully mapped	Fully mapped
3	Secondary Process Subcontractor	Provider of one or more processes e.g. stitching, cutting, packing, QC and shipping to tier two supplier	Partially mapped	Partially mapped	Partially mapped
4	Fabrics and Components	Fabric mills, tanneries, hardware and trims	Not mapped	Not mapped	Partially mapped
5	Raw Materials	Textile fibres, natural and synthetic materials	Not mapped	Not mapped	Partially mapped

## TFG London 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 London core policies relate to our commitment to adopting the UNGPs, to benefit all those who work on behalf of the brands. These are our [Supplier Code of Conduct](#), the [Migrant Workers Employment Policy and Implementation Guidelines](#) 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 SA1000 Standard:2014. It outlines the minimum social and



environmental standards we expect each factory to meet and our expectations regarding the 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.

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 are also related to the prevention of modern slavery are our Anti-Bribery Policy, Whistleblowing Policy, Equal Opportunity Policy and our Compliance Handbook.

This year we commit to review all of our current policies to ensure they reflect existing, new and upcoming topics in line with our group due diligence framework.

## **Due Diligence**

### **Our Governance**

The TFG London Board of Directors and each brand's Managing Director are responsible for ensuring TFG London meets its human rights responsibilities. They are supported by the CSR and sustainability team and sourcing teams.

### **Our Risk Assessment and Management**

Modern slavery depends on multiple factors and TFG London has identified key elements that pose a risk of modern slavery in our industry and global supply chains. As such, TFG London applies these considerations to its assessment of risk, broadening 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

#### **Global 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

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.

For this very reason, in 2018 Whistles voluntarily joined the Better Buying initiative in order to scrutinise their own purchasing practices and assess how their business model might impact supply chain partners. Extending this to the group, both Hobbs and Phase Eight are reviewing their approach.

- We know that unrealistic expectations about lead times can cause suppliers to slip on their ethical standards in order to meet high-pressure expectations from clients. As such, we talk with them to understand what deadlines are realistically possible to meet.
- We ensure our Ethical Trade Policy is prioritised over any cuts on delivery speed and price and align our procurement practices in line with these standards.
- We discuss payment schedule and margins with suppliers, and ensure we make payments on time.
- We ask suppliers about their use of sub-contractors, recruiters and brokers in order to have visibility of supply chains.

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.

In addition, we are conducting further analysis of areas of our business where there is migrant labour, high presence of refugees, home workers, young workers and a risk of the use of child labour, contract and temporary workers, women workers, and outsourced recruitment agencies.

It is always possible that suppliers have cases of modern slavery in their supply chain, but they may not realise what it is.

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

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

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. As such we have developed specific policies and tools which allow us to investigate further where issues arise.

As part of our risk assessment and management, we rely on expert research and advice, and partner with specialists on the ground to further investigations with our suppliers or to raise awareness of potential risks. At the same time, we value our partnerships with key NGOs, 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.

Mapping our supply chain is an essential piece of work in managing and mitigating risks. In 2016 we started the mapping of our supply chain, which allowed us to gain visibility of all our first tier suppliers. Although we acknowledge that it is in the nature of supply chains to be continuously evolving, we are working towards establishing long lasting relationships with our existing suppliers and the aim for 2020 is to focus on continuing to map our supply base beyond our second tier.

## Actions taken

During our due diligence process, we have identified key modern slavery risks and focused our attention on them.

Modern Slavery Risk	Definition of Issue	Steps Taken	TFG London Commitment
Migrant Labour	<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 London 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' supplier's 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</p>	<p>Further our commitment to map and carry out a risk assessment of migrant labour across our supply chain.</p> <p>Revise TFG Migrant and Contract Worker Policy to include further detail on ethical recruitment, remediation, and guidance for implementation across high risk regions and business operations, as multi stakeholder dialogue progresses.</p> <p>Continue to influence the Bangladeshi and Mauritian governments regarding a fair migration corridor between the two countries.</p> <p>Identify and collaborate with specialist NGOs to further our migrant labour programme.</p> <p>Continue engagement with ETI Mauritius Working Group to deliver roadmap of activities agreed at multi-stakeholder event.</p>

		<p>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>Monitor the progress of the Quizrr programme and act upon remediation where needed.</p>
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Refugee Labour	<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>We identified our main risk in Turkey as well as Greece.</p>	<p>Participated in ETI working group on Business and Human Rights and ETI Turkey Platform Steering Group, to develop a robust framework on exploitation and discrimination of refugees in Turkey, looking at issues such as purchasing practices, social dialogue and business and human rights.</p>	<p>Continue to participate in ETI Turkey Working groups.</p> <p>Continue to support suppliers to provide decent employment opportunities for Syrian refugees.</p> <p>Established links between factories and local NGOs to facilitate the recruitment of Syrian workers into our supply chain.</p> <p>Identify and collaborate with specialist NGO to further our Turkey country programme and provide awareness</p>

			<p>training to our suppliers.</p> <p>Further delve into refugee labour in Greece, in light of the 2015 Syrian refugees exodus and the most recent reopening of Turkish borders.</p>
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Child Labour and Young Workers	<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>	Added robustness to our Child Labour and Young Worker policy and communicated this to all our suppliers.	<p>Continue to participate in ETI Turkey Working groups.</p> <p>Identify and collaborate with specialist NGO to further our Turkey country programme and provide awareness training to our suppliers.</p> <p>Conduct further risk assessment of our supply chain to understand where hot spots for child labour exist and the type of unit.</p> <p>Build our regional capacity in high risk countries, including India.</p> <p>Build local NGO partnerships in other high-risk countries in order to address root causes of child labour and deliver remediation programme.</p>
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Contract and Agency Workers	There is insecurity in the status of contract workers,	Developed our Migrant Workers Employment Policy and	Further our risk assessment of supply chain to identify where other potential

	<p>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>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>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>
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Female Workers	<p>Women are particularly vulnerable to exploitation, human trafficking and bonded labour.</p> <p>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>
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Purchasing Practices	Purchasing practices can	Whistles voluntarily joined Better	Applying the lessons learnt from the



	<p>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"> <li>1. Failure to pay wages and benefits required by law and buyers' codes of conduct</li> <li>2. Use of excessive overtime, some of which may be forced</li> <li>3. Unauthorized subcontracting to unsafe facilities with poor working conditions</li> <li>4. Increase use of temporary labour making employment more precarious</li> </ol>	<p>Buying, 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>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>
<b>Modern Slavery</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>

Risk			
Homeworkers	<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</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"> <li>1. Communicate our position on homeworking throughout our company, to those who supply to us, and those we supply to</li> <li>2. Ensure the presence of homeworkers in the supply chain will not lead to the relocation of work or cancellation of orders</li> <li>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</li> <li>4. Explore the opportunity to forge partnerships with local experts in risk regions, starting from India, to seek specialist support in addressing this issue</li> </ol>

	<p>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>		
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Workers' Rights Awareness and Social Dialogue	<p>Millions of workers in global supply chains are unaware of their basic rights.</p> <p>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.</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. The modules of this digital training include:</p> <ul style="list-style-type: none"> <li>• Rights and Responsibilities</li> <li>• Worker Engagement</li> <li>• Wage Management</li> <li>• Migrant Parenting</li> </ul>	<p>With this three-year scalable capacity building programme, we commit to:</p> <ol style="list-style-type: none"> <li>1. Improve social dialogue &amp; engagement between workers and management</li> <li>2. Measurability year on year</li> <li>3. Shared knowledge</li> <li>4. Secure safe &amp; decent workplaces</li> <li>5. Enable sustainable change</li> </ol>

	Workers facing these abuses often lack awareness of their human and labour rights and access to complaints mechanisms and whistle blower protections.		
<b>Modern Slavery Risk</b>	<b>Definition of Issue</b>	<b>Steps Taken</b>	<b>TFG London Commitment</b>
Non-Stock Suppliers	We recognise our responsibility, and opportunity, to embed ethical purchasing practices to include non-stock suppliers of goods and services.	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>With the introduction of a harmonised new financial system, we will be able to map, analyse and prioritise the highest risk suppliers according to spend, industry, geography and known ethical risks.</p> <p>We will send them a self-assessment questionnaire to help gather further information on their employment practices and ethical standards.</p> <p>We will develop a roadmap to ensure that our highest risk sites are monitored on a regular basis.</p>

## Next Steps

The Modern Slavery Act has been an opportunity to embed a greater understanding of human rights within our product supply chain and to extend the awareness of the issue internally across departments. All our Heads of Departments are continuously briefed and engage in regular discussions on human rights and modern slavery through our Modern Slavery working group. We brought on board our distribution centre to be part of the wider discussion.

We have developed a comprehensive training programme for our Buying and Merchandising designed to improve our purchasing practices, and we will extend this to include the whole group. The training covered cost prices, models and negotiation, production lead times and manufacturing processes, forecasting process, and ethical and sustainable policies. We will also be developing a programme of factory visits for all buyers and merchandisers to enable them to better understand production processes.

This year we launched the TFG London Sustainability Strategy 2025, which incorporates modern slavery and related topics in its Supply Chain and Communities pillar.

As part of the entrenching phase of the strategy we are working to set measurable targets related to each area of influence and we will be able to share progress in due course.

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. Moving forward we will extend the breadth and depth of our approach to include non-stock suppliers and third party brands, and risk assessment of other sourcing regions. Our aim is to further strengthen and promote our core values of fairness, integrity, transparency and collaboration, and as such we will be updating this statement annually.

This Modern Slavery Statement was prepared by the TFG London CSR and sustainability team and approved by TFG London Board of Directors on 31st March 2020.

At the time of publishing this statement our business, as all businesses Worldwide, is facing unprecedented times as we witness first-hand the impact that the Coronavirus is having and will continue to have on our own operations and supply chains. As we see the enormity of its scale unfold we are working tirelessly to find measures to mitigate the impact and damage that inevitably we will experience and will change our circumstances and those of all our stakeholders. All our efforts will be duly documented, measured and reported on during the course of the next reporting period.



Catherine Lambert Chief Financial Officer,

on behalf of the TFG London Board of Directors