

HSEMSP002	<b>UNBOUND GROUP</b>	Issue No: 01
	<b>HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM</b>	Issue Date: July 22
	<b>Modern Slavery Policy</b>	Page 1 of 3

## 1. Statement of Intent

This statement is made in accordance with the Section 54 (1) of the Modern Slavery Act 2015 and describes how Unbound Group PLC and its subsidiary companies commit to developing and adopting a proactive approach to prevent, respond to, and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces and supply chain. This statement constitutes our slavery and human trafficking statement for the financial year ending 31st January 2022.

We aim to manage our employee safeguarding responsibilities through responsible recruitment and thorough checks, and always live up to the expectations of our stakeholders. This includes our supply chain, where we will ensure that our standards are being met through regular supplier assessments, ethical accreditation checks, and audits.

We endorse the objectives set out below and the procedures for their implementation, with a view to eliminating or controlling such risk, and to creating and maintaining a safe and secure working environment for our employees and those working in our supply chain.

### In the financial year 2021/22, the Company has:

- Conducted supplier assurance reviews with our three main suppliers to confirm compliance with local modern slavery and child labour laws.
- Provided Modern Slavery in UK Business training for senior management, delivered by Stronger Together.
- Provided Ethical and Social accountability training for Procurement, Product Design, and Assurance teams, delivered by SGS.
- Joined SEDEX as buyer/supplier members in January 2022.

### The Company will:

- Prioritise the safety of our employees and those working within our supply chain in all our activities, considering the potential impacts of fast-moving business demands on labour when making critical decisions.
- Progressively and proactively identify and assess potential slavery risks within our recruitment, employment and business practices and establish measures to reduce any risks to our employees, supply chain and business.
- Produce plans to ensure all aspects of the business are complying with legislation through SEDEX membership and the aim to become Stronger Together Business Partners by the end of our 2022/23 financial year.
- Provide information, instruction, training, and supervision to our employees on Modern Slavery and Forced Labour in conjunction with Stronger Together, to give awareness, skills, and assurance.
- We will review our policies at least annually or when necessary, to achieve our goals, monitor effectiveness and to remain in accordance with the Law and best practices.

The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

Signed:

Ian Watson  
Chief Executive Officer Unbound Group PLC

Dated: 24/08/2022



Signed:

Dan Lampard  
Chief Financial Officer Beaconsfield Footwear Limited

Dated: 24/08/2022

HSEMSP002	<b>UNBOUND GROUP</b>	Issue No: 01
	<b>HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM</b>	Issue Date: July 22
	<b>Modern Slavery Policy</b>	Page 2 of 3

## 2. Policy details

### Scope

- This policy applies to all Unbound Group PLC UK operated sites and employees, UK sites and all employees of Beaconsfield Footwear Limited trading as Hotter, and all Tier 1 suppliers.

### Board Responsibility

- The board of directors of Unbound Group PLC has overall responsibility for all Unbound Group activities.
- The operating board of Beaconsfield Footwear Limited has overall responsibility for all activities associated with Hotter sites and supply chains.
- Both boards are responsible for reviewing and approving this statement.

### Policy Commitments

#### ***COMMITMENT to tackle modern slavery risks within the business***

#### 1. Employee Responsibility

- All recruiting managers are responsible for ensuring they follow the relevant procedures for ensuring safe recruitment checks.
- All line managers and supervisors are responsible for monitoring for and raising any risks or signs of modern slavery activities within the business.
- All purchasing managers are responsible for ensuring suppliers commit to Unbound Group's standards and expectations before engaging in business with them.

#### 2. Training

- All roles with a responsibility for tackling modern slavery risks within the business will be trained through courses and/ or training materials from Stronger Together, a multi-stakeholder business-led initiative aiming to reduce modern slavery.
- All employees will receive awareness training on the signs and potential risks of modern slavery and labour exploitation and reporting issues.

#### 3. Management Systems

- The Beaconsfield Footwear Limited Anti-Bribery and Corruption Policy states the principles, rules, and guidance that all employees must abide by and follow to ensure good ethical and business practice.
- The Unbound Group PLC Quality Management System and the Health, Safety and Environment Management System, based on ISO 9001 and 45001 respectively, ensure the documented control, review and continuous improvement of all related policies, procedures, and training.

HSEMSP002	<b>UNBOUND GROUP</b>	Issue No: 01
	<b>HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM</b>	Issue Date: July 22
	<b>Modern Slavery Policy</b>	Page 3 of 3

***ASSESSMENT of modern slavery risks within the business***

1. **All UK operational sites will be mapped and detailed by type, including**
  - i) the recruitment methodologies used,
  - ii) Labour providers used and their sourcing processes.
2. **Using the above information, each site will:**
  - i) Be assessed for potential modern slavery risks.
  - ii) Identify priority areas to implement operational due diligence measures and develop action plans.

***ACTION to prevent and deal with identified risks of modern slavery within the business***

3. Stronger Together multi language posters have been displayed around the Skelmersdale site, using the languages most spoken by non-UK workers to raise awareness of how to recognise and report hidden exploitation.
4. The new starter induction process at the Skelmersdale site is being improved to include a section on how to recognise and report hidden worker exploitation.
5. Existing employees will receive training on how to recognise and report the indicators hidden worker exploitation by the end of FY 22/23.

**The respective boards are aware of the need to:**

- Assess and implement further preventative actions, particularly within supply chains,
- Assess and implement appropriate remedy responses,
- Assess and implement processes to monitor progress of the above,
- Incorporate Modern Slavery practices and procedures within established continuous improvement programme
- Assess and implement a formal review process for all procedures and arrangements at least on an annual basis.

***COMMUNICATE the steps that the company has implemented to prevent, respond to and remediate the risks of modern slavery within the business***

6. The company has appointed Dan Lampard as the person with responsibility for communicating its efforts and effectiveness to prevent and address modern slavery and hidden labour exploitation risks, having an in-depth knowledge of these issues following attendance of Stronger Together training.
7. By the conclusion of FY22/23, the company will make a public commitment to addressing the risks of modern slavery in its UK business in becoming a Stronger Together Business Partner, through uploading evidence of steps taken as described above.
8. The company produces an annual statement as per the requirements of Modern Slavery Act 2015 Section 54 Transparency in Supply Chains, which details the steps taken to ensure slavery and trafficking is not taking place. In doing so, the company acts in accordance with the intentions of the Act, with transparency in all processes.