MODERN SLAVERY STATEMENT

We have prepared this statement for the purposes of the Modern Slavery Act 2015 and it has been updated for the financial year ending 30 March 2020. References in the statement to “forced labour” mean any conduct which is an offence under Part I of that Act including slavery, servitude, any type of forced or compulsory labour and trafficking for the purposes of exploitation.

OUR PRINCIPLES

We do not tolerate forced labour either within our business itself or within our supply chain. We are committed to operating with integrity in the way we work, with a responsible practice across all areas of our business. We expect our supply chain (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share the same values.

OUR BUSINESS

Harvey Nichols is a premier luxury fashion retailer, selling fashion, accessories, beauty, food and wine products across its 8 stores and online within the UK and Ireland. All UK stores have luxury Foodmarkets and Restaurants, Cafés or Brasseries. Harvey Nichols also owns and operates OXO Tower Restaurant, Bar and Brasserie on the South Bank in London.

Our product supply chains are extensive and global, numbering thousands of direct suppliers, agencies and concessions (“Associates”). Our Associates operate and manufacture globally.

We submit this statement as the Group Company Broad Gain (UK) Limited. The statement covers all of our subsidiary companies, namely:

- Harvey Nichols Group Limited
- Harvey Nichols and Company Limited
- Harvey Nichols (Own Brand) Stores Limited
- Harvey Nichols Beauty Bazaar Limited
- Harvey Nichols Regional Stores Limited
- Harvey Nichols (Dublin) Limited
- Harvey Nichols.com Limited
- Harvey Nichols (Distribution) Limited

The statement, approved by the Board of Directors, sets how we as a Company have taken steps to mitigate the risk of forced labour within our own Company and our Associates.

POLICIES

Harvey Nichols’ internal policies cover recruitment, basic pay, working conditions and the use of contractors. These support our commitment to zero tolerance of the use of forced labour within any part of our business.

We also operate a Whistleblowing Policy, aimed principally at our employees, which encourages individuals working with us to report any suspected wrongdoing, including human rights violations such as forced labour.

We have clear guidelines as to the steps required to be taken on the appointment of Associates, with controls in place that would flag any concerns regarding the use of forced labour and to allow for an investigation where appropriate.

INTERNAL TRAINING

To raise awareness of our zero policy stance on forced labour, Modern Slavery training is included as part of our induction programme to new starters. In this financial year, we are rolling out a computerised learning tool that builds on the awareness of employees of forced labour and the steps to take if suspected.

CONTRACTUAL COMMITMENT

Our standard supplier contractual terms includes the obligation on our Associates to: comply with the Modern Slavery Act 2015; warrant that their business and, to the best of their knowledge, their own supply chain do not use forced labour; implement appropriate controls to prevent forced labour and to notify Harvey Nichols immediately if they become aware of forced labour within their supply chains.

SUPPLY CHAIN

We have reviewed our business and our supply chain. Neither we nor, to the best of our knowledge, our supply chain make use of forced labour. We take the following steps to prevent, evaluate and address risks of forced labour in our supply chain:

- When entering into arrangements with suppliers, suppliers undergo a supplier approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour;
- When working with our Associates, we employ best practice measures. This prevents putting undue pressures on our Associates which could increase the risk of forced labour. Such measures include: paying market prices; not withholding undisputed payments; and avoiding applying unnecessary pressure for the early delivery of products.
We have adopted a Supplier Code of Conduct, which we communicate to our Associates and ask for them to contractually commit to.

This Code of Conduct rejects the use of forced labour. We expect our Associates to comply with the Code of Conduct and to place similar expectations on their respective supply chain. Please refer to the Corporate Responsibility section on www.harveynichols.com for the Code of Conduct issued to our Associates.

The Code of Conduct sets out our right to audit compliance by inspecting Associates’ facilities, reviewing records, policies and practices and interviewing personnel. We reserve the right to request our Associates to complete a questionnaire regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chain make use of it. This will facilitate our due diligence process and allow us to identify red flags.

On focusing on responsible and ethical sourcing, the Code of Conduct also incorporates our animal sourcing principles, environmental responsibility and Bribery Policy.

If we identify or suspect non-compliance with the Code of Conduct we will work with our Associates to execute an improvement plan to rectify matters. Failure to address non-compliance in an appropriate manner will lead us to cease trading with the Associate.