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ARCHIVE

09 AUGUST 2018

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9 August 2018

AS A BUSINESS WE TAKE SERIOUSLY OUR RESPONSIBILITY TO OPERATE ETHICALLY. RESPECTING HUMAN RIGHTS IS A FUNDAMENTAL PART OF OUR BUSINESS.

OUTLINED BELOW IS OUR POSITION ON SLAVERY AND HUMAN TRAFFICKING.

This is our third Modern Slavery Statement and sets out steps taken by Superdry Plc (which includes its wholly owned subsidiaries C-Retail Limited, DKH Retail Limited and SuperGroup Internet Limited) to ensure modern slavery does not take place in any part of our business and supply chain. We have updated our statement with progress made in the last 12 months; our overall modern slavery strategy remains on track.

We review our approach on a regular basis and seek to continually improve through ongoing risk assessment, raising awareness of issues and requirements, and by delivering training to our colleagues and working in partnership with our suppliers and partners.

About Superdry

WE DESIGN, PRODUCE AND SELL CLOTHING AND ACCESSORIES GLOBALLY UNDER THE SUPERDRY BRAND.

At Superdry we focus on high quality, contemporary products with a strong link between our brand values and our product attributes: design detail; quality obsession; end-to-end innovation; and affordability.

Our products are:

Designed at our head office based in the UK.

Manufactured through third party suppliers globally.

Sold globally through our stores, through e-commerce sites and through our wholesale customers.

These activities are co-ordinated by a global team of almost 5,000 employees and a network of trusted suppliers and business partners.

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About our Supply Chain

Superdry works with apparel, footwear and accessory suppliers, the majority of which are based in India, Turkey and China. Our suppliers may choose to use subcontractors (also known as Tier 2) where specialist components are required or services needed which cannot be completed on these main production sites (Tier 1). Our suppliers' source branded trims and labels through a network of nominated and sourced suppliers ([ESSENTIALS/PRIVACY-POLICY](#))

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In September 2017 we announced our goal to use 100% organic cotton in all apparel by 2040. This goal is ambitious and will have significant impacts on extending visibility through our organic cotton supply chains. To achieve this we plan to establish dedicated organic supply chains, with fabric, spinning and ginning mill traceability. As a part of this we plan to establish risk assessment and monitoring in key sites to support our modern slavery strategy.

We also have a network of suppliers providing services to support day-to-day business operations, examples of which include transportation, warehousing and store ancillary services.

We operate sourcing offices in key source countries, which function to support our suppliers in manufacturing our apparel, footwear and accessories in line with our standards – from quality standards, through to compliance with our ethical standards including our Modern Slavery Policy.

Our Commitment to Human Rights and our Modern Slavery Policy

As an integral part of our commitment to human rights, we actively seek to ensure that our business, business partners and all parts of the associated supply chain are free from all forms of slavery and human trafficking.

Our Modern Slavery Policy applies to all colleagues, suppliers and business partners and requires them to implement effective due diligence processes to enable us to understand and identify the potential risks of slavery and human trafficking so that we can report actual and suspected cases to the appropriate law enforcement agencies.

Our commitment to human rights is further re-enforced through all of our ethical trading policies, which are contained within our supplier manual, and all contracts from 2016 onwards contain a requirement to comply with it.

Our:-

1. Ethical trading Code of Practice is based on international standards including the Universal Declaration of Human Rights and the International Labour Organization's Core Conventions on Labour Standards.
2. Migrant and Contract Worker Policy and Guidelines aim to protect vulnerable groups of workers by requiring ethical recruitment practices, appropriate conditions for accommodation, and effective communication of terms and conditions of employment.
3. Subcontractor Policy aims to support ongoing mapping of our supply base, and to ensure our standards are actively communicated and supported within this tier. To date, this policy has been rolled out in factories producing 83% of our volume by number of units delivered.

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All policies have been developed in consultation with organisations including the Ethical Trading Initiative, and local experts. Their ongoing development is managed by our ethical trading team, which is overseen by our Executive Committee and Board of Directors.

How we implement The Modern Slavery Policy

If at any point we suspect or identify any cases of modern slavery, we commit to support the remediation of any victims – working with business partners, other brands, governments and NGOs as applicable. We also commit to assist law enforcement agencies with the investigation, identification and prosecution of any party that knowingly engages in or facilitates slavery or human trafficking.

1. Raising Awareness for Colleagues, Suppliers and Business Partners

During this financial year, Superdry trained 90 supplier-facing colleagues and selected suppliers to raise awareness of our Modern Slavery Policy – to support the continued risk assessment and roll-out of our due diligence processes.

This rolling training programme continues to support our cross business risk assessment and roll-out plan of our Modern Slavery Policy.

2. Embedding human rights across our business

Superdry has a growing global team focused on human rights and wider sustainability.

This team manages our ethical trading programme as well as progress towards environmental targets.

We have established a number of mechanisms across our organisation to ensure human rights continue to be embedded in day-to-day business practice:

We regularly audit all main production sites (Tier 1) and their subcontracted units (Tier 2) on a semi-announced and unannounced basis. We are starting to enrol Tier 3 (trims and labels) into our ethical trading monitoring processes. In the last 12 months we have started to enrol Tier 3 (trims and labels) into our ethical trading pre-approval processes, reaching 100% coverage in Turkey with the aim to extend this to 100% in India in the next financial year.

We risk assess human rights impacts within our business and supply chain and adapt our programme to ensure any issues are addressed. In the last 12 months we have established a dedicated migrant worker assessment, which in part targets modern slavery risk identification at factories with international migrant workers.

We have established robust ethical pre-approval processes for all main factory sites (Tier 1) and subcontracted units (Tier 2) to ensure we continue to work with the best possible partners. In the last 12 months we have started to enrol Tier 3 (trims and labels) into our ethical trading pre-approval processes, reaching 100% coverage in Turkey with the aim to extend this to 100% in India in the next financial year.

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We established dedicated local ethical trading experts in key source countries to work closely with our suppliers’ factories and their subcontracted units. In the next financial year we plan to extend the teams reach to satellite countries including Vietnam, Cambodia and Sri Lanka.

We provide training and support for factories to remediate any issues where identified. An example of this is that we are trialling ways of strengthening factory grievance mechanisms by working with locally based NGOs and former trade union representatives in India. Please refer to our Gender Empowerment Case Study for more information on providing 6,181 workers with access to effective grievance mechanisms.

We continue to collaborate alongside other Ethical Trading Initiative members to support the development of best practice guidelines where industry wide risk has been identified.

3. Measuring the Effectiveness of our Ethical Trading Programme

We monitor the ongoing impacts of our ethical trading programme and report to our Executive Committee and Board of Directors regularly to provide continued oversight.

An update on targets set in the last financial year and the targets we are setting ourselves for the next financial year are set out below:-

FY18 Target

All supplier facing colleagues trained in head office on a rolling basis.

Maintain ethical approval and monitoring processes for 100% of main production sites (Tier 1) and continue roll-out to achieve 100% for all subcontracted units (Tier 2).

FY18 Progress

90 colleagues trained in FY18 across UK head office, USA, Hong Kong, Turkey and India offices. Ongoing rolling programme.

Complete.

FY19 Target

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 Extend migrant worker assessments to factories employing significant proportion of international migrant workers.



FY19 Target

Extend Tier 3 monitoring programme to 100% India based trims and labels sites, maintain coverage in Turkey.

Complete full end line assessment for gender empowerment work in India and review possibility of extending to 40% of Indian factory base.

Support factory resilience and train all factories to ensure they have sufficient systems to support ethical conditions in Tier 2 and Tier 3 factories.

The above statement has been made pursuant to Section 54 of the Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010 (SB657) and was approved and signed by Euan Sutherland, Chief Executive Officer, Superdry Plc (formerly SuperGroup Plc), on 9 August 2018.

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[SUPERDRY.COM \(HTTPS://WWW.SUPERDRY.COM\)](https://www.superdry.com)

[UK CONDITIONS OF PURCHASE \(/MEDIA/2475/UK-CONDITIONS-OF-PURCHASE-NON-STOCK-100118-AS.PDF\)](#)

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