Debenhams

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Equality Community

CORPORATE SOCIAL RESPONSIBILITY

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Environment

Ethical sustainable sourcing is essential to our business and integral to our decision making. We work closely with our suppliers and factories, taking into consideration at all times the impact on the environment and the needs of the people who work within our complex global supply chains. When looking at new countries or regions, we work with our overseas offices and existing suppliers to understand the local challenges, helping to support and manage risk.

Our Global Teams

The Ethical Trade and Corporate Responsibility teams are part of the Sourcing division working closely together with Buying and Merchandising and our suppliers to ensure a compliant, transparent and consistent flow of goods. As well as the Support Centre located in London, Debenhams has two international sourcing offices, located in Hong Kong and Bangladesh, who also provide in country support for sourcing, merchandising, quality control and ethical trade. The overseas offices enable us to create closer working relationships with suppliers and factories as well as increase flexibility, control and transparency. The in-country Ethical Trade teams visit and assess factories on an on-going basis and also manage capacity building programmes. Our Ethical Trade team in Dhaka continue to support the remediation process within our approved factory supply base to ensure building, fire and electrical safety improvements have been met and are being monitored regularly as part of the Accord Bangladesh.

Our Code

Debenhams has been a member of the Ethical Trading Initiative (ETI) since 2001. The ETI Base Code is an internationally recognised code of labour practice based on the core conventions of the International Labour Organisation (ILO).

- Employment is freely chosen
- Freedom of association
- Health and safety
- Child labour
- Living Wages are paid
- Working hours
- No discrimination
- Regular employment and benefits
- No harsh treatment

Our Supplier Code of Conduct is based upon the ETI

Base code and ILO Core Conventions. This code describes the absolute minimum requirements for all suppliers and factories to adhere to. The underlying objective of the code is to protect human rights for all workers within the global supply chain, forming the basis of our Ethical Trade programme. To view the Supplier Code of Conduct, please click here.

In addition, we are actively involved with various ETI initiatives, such as Gender Analysis, Transparency, Modern Slavery and the China Working Group. We also continue to collaborate with other retailers and organisations such as the British Retail Consortium (BRC), Stronger Together and the Association of Labour Providers (ALP) to share learning experiences and find solutions.

Better Retail Better World



ETI Logo

Better Retail Better World

As of March 2018 we confirmed our commitment to the BRC Better Retail Better World Pledge, joining a number of recognisable brands and retailers, to focus on the challenges surrounding modern slavery, decent work, sustainable economic growth, reducing inequalities, climate change, responsible consumption and production.

We see Better Retail, Better World as an opportunity to collaborate at an industry level and effect real sustainable change on a global scale. As a company we are committed to the Sustainable Development Goals, which have become the foundation of our company wide core CSR strategy 'Doing Our Bit' with the aim to positively impact our colleagues and the communities we operate in.

Monitoring of the Supply Base

We operate a continuous monitoring programme which assesses all factories making own brand product against the Debenhams <u>Supplier Code of Conduct</u>. This is done through either an independent third party audit on an annual basis or more frequently depending on the type of issues raised, or a follow-up remediation visit by Ethical Trade team members based in the UK, Hong Kong and Bangladesh. We use an audit methodology called SMETA, an industry standard across the retail sector, creating continuity and standardised reporting. This also helps reduce repetitive auditing for factories where retailers share the same manufacturing site.

Currently we have <u>938</u> active factories consisting of almost half a million workers across our global supply base. All factories must undergo a pre-assessment process by the Ethical Trade team before order placement, this includes:

During FY2018 the Ethical Trade team conducted over 450 factory visits to support remediation, conduct training and support implementation of corrective actions identified within the third party audits. This would have included critical non-compliances, indicators of Modern Slavery, young workers, health and safety issues, wage violations, excessive working hours, lack of legal employment contracts and discrimination against migrant labour.

It is clearly stated in our Code of Conduct, Conditions of Trading and company policies, that unauthorised subcontracting is not permitted under any circumstances. This is also frequently communicated to all suppliers and factories. However, as unauthorised subcontracting is still a challenge that retailers face, to minimise the risk of this happening Debenhams have an ongoing Spot Check programme. Each month factories are randomly selected for unannounced inspections conducted by Intertek or the Debenhams Ethical Trade team to check orders are being produced in the approved factory.

Capacity Building Programmes

The importance of supplier and factory engagement is essential to maintain open working relationships, encourage dialogue and promote transparency. Therefore training and development coupled with on-going support and guidance, is imperative to drive positive sustainable change. Please see below for more information on in country capacity building programmes that Debenhams are a part of:

- ILO Better Work Programme
- China Collaboration Program
- ACCORD
- Fast Forward

ILO - Better Work Programme

Better Work is a global partnership between the ILO (International Labour Organization), the International Finance Corporation (IFC), Brands, Government, Manufacturers, Trade Unions and Workers. The global programme reaches over 1.3 million workers, with 80% of those workers being women.



The aim is to improve social standards and the lives of workers through monitoring, stakeholder engagement and facilitating collaboration between workers and management to strengthen dialogue on work-related issues. The programme builds on long-term improvement plans to create real sustainable change.

The Better Work programme uses tools such as factory self-reporting and public reporting to improve conditions and drive competitiveness within the industry.

As a partner member, Debenhams garment factories in Cambodia, Vietnam and more recently Bangladesh, are involved in the programme. During the course of 2017 Debenhams Ethical Trade team, supported by the ILO, have conducted seminars in the UK, Cambodia and Vietnam for suppliers and factories, to continue awareness, training and open discussions on the Better Work audit programme.

Debenhams & Better Work Seminar in Cambodia

Debenhams & Better Work Seminar in Vietnam

Better Factories Cambodia (BFC) started in 2001 with participation in the Better Work programme being mandatory for all export garment factories. Through our partnership with Better Factories Cambodia (BFC) we have indirectly impacted over 24,000 workers in our supply chain.

Better Work Vietnam (BWV) started in 2009, only garment and footwear factories in Ho Chi Minh and Hanoi are in scope. Better Work Vietnam (BWV) to date has reached over 6000 workers since we engaged in the programme.

The factories benefits from:

• Fewer audits

- On-going support through improvement plans and regular visits by the ILO local team
- Access to networking with other factories and brands
- Support on labour law
- Tailored visits to ensure sustainable improvements

• Access to free training days

China Collaboration Programme



In 2015, we partnered with Impactt, a leading Ethical Trade consultancy

(www.impacttlimited.com), to design and develop a capacity training programme, focusing on the following key areas:



The programme aims to inform factories of common root causes that could lead to issues such as inefficient systems for social security insurance, excessive overtime working hours in peak seasons, how to balance fair compensation and factory productivity for piece-rate workers. All training material was designed and conducted in local language by Impactt's expert training team, supported by the Debenhams Ethical Trade team.

39 suppliers participated in our initial phase. At the end of each training session, the participants were required to design realistic and practical solutions based on their individual factory issues with the aim to resolve the non-compliance identified from their previous audits. At the end of the agreed remediation timeframe, Impactt conducted verification of each committed action with the individual factory participants.

At the end of the pilot programme our factories had developed 672 improvement actions with 70% or 471 actions now completed or in progress. We further identified additional areas for improvement including training policy, workers' involvement, topics such as anti-bribery and antislavery. Due to the success of the initial phase it has been developed further to include a total of 7 major retailers and brands, increasing the scope across China.

There are now 140 factories in Guangzhou, Hangzhou and Fujian regions, enrolled in the expanded programme.

In July 2017, 78 factories had completed the first training module on health and safety in Guangzhou and Hangzhou, they expressed different challenges during the training which included:

- Electrical safety
- Fire safety training, including use of equipment and the importance of clear exit routes
- Safe Chemical storage

ACCORD

Following the tragic Rana Plaza building collapse in 2013, the Accord was set up as an independent agreement between brands and trade unions designed to work towards a safe and healthy Bangladeshi Ready-Made Garment (RMG) Industry.

Debenhams remain a signatory to the ACCORD and have continued this commitment by signing the new ACCORD 2018 agreement.

We continue to support our supplier partners and factories to ensure the remediation from the ACCORD inspections is being completed to ensure worker safety. On a continual basis our Dhaka compliance team visit factories, monitor progress and we attend joint collaborative retailer meetings in Dhaka, UK and ACCORD EU headquarters.

For further information please go to www.bangladeshaccord.org

All Debenhams Bangladeshi factories have been inspected under the ACCORD

Fast Forward

The Fast Forward Programme is an industry initiative focusing on human rights risks in supply chains, with retailers working collaboratively to tackle labour exploitation and build a sustainable UK manufacturing base.

The Modern Slavery Act came into effect in 2015, which required businesses to declare actions taken to make their supply chain fully transparent. In 2015, Debenhams became a founder member of Fast Forward, currently there are 9 Retail members and brands in the programme.

The Fast Forward assessment, approach and methodology has proven to delve appropriately into business management systems and labour laws to identify poor working conditions, which the majority of standard audit methodologies did not previously identify. The in-depth audit assessments cover key areas such as right to work documentation, national minimum wage, contracts of employment, tax, mistreatment and health & safety in line with the UK labour law requirements.

We have 20 UK factories in the Apparel, Food and Furniture sectors. All the facilities have been audited under the Fast Forward programme, impacting more than 4000 workers in our supply chain. This assessment replaces the industry standard SMETA audit for our UK supply base, however we continue to use the SMETA audit methodology globally.

20 100%

No of UK factories we Å Fast Forward audited source from

Some of the non-compliances found through these audits are:

• Right to work documentation checks were not in place at the factory

- Employment contracts do not state the National Minimum Wage
- Factories cannot demonstrate that it collects the National Insurance numbers
- Agency workers in the factories are not aware of their legal rights which include documented copy of signed contracts, illegal payment deductions, minimum wage calculations etc.

Following the audit, we work with our suppliers and factories to complete a remediation programme with agreed timelines. The Fast Forward programme is being introduced across our business to other categories such as Goods Not for Resale (GNFR) and Service Providers. All of our UK manufacturers have gone through a one day Fast Forward workshop and training to understand the requirements of the programme. Being a member of Fast Forward allows us to build honest and open dialogue with our UK factories and creating long term sustainable partnerships.