

MODERN SLAVERY ACT 2015

INTRODUCTION

The Modern Slavery Act 2015 (**'the MSA'** or **'the Act'**) requires UK companies to promote ethical business practices and policies to protect workers from abuse and/or exploitation by their organisation and global supply chains. The Act specifically requires all businesses with annual revenues of over £36million to publish a transparency statement setting out the steps taken to ensure there is no modern slavery in their own business and their supply chains.

In October 2017, the Home Office published further guidance 'Transparency in Supply Chains etc., A Practical Guide' (**'the Guidance'**), under Section 54(9) of the Act, which provides further clarification of how companies are expected to comply with the Act, and also reaffirms the importance of an effective response from UK businesses to the threats and risks posed by modern slavery.

Frasers Group plc (**Frasers Group**), which is the Group's qualifying entity for these purposes, published its first transparency statement with the Act in September 2016. This statement is the Group's fourth iteration, and the third since publication of the guidance.

This Statement has been delayed due to the Coronavirus pandemic and this has meant that the Group has been forced to focus on other aspects of the business. However, during this time the Group has continued our activities in identifying, monitoring and addressing risks of modern slavery in our operations and supply chains. The ongoing pandemic has meant that focusing on the health and safety of their workers has heightened in importance, and we are supporting both workers and suppliers during this difficult time, whilst also looking into emerging risks created.

ABOUT FRASERS GROUP

Frasers Group plc is listed on the London Stock Exchange and is a member of the FTSE 250. The Group is one of Europe's largest sporting goods retailers and owns / operates a diversified portfolio of sports, fitness, fashion, lifestyle and gaming fascias and brands.

Each year the Group's approx. 30,000 people work together to serve our valued customers and collaborate with our global wholesale and licensing partners to promote the Group's brands.

The Group operates through five strategic business segments:

- UK Sports Retail;
- European Sports Retail;
- Rest of World Retail; - Premium Lifestyle; and
- Wholesale & Licensing.

As part of our publicised elevation strategy, we continue to enhance our store portfolio (which operates out of over 1,000 plus stores).

This statement applies to all of the subsidiaries of the company

which can be found at(<https://www.sportsdirectplc.com/~media/Files/S/Sports-Direct/annualreport/Annual%20Report%20%20Final%20-%2011092020.pdf>) with an annual turnover in excess of £36m per year and which carry on business in the UK.

Our supply chains include household name international brands, staff agencies, buying agents, shipping partners and licensees in the UK and elsewhere.

OUR POLICIES ON MODERN SLAVERY AND HUMAN TRAFFICKING

We have a zero tolerance approach to modern slavery and human trafficking and we are committed to eradicating modern slavery and human trafficking (including child labour) occurring in our business.

We take all reasonable steps to effect necessary change in our supply chains, acknowledging that it is an on-going challenge to ensure consistent visibility and enforcement of policies which virtually all businesses dealing in consumer goods are facing.

We are committed to acting ethically and with integrity in our business relationships and to implementing and enforcing effective systems and controls aimed at reducing the risk that modern slavery or human trafficking is taking place anywhere in our business or supply chains.

DUE DILIGENCE PROCESSES IN 2019/2020 FOR MODERN SLAVERY AND HUMAN TRAFFICKING WITHIN THE GROUP

As part of our overall drive to identify and mitigate the risk of modern slavery and human trafficking, we conduct an annual assessment of our operations in order to:

- Highlight and address potential risk areas in our business and supply chains, including through contractual provisions.
- Monitor potential risk areas in our supply chains, including through audits.
- Notify and work with relevant authorities when any instances are believed / suspected to have occurred. For example, we have supported the police in securing convictions in a number of publicly reported cases involving agency workers who had worked at our main warehouse. We obviously do not comment on live investigations out of respect for the relevant authorities' processes.

Since the well-publicised issues surrounding our Shirebrook distribution centre, we have had implemented a wide range of improvements including 'review and increase of number of first aid rooms, the provision of green waste bags to identify first aiders and fully equip them, and the establishment of 'Your Company, Your Voice', a system whereby staff are able to raise any issues of their choosing via a number of different routes'. We will continue to monitor our performance at Shirebrook closely to ensure the new working practices are fully embedded and audited.

ACROSS OUR WIDER SUPPLY CHAIN

We have continued to engage with our suppliers to ensure that as far as is reasonably possible all those in our supply chains and contractors comply with our values.

A large proportion of our supply chain comes via major third party brand suppliers with equally mature and publicised transparency statements in relation to modern slavery and human trafficking risks, which we monitor and discuss with them.

We have a long standing relationship with our two largest supply chain companies, both of whom we have worked with extensively for over 12 years now. This model is an important component of our approach (preceding the MSA and the Guidance) which affords us the opportunity to influence our supply chains directly and more effectively.

We have met with new suppliers/suppliers introduced through acquisitions and have ensured they are aware of our policies, procedures, training and verification requirements.

We have the right to audit/review the performance of a large number of our suppliers.

We consider our progress with our suppliers has improved our overall capabilities in relation to addressing modern slavery and help to ensure that our supply chains are compliant with the provisions and underlying principles of the MSA, the Guidance and importantly, the core values of our business.

TRAINING

In an effort to ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide relevant on-going training to our staff.

In addition, we have sought to open up the discussion about modern slavery amongst our workforce, for example, by displaying modern slavery posters around our relevant premises. We have also held forums to allow staff to volunteer information regarding potential modern slavery incidents or concerns.

We continue to encourage our supply chains to provide equivalent relevant training to their staff and their suppliers.

FUTURE COMMITMENTS

1. To maintain the Group's zero tolerance approach to modern slavery and human trafficking;
2. To continue to build awareness of modern slavery risk and mitigation measures through the staff training already offered;
3. To further strengthen the Group's monitoring and assurance processes;
4. To engage with more of our suppliers to seek confirmation of adherence to our requirements with specific focus on suppliers listed as high risk on the Global Slavery Index (<http://globalslaveryindex.org>); and
5. To further strengthen and enforce our mitigation procedures and policies for modern slavery related risks.

A nominated contact for the Group has been registered on the Home Office's Modern Slavery Contact Database.

OUR ASSESSMENT OF MODERN SLAVERY RISK

The Board of Frasers Group are mindful of the ongoing risks, impacts and costs of global slavery and human trafficking. We are committed to conducting our operations with honesty and integrity, and with respect for human rights and the interests of our employees and shareholders. We fully support both the original principles of the MSA and the Guidance published in October 2017. The Group actively maintains a zero tolerance approach to slavery and trafficking in all its forms, in any part of its business or supply chain, continuing to apply the UN Guiding Principles on Business and Human Rights and core labour standards set out by the International Labour Organisation.

The Board oversees our approach to addressing modern slavery through our governance and risk frameworks. The Board is kept informed of any material issues or developments in this area and has approved this Transparency Statement.

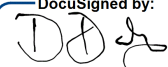
As outlined above, we have continued to review and assess the risk of modern slavery in our business and supply chains, taking into account the Guidance, and we have specifically assessed the changes to our operations in the year as a result of acquisitions. Based on this, we are satisfied that Frasers Group, its operations and supply chain are materially 'low risk' in terms of actual instances of, and the potential for slavery or trafficking.

SECTION 54(1)

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's modern slavery and human trafficking statement for the financial year ending 26 April 2020.

This statement has been approved by the Board on 31st July 2020.

As part of the Group's commitment to transparency, this statement will also be published on [TISCreport.org](https://www.tiscreport.org) and [modernslaveryregistry.org](https://www.modernslaveryregistry.org).

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David Daly

Chairman

Frasers Group Plc

Date: 31st July 2020