

Superdry's Approach to Human Rights

Superdry's approach to human rights is based on the UN Guiding Principles on Business and Human Rights, and the recognition that while states have a duty to protect human rights, companies have a responsibility to respect them and where there are breaches, to remedy.

We continue to risk assess on a country level to identify our Material Human Rights impacts – identifying Geographic Hotspots and identifying appropriate due diligence and remedy mechanisms to address them. The below are listed as material human rights impacts due to their severity in impact.

For each of the issues listed below, further due diligence is in place (beyond ethical audits) and where evidence is provided in the form of whistleblowing, calls with local partners (NGOs, Auditor) or increased risk indication we will utilise offsite and unannounced investigations to understand the issue further. Results from the investigation and remedial actions are overseen by the Head of Sustainability who in turn reports risk and progress in line with Exec, Board and Audit Committee reporting. Remediation is managed locally with oversight from the Head of Sustainability and relevant escalation routes to it is effective and sustainable.

We will terminate business with any factories that fails to co-operate in investigation or remedy of any of the below issues.

ISSUE	ILO CONV.	DEFINITION	POLICY	APPLICATION – HUMAN RIGHTS PRINCIPLES
FORCED LABOUR/ MODERN SLAVERY	29, 105, 97	<p>The recruitment, movement, harbouring or receiving of children, women, or men using force, coercion, abuse of vulnerability, deception, or other means for the purpose of exploitation.</p> <p>Particularly vulnerable situation appears for migrant workers, often recruited through labour agencies either from abroad or interstate.</p> <p>Indicators of exploitation among migrants vary, but can include unreasonable fees leading to debt bondage, physical and sexual violence, threats against employees</p>	<p>Modern Slavery Policy</p> <p>Migrant Worker Policy.</p> <p>Code of Practice</p>	<p>Critical/zero tolerance issue which requires immediate action, if identified all orders are held until remedy is established.</p> <p>Migrant worker assessment is conducted in any workforce reliant on a high percentage of international migrant labour.</p>

		and their families, wage withholding, restrictions in freedom of movement, and retention of personal documents.		
DISCRIMINATION, VIOLENCE AND HARASSMENT	100,111, 159	<p>Unfair or humiliating treatment on the grounds of gender, sexual orientation, race, colour, age, pregnancy, marital or social status, religion, political opinion, nationality, ethnic origin, disease, or disability.</p> <p>“Gender-based violence (GBV) and harassment” means violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.</p>	Code of Practice	<p>Critical/zero tolerance issue which requires immediate action, if identified all orders are held until remedy is established.</p> <p>Our ambition is for 100% of our factories to be proactively engaged in gender/worker empowerment practices by 2030. We initially started in proactive training following Sisters for Change report (2016) on Eliminating Violence Against Women at Work.</p> <p>Factories enrolled in “Respect” required to access worker hotline/strengthened complaints process.</p>
CHILD LABOR / YOUNG WORKERS	138, 182, United Nations Convention on the Rights of the Child, The Children’s Rights and Business Principles ILO Convention 138, Article 3	<p>Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.</p> <p>Work that is mentally, physically, socially, or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.</p> <p>The minimum age for admission to any type of employment or work which by its nature or the</p>	Code of Practice Child Labour Principles	<p>Child Labour is a critical/zero tolerance issue which requires immediate action, if identified all orders are held until remedy is established.</p> <p>If legally allowed workers over the legal age of work and under 18 years old can work, ineffective protections jeopardising their Health and Safety is classified as a severe issue requiring urgent remedy.</p> <p>If identified, remedy is established in line with our Child Labour principles.</p>

		circumstances in which it is carried out is likely to jeopardize the health and safety of young persons shall not be less than 18 years.		
FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING	87, 98, 135, 154.	A person's right to join, and/or form, organizations of his/her own choosing and to bargain collectively	Code of Practice	<p>If identified this issue is classified as critical/severe which requires immediate action and continuous improvement to support remedy.</p> <p>We are actively tracking this through our supply chain and working with factories to enable constructive worker management dialogue.</p>
FAIR LIVING WAGE, SOCIAL SECURITY, WORKING HOURS	95,131 122, 158 and 175 001, 014, 106 and 030	<p>Living wage: A wage level covering workers' and their families' basic needs and provides some discretionary income.</p> <p>Social security: Predictable and recognized employment is a pre-condition to get access to health care and income security, particularly in cases of old age, unemployment, sickness, invalidity, work injury, maternity, or loss of a main income earner. Precarious and self-employment might reduce access to social security.</p> <p>Working hours: Comply with national law, ILO Conventions, or collective agreement, whichever affords the greater protection of the worker. Connected to the workers right to health and family life, as well secured income.</p>	Code of Practice Living Wage Policy	<p>If identified this issue is classified as critical/severe which requires immediate action and continuous improvement to support remedy. This covers non-payment of Social Insurance, excessive working hours and non-payment of legal wage.</p> <p>Any factory with the same issue raised consistently is enrolled on our improvement plan – and is engaged in monthly visits and training established with local experts.</p> <p>In China we have established a contract with Shenzhen Tongtu Consulting Ltd to supply additional support to suppliers in monitoring and enabling implementation of social insurance coverage in key factories.</p>
HEALTH & SAFETY	155, 183	Health, safety and wellbeing of employees, workers, and customers across the value chain, such as working conditions, store safety, product safety, chemical safety.	Code of Practice H&S Policy	<p>If identified this issue is classified as critical if where immediate risk is identified, where there is significant risk of harm. Immediate</p>

			<p>COVID Response</p>	<p>action is required to address the risk and orders are held should factories fail to cooperate. Continuous improvement is then monitored to ensure sustainable systems are established to prevent future risk.</p> <p>During COVID we supplied additional training modules to suppliers covering updates to risk assessments and measures to enable social distancing in factories. These training materials with developed in Turkey in partnership with local organisation, SORFOs, with key aspects rolled out globally. Remote monitoring through self-assessment and desktop review to validate implementation.</p>
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