

## Superdry's Approach to Human Rights

Version 2.0 Updated March 2022

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 ensure 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.

SALIENT ISSUE	ILO CONV.	SUSTAINABLE DEVELOPMENT GOAL ALIGNMENT	DEFINITION	POLICY	APPLICATION
FORCED LABOUR/ MODERN SLAVERY	29, 105, 97	8	<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>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> <p><i>Domestic migration -</i></p>

			Indicators of exploitation among migrants vary, but can include unreasonable fees leading to debt bondage, physical and sexual violence, threats against employees and their families, wage withholding, restrictions in freedom of movement, and retention of personal documents.		<p>The full traceability of raw materials is of prime focus to the brand, as we recognise that the visibility reduces as we move down the supply chain and due to the high seasonal nature of cotton’s harvest, it is reliant on an influx of migrant labour every year. As such, we have several regions which we will not source cotton from, due to increased modern slavery risk, while focusing on increasing the traceability and investing in organic cotton farmers to ensure this risk is effectively managed – in 2022, 40% of our total cotton footprint will be sourced directly from farm.</p> <p><i>International migration -</i></p> <p>Turkey is a hotspot for this risk, due to high levels of migration from neighbouring countries – our local labour standards experts continue to monitor this very closely.</p>
DISCRIMINATION, VIOLENCE AND HARASSMENT	100,111, 159	4, 5, 8, 10	<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 (our “Respect Programme”). We initially started in proactive training following Sisters for Change report (2016) on <a href="#">Eliminating Violence Against Women at Work</a>. The programme has focused on India thus far due to the increased risk in this territory, reaching 37% of workers in our Indian supply base.</p> <p>Factories enrolled in “Respect” are required to access worker hotline/strengthened complaints process and receive training on the prevention of workplace and</p>

					sexual harassment. This programme has been extended to Turkey in January 2022, covering 5% of workers in this region.
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	4	<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 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.</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 <a href="#">Child Labour principles</a>.</p>
FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING	87, 98, 135, 154.	8, 10	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> <p>A key component of the Respect Programme focuses on ensuring that committee structures are in place to best represent workers, supported by effective</p>

					grievance mechanisms which enable all workers to raise their voices.
FAIR LIVING WAGE, SOCIAL SECURITY, WORKING HOURS	95,131 122, 158 and 175 001, 014, 106 and 030	8, 10	<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 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 Intensive Care Process – and is engaged in monthly visits and training established with local experts.</p> <p>Common industry practice sees low levels of social insurance coverage in China due to high levels of domestic migration and concerns from workers around access to funds. We have established a contract with Shenzhen Tongtu Consulting Ltd to supply additional support to suppliers in training, monitoring and enabling implementation of social insurance coverage in key factories. This, combined with targeted improvement across all factories, has enabled a 23% uplift in coverage of the 5 types of social insurance across our Chinese supply base (FY21).</p>
HEALTH & SAFETY	155, 183	3	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 COVID-19 Response	<p>If identified this issue is classified as critical where immediate risk to life or limb is identified, where there is significant risk of harm. Immediate action is required to address the risk and orders are held should factories fail to remedy. Continuous improvement is then monitored to ensure sustainable systems are established to prevent future risk and to remedy ongoing non-critical risks.</p> <p>During COVID-19 we supplied additional training modules to suppliers covering updates to risk</p>

					assessments and measures to enable social distancing in factories. These training materials were developed in Turkey in partnership with local organisation, SORFOs, with key aspects rolled out globally. Remote monitoring is completed during lockdown periods through self-assessment and desktop review to validate implementation.
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