

Migrant and Contract Worker Policy

Version 5.0 Updated November 2024

Introduction

Where Migrants and Contract workers are employed within our supply chains, Superdry acknowledges our shared responsibility with our Suppliers to ensure that they are adequately protected.

This Policy & Guidance has been developed with direct reference to the [Dhaka Principles](#) of equal treatment, no discrimination and that all workers enjoy the protection of employment law.

This document is intended to help Superdry and our Suppliers to:

1. Safeguard the rights and welfare of Migrant and Contract Workers in our supply chains;
2. Manage the risks and responsibilities associated with the indirect employment of migrant and non-migrant Workers; and
3. Formalise our commitment to the Human Rights for these groups of workers – in line with our Code of Practice and Modern Slavery Policy.

Why we a Specific Policy & Guidance for Migrant Workers

As of March 2024, 13% of the workers operating in our Tier 1 supply chain are domestic or international migrant workers.

The employment of Migrant Workers is important in our global supply chain as people seek better opportunities to provide for their families and futures. We often identify Migrant Labour in supply chains where local labour availability is declining, or where there are well-established and well used immigration routes.

The routes used to recruit Migrant Worker can be complicated, Migrant Labour is recruited by factories (directly) or through agencies (indirectly) linking factories to home countries or territories. Once they arrive in their destination country/territory they may again be employed directly by factories or indirectly as Contract Labour, working for Labour Providers.

Migrant Workers are vulnerable to several risks which could lead to inferior employment terms, harsh treatment, discrimination and unsuitable accommodation.

1. Impaired training (including essential safety training) due to lack of fluency in local language;
2. Lack of awareness of rights and entitlements in their destination country;
3. Lack of access to services and entitlements (welfare/health) in their destination country;
4. Being bonded to their job through repayment of fees to recruitment agencies or employers;
5. Exploitation due to lack of full legal employment status;

Why we a Specific Policy & Guidance for Contract Workers

Contract Workers are vulnerable to several risks associated with working for an alternative employer within a workplace which could lead to inferior employment terms, a lack of welfare support and discrimination within the workplace.

Definitions

1. **Migrant Worker:** A person who migrates from one territory or country to another in order to seek employment.
2. **Contract worker:** Any worker who either utilises a third party to obtain work, or who is employed by a labour provider/employment agency, rather than being employed directly by the factory. This definition includes any worker that is contracted through a third party as part of any local or national skills development programme.
3. **Destination Country/Territory:** The country/territory where the Migrant Worker will work.
4. **Source Country/Territory:** The home country, territory or region from which the Worker has migrated.
5. **Worker:** Anyone who is doing work for an Employer, either directly, through a Labour Provider or through a third party.
6. **Direct employment:** An arrangement where a Worker is employed directly by the Supplier.
7. **Indirect employment:** An arrangement where a Worker continues to be employed or managed by an agency or Labour Provider while they are working for the Supplier.
8. **Employer:** An Employer is a legal entity that provides any form of (permanent, casual, full or part time) work in return for remuneration and that controls/directs Workers at the workplace. Labour Provider - an organisation that employs or manages Workers on behalf of a Supplier.
9. **Recruitment Agency:** An organisation that arranges work for Workers in return for a fee.
10. **Supplier:** An organisation that manufactures or procures goods or services.

Migrant and Contract Worker Policy

1. Responsibilities

Superdry is responsible for:

1. Ensuring our Migrant and Contract Worker Policy is up to date, reflects best practice and is effectively communicated to our Suppliers. Where migrant workers are identified in a factory, Superdry will include factory owned or third party owned accommodation within scope of our pre-approval or approved factory auditing scope – to ensure conditions align with standards defined in our migrant worker guidance document.
2. Supporting and working with Suppliers who have genuine difficulty in meeting this policy, are open and committed to continuous improvement.
3. Fulfilling our legal responsibilities under the UK Modern Slavery Act 2015, this may include reporting criminal activity to applicable law enforcement agencies.

Our Suppliers are responsible for:

1. Communicating this policy to manufacturers making Superdry product and ensuring that Migrant and Contract Workers are employed in line with the principles of this Policy.
2. Informing Superdry of the use of all Migrant or Contract Workers, the conditions under which they are employed and any circumstances where this policy is not being met;
3. Carrying out sufficient and effective due diligence on all manufacturing sites under their ownership or control, as well as owned or third-party accommodation associated with those manufacturing sites.
4. Escalating any offences under the UK Modern Slavery Act 2015. A failure to report offences, or a strong suspicion of an offence, could lead to termination of business with Superdry.

2. Principles

1. There must be zero tolerance of exploitation, forced or compulsory labour through all levels of the Supply Chain.
2. All workers must have the freedom to individually leave employment with reasonable notice.
3. Migrant workers must have a legal right to work in the destination country.
4. Employers are accountable for only using recruitment agencies that are legally recognised, reputable, and responsible.
5. All workers must have clear and transparent contracts available in their native language to ensure they are aware of terms of employment.
6. Migrant and Contract workers must not be bonded using mechanisms or schemes including rehabilitation, apprenticeship programmes, loans or fees to obtain work. Any such loans or fees associated with recruitment or transportation of workers must be borne by the employer.
7. The responsibility for training Migrant and Contract Workers must be well-defined. Training must be adequate and in a language that is understood;
8. Working and living conditions must safeguard Migrant and Contract Workers' safety, dignity, welfare and rights.
9. Migrant and Contract Workers must be protected in cases where exploitation is suspected or identified - and remedy provided.

3. Supporting our Colleagues and Suppliers

We have put measures in place to educate our supplier facing colleagues on our responsibilities in this area and include this policy as a condition of business in our Supplier Manual.

We continue to complete Due Diligence in partnership with Suppliers and Third-Party specialists to ensure the principles of this policy are upheld.

4. **Where cases of exploitation of migrant or contract workers is suspected, the supplier/ employer must:-**

1. Protect the identity and welfare of vulnerable people, including the person or people who reported the case.
2. Inform Superdry as soon as possible.
3. Work with Superdry and necessary independent international agencies to investigate and document any outcomes. Seek professional help where an independent view is required or in complex or sensitive cases.
4. Provide suitable remedy to the impacted workers.

We will continue to support and work with Suppliers who have genuine difficulty in meeting this policy, are open and committed to continuous improvement.

We reserve the right to terminate business with any supplier that fails to report offences against The Modern Slavery Act (2015), or should we have a strong suspicion of an offence.

Ownership and Contact Details

This policy is owned by the Head of Sourcing, Ethical and Sustainability, overseen by the Chief Operating Officer and managed by the Ethical Sustainability Coordinator.

Please contact your local Ethical Trading Manager with any questions relating to the Implementation of this policy.

Superdry's Head Office Sustainability and Ethical Trading team is contactable through: - ethical.trading@superdry.com.