

# BOOHOO GROUP PLC (“BOOHOO”) SUBCONTRACTING POLICY

boohoo group (boohoo, boohooMAN, Pretty Little Thing, Nastygal, Misspap, Debenhams, Karen Millen, Coast, Oasis, Warehouse, Dorothy Perkins, Wallis, Burton)

## Definition of sub-contracting

- Subcontracting is the practice of assigning, engaging or outsourcing work to a company or third party outside of your company.
- It includes bringing in an outside company or party to perform a contract or certain parts of it
- Any subcontracting requires prior approval from Boohoo. Otherwise, the sub-contracting will be “unauthorised”. Please email **ethicalcompliance@boohoo.com** if you are aware of any new sub-contracting or sub-contracting which has not been disclosed to us.

## Responsibilities

- As a supplier, it is your responsibility to ensure all sub-contracting is declared in accordance with the boohoo production tier definition (see boohoo group modern slavery statement).
- Only sub-contracting that has been declared and approved can be used for any form of Boohoo production.
- You must ensure all sites that you are approved to sub-contract to adhere to Boohoo’s Code of Conduct (which you have been provided with).
- You must ensure strict processes are implemented to prevent unauthorised sub-contracting.

## Due diligence process

To ensure that all Boohoo suppliers (including factories) do not sub-contract to unapproved third parties, Boohoo shall:

- Perform unannounced production spot checks by Boohoo and a third party auditor, in all regions
- Complete regular capacity and compliance monitoring, including:

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- monitoring the capacities and number of purchase orders going to each supplier and factory; and
- maintaining an up-to-date supplier scorecard enabling Boohoo to review each supplier's order book and factory details at any time.

### **Consequences and correction plans**

- Where unauthorised subcontracting is found and proven, you and/or your unauthorised sub-contractor(s) may be suspended and/or responsibly disengaged

*This policy is to be read in conjunction with Boohoo's manufacturing tier definitions, which can be found in the ethical compliance and trade guidelines on the group supplier portal:*

- <https://supplier.boohoo.com/ethical-compliance-trade-supplier-guidelines/>

Other related support and guidance includes:

- New supplier and factory on boarding guidelines - <https://supplier.boohoo.com/supplier-onboarding-guidelines-handly-links-key-contacts/>
- Boohoo group Code of conduct - <https://supplier.boohoo.com/code-of-conduct-2/>
- Supplier terms & conditions - <https://supplier.boohoo.com/supplier-terms-and-conditions-of-purchase/>

If you have any questions, please contact us at  
**[ethicalcompliance@boohoo.com](mailto:ethicalcompliance@boohoo.com)**

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