BOOHOO GROUP PLC ("BOOHOO")

APPROACH TO RESPONSIBLE DISENGAGEMENT

Reason for responsible disengagement:

- Brand consolidation exercise
- Serious breach of the boohoo groups <u>code of conduct.</u> Zero tolerance violations:
 Child labour
 - Underpayment of national minimum wage
 - Health and safety critical risk to workers
 - Anv form of forced or bonded labour
 - Physical abuse
 - · Disciplining of workers
 - · Discrimination of any form
 - · Undeclared subcontracting

*If a zero tolerance violation is found within an undeclared subcontracting site boohoo group reserve the right to disengage the factory with immediate effect.

If any of the above are found within our supply chain, then the supplier/factory in question are placed on hold immediately and no new purchase orders can be raised.

The boohoo team will then conduct an investigation – this can take 1-4 weeks. The process of investigation is:

- Supplier/factory placed on hold and notified of the issue
- Boohoo ethical team create a report and share evidence, notes and images
 Boohoo meet with supplier/factory to discuss the issues and expectations for
- remediation
- Boohoo ethical team or third-party may conduct an audit at any stage during or after the investigation has been concluded
- Supplier will then share remediation/evidence (if any) for review

Once the investigation has concluded, the ethical compliance team will make a decision on next steps for the factory/supplier. The decision will be made based on the following factors:

- Nature of the ZTVWorker welfare
- Worker werrare
- Boohoo group reputation
 Constitution
- Supplier/factory engagement and transparency throughout the process

The key focus is remediation, however if remediation is not a viable option boohoo group reserve the right to responsibly disengage the supplier/factory.

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