

SUPPLIER CODE OF CONDUCT

Our supplier manual is made available to all suppliers at the contract stage and suppliers have ongoing access to the supplier manual via the supplier portal. The supplier manual is a comprehensive document which sets out the Debenhams Group's standards, codes and policies. These standards, codes and policies are based on the Ethical Trade Initiative (ETI) base code, which sets worldwide standards of labour practice.

The supplier manual also outlines our Code of Conduct, which advises suppliers that we have a responsibility to ensure that all goods sold by the boohoo group are produced in an ethical way.

Our supplier code of conduct sets out the principals that our stock suppliers are expected to adhere to.

EMPLOYMENT IS FREELY CHOSEN

- There is no forced, bonded or involuntary labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after agreed notice.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- Worker's representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

WORKING CONDITIONS ARE SAFE AND HYGIENIC

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

CHILD LABOUR SHALL NOT BE USED

- There shall be no recruitment of child labour.
- Companies shall develop or participate in and contribute to initiatives, policies and programmes which provide for the transition of children impacted by child labour to enable to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.

- These policies and procedures shall conform to the provisions of the relevant ILO standards.

LIVING WAGES ARE PAID

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

WORKING HOURS ARE NOT EXCESSIVE

- Working hours must comply with national laws, collective agreements,
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.
- The Debenhams Group strictly prohibits the use of zero hour contracts anywhere within our supply chain
- Working hours should be stated on the workers contract on initial start date, and should be signed by the worker as soon as they begin work.

- If any supplier/factory are found to be using zero hour contracts then this will be classed as a critical non-compliance.
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked individual workers and the workforce as a whole. It shall not be used to replace regular employment.
- The total hours worked in any seven-day period shall not exceed 60 hours except only in exceptional circumstances where all of the following are met;
 - This is allowed by national law.
 - This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
 - Appropriate safeguards are taken to protect the workers' health and safety and the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents, or emergencies.
- Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

NO HARSH OR INHUMANE TREATMENT IS ALLOWED

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

NO DISCRIMINATION IS PRACTISED

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

REGULAR EMPLOYMENT IS PROVIDED

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

SUPPLIERS MUST COMPLY WITH LOCAL LAWS

- The Debenhams Group expects its suppliers to be in full compliance with the laws and regulations of the countries in which they operate.
- The supplier will conduct itself with proper business integrity
- There shall be no improper advantage sought, including the payment of bribes, to secure delivery of goods or services to the Debenhams Group.

COMMUNICATION AND SUPERVISION

- Suppliers must cooperate with any representatives of the Debenhams Group (or third parties appointed by them) carrying out audits to monitor compliance with and observance of this code.
- Suppliers must provide these supervisors access to the necessary documentation and means to ensure this process.

ENVIROMENTAL PROTECTION

- We expect our suppliers to comply with all relevant laws and regulations regarding the protection and preservation of the environment.

SUBCONTRACTING & TRANSPARENCY

- Sub-contracting of any part of Debenhams Group production without the knowledge and approval of Boohoo Group will not be tolerated. Any factory used for Debenhams Group production must be approved prior to production starting – there must not be any sub-contracting to a non-approved site.