



**HUMAN TRAFFICKING AND  
MODERN SLAVERY STATEMENT**

*May 2023 - April 2024*



## *Introduction*

This is Oh Polly's third Modern Slavery Statement, covering May 2023 - April 2024, in line with Section 54 of the Modern Slavery Act 2015.

Modern slavery violates fundamental human rights and includes slavery, servitude, forced labour, and human trafficking.

At Oh Polly, we are committed to ethical conduct and integrity, maintaining a zero-tolerance approach to modern slavery. This statement outlines our commitment and actions to identify and prevent modern slavery within our business, including our organisation structure, supply chain, policies, due diligence, risk assessment, and plans for 2025.

## *Commitment*

Oh Polly acknowledges its responsibility to tackle modern slavery and commits to complying with the Modern Slavery Act 2015. We are dedicated to transparency in our business and supply chains, requiring ongoing review and improvement of our practices.

We do not engage with any organisation involved in slavery, servitude, or forced labour. We accept our responsibility to identify and eliminate any risks of modern slavery within our operations and supply chains.

*“Since our foundation, treating the workers in our supply chain fairly has been a core tenant of our organisation and always will be. Our objective is to not only avoid and condemn modern slavery practices but to try to offer living wages to those workers in the supply chain under our more direct control.”*

- Mike Branney, Managing Director.



## Organisational Structure

About Oh Polly

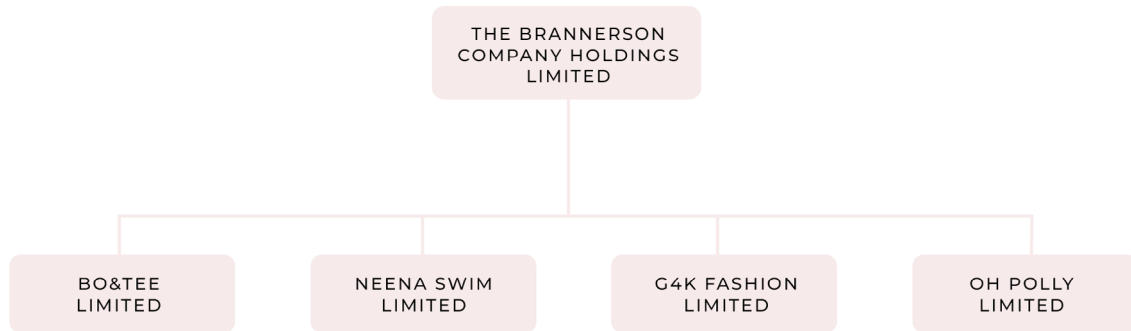


Image 1: Details our organisational structure

Oh Polly, part of The Brannerson Company Holdings Limited (including Bo and Tee and Neena Swim), is a global online retailer of women’s clothing.

Founded in 2015 by Michael Branney and Claire Henderson, we operate a social-first business model with offices in Glasgow, Liverpool, London, Los Angeles, Miami, and Manchester, employing 339 people. Our fulfilment centre is located in Liverpool.

Learn more about us [here](#) and our sustainability initiatives [here](#).

### OH POLLY’S STATISTICS FOR MAY 2023 - APRIL 2024



OPERATING IN **SEVEN COUNTRIES**



WORKING WITH **26 STOCK SUPPLIERS** FOR OH POLLY AND **43 STOCK SUPPLIERS** ACROSS THE OH POLLY GROUP



TURNOVER OH POLLY GROUP  
**£86,531.39 M**



EMPLOYING **339 WORKERS**



SERVING **951,852 CUSTOMERS**



**ONE FULFILMENT CENTRE**

Image 2: A summary of our key metrics for financial year 2024

## Our Supply Chain:

### Tracing Our Suppliers

We have traced 100% of our Tier 1 suppliers and 41% of our Tier 2 suppliers across all brands.

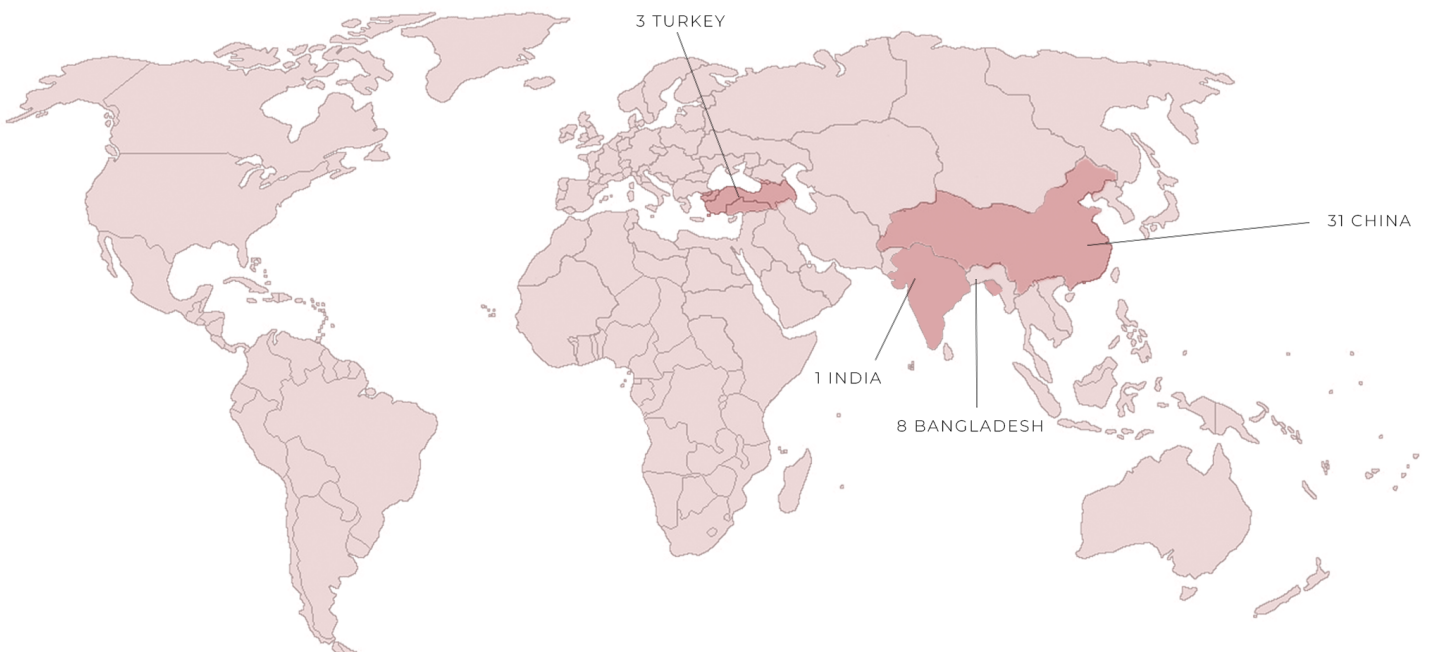
The different Tiers of suppliers and what they do:

<b>TIER 1</b>	Final stages: cutting, sewing and packing
<b>TIER 2</b>	Fabric suppliers & mills, hardware and trims
<b>TIER 3</b>	Raw material

### Tier 1 Suppliers

We define Tier 1 suppliers as those responsible for the final stages of production, including cutting, sewing, and packing. Across all our brands, we sourced from 43 Tier 1 suppliers located in Bangladesh, China, India, and Turkey.

#### TIER ONE SUPPLIERS



**Oh Polly Tier 1 Stock Suppliers - China, Bangladesh and India**

	FY2023	FY2024	DIFFERENCE
NUMBER OF COUNTRIES	4	3	DECREASED BY 1
NUMBER TIER 1 SUPPLIERS	25	26	INCREASED BY 1

**Oh Polly Group Tier 1 Stock Suppliers - China, Bangladesh, India and Turkey**

	FY2023	FY2024	DIFFERENCE
NUMBER OF COUNTRIES	5	4	DECREASED BY 1
NUMBER TIER 1 SUPPLIERS	31	43	INCREASED BY 12

**Our In-House Tier 1 Suppliers**

Our founders, Michael Branney and Claire Henderson, established two in-house factories in China and Bangladesh, which exclusively serve the Oh Polly Group. We have Oh Polly employees stationed at both facilities, ensuring close oversight of operations, strong supplier relationships, and effective business monitoring.

**Oh Polly Tier 1 FY24**

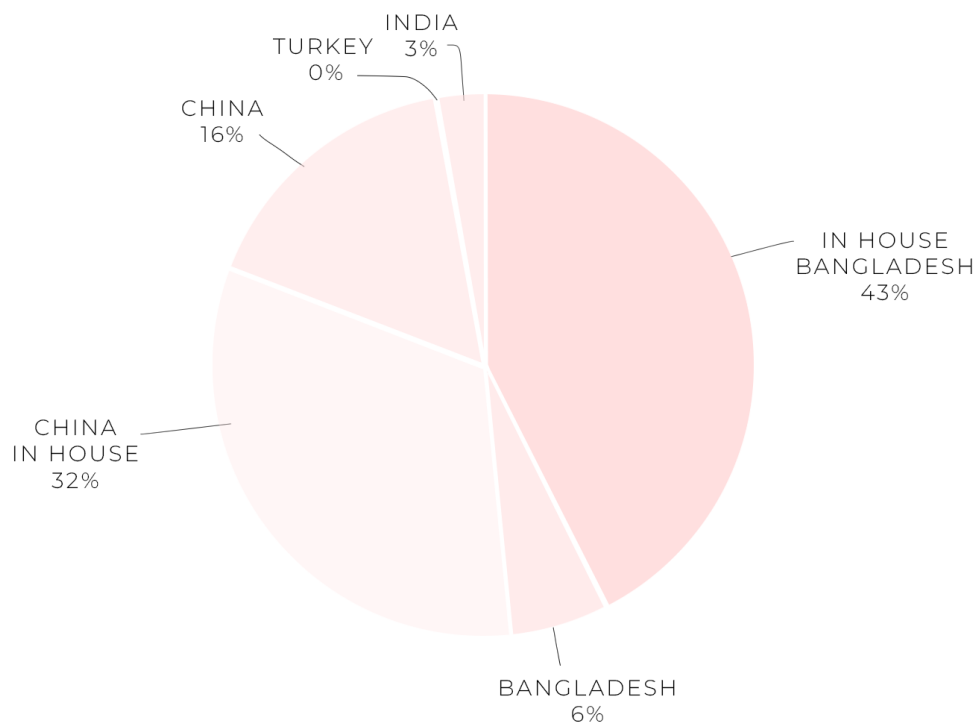
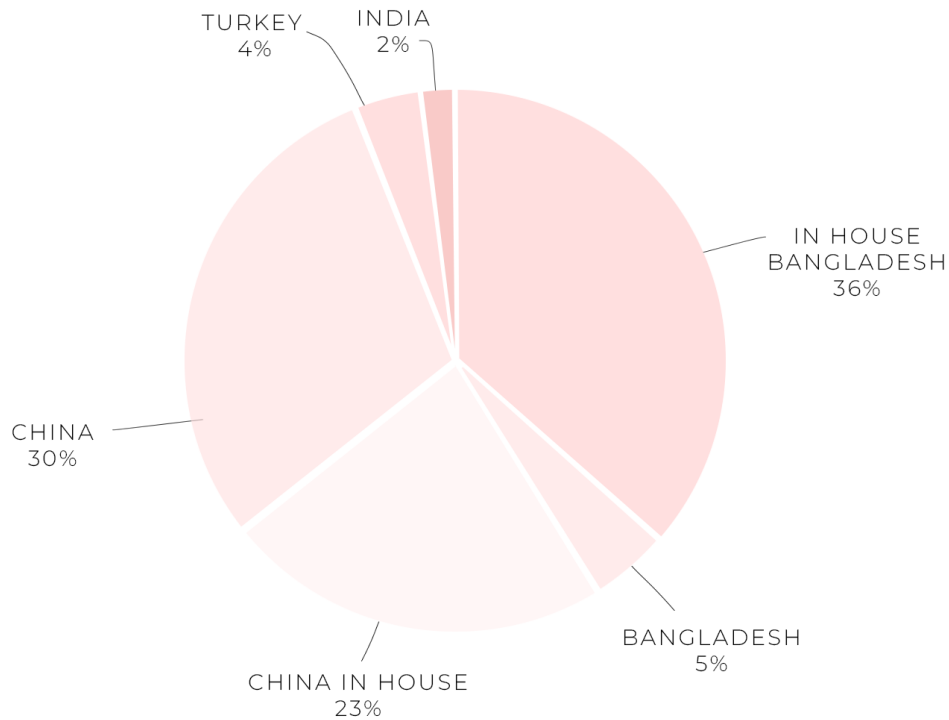


Figure 4: Split of Oh Polly's Tier 1 suppliers by units

75% of Oh Polly's stock (by units) was produced by our in-house suppliers, with the China factory providing 32% and the Bangladesh factory supplying 43% (figure 4). This split has increased by 15% from last year. To support our Bangladesh factory, we provide a 2% profit share annually.

### Oh Polly Group Tier 1 FY24



*Figure 5: Split of Oh Polly Group's Tier 1 suppliers by units*

Across all our brands, our in-house suppliers produced 59% of the units (figure 5), with a percentage increase of 9% compared to last year.

### External Suppliers

The remaining 25% of Oh Polly's stock (by units) comes from external suppliers in China, Bangladesh, Turkey and India. All external suppliers must comply with our Code of Conduct and Terms and Conditions. We establish direct partnerships with manufacturers to ensure transparency in working standards and quality control. Our local teams maintain a physical presence at all manufacturing facilities to ensure worker well-being (more on this in "Due Diligence and Risk Assessment, page 7).

External suppliers supply 41% of Oh Polly Group's stock (by units).

## Tier 2 Suppliers

We define Tier 2 suppliers as those responsible for producing the fabrics used in our products.

Last year, we committed to maintaining our Tier 2 tracing. We have successfully continued tracing our Tier 2 suppliers in Bangladesh, which makes up 41% of the Oh Polly Group.

We have started tracing our Tier 2 suppliers in China.

Oh Polly Group Products - Tier 2		
	FY2023	FY2024
NUMBER OF COUNTRIES	2	2
NUMBER OF TIER 2 SUPPLIERS	8	15

All supplier data has been pulled from our internal product software.

## Non-Stock Suppliers

Non-stock suppliers provide essential services like distribution, marketing, and office cleaning. Last year, we collaborated with 604 non-stock suppliers.

## Warehouse Agency Workers

Our fulfilment centre employs a mix of agency and permanent workers, adhering to the Agency Workers Regulations 2010. Agency workers receive the same pay and treatment as full-time employees and are offered permanent contracts after 12 weeks. Our workforce consists of 70% permanent employees and 30% agency workers.

## *Policies on Modern Slavery*

We shared our internal policies with our suppliers, encouraging them to implement these guidelines throughout their supply chains.

Our policies include:

- *Bribery, Gifts, and Hospitality Policy*
- *Grievance Policy and Procedure*
- *People Whistleblowing Policy*
- *Recruitment and Selection Policy*
- *Code of Conduct*
- *Environmental Policy*

Our policies have not been amended in the last year. You can find more details about them [here](#) [pages 6 and 7].

## *Due Diligence and Risk Assessment*

We are committed to our due diligence and risk assessment practices to combat modern slavery. We have implemented measures to prevent such practices and require all suppliers to comply with our Code of Conduct and Terms and Conditions of trade.

We have expanded our due diligence team within the Oh Polly Group, hiring new team members to focus and oversee our corporate social responsibility (CSR), alongside our current Sustainability and Production teams.

As mentioned previously (Tier 1 Suppliers, pages 4-6), we have local teams based at our in-house factories in Bangladesh and China. They are responsible for maintaining relationships with external suppliers, completing audits when visiting factories and keeping documentation up to date.

All team members are responsible for the following:

- *Reviewing country-specific risks.*
- *Identifying which parts of the business could be vulnerable to slavery and human trafficking.*
- *Understanding the facility's reputation within the industry.*
- *Ensuring the Code of Conduct and Terms and Conditions are not breached.*



## *Our Code of Conduct*

We are reviewing our Code of Conduct to include environmental considerations, which reflect evolving best practices and stakeholder expectations. Suppliers will be required to sign and adhere to the updated document, which condemns all forms of human trafficking, modern slavery, and forced labour.

The updated Code will focus on:

- *Child Labour*
- *Harassment or Abuse*
- *Non-discrimination*
- *Safe Working Environment and Health & Safety*
- *Freedom of Association and Collective Bargaining*
- *Wages and Benefits*
- *Hours of Work and Overtime*
- *Environment & Sustainability*
- *Chemical Management*
- *Business Ethics*
- *Reporting of Grievances*
- *Transparency*
- *How we will Monitor the Above*

Suppliers will be required to have themselves audited by a verified 3rd party organisation. Where an existing supplier is not meeting our minimum requirements we will support the supplier in developing an action plan with sensible timescales for improvements. Although, suppliers violating these terms face disciplinary actions, potentially leading to termination of their contracts.

Each supplier should have at least one member of staff who is responsible for managing ethical trade requirements centrally and ensure this person is known to Oh Polly. Regular training should be given to all senior staff within the facility in regards to Health and Safety practices and CSR initiatives.

You can read more about our current Code of Conduct [here](#) (page 8).

## Looking Back on the Past Year

Last year, we set ourselves some targets to work towards. See below our progress on these targets.

FY23	FY24
Look into publishing our factory list twice a year. This will eventually be located under [this page] on our website.	This is still under review. We have since merged “our supply chain” and “our people” pages together.
Continue our commitment to tracing the rest of our Tier 2 suppliers and beyond.	We have maintained our commitment in Bangladesh. More effort is needed to improve our tracing in China.
Ensure all staff have completed Modern Slavery training.	After review, we will be rolling out Modern Slavery training for high risk Oh Polly employees in FY25.

## Further Steps for FY2025

- Publish our updated Code of Conduct and refined due diligence process.
- Improve Tier 2 tracing in China and maintaining it in Bangladesh.
- Introduce mandatory Modern Slavery Training for high risk teams

This statement was approved by the Board of Directors; on behalf of Oh Polly

Signed by



**Michael Branney**

Position: **Managing Director**

Date signed: **14/08/2024**