



**SLAVERY & HUMAN
TRAFFICKING STATEMENT**

May 2022 - April 2023



This is Oh Polly's second Modern Slavery Statement, which represents the reporting period of May 2022 - April 2023. All statistics and data reference the same time period. This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015.

Modern slavery is a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Oh Polly have a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

This statement outlines our continuous commitment and actions in terms of identifying risk and the necessary steps to prevent modern slavery within our business. We will cover the areas of organisation structure and supply chain, policies, due diligence and risk assessment, as well as outline our action plan for 2024.

COMMITMENT

As a company, Oh Polly acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the Modern Slavery Act 2015. Oh Polly is committed to ensuring there is transparency within our business and in our approach to tackling modern slavery throughout our supply chains. This requires an ongoing review of both the internal practices in relation to its labour force and its supply chains.



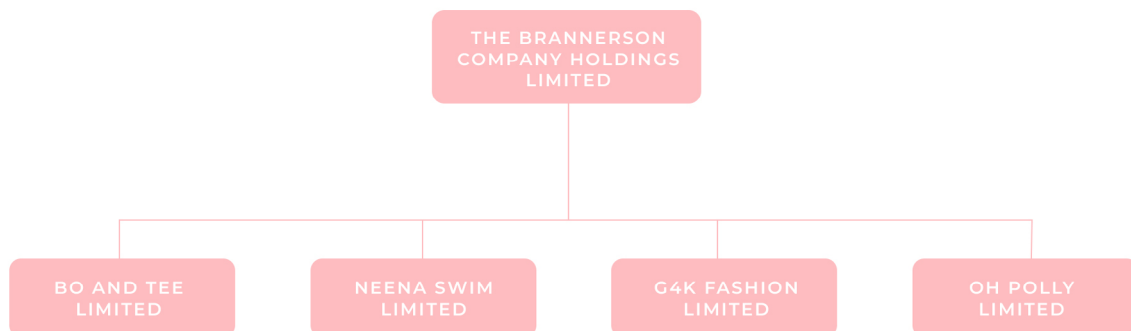
Oh Polly doesn't enter into business with any other organisation, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. Oh Polly accepts their responsibility to ensure any risks of modern slavery within its operations and supply chains are identified and abolished.

“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



Oh Polly is part of The Brannerson Company Holdings Limited, along with Bo and Tee and Neena Swim. Throughout this document, The Brannerson Company Holdings Limited brands will be referred to as the “Oh Polly Group”.

Oh Polly was founded in 2015 by Michael Branney and Claire Henderson, following a social-first business model and collaborating with influencers. It has become a global online retailer selling women's clothing since 2015, focused on delivering trend-driven, high-quality products.

Oh Polly's head office is based in Glasgow, with 3 additional offices in Liverpool, London and Los Angeles. In total, we employed **345 employees** directly across all **3 bases**. We operate **1 fulfilment centre** which is based in Liverpool and managed in-house.

The Oh Polly e-commerce website hosts the 2 additional Brannerson Company Holding Limited brands. Both Bo and Tee and Neena Swim also have dedicated e-commerce sites. All 3 apparel brands are in operation under the same facilities.

You can read more about us [here](#) and learn about our sustainability initiatives [here](#).

OH POLLY'S STATISTICS FOR FY23



OPERATING IN **SEVEN COUNTRIES**



WORKING WITH **25 STOCK SUPPLIERS** FOR OH POLLY AND **31 STOCK SUPPLIERS** ACROSS THE OH POLLY GROUP



TURNOVER OH POLLY GROUP **£113 M** (INCLUDING OH POLLY USA)



EMPLOYING **345 WORKERS**



SERVING **1,744,379 CUSTOMERS**



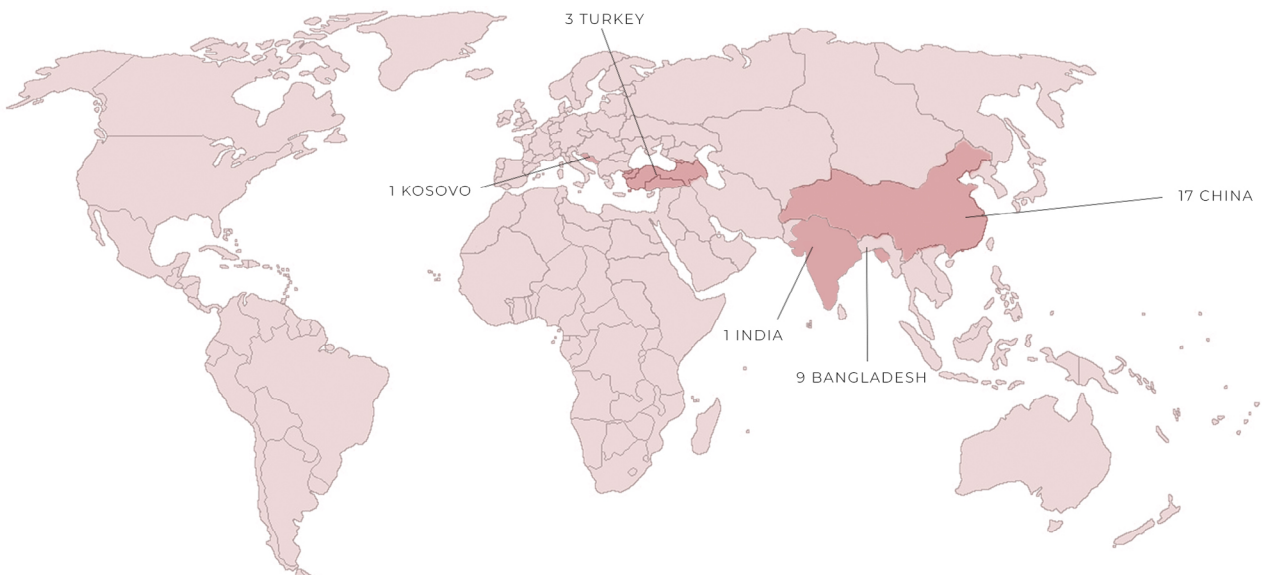
ONE FUFILMENT CENTRE

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.

TIER ONE SUPPLIERS



We define tier 1 suppliers as those who finish the products, which includes cutting, sewing and packing. For Oh Polly products specifically, we sourced from 25 stock suppliers, across four countries: Bangladesh, China, India and Kosovo.

OH POLLY'S PRODUCTS - TIER 1

	FY2022	FY2023	DIFFERENCE
NUMBER OF COUNTRIES	2	4	INCREASED BY 2
NUMBER TIER 1 SUPPLIERS	19	25	INCREASED BY 6

Across the Oh Polly Group, we sourced from 31 stock suppliers, across five countries: Bangladesh, China, India, Turkey and Kosovo.

OH POLLY GROUP PRODUCTS - TIER 1

	FY2022	FY2023	DIFFERENCE
NUMBER OF COUNTRIES	3	5	INCREASED BY 2
NUMBER TIER 1 SUPPLIERS	21	31	INCREASED BY 10

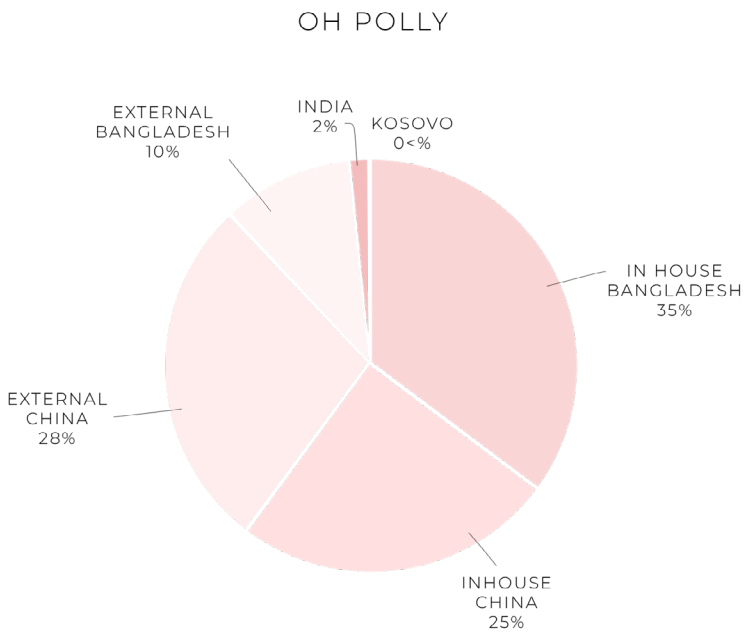


Figure 1: Split of Oh Polly's tier 1 suppliers by units.

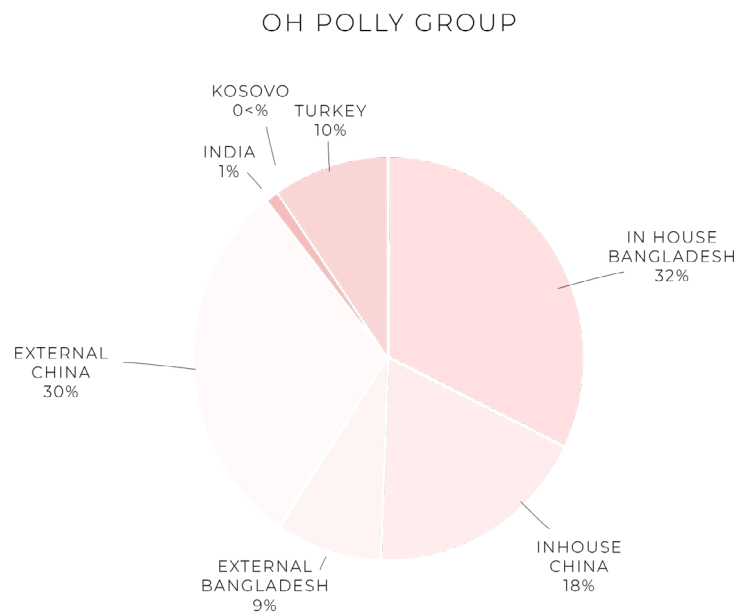


Figure 2: Split of the Oh Polly Group's tier 1 suppliers by units.

IN HOUSE SUPPLIERS

Our founders, Michael Branney and Claire Henderson established our two in-house factories in China and Bangladesh. These factories exclusively serve the Oh Polly Group. We have Oh Polly employees stationed at both facilities, enabling us to closely oversee and manage operations, nurture supplier relationships, and monitor our business effectively.

60% of Oh Polly's stock (by units) originated from our in-house suppliers. Our in-house China factory supplies 25% of Oh Polly's stock. Our Bangladesh factory supplies 35% of Oh Polly's stock [figure 1]. To help support them, we issue our Bangladesh factory a 2% profit share each year.

Our in-house suppliers supply 50% of Oh Polly Group's stock (by units) [figure 2].

EXTERNAL SUPPLIERS

The remaining 40% of Oh Polly's stock (by units) is sourced from our external suppliers in China, Bangladesh, India and Kosovo [figure 1]. All external suppliers are expected to comply with our Code of Conduct, and our Terms of Conditions. We establish direct partnerships with manufacturers to maintain transparency regarding working standards and quality control. We're able to maintain a physical presence in all of our manufacturing facilities to ensure the well-being of workers due to our local teams in each country.

External suppliers supply 50% of Oh Polly Groups stock (by units) [figure 2].

TIER TWO SUPPLIERS

We define tier 2 suppliers as those who create the fabrics. Our tier 1 suppliers purchase the fabric from our tier 2 suppliers.

We've been working to increase our supply chain transparency. We have successfully traced our tier 2 suppliers for all products produced in Bangladesh, which makes up around 55% of our tier 1 suppliers for Oh Polly products and 41% of our tier 1 suppliers for the Oh Polly Group.

OH POLLY PRODUCTS - TIER 2

	FY2023
NUMBER OF COUNTRIES	2
NUMBER TIER 2 SUPPLIERS	8

Work is ongoing to trace the remainder of tier 2 factories across our other production countries, whilst maintaining our commitment in Bangladesh.

All supplier data has been pulled from our internal PLM.

NON-STOCK SUPPLIERS

We define non-stock suppliers as goods not for sale. We worked with 639 non-stock suppliers. They provide us with services that are necessary to help the business run, which include but aren't limited to, distribution, marketing and office cleaning services.

WAREHOUSE AGENCY WORKERS

To support our UK operations, we employ a mixture of agency workers and permanent workers in our fulfilment centre. We comply with Agency Workers Regulations 2010 and all workers need to provide right-to-work documents.

Agency workers are paid and treated in line with full-time employees. After they pass 12 weeks we offer them a contract, to become permanent staff. On average our mix is 70% permanent workers and 30% agency workers.

OUR POLICIES ON MODERN SLAVERY

We have shared our various internal policies with our in-house suppliers in FY22, encouraging them to filter these guidelines through their own supply chains and among additional suppliers. Our aim is to have these policies serve as a reference for expected conduct. We remain committed to adhering to our existing policies, and you can find more details about them [here](#) [pages 6 and 7].

The policies we have in place are:

- *Bribery, gifts and hospitality policy*
- *Grievance policy and procedure*
- *People whistleblowing policy*
- *Recruitment and selection policy*
- *Code of conduct*

OUR CODE OF CONDUCT

This code explains the way that we behave as an organisation and what we expect our colleagues and suppliers to adhere to. Our Code of Conduct has been developed inline with the ETI base code.

- *Employment is freely chosen*
- *Freedom of association and the right to collective bargaining are respected*
- *Legal Minimum Wage is paid*
- *Working conditions are safe and hygienic*
- *Child labour is not used*
- *Working hours are not excessive*
- *No discrimination is practised*
- *Regular employment is provided*
- *No harsh or inhumane treatment is allowed*
- *Transparency and full access of production sites*

Our Code of Conduct highlights our no-tolerance policy to the following:

- *Dangerous working conditions*
- *Forced labour*
- *Child labour*
- *Bribery and corruption*
- *Access denied to property or records*
- *Unauthorised subcontract*

If any suppliers are found committing any of the above, in accordance with our Terms and Conditions, they are subject to disciplinary action, which could result in dismissal. We may terminate our relationship with other individuals and businesses working on our behalf if they breach this policy.

All employees, agency workers, volunteers, contractors, external consultants, third-party representatives and business partners must ensure that they have read, understand and comply with this policy and Code of Conduct.

DUE DILIGENCE AND RISK ASSESSMENT

SUPPLIER ONBOARDING

Similarly to our policies, we remain committed to adhering to our due diligence and risk assessment practices. We understand that our primary vulnerability to the threat of modern slavery lies within our supply chain, particularly in regions where safeguards against human rights violations may be insufficient. We have implemented measures to prevent these practices and have extended these requirements to all organisations that provide us with goods and/or services through our new goods not for sale onboarding portal.

As we have local teams based at our in-house factories in Bangladesh and China, they currently oversee the due diligence and risk assessment of suppliers. This includes the following:

- *Reviewing country-specific risks.*
- *Identifying which parts of the business could be vulnerable to slavery and human trafficking.*
- *Facility reputation within the industry*

When our local teams are happy with the supplier quality and social practices, the suppliers must sign our Code of Conduct and Terms and Conditions and then send it back to us.

Through our Terms and Conditions, we expect our suppliers to:

- *Maintain records of the Product as may be necessary to trace the supply chain of such Product*
- *Conduct Modern Slavery training and awareness sessions, with records of when training was offered and completed*
- *Inform Oh Polly if they believe any of their subcontractors have breached the Code of Conduct*
- *Understand that Oh Polly has the ability to audit suppliers and subcontractors to ensure compliance*
- *Responsible for remediation actions to address any issues of failures identified by an audit, within the timeframe specified*

Additionally, we encourage suppliers to complete an external audit on an annual basis.

LOOKING BACK ON THE PAST YEAR

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

FY22	FY23
Require all suppliers to be audited by verified third-party ethical on an annual basis	This is in their contract. Audits are shared with local teams and production teams. If an audit becomes out of date, the local teams will alert the supplier to update this, if they have not already done so themselves.
All staff are to complete a Modern Slavery and Human Trafficking training module	We are looking to improve our onboarding process, which will make it compulsory for all employees to complete modern slavery training. We plan to review this and are scoping out the possibilities of offering a specialised training session for employees working in high-risk countries or job roles defined by the Global Slavery Index.
Establish a robust Whistleblowing Policy for suppliers to adhere to. Oh Polly would provide support with the investigations and remediation	We have this set up for Oh Polly employees. Work is ongoing to find the best way to support suppliers with whistleblowing and remediation.
Develop an Ethical and Compliance team within Oh Polly to review, update and create policies. To also strengthen commitment to monitoring and compliance within the supply chain	The responsibility lies between our Production, People & Culture, Operations and Sustainability team.
Move to a new financing platform where we can onboard non-stock suppliers	This has been rolled out.
Expand the onboarding and pre-screening process for direct suppliers e.g. self-assessment questionnaires	Work on this has been ongoing when onboarding new suppliers.

FURTHER STEPS

- Look into publishing our factory list twice a year. This will eventually be located under [this page](#) on our website.
- Continue our commitment to tracing the rest of our tier 2 suppliers and beyond.
- Ensure all staff have completed Modern Slavery training.

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



Michael Branney

Signed by **Michael Branney**

Position: **Managing Director**