

Modern
Slavery &
Human
Trafficking
Policy
2021/22



PAVERS
YOUR PERFECT STYLE

JONES
B O O T M A K E R

WHAT IS MODERN SLAVERY?



We are pleased to share our fifth Modern Slavery and Human Trafficking statement detailing the progress we have made to date. We continue to apply a focus to this area, ensuring continual improvement and advancement on previous work.

Modern Slavery remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our businesses and in the wider supply chain. Our colleagues are expected to report concerns and our management team are expected to act upon them.

Many think of slavery as a relic of history, eradicated in the nineteenth century by the abolitionist movement. Unfortunately, slavery continues to flourish in the modern world. Modern Slavery refers to situations of exploitation that a person cannot refuse or leave, because of threats, violence, and coercion, abuse of power or deception. There is no room for Modern Slavery within our supply chain or our retail business in general.

We are committed to acting ethically and with integrity in all our business relationships and are taking steps to enforce effective systems and controls, to ensure that no Modern Slavery or Human Trafficking occurs anywhere in our supply chain in the UK or internationally.

Pavers Shoes is one of the UK's leading shoe retailers. Established in 1971 we remain family owned-and-run, and also own and operate the Jones Bootmaker and Herring Shoes brands. Headquartered in York, Pavers has grown significantly and now operates as a multi-channel retailer, selling its products via over 170 stores nationwide, website pavers.co.uk, mail order catalogues, together with exposure to major shopping channels. We have over 1,500 people in our ever-expanding family,

In 2021 we were voted one of the Top 10 Retailers in the country to work for (Best Companies), and in 2020 were recognised in the Sunday Times' Top Track 250, and also won Best Footwear Retailer (Multiple) at the Drapers Awards.

We are passionate about providing comfort and happiness to our customers, and we make sure to employ people who are as passionate as we are. We provide great jobs in a supportive family environment for our employees. We know that without our colleagues there is no business, and so the better we look after them, the better the service our customers receive. We endeavour to treat people with respect and in a way we would wish to be treated ourselves. Fairness is embedded into our DNA.

We strive for diversity of thinking across the business and believe strongly in supporting our local communities. The Pavers Foundation launched in 2018 was created to reflect the passion of the Paver family to help and improve lives across the UK and beyond, specific purpose of providing grants for causes important to all our colleagues in the areas of health, education, and community. With an initial donation from Pavers of £2.2m, together with additional funds donated from our Founders estate. Every year Pavers donates 2% of its net profits to the Foundation, together with monies collected from the plastic carrier bag levy. In terms of the environment, we are constantly seeking to reduce our impact. Since 2020 we have been fully carbon neutral, and we also have one of the largest solar arrays in the North-East of England on our warehouse generating clean energy. Our overarching aim is to be financially successful, but to achieve this in an environmentally and socially responsible manner.

40 million
people estimated to be trapped in
modern slavery worldwide
1 in 4
of them are children



← 71% Female

29% Male →



Our Policies

As part of our commitment to identify and mitigate risk, we build long standing relationships with our suppliers and make our expectations of acceptable business behaviour, clear.

By building these relationships, we are able to engage with our suppliers to ensure that they share our commitment and ethics. With the strength of our supplier relationships we are confident that our tier 1 suppliers maintain this same relationship with their tier 1 suppliers and so forth. Part of our COVID response involved carefully managing our decision making regarding cancellation of orders and extension of payment terms. We felt it imperative that we took the time to understand what wider impact our decisions would make on suppliers and their workforces.

Pavers have a zero tolerance approach to Modern Slavery and Human Trafficking and expect all those in our supply chain to take the same approach and to comply with our values, including any 3rd party brands who supply both our Pavers and Jones Bootmaker stores.

Any suppliers within our supply chain who are unable to comply with our code of conduct and Modern Slavery Policies and refuse to collaborate with us on implementing improvement strategies would have their contractual relationship terminated immediately.

Code of Conduct

Modern Slavery Policy

Anti Bribery Policy



Code of Conduct

Our Code of Conduct is based on the Ethical Trading Initiative (ETI) Base Code which can be fairly applied to all nations. This code is shared with all our current Tier 1 suppliers across our supply chain and with all our service providers, recruiters & distribution services.

We have made the ETI Base Code available to all agents and suppliers in a variety of languages to ensure it is accurately understood once translated. This is available via our new Supplier Handbook and supporting documents pack which has been issued to all active suppliers and agents throughout June of 2021. This will also be issued to new suppliers as part of the supplier onboarding process.

We ensure all employees have access to our policies via our Learn, Explore & Grow portal. On here, our key policies can be viewed as part of our mandatory induction process and remain available for anyone who needs to revisit at a later date for any reason.

Retail Trust continues to provide a support network for our employees to consult and provide them with guidance on their wellbeing. Retail Trust provides a further forum for educating our employees on Modern Slavery and raising its awareness.

Ethical Trading Initiative

Employee Binder

Retail Trust



Identifying Risk

We source our products from over 20 international countries, with a supplier base in excess of 180. We continue to put a focus on areas which are at highest risk of modern slavery, ensuring our factories located in these areas have completed our audit questionnaire. All of our suppliers, regardless of location, have received our new Supplier Handbook which includes our commitment to the ETI Base code and our most recent sign up to Sedex.

Our focus for 2021/22 is to continue to build on our previous assessments and develop a more robust audit mechanism for our suppliers, allowing more of an interactive and informative experience.

We continuously work with suppliers to ensure that expected standards are met, and actively identify areas of improvement with any suppliers who fall short of these expectations. We are aiming to develop and implement a scoring methodology which will allow us to further focus attention on areas in need of improvement within our supplier base. We collaborate with relevant industry partners and look to remedy any areas of concern through close communication and education.

We work alongside a network of agents who represent us in our primary sourcing areas. We instil our company values, policies and standards with our agents and they are expected to share these with suppliers who are based in their countries of origin. Our agents regularly visit factories to cascade our values, and feedback to the teams in head office. By acting as our representatives they ensure factories are complying to our Code of Conduct and new supplier handbook. For 2021/22 we plan to refresh our SLAs with our agents to align them with our new supplier handbook, to ensure the framework they work to continually delivers our ethical policies and high standards.

We have now developed and circulated a Procurement Policy, which has been shared across all key functions. This was previously recognised as a gap in our corporate policy documents. A centralised statement is now available to all key stakeholders that encompasses our desire for accountability, transparency and ethical practices to be used across the procurement function.

We ensure all our employees are aware of and abide by the Bribery Act 2010, with training focused on areas which have more exposure to this environment.

Planned for 2021/22...

Continuation of Supplier Audits in
high risk areas

Sharing Code of Conduct with
Recruiters and Labour Providers

E-learning courses for employees on
Modern Slavery, Human Trafficking &
Anti Bribery

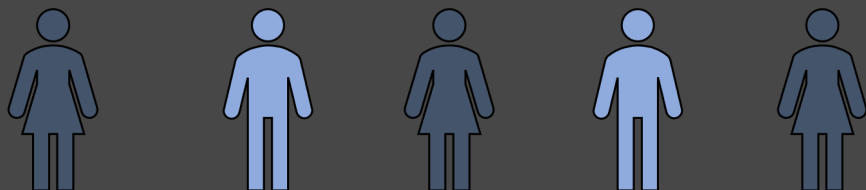


Due Diligence

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. We operate a transparent and open culture at all levels throughout our organisation and supply chain.

Our Senior Operating Group directly report to the board on business operations, governance & risk management. The SOG who meet on a monthly basis, operationally manage the business and discuss topics including Business Sustainability, Risk Identification & Modern Slavery. Through 2021 we plan to create a sub 'steering' group to provide greater focus on continually improving and embedding our policies and codes of conduct.

Members of the group represent functional areas across the business and take responsibility for ensuring the business operates within accordance of our corporate governance structure.



Senior Operating Group

Corporate Governance



Next Steps... 2021/22

Actions	To Start	On Going	Completed
Include Modern Slavery Policy as part of employee induction		✓	
Provide E-Learning 'Modern Slavery awareness' training to employees		✓	
Share our code of conduct with labour providers and recruiters		✓	
Continue with supplier audits in high risk geographic areas. Including development of new interactive communication tools.		✓	
Raise profile of the Bribery Act 2010 across the company.		✓	
Create a specific Ethical Procurement Policy	✓		
Development of Sub – Steering Group to focus on Modern Slavery and Ethical Trading Policies	✓		
Development of our On Boarding Pack for Suppliers – inclusion of our policies surrounding Modern Slavery			✓
Updating our Supplier Guidelines Pack			✓
Increase awareness of the Leather Working Group, and begin to include this as part of our sourcing requirements in key areas	✓		

We can confirm that the information contained in this report is accurate and has been approved by the board of directors.




Stuart Paver
Managing Director

Jason Paver
Managing Director

Pavers are committed to introducing KPIs to develop, educate and raise awareness of Modern Slavery and Human Trafficking across our end to end supply chain. Our focus for 2021/22 is completing the next step actions driven by the steering group.

Our focus continues to ensure we collaboratively engage with all touch points across the supply chain to instil our company virtues, values and principles.

