



**SLAVERY & HUMAN
TRAFFICKING STATMENT**

May 2021 - April 2022



This is Oh Polly's first Modern Slavery Statement, which represents the reporting period May 2021- April 2022. This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. Modern slavery is a worldwide issue which is found in many workplaces.

The National Crime Agency defines Modern Slavery as "the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation".

This statement outlines our actions in terms of identifying risk and taking necessary steps to preventing 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 outlining our action plan for 2023.

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 understands that 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.



ORGANISATIONAL STRUCTURE

About Oh Polly

Oh Polly was founded in 2015 by Michael Branney and Claire Henderson to support *The Brannerson Foundation*, a Scottish Charity which operates in Cambodia. The brand follows a social-first business model and often collaborates with social media influencers and celebrities alike. Oh Polly's parent company is the *Brannerson Holdings Company*.

Since 2015 Oh Polly has rapidly progressed into a leading global online retailer, selling women's clothing internationally. Oh Polly exists to provide trend-driven, high quality products across the globe.

Oh Polly's head office is based in Glasgow, with 3 additional offices in Liverpool, London and Los Angeles. In total, we employ 289 employees directly across all 3 bases. We operate 1 fulfilment centre which is based in Liverpool and managed in-house.

OH POLLY'S STATISTICS FOR MAY 2021 - APRIL 2022



OPERATING IN **FIVE COUNTRIES**



TURNOVER OF **£79M**



SERVING **1,007,629 CUSTOMERS**



WORKING WITH **21 STOCK SUPPLIERS**



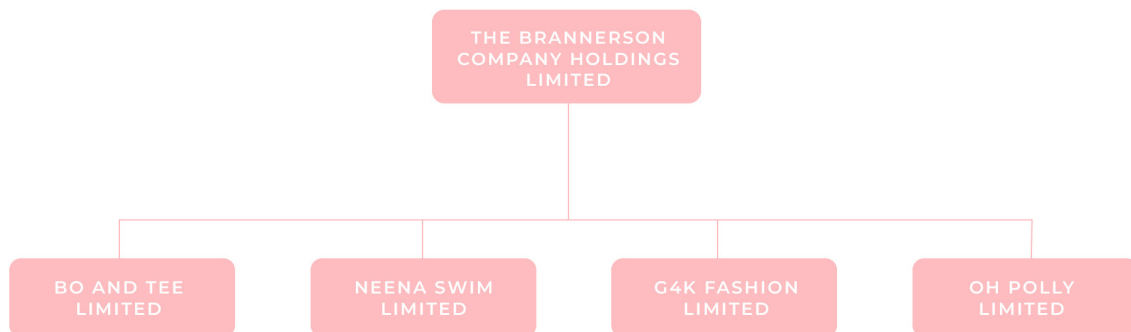
EMPLOYING **289 WORKERS**



ONE FUFILMENT CENTRE

About The Group

The Brannerson Company Holding Limited is the parent company to four different entities: *Oh Polly Limited*, *Bo and Tee Limited*, *Neena Swim Limited* and *G4K Fashion Limited*.



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Bo+Tee was founded by Mike Branney and Claire Henderson later in 2020. This brand also supports The Brannerson Foundation, the Cambodia based charity and follows a social-first business model.

Over the course of 2 years Bo+Tee has experienced significant growth in the activewear apparel industry. Much like Oh Polly, Bo+Tee sells a variety of versatile, trend-driven fitness clothing across the globe.

Sister swimwear brand, Neena Swim was officially launched in 2021. Like the other 2 sister brands, Neena Swim supports The Brannerson Foundation, the Cambodia based charity and follows a social-first business model. Neena Swim is paving the way in the trend-driven swimwear and beachwear industry.

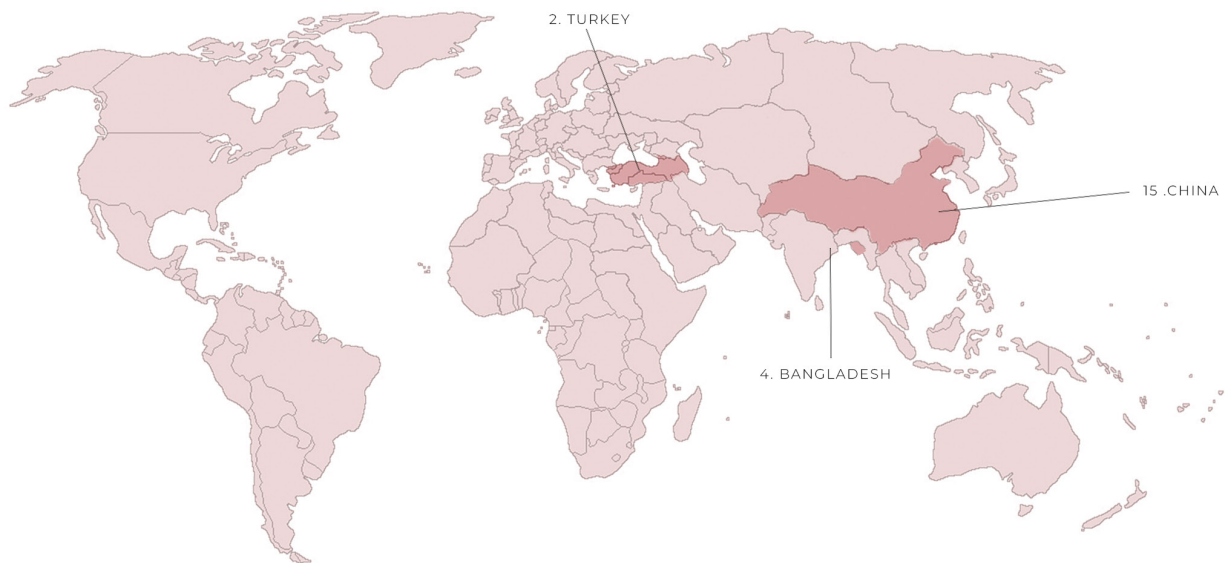
Our buyers for all 3 brands do not purchase wholesale products, which allows them to maintain original, unique designs. All of our collections are designed in-house, in the UK. We market all products including (but not limited to): clothing and accessories to 18-30 year old consumers globally.

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

OUR SUPPLY CHAIN

We understand that supply chains can be complex. We've mapped our tier 1 suppliers and work is ongoing to map our tier 2-5 suppliers for better visibility. Between May 2021- April 2022 we sourced stock from 3 countries and 21 factories. We aim to operate a business that is a fair and positive experience for all. We will continue to work collaboratively to foresee any upcoming issues and together we will mitigate against the risk of modern slavery within our business.

TIER ONE SUPPLIERS



IN-HOUSE SUPPLIERS

We have 2 in-house tier 1 suppliers based in Bangladesh and China and they only supply to the Oh Polly brands. Our founders, Michael Branney and Claire Henderson set these factories up, meaning we are able to tightly manage the operations. We have Oh Polly employees situated in both factories to build supplier relationships and oversee the business. The majority of our stock is supplied by our in-house suppliers.

NON-STOCK SUPPLIERS

Non-stock suppliers are identified as goods not for resale. They provide us with services that are necessary to help the business run. Throughout the financial year 2022, we worked with 558 non - stock suppliers. The supplier types most used were shoots, marketing and IT/software. This also includes services such as cleaning, waste disposal and stationary. The vast majority of these suppliers were based in the United Kingdom or United States.

EXTERNAL SUPPLIERS

We also work with a small number of 3rd party suppliers in China, Bangladesh and Turkey. We only use external suppliers if the type of product can't be produced by our in-house factories. For the financial year, we worked with 19 external suppliers. We recognise that our main exposure to the risk of modern slavery is within our supply chain because they involve labour in a country where protection against breaches of human rights may be limited. Nonetheless, we have taken steps to ensure that such practices do not take place nor the business of any organisation that supplies goods and/or services to us.

We prefer to form a direct association with manufacturers so we can have full visibility on working standards and quality control. This means we have a presence in all our manufacturing units to ensure worker welfare at every stage. We follow a strict code of conduct (see Policies) in our own factories and make sure these are implemented with our manufacturing partners.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We understand that our policies shape the expectations required of Oh Polly employees and suppliers. We have multiple internal policies that we have shared with our in-house suppliers to filter through their supply chain and additional suppliers. This is to encourage them to use these policies as a reference to what is expected.

BRIBERY, GIFTS AND HOSPITALITY POLICY

This policy is to ensure compliance and adherence with all applicable anti-bribery and corruption regulations, this includes both gifts and hospitality which can sometimes be interpreted as bribes or can be seen to hide bribes. This policy aims to:

- *Ensure we comply with the Bribery Act 2010 at home and abroad*
- *Protect ourselves from bribery and corruption*

GRIEVANCE POLICY AND PROCEDURE

Oh Polly appreciates that from time-to-time employees might have concerns about aspects of their work or working environment. The Oh Polly is committed to addressing any of these concerns. The procedure is intended as a straightforward and easy to understand process.

PEOPLE WHISTLEBLOWING POLICY

The purpose of this policy is to encourage employees who know, or suspect, any wrongdoing to voice those concerns appropriately. The term 'Whistleblowing' is used to refer to the disclosure by employees of malpractice – internally or externally – as well as illegal acts, or omissions at work. The policy is intended to cover concerns which fall outside of the scope of policies that deal with standards of behaviour at work including disciplinary, grievance, bullying and harassment policies. Colleagues can email the HR department or call the whistleblowing hotline.

RECRUITMENT AND SELECTION POLICY

The aim of this policy and procedure is to act as a guide/framework for all managers and employees involved in the recruitment and selection process at any level. It is also to promote and maintain high professional standards of recruitment which are fair, consistent and efficient, ensuring that Oh Polly complies with employment legislation and best practices.

CODE OF CONDUCT

We issue employees and suppliers with our Code of Conduct, which they are required to keep a copy of. This 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 employees or suppliers are found committing any of the above, in accordance with our Terms and Conditions contact (see Supplier Onboarding), we will immediately terminate the contract.

You can read more about how we manufacturer on our website by visiting this link:

<https://www.ohpolly.com/pages/environmental-manifesto>

DUE DILIGENCE AND RISK ASSESSMENT

SUPPLIER ONBOARDING

Oh Polly conducts due diligence before all new suppliers are onboarded. This includes the following:

- *Reviewing country specific risks through the Global Slavery Index*
- *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 are required to sign our Code of Conduct and Terms and Conditions. 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*

SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme. We require any suppliers operating in high-risk countries to be audited on an annual basis by a third-party organisation. Once completed, they're sent to our Director of Production and Sourcing for review. Whilst work is ongoing to trace our tier 2-5 factories, we currently don't require these to be audited but encourage our tier 1 suppliers to issue self-assessment questionnaires for them to complete.

FURTHER STEPS

- *Require all suppliers to be audited by verified third-party ethical on an annual basis*
- *All staff to complete a Modern Slavery and Human Trafficking training module*
- *Establish a robust Whistleblowing Policy for suppliers to adhere to. Oh Polly would provide support with the investigations 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*
- *Move to a new financing platform where we can onboard non-stock suppliers*
- *Expand onboarding and pre-screening process for direct suppliers e.g. self-assessment questionnaires*

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

Signed by **Michael Branney**

Position: **Managing Director**

Date signed: **21st December 2022**