

Modern
Slavery &
Human
Trafficking
Policy
2020/21



PAVERS

YOUR PERFECT STYLE

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B O O T M A K E R

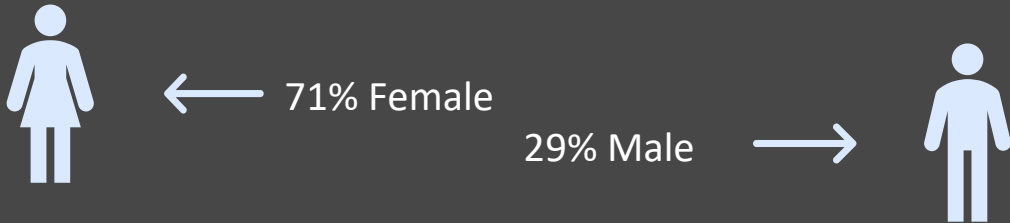
WHAT IS MODERN SLAVERY?

We are pleased to share our fourth Modern Slavery and Human Trafficking statement detailing the progress we have made to date. We have taken some advanced steps forward building on our incredible work in previous years. 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. There is no room for Modern Slavery within our supply chain or our retail business in general.

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. (1)

We are committed to acting ethically and with integrity in all of 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 and internationally.

40.3 million
people in modern slavery in 2016



Pavers is one of the UK's leading multi-channel shoe retailers with a strong focus on comfort, quality and affordability. Founded by Catherine Paver in 1971, the business remains family owned today. We aim to deliver comfort and happiness in everything we do.

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 endeavour to treat people with respect and in a way, we would wish to be treated ourselves. Fairness is embedded into our DNA.

The business continues to diversify, in 2018 successfully acquired Jones Bootmaker and Herring Shoes, allowing the business to broaden its product offering.

The Pavers Foundation launched in 2017 was created to reflect the passion of the Paver family to help and improve lives across the UK and beyond. 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. The Foundation is an employee led initiative driven by its colleagues.



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 to 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 the 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



Code of Conduct

Our Code of Conduct is based on the Ethical Trading Initiative (ETI) Base Code which can be applied, fairly, to all nations.

This code is shared with all our current Tier 1 suppliers across our supply chain and with all our service providers which was issued to our labour providers, recruiters & distribution services through 2020.

Our Agents actively translate and ensure our Code of Conduct is communicated to all suppliers and factories under their remit. Those factories operating outside of Agents we communicate directly with.

For 2020/21 we plan to update our Supplier Guidelines – On boarding Pack, Our Modern Slavery Policy will form part of this pack. This pack will be shared on continual basis with all stock, labelling & packaging suppliers.

We ensure all employees have access to our policies via our Employee Binder located on our intranet which covers anti-bribery policies, grievance and whistle blowing procedures and forms part of our mandatory induction process which has been developed throughout 2020 to deliver the inductions through new communication platforms.

Retail Trust continues to provide a support network for our employees to consult and provide them 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 focus on areas of highest risk of modern slavery ensuring our factories located in these areas have completed our audit programme. Those outstanding we plan to be audited in the coming months as a matter of priority.

Our focus for 2020/21 is to build on our previous assessments and complete a more robust and deeper audit of suppliers situated in high risk areas. Reviewing a more interactive mechanism for communicating these audits will be a priority..

Whilst continuing to ensure that standards are continuing to be met and roll out the programme to further suppliers, alongside addressing and working with any suppliers who fall short of our expectations. We are continuing to develop our scoring methodology to help focus attention and deliver results and improvements with our supplier base.. We collaborate with relevant industry partners and look to remedy any areas of concern through close communication and education.

Our network of agents who represent the company in all our primary origin source bases. We instil our company virtues in our agents and ethical stance. We train them to the highest standard to share our values face to face with our factories. They regularly visit factories and provide feedback to our head office team. Acting as our representative they ensure factories are complying to our Code of Conduct. For 2020/21 we plan to refresh our SLAs with our agents to ensure the framework they work to continually delivers our ethical policies.

We have centralised procurement as a headoffice function over the past 12 months and are in the process of developing a 'Procurement Policy' to be shared across the function. Having highlighted a gap in our corporate policy documents we are developing a statement 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. We have created a roll out plan to deliver tailored training for employees involved within buying and sourcing to equip them with the tools to identify practices that would contravene our code of ethics.

Planned for 2020/21...

Continuation of Supplier Audits in high risk areas

Devise a scoring system to identify suppliers requiring improvement

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 meet on a monthly basis operationally manage the business and to 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... 2020/21

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.		✓	
Develop a scorecard system to rate suppliers against our code of conduct.		✓	
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	✓		

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

Louise Scarth
Head of Procurement & Supply Chain

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 2020/21 is completing the next step actions driven by the introduction of a 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.

