

# MODERN SLAVERY STATEMENT



# Contents

**01**

Introduction

**02**

Our Business

**03**

Our Supply Chain

**04**

Governance & Partnerships

**05**

Our Policies Relating to Modern Slavery

**06**

Risk Assessment & Due Diligence Procedures

**08**

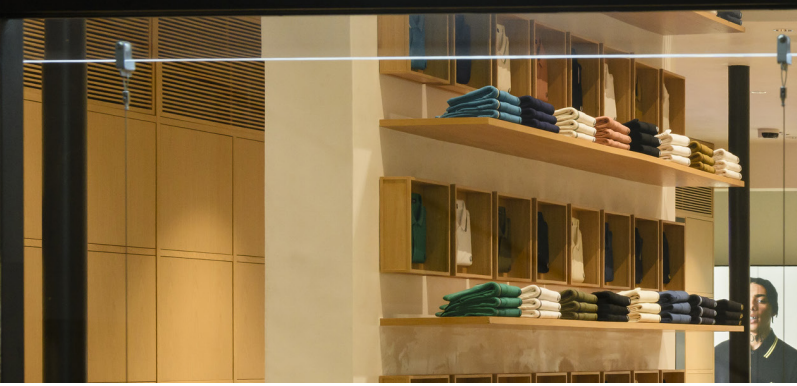
Our Actions Taken and Steps to Take

**12**

Training







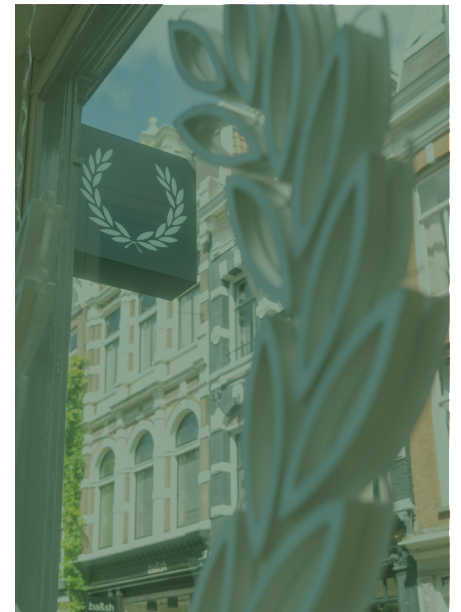
## Introduction

**At Fred Perry Ltd we are committed to respecting the human rights of everyone who works for us, whether directly or indirectly. We believe all workers must be treated with dignity, respect and fairness and we will not knowingly tolerate forced or compulsory labour or human trafficking in any parts of our business or supply chain.**

This statement has been published in accordance to the Modern Slavery Act 2015. It details the steps we have taken in the financial year 2023 to prevent modern slavery throughout our business and supply chain and outlines our plans and commitment going forward.

The Fred Perry Modern Slavery Statement has been prepared by our CSR team and approved by Fred Perry Board of Directors on the 19<sup>th</sup> July 2024.

**Richard Gilmore**  
Managing Director,  
Fred Perry Limited





## Our Business

**What started out as a small company selling polo shirts to tennis players in 1952 has grown into a global brand inspired by music – our “subculture” - and the street. Whilst the range has expanded to include apparel, footwear and accessories for men, women and children, the polo shirt remains at the core of what we do. The Laurel Wreath is our difference - our symbol of success and excellence of all that we do.**

Fred Perry employs 403 staff globally of which 159 are in our London head office. We trade around the world through 220 direct retail outlets, 31 of which are owned and operated by ourselves. Our long standing international wholesale partners and select international distribution

routes complement our fast-growing online platform. In 2019 we extended our websites into five new languages: French, Italian, German, Portuguese and Spanish.





## Our Supply Chain

**We source our products from a small range of British and international factories, enabling us to get to know them really well and maintain strong working relationships. This makes it easier for us to be sure that things are being done in the right way and when challenges arise, we can work together to resolve them.**

Our products are sourced from the following six countries: UK, China, Vietnam, Portugal, Germany & Thailand. In total, Fred Perry has 32 live factories which is a 26% reduction on last year. We have consolidated our factory base focusing on those with a shared vision of full transparency. The majority of our products are sourced directly from the manufacturer with only one factory operating through an agent.

81% of our products are supplied by our top five factories. The supply base producing our product has remained stable with only 3 new factories being introduced in 2023. These have been introduced primarily to replace an existing supplier and to increase our production capacity in Europe. We have long standing partnerships with most of our factories - the longest relationship being in excess of twenty years.

All factories, suppliers and agents sign up to the Fred Perry Code of Practice. Our COP principle standards clearly set out the

minimum standards and requirements that Fred Perry require all our product suppliers to follow in relation to workers' human rights, safety, employment and working conditions.

There are many people involved in making Fred Perry products and to maintain transparency we map our supply chain using the following 5 tiers:

Tier	Definition
1	Main factory where products are manufactured.
1+	Sites providing additional support to Tier 1 factories.
2	Material & component production
3	Yarn & dye stuff suppliers.
4	Raw materials.

Whilst it is often deemed that the risks of modern slavery and human trafficking are most prominent in the lower tiers of the supply chain within the textile sector, we are fully aware that the risks present themselves in different ways across countries and supply chains. This includes our own internal operations and those providing us with services and goods not for resale.





## Governance & Partnerships

**At Fred Perry we are fully committed to tackling modern slavery and worker exploitation in all areas of the business and believe strong governance and strategic partnerships are key to ensuring we meet and exceed our responsibilities.**

Whilst the Managing Director and Board of Directors are ultimately responsible for ensuring that Fred Perry meets all its human rights obligations, they are supported by a CSR team. The team sits within the product department closely supporting the procurement function, ensuring products are designed, sourced and manufactured ethically and sustainably. It also reaches across the whole business, implementing the necessary procedures accordingly.

Recognising the persistent and deepening challenges facing the global fashion industry we continue to work with our chosen strategic partners to help us meet our CSR and sustainability goals:

- Better Cotton
- Fast Forward – Stronger Together
- The Reassurance Network

**Better Cotton** are a not-for-profit organisation who help global cotton communities survive and thrive, while protecting and restoring the environment. A central focus of the Better Cotton programme is decent work, improving the wellbeing of farmers and their communities, nurturing decent work opportunities for rural populations, and promoting a safe and healthy environment.

**Fast Forward** operated by the non-for-profit Stronger Together is a UK labour standards education, audit and improvement initiative designed to support all businesses in the supply chain. They promote an ethical UK supply base with safe and decent working conditions ensuring businesses throughout the value chain operate on a level playing field with accountability, transparency, and dignity.

**The Reassurance Network** are a close-knit team of on-the-ground specialists located in all major sourcing regions around the world. They help manufactures, suppliers and agents understand and improve working conditions and factory performance.







## Our Policies Relating to Modern Slavery

**At Fred Perry, we are fully committed to respecting, protecting and advocating for the human rights of all those working directly or indirectly for us. To support our zero-tolerance approach, we follow the UN Guiding Principles on Business and Human Rights and regularly review and update our policies to ensure that they reflect the latest legislation.**

### Code of Practice

This sets out the ethical standards (which mirror the terms of the Ethical Trading Initiative Base Code) that we require all our staff at Fred Perry and those working for us directly and indirectly to comply with. The principle standards of our Code of Practice are listed below:

- Freely chosen employment
- Respect for freedom of association & collective bargaining
- Safe and hygienic working conditions
- No child labour
- Fair wages & benefits
- Lawful working hours & treatment
- Equal opportunities/no discrimination
- Employment security
- Fair treatment/no intimidation
- Legal working rights

### Human Rights and Anti-Slavery Policy

This reflects our commitment to conducting all our business relationships ethically and with integrity. We ensure effective controls are in place to identify, prevent and eliminate human rights risks, slavery and human trafficking.

Whilst all factories, suppliers and agents sign up to the Fred Perry Code of Practice we also require them to comply with all other relevant policies. It is critically important that all parties, including ourselves, take responsibility in communicating our COP and policies so that everyone at every tier of our supply chain is aware of their obligations.

Transparency remains important to us, and in 2021 we completed a website upgrade to include the publishing of our company policies supporting our CSR and sustainability strategies. These can now be found on the community page of the Fred Perry website.

- Ethical Trading Code of Practice
- Supply Chain Transparency & Modern Slavery
- Human Rights
- Responsible Sourcing and Animal Welfare
- Chemical Management



## Risk Assessment & Due Diligence Procedures

### Our Own Operations

We realise that modern slavery and human trafficking has the potential to occur anywhere – even within our own recruitment process. To reduce our risks, Fred Perry made a strategic business decision to appoint an internal recruiter to hire staff directly. This enables us to follow a robust recruitment process ensuring that the correct systems and procedures are in place to avoid modern slavery. In 2023 97.8% of new permanent employees and 92.5% of all temporary positions were hired directly without the use of a recruitment agency.

When we do require external support, we work with a limited number of employment agencies who adhere to our own code of conduct and recruitment standards.

### Supply Chain – Goods for Sale

We recognise that there is an increased risk of modern slavery or human trafficking affecting people throughout our supply chain where the following factors are present:

- Migrant labour is used.
- Temporary or agency workers are required, who may not be subject to adequate due diligence checks.
- Materials are being sourced locally, directly by factories.

Our approach to risk assessment is through supply chain mapping, self and 3rd party auditing and targeted due diligence.

### Transparency

To effectively identify and mitigate risk, we appreciate that transparency in our supply chain is essential. To this end we have added another person to our CSR team, responsible for mapping our supply base bi-annually. Due to increased personnel and our small, well established supply base we have been able to successfully maintain 100% mapping of all Tier 1 and Tier 1+ factories. To date, we have mapped 97% of our Tier 2 supply base, this

is a 14% increase on last year, and 65% of our Tier 3 supply base. We continue to work hard, hand in hand with our Tier 1 factories, to gain increased visibility through to Tier 4. We share details of all T1 factories on the Open Apparel Registry.

### Audits

Although we appreciate audits only provide a snapshot in time, we believe they are still a worthy start as a risk assessment tool. At Fred Perry, we use our own internal ethical audit to check all our Tier 1 and 1+ factories and increasingly audit Tier 2 suppliers. These onsite announced audits are conducted by our CSR team.

In addition, independent third-party audits are used as a further monitoring tool, these are annually assessed against our set criteria so that all labour and environmental areas can be graded using a 4 level traffic light system.







Where audits highlight areas of concern, issues are graded in terms of severity and an appropriate timeframe is given for corrective action. We work with our suppliers and support them during this period so compliance can be achieved.

In the UK, as members of Fast Forward we use their audit methodology to assess our UK manufacturing sites and evaluate any modern slavery risks. All factories involved attend Fast Forward supplier training to understand the programme objectives, the audit methodology and what is required of their businesses to embed better practices and drive continuous improvement.

#### **Concentrated Due Diligence**

At Fred Perry, we recognise that in order to build and maintain healthy relationships - and to ultimately manage risk - it is critical that we regularly visit our suppliers. As such, we manage a rolling programme of visits by our staff, especially the CSR and Technical team, to all Tier 1, 1+ and Tier 2 sites.

Any new Tier 1 or Tier 1+ factory will benefit from regular visits by members of the Fred Perry team during the initial trial period. To support new European factories during their trial period we have appointed a Europe based senior technologist. If we are satisfied with the new Tier 1/1+ factory during the trial period, it will become one of the sites regularly visited by the CSR and Technical team as part of the rolling programme.

When required, we support our factories by placing our own personnel on site or by employing independent 3rd party personnel when more appropriate. This support along with that of our Far East regional technical manager is invaluable to our business, specifically the CSR team in supporting us in maintaining standards.

#### **On Boarding New Suppliers**

To help inform decision making and mitigate risk, all new suppliers are required to go through a process of assessment prior to engagement. This thoroughly evaluates their ethical, commercial and environmental viability in relation

to our new supplier set up procedure and due diligence guidelines. As part of this initial assessment procedure, potential new suppliers must submit and facilitate the following:

- Full mapping of their supply chain.
- Disclosure of a minimum of 2 recent 3rd party audits.
- An announced factory visit by our Head of CSR.

All new factories must pass our audit before production can start, they will then be signed up to an ongoing monitoring programme.

#### **On Boarding New Suppliers**

To help inform decision making and mitigate risk, all new suppliers are required to go through a process of assessment prior to engagement. This thoroughly evaluates their ethical, commercial and environmental viability in relation to our new supplier set up procedure and due diligence guidelines. As part of this initial assessment procedure, potential new suppliers must submit and facilitate the following:

- Full mapping of their supply chain.
- Disclosure of a minimum of 2 recent 3rd party audits.
- An announced factory visit by our Head of CSR.

All new factories must pass our audit before production can start, they will then be signed up to an ongoing monitoring programme.

#### **Supply Chain – Services and Goods not for Resale**

Historically we have focused on our goods for sale supply chain, however we are aware that the same set of risks is also relevant to our service providers and suppliers of goods not for resale. To this end we have undertaken an extensive review to assess the modern slavery and human trafficking risks in these areas and are implementing a robust system to mirror that of our Goods for Sale supply chain, with mapping well underway.



## Our Actions Taken and Steps to Take

Through our due diligence process, we have identified a number of areas at increased risk to modern slavery. The table below highlights risk areas along with the targets we have set ourselves, our achievements to date and our future aims.

### Supply Chain - Goods for Resale

<p><b>Modern Slavery Risk:</b> Lack of visibility of supply chain = increased risk of undetected modern slavery</p>
<p><b>Action Taken to Reduce Risk</b></p>
<p><b>Target:</b></p> <ul style="list-style-type: none"> <li>• Continue to increase understanding and visibility of our supply chain.</li> </ul>
<p><b>Achievements to Date:</b></p> <ul style="list-style-type: none"> <li>• We have maintained 100% mapping of our factory base giving visibility of Tier 1 and Tier 1+ suppliers.</li> <li>• We continue to use the services of the Open Supplier Hub providing transparency of our Tier 1 suppliers.</li> <li>• In 2023 we have mapped 97% of our Tier 2 supply base a 14% increase on last year and 65% of our Tier 3 supply base.</li> <li>• We have maintained mapping of the tanneries used as part of our leather supply chain for footwear and gained increased visibility of our wet processors in this area. We have partial mapping of the tanneries and wet processors for the accessories leather supply chain.</li> <li>• We continue as a member of Fast Forward and maintain a programme of auditing our UK manufacturing sites against their standards. Our two Leicester based factories have achieved performing status in the Fast Forward programme.</li> <li>• Three out of four of our UK factories are members of the Fast Forward programme and maintain their knowledge of best practise and industry standards through regular training.</li> <li>• We promote the use of the Just Good Work App for all our UK factories, and their staff.</li> <li>• We encourage our Leicester factory workers to engage with the FAB L organisation.</li> <li>• New suppliers must provide full mapping of their supply chain along with all 3rd party audits so we can fully assess whether to engage prior to set up.</li> <li>• In the last year we have gained increased visibility of the cotton supply chain. 99% of our cotton intake for 2023 apparel came from our top 8 suppliers for this area. We continue as a member of the Better Cotton Initiative and in 2023 all cotton was sourced as Better Cotton.</li> <li>• Ban on cotton from the Xinjiang- region.</li> <li>• Ban on cotton from Uzbekistan and Turkmenistan.</li> </ul>
<p><b>Future Aims:</b></p> <ul style="list-style-type: none"> <li>• To continue mapping Tier 2 suppliers and beyond gaining further visibility of Tier 3 and 4.</li> <li>• To continue mapping tanneries used as part of our leather supply chain for accessories.</li> <li>• Continue mapping our wet processors.</li> <li>• Continue the roll out of Fast Forward assessments across our UK supply base.</li> <li>• Continue the roll out of our CAP programme for non-UK factories.</li> <li>• Source all our cotton intake for the coming year as Better Cotton.</li> <li>• Continue to advertise the Just Good Work App in all our factories via poster communication.</li> </ul>





## Supply Chain - Goods for Resale

### Modern Slavery Risk: Contract, Agency and Temporary Workers

#### Action Taken to Reduce Risk

#### Target:

- Further improve our knowledge of the risk faced by contract, agency and temporary workers in our supply chain.

#### Achievements to Date:

- Having identified the UK as a high-risk area we continue to map our labour providers and run a compliance screening programme through Fast Forward.
- We have introduced best practice for on-boarding new suppliers which helps provide visibility of labour providers before engagement.
- Completed comprehensive supply chain mapping for China along with a 3rd party audit review to determine where agencies are used and help fully evaluate modern slavery risks to agency workers.

#### Future Aims:

- Continue the Fast Forward programme of labour provider compliance across the UK supply base.
- Investigate further the individual employment practices of all our Tier 1/1+ sites.
- To help mitigate modern slavery risks caused by people migration from war torn counties such as the Ukraine we will continue mapping refugee populations in key sourcing areas.





**Supply Chain - Services and Goods not for Resale**

**Modern Slavery Risk:**

Lack of visibility of supply chain = increased risk of undetected modern slavery

**Action Taken to Reduce Risk**

**Target:**

- To improve our knowledge of our service providers and goods not for resale suppliers. This will help us and them identify and protect against modern slavery risks.

**Achievements to Date:**

- Continued mapping our service providers.
- Continued mapping our Tier 1 goods not for resale suppliers.

**Future Aims:**

- Gain complete transparency of our service providers.
- Complete mapping Tier 1 goods not for resale suppliers and extend to Tier 2.
- All service providers and goods not for resale suppliers will need to provide evidence of their own due diligence programme and submit internal and/or 3rd Party audits for us to review against our set criteria.
- Audit our UK & NL DC against Fast Forward standard.



## Own Operations

### Modern Slavery Risk:

Recruitment Agencies not following our own recruitment standards and procedures

#### Action Taken to Reduce Risk

#### Achievements to Date:

- Recruitment now occurs inhouse wherever possible reducing the use of labour providers. In 2023 97.8% of new permanent employees were recruited internally without the need of a recruitment agency.
- In 2023 we used recruitment agencies to hire only 2.2% of our permanent employees and 7.5% of new workers employed on a temporary basis.

#### Future Aims:

- Introduce a recruitment policy to support the selection and engagement of 3rd party recruiters.

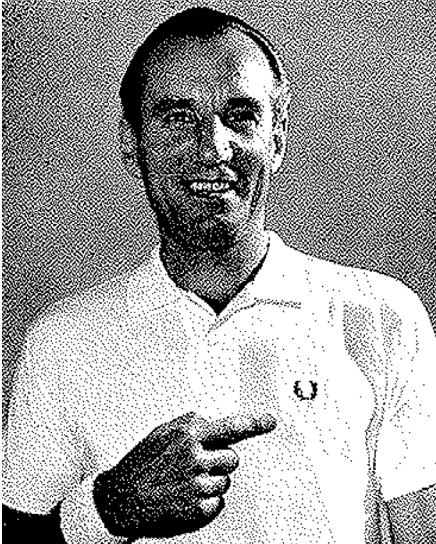
### Modern Slavery Risk:

Access to Training

#### Action Taken to Reduce Risk

- Continued engagement with Ted Learning Hub providing a modern slavery training programme for all Fred Perry employees.





## Training

The Modern Slavery Act has brought the issue of modern slavery to the forefront. We are committed at Fred Perry to ensuring that it remains there, and that those within our business and supply chain continue to develop their awareness and understanding of the risks posed.

Regular internal meetings are conducted by the CSR team to ensure that all heads of departments are fully informed on modern slavery and human rights issues and able to engage in regular discussions. Fred Perry remains engaged with Ted Learning Hub and their modern slavery training programme is available to all employees to improve their understanding of modern slavery and awareness of the actions required if they suspect it is occurring.

We recognise the need to raise awareness of modern slavery externally through our supply chain. To facilitate this, we plan to engage our product suppliers in training on this subject and provide them with the required training tools so they can extend their knowledge further through the supply chain. All UK suppliers audited against the Fast Forward Standard have been provided with external training to increase their recognition of any issues and support them in improving and embedding legal and ethical labour standards.