



THE VERY GROUP

MODERN SLAVERY STATEMENT | 2019/2020

Modern Slavery Statement

Introduction



Henry Birch

Henry Birch
Group CEO

The last 12 months have seen many changes not just within our business but globally. In January 2020, we re-branded to The Very Group bringing the Group's name and identity in line with our flagship consumer brand, Very.co.uk.

Less than three months after the rebrand, the Covid-19 pandemic struck, resulting in a set of unprecedented challenges which impacted our people, our supply chains and our customers. I am incredibly proud of the way our business has responded to the pandemic by continuing to operate and serving our customers, adapting to new ways of working and supporting our communities. Unfortunately, the impacts of COVID-19 are likely to be here for some time and we will continue to support our colleagues, our customers, and our wider communities through this.

At The Very Group, we are determined to behave in a responsible manner to our people, our planet and the communities we operate in, trading ethically, sourcing responsibly and working to find and tackle modern slavery and human trafficking throughout our organisation and our supply chain.

Over the last 12 months, we have refocused our sustainability agenda. In June 2019, we centralised our CSR activities and agreed on a business wide sustainability strategy. The strategy is based on three pillars; our people, our planet and our communities.

We recognise that modern slavery takes many different forms and is an incredibly complex issue, but we continue to drive transparency to find and resolve problems, regularly review our business practices and collaborate with others to protect the rights of workers, particularly those who are most vulnerable to exploitation.

This is our fifth statement under section 54 of The Modern Slavery Act, but our first as The Very Group. It summarises our policies, processes and due diligence relating to modern slavery and highlights the key activities we have undertaken during the year and our plans for the future. It also details our response to the global pandemic that struck halfway through our financial year and the actions taken to support those affected throughout our supply chain.

The Very Group

At a glance

As the UK's largest integrated pureplay digital retailer and financial services provider, our purpose is to *make good things easily accessible to more people.*

With our multicategory range of leading brands and unique financial services products, which offer customers flexible ways to pay, we are well placed to deliver on that promise.

The Very Group consists of three customer facing brands which are Very.co.uk, Littlewoods.com and LittlewoodsIreland.ie.

Headquartered in Liverpool, we also have offices in London and Dublin. This year we also launched our new fulfilment centre, Skygate, located in the East Midlands. With 850,000sq ft of automated warehousing space, Skygate allows us to better serve our customers and gives us space for expansion and future innovation.

4.5m
active
customers

£2bn
annual
revenue

3,500
Engaged
colleagues

1,900
famous
brands

1.9m
daily website
visits

82%
Sales via
mobile

The Very Group

Key activities 2019/2020

Transparency

- First tier factory list published publicly and updated every quarter
- Mapping of tier 2 commenced in key sourcing regions
- Mill level mapping ongoing
- Working with Mach, our UK recruitment partner, to understand their recruitment policies and process

Training and awareness

- Ongoing community awareness being delivered in South India, supporting responsible recruitment into the textile industry
- Continue to publicise and promote modern slavery helplines across UK warehouses
- Carried out counselling skills training for worker welfare officers at three key partners in Bangladesh
- Provided best practice guidance and training on Covid-19 safety measures for factories in India, Bangladesh and Turkey

Collaboration

- Signatory to the ILO Call to Action in the wake of the pandemic
- Active members of the UK Public Private protocol and the ETI and BRC convened working groups on Leicester
- Entered a new partnership with the International Slavery Museum to support with educating, colleagues, customers and communities on modern slavery

Remediation and mitigation

- Launched a worker voice app, Timby in South India, enabling workers and their families to raise concerns and grievances
- Developed a pre- and post-departure app for migrant workers seeking employment in Malaysia, equipping them with relevant information and giving visibility of the recruitment journey

Governance & policies

Contractual controls

At The Very Group we have clear policies and processes in place to support our commitment to conducting business responsibly. These policies are reviewed and updated regularly as we learn from our experiences and industry best practice. They are designed to ensure that people are treated with dignity and respect in all areas of our business and supply chain, and are based on the principles laid out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The Very Group Modern Slavery and Human Rights Policy: this outlines our company wide stance on modern slavery and human rights. The policy is owned by the company people team and is publicly available on our website.

The Very Group Bribery and Corruption Policy: establishes The Very Group's position on preventing and prohibiting bribery, in accordance with the Bribery Act. The policy applies to all individuals working for The Very Group, including senior managers, directors, employees' consultants, contractors, or any other person associated with the business.

Supplier Ethical Code of Conduct: based on the International Labour Organisation's core standards as well as the Ethical Trading Initiative Base Code, the document reflects best practice industry standards being applied globally by responsible retailers. All merchandise suppliers must sign this document prior to doing business with us.

Child Labour Remediation and Young Worker Policy: sets out the steps suppliers need to take to protect young workers and to make sure no children are involved in the manufacture of any of our products. If we discover child labour in our supply chain, the policy sets out our remediation process.

Migrant and Contract Worker Policy: sets out the steps suppliers and factories need to take to responsibly recruit migrant labour and ensure they receive the same rights and benefits as local workers. This policy also underlines the importance of the employer pays principle.

Syrian Refugee Remediation Policy: designed to provide support and guidance to suppliers and factories in the event of hiring Syrian workers within our Turkish supply chain.

Governance: The CSR team was moved into a central function in the last financial year to ensure the strategy is delivered with a business wide approach. The CSR team reports into the Chief Operating Officer of The Very Group to ensure accountability and that we are upholding our commitments to protecting and respecting human rights.

All of our public policies can be viewed [here](#).

Own operations



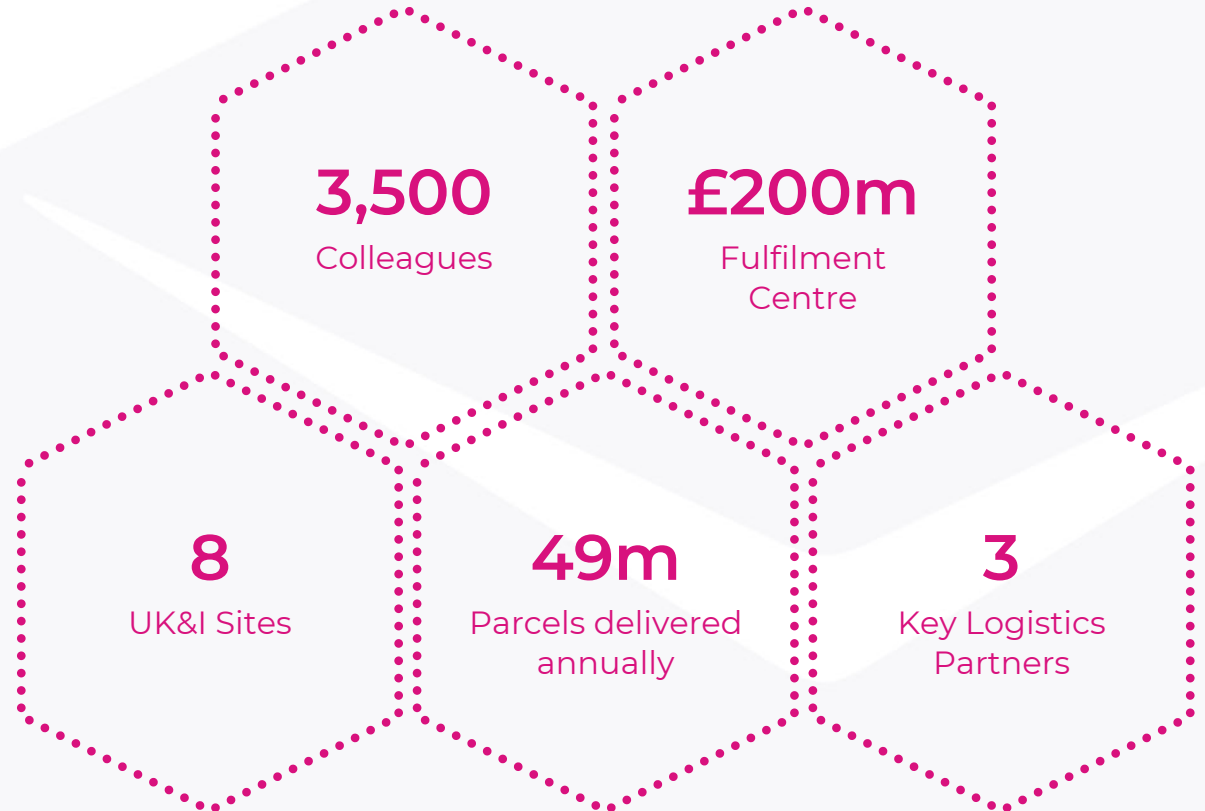
UK & Ireland operations

Introduction & key data

The Very Group's operations are all located within the UK and Ireland, with sites across Liverpool, London, Greater Manchester, East Midlands and Dublin.

In March 2020 Skygate, our new fulfilment centre at the East Midlands Gateway development, became fully operational. Skygate enabled the group to consolidate the warehouse operations in Shaw, Raven and Little Hulton during 2020 and become centre of operations for customer deliveries. Our UK operations are broken in to three separate areas; head office, customer service and logistics.

It is our responsibility to ensure where we have direct control within our own operations that no forms of modern slavery are found to be in practice. Our primary focus within our business operations is to ensure all colleagues are employed legally and human rights are protected at all times. The Very Group actively promotes the use of grievance mechanisms to ensure workers are able to raise concerns and support both colleagues and our communities.



Our approach

UK operations

Ensure recruitment provider is eliminating modern slavery risks

Work with logistics providers as partners and collaborate to raise awareness

Implement stringent employment practices and verification checks

Enable grievance mechanisms to ensure worker voice

Induction process for agency labour to protect migrant workers

Delivered through

Trusted dedicated account managers

Annual audit / monitoring due diligence

Transparency and open business relationships

Worker interviews and support

Spotting the signs of modern slavery

Trained management and supervisors

Promote industry initiatives

Courier visits and accompanied deliveries

Promoting helplines

Multilingual business

Our approach

People & operations

People

Target from 19/20

Deliver mandatory training for all of The Very Group's employees

Specialist training for new warehouse facilities on spotting signs of modern slavery

Steps taken

Engaged with International Slavery Museum to raise awareness through colleague population via video content and guest speaking at leadership meetings

Training content for colleagues in warehousing has been developed and was pending delivery when pandemic struck. Non-essential face to face interactions were restricted, putting the training on hold

Actions for 20/21

Engage with our partner, Unseen UK, to deliver modern slavery awareness training to the business

Further develop our relationship with the International Slavery Museum to further raise awareness of the legacy of historic slavery as well as issues presented by modern slavery

Operations

Deliver workshops to support logistics partners in recognising and tackling modern slavery risks within their operations

Conduct audits on recruitment policies and processes and implement remediation on any potential risk

Engaged with logistics partners to understand their operations and processes for delivering our product and mitigating risk of modern slavery

Worked with our recruitment partner Mach, to understand their recruitment process for temporary workers into our warehousing facility

Maintaining an open and transparent relationship with our logistics partners, sharing best practice and examples on reducing risk of modern slavery

We will support our recruitment partner Mach to enable quick response for recruitment needs whilst ensuring due diligence on temporary worker recruitment

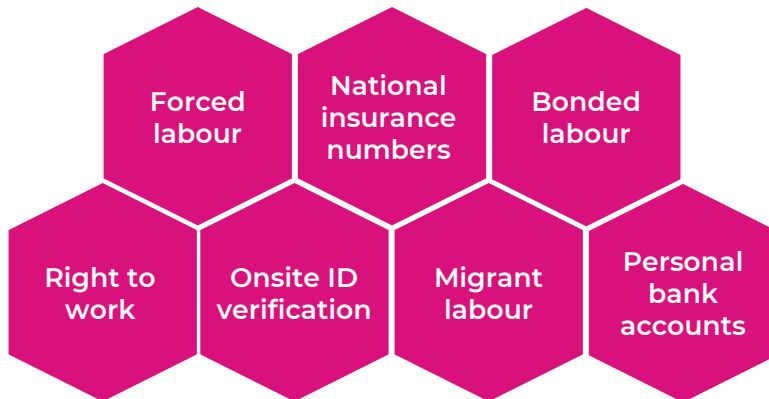
Case studies

Mach recruitment training



In July 2019 The Very Group partnered with Mach Recruitment to provide temporary labour for our new Skygate fulfilment centre. Mach have 46 locations and over 120 team members. Mach were chosen to be our designated recruitment provider due to their organisational culture and commitment to fulfilling the required levels of temporary workers needed during peak delivery periods.

Recognising that indirectly recruited workers in our sites are likely to be more at risk of worker exploitation, the team decided to conduct a full due diligence exercise on Mach to ensure the recruitment process was robust and that they had systems in place to ensure that workers were not exposed to exploitation. During the due diligence procedure Mach demonstrated the employment onboarding process for new recruits and took us through the checks they carried out prior to jobs being offered. Essential checks conducted and verified by the Very Group CSR team include:



Following their time with Mach, when temporary workers arrive at Skygate they are given an onsite induction to ensure they are aware of our policies, procedures and health and safety protocols. All Skygate managers, supervisors and team leaders are aware of how to spot potential signs of modern slavery and where to raise them if there are concerns, particularly with new workers entering site.

Alongside our ongoing due diligence, Mach are members of the GLAA and REC as well as engaging with Stronger Together and the ALP (Association of Labour Providers) and demonstrate a good understanding of modern slavery risks within the UK. The discussions conducted between Mach and The Very Group CSR team did not highlight any immediate concerns around recruitment of temporary workers.

We will continue to support Mach on their recruitment drive and promote UK employment opportunities within The Very Group. Our relationship with Mach is built on trust and transparency and will continue to develop this as we move forward. For now, we are ensuring that our recruitment strategies are aligned, and we work in partnership to provide full support to potential employees.

Our approach

Risks & actions

Issue area	Steps taken	Actions for 20/21
<ul style="list-style-type: none"> Recruitment of temporary workers, through recruitment agents to fulfil spikes in demand during peak periods 	<ul style="list-style-type: none"> Ensured that the opportunity for temporary workers was competitive and attractive via Mach recruitment Conducted due diligence on the Mach recruitment process, ensuring the right steps were in place to mitigate worker exploitation 	<ul style="list-style-type: none"> Continue our due diligence of Mach recruitment, conducting regular check in sessions with the team to ensure standards are being maintained Partner with Unseen to provide access to the Modern Slavery Helpline for employees
<ul style="list-style-type: none"> Utilisation from logistics partners of sub-contracted drivers to undertake the final mile delivery of product 	<ul style="list-style-type: none"> Conducted due diligence with logistics partners via accompanied delivery sessions to understand current processes and potential risks of Modern Slavery 	<ul style="list-style-type: none"> Maintain close and open relationship with logistics partners to ensure mitigation of risk
<ul style="list-style-type: none"> New sources of uniform and other branded Very product utilised in the new warehouse, without appropriate due diligence having been undertaken 	<ul style="list-style-type: none"> Established information of production facilities which are manufacturing TVG branded goods not for resale 	<ul style="list-style-type: none"> Conduct on site visits to these facilities from the Very group team to conduct an initial risk assessment High risk sites to be included in third party audit programme

Supply chain



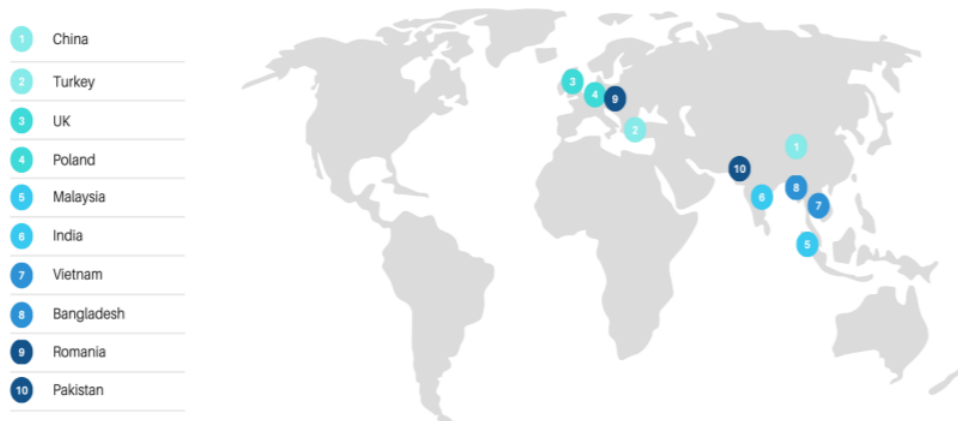
Supply chain

Introduction & key data

The Very Group has a broad and varied supply chain, manufacturing product across our own brand clothing and home and living ranges. We source from approximately 489 tier 1 factories in 30 countries worldwide with a colleague presence in key sourcing countries; Bangladesh, China, India, Malaysia, Poland and Turkey.

Of the 489 tier 1 factories, 189 supply Clothing and & Footwear and 300 supply Home & Living. A full list of our manufacturing sites can be found [HERE](#). We are currently enhancing our supply chain transparency and will have fully mapped tier 2 factories by June 2021.

The top ten countries that we source from by volume are detailed below;



489

Number of
factories

322

Audits
completed

10,700

Workers trained in
FY19/20

10,500

Approx. Workers
interviewed

**Approx.
2,000**

Families supported
through Covid-19

Responsible sourcing

Our approach



Delivered through



Supply chain

Our approach to ongoing due diligence

We understand that audits only provide us with a snapshot in time at our manufacturing sites. However, they remain a crucial part of our due diligence programme. Our audits are carried out by three third party audit companies against local law, our code of conduct and the ETI base code. These audits allow us to identify risks and enable our in-country teams to work with factories on improvement actions. Due to the outbreak of Covid-19 our audit programme was disrupted but we continued to monitor factories remotely.

Our in-country experts carry out regular visits to our factories to offer advice and support on improving issues and implementing best practice. During the pandemic we continued factory visits in Bangladesh and China and worked through desktop communication in regions where visits are on hold for the safety of colleagues and workers.

Where we recognise salient human rights risks or identify problems relating to specific issues within our supply chain, we work with partners to develop and deliver training to both factories and workers to mitigate and remediate. Elements of our training programmes and project work are explored later in the statement.

Using intelligence and regional understanding from our partners, we work to identify risk hotspots and take action accordingly. This helps ensure our due diligence process is robust and working to mitigate risk effectively. We recognise the need for collaboration to tackle more complex human rights issues within our supply chain so proactively work with other brands, global organisations and NGO's to find solutions to these.



From our due diligence, we know that the following workers are most vulnerable to modern slavery:

- Migrant workers
- Minority groups
- Homeworkers
- Contract, agency, and temporary workers
- Young workers
- Women workers

There is also an increased risk of modern slavery where the below conditions exist:

- Recruitment fees and labour agents
- Cash-in-hand payments
- No union presence
- No access to grievance mechanisms
- Accommodation tied to employment
- Poor working conditions
- Irregular work



Supply chain

Understanding the impact of Coronavirus

Poverty, lack of social or economic opportunity and limited labour protections are the main root causes and drivers that render people vulnerable or cause them to fall victim to modern slavery.

The ILO estimated that 40.3 million victims were in a form of modern slavery prior to the pandemic. This pandemic has the power to exacerbate all the aforementioned causes and drivers, and result in further victims of modern slavery. At the time of writing this statement, the ILO estimated that approximately 94% of the global workforce are impacted by workplace closures due to lockdown measures, with women suffering greater levels of unemployment.

When the Covid-19 pandemic took effect it created uncertainty and disruption across our supply chain, and impacted the delivery of our work on modern slavery and our factory monitoring programme. Whilst we had to adapt our approach to tackling modern slavery our priority was to ensure that suppliers manufacturing our product were supported and, in turn, were able to protect workers as far as possible.

The UK national lockdown also altered the shape of our business substantially as high streets closed and consumer behaviour changed. This led us to review our intake and adapt our product offering to meet consumer demand. We understood that these changes also impacted our suppliers and workers within our supply chain, so where possible we did our best to mitigate these impacts. Measures taken included:

- Ensuring we paid in full for all completed and shipped orders
- Continuing to place orders throughout, particularly in regions with the most vulnerable workforce such as Bangladesh, India and Malaysia
- Where cancellations or deferrals were needed, if these were in work and suppliers had committed to the purchase of raw materials these costs were reimbursed

Our full 'response to Covid-19' statement can be found [here](#). In it we further outline the steps taken to support suppliers through this challenging period and ensure workers remain protected.

We recognise that the consequent economic crisis caused by Covid-19 will further impact vulnerable workers in supply chains globally. Low skilled workers, undocumented migrant workers and workers in the informal economies are all particularly vulnerable. With this in mind, we have worked to understand the changing risks within our supply chains, driven by the current pandemic and have set ourselves actions to address this.

Supply chain

Risks identified in our supply chain

Child labour in mills, South India

As migrant workers retreated back to their villages in the wake of lockdown measures, mills were left with a shortage of workers. In order to overcome this, mills focussed on building their workforce by hiring from rural villages closer to production sites. As a result a lot of young children and adolescents were hired as they sought jobs to support their families during school closures.

Increased use of temporary workers in China

Manufacturing in China resumed quickly following the outbreak of Covid-19. As a result many businesses shifted production back to China as they were unable to get deliveries from elsewhere. This increase in production seen by factories led to a need for increased workforces and so a sharp rise in temporary workers was observed. The risk here is that management systems to verify worker age, wage records and working hours amongst others are often not put in place, meaning monitoring of temporary workers is challenging. There is also a risk these workers could come from Government forced labour schemes and other poor recruitment processes.

Increase in day labourers and consequent modern slavery risk to refugees in Turkey

The number of Afghan, Iranian and Georgian refugees has been seen to increase this year. For these refugees, achieving work permits is very difficult and increases their risk to modern slavery dramatically. Jobs in textile factories can be low skilled; therefore there is heightened opportunity for vulnerable refugees to gain illegal employment within textile supply chain.

Mass job loss through a downturn of orders in Bangladesh

There has been mass job loss in Bangladesh as manufacturing units struggled in the wake of Covid-19 and the ensuing loss of business. As a result there is risk of extreme poverty, particularly amongst women who form the majority of the garment supply chain which has

been particularly impacted.

UK garment Industry and risks of modern slavery

Through media reports released in 2020, the prevalence of poor working conditions, underpayment of minimum wage and risk of forced overtime and work attendance were widely publicised. The Very Group are long standing signatories to the Apparel and General Merchandise Public/Private Protocol and are actively participating in the sector wide approach being developed through this forum to prevent and mitigate worker exploitation in the UK garment industry.

Risk of forced overtime in Malaysia

The closure of recruitment corridors into Malaysia and a lack of local workforce has left many factories facing worker shortages during the pandemic. The lack of workforce and full order books could potentially drive forced overtime and underpayment of overtime premiums within factories.

Uyghur exploitation, Xinjiang, China:

There are increasing numbers of reports of the growing risk to the Uyghur population in Xinjiang, China. These include involuntary labour schemes distributing Uyghurs to workplaces in Xinjiang and throughout China. There are reports of these workers being supplied to both textile mills and factories. We are aware this risk is present at every tier of our supply chain noting that processing of cotton, from harvesting through to spinning mills will be the areas of highest concern due to lowest visibility.

Supply chain

Enhanced risks identified in our supply chain as a result of Covid-19

Impacts of coronavirus fuelling the risk
of modern slavery in supply chain



Supply chain

India

Issue area

Steps taken

Actions for 20/21

- **Recruitment practices of young women into Southern Indian textile mills**

- Secured 7 community centres in South India to further support workers and their families
- Training for mid management and supervisors on behavioural skills and grievance redressal delivered in two strategic partner mills
- Launched TIMBY app for addressing workers grievances in the mills

- Open 7 community centres in South India
- Offer access to legal support and grievance redressal through all 7 centres
- Offer medical camps to enable workers to better manage their health and well being throughout Covid-19 period
- Giving opportunities for re-skilling through computer literacy classes, supporting those suffering job loss during Covid-19
- Partner with the Child Welfare Committee (CWC) to support in rescue of potential child labour in mills
- Explore opportunities to scale the recruitment practices training to protect more people from risk of modern slavery

Supply chain

Malaysia

Issue area

Steps taken

Actions for 20/21

- **Risk of forced overtime in Malaysia**

- Worked with suppliers to understand production capacities, worker numbers and delivery dates, to better support enhanced production planning
- Sent out guidance to suppliers on minimum expectations around overtime
- Supported factories to ensure better distancing, cleaning and education to reduce Covid-19 risks

- Continue to work with buyers and suppliers on capacity planning, enabling factories to better plan and reduce the need for excessive overtime
- Utilise the Everyone's Business app to get more regular feedback from the wider Very Group team on factory conditions including concerns around workforce
- Explore the opportunity of utilising the Just Good Work app to get live feedback from workers in factories, concerning conditions, hours and pay

Supply chain

Malaysia

Issue area

Steps taken

Actions for 20/21

- **Migrant worker recruitment fee debts in Malaysia**

- Developed and tested the 50eight app to ensure suitability in supporting migrant workers in the Nepal – Malaysia corridor
- Due to the pandemic, the migrant labour corridors into Malaysia were disrupted. This delayed the launch of the app and in turn we focused on protecting migrants already in situ.

- When the migrant corridors reopen, work with Malaysian partners to ensure app is used during recruitment process
- Support in the development of the app into other key migrant labour markets, such as Bangladesh
- Explore collaboration with International organisation of Migrants to utilise the app in migrant communities

Supply chain

Turkey

Issue area

Steps taken

Actions for 20/21

- **Employment issues relating to refugees in Turkey**

- Continued our partnership with United Work to ensure refugee workers are supported. 4 Syrian refugees were hired in our supply chain and trained by both United Work and the factory
- Continued to support the Work Support Centre project with positive feedback from Syrian and Turkish workers on their understanding of right to work
- Worked with suppliers to understand their labour situation and capacity

- Roll out refresher training to factories on the responsible recruitment of refugees
- Work with Mudem and United Work to understand the increased risk of Modern Slavery to Afghan, Iranian and Georgian Refugees and the potential for impacted persons in our supply chain
- Offer production planning and capacity training to factories and work with buying teams to better plan production

Supply chain

Bangladesh

Issue area

Steps taken

Actions for 20/21

- **Lack of effective worker voice for females in Bangladesh and risk of increased job loss**

- Developed and delivered additional training for welfare officers around counselling skills and developing workplaces to further support enhanced worker voice resulting in evidenced improvements in worker dialogue

- Trial a social dialogue programme with a key factory partner, enhancing worker, management communication
- Explore opportunities for a community centre in Dhaka supporting women workers through the delivery of child care, legal, health, financial literacy and IT skill training
- Roll out a worker hotline for workers and communities to raise grievances related to human rights
- Explore opportunities to improve workers' access to information and support through the use of technology

Supply chain

China

Issue Area

- Increased use of temporary workers in China

Steps Taken

- Expectations regarding correct practice in the recruitment of temporary workers communicated with all suppliers
- Started conducting unannounced visits to suppliers to check on the workforce and records

Actions for 20/21

- Supplier conferences planned to take place in 6 cities in China to provide modern slavery awareness training for suppliers and best practice in recruitment
- Continue a programme of unannounced visits to factories, focussing on those in high-risk regions
- Utilise the Everyone's Business app to get more regular feedback from the wider Very Group team on factory conditions including concerns around workforce

Supply Chain

China

Issue Area

- **Uyghur forced labour and risk in sourcing from Xinjiang, China.**

Steps Taken

- Partner with the Better Cotton Initiative and are currently working to achieve 100% BCI Cotton across our entire product offering by 2022
- Active participants in collaborative forums to monitor the situation
- Started mapping our supply chain beyond tier one to better understand the risks
- Working with the Better Cotton Initiative and other brands on improving traceability of cotton supply chains

Actions for 20/21

- Finalise business commitment to exit Xinjiang at every tier of our supply chain and ensure no further/new sourcing from the region.
- Identify and map through all credible means possible within our supply chain:
 - Suppliers and sub suppliers with facilities in the Uyghur region making apparel and other cotton-based goods,
 - Suppliers and sub-suppliers in any region that are utilising the government Uyghur scheme
 - Business relationships with any supplier in China and globally that source inputs produced in the Uyghur region for products such as fabric, yarn or cotton.
- Disengage from business relationships with suppliers based in the Uyghur region or have subsidiaries or operations in the Uyghur region.
- Disengage from business relationships where there is credible evidence that the supplier has employed workers from the Uyghur region

Supply Chain

UK

Issue area

Steps taken

Actions for 20/21

- **UK garment sector and risks of modern slavery**

- Consolidated UK garment supply chain to 1 tier 1 factory and 7 tier 2 factories
- Signed the BRC letter to Government calling for the UK garment industry to be licensed to ensure better protection of worker rights
- Worked with Fast Forward initiative and ETI on broader initiatives to ensure a safe and legal UK garment industry
- Worked closely with factories to ensure adequate measure to protect workers during the Covid-19 pandemic

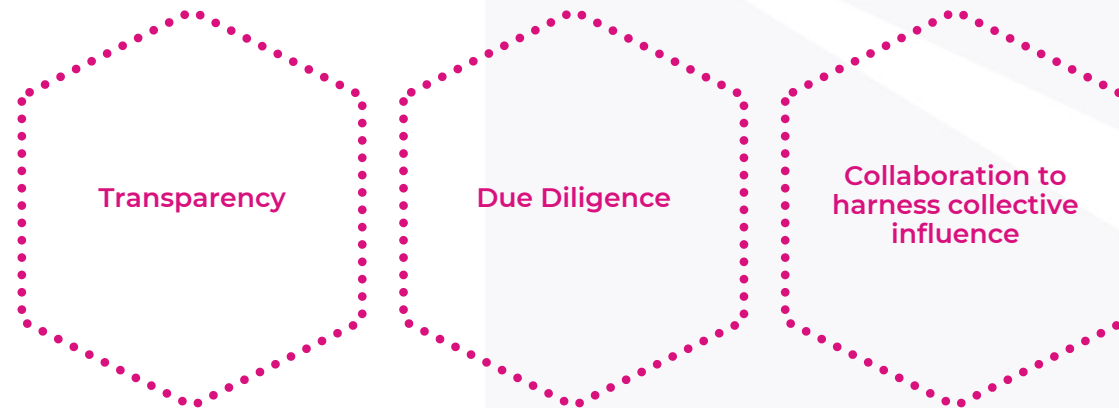
- Continue to contribute to the development of the UK AGM PPP in partnership with UK stakeholders and take steps as required
- Become an official partner of Unseen, a UK wide Modern Slavery Helpline to mitigate risk and manage emerging threats to workers in our supply chain as well as forced labour situations throughout the UK
- Recognising the high risk in the UK garment supply chain, we will be scaling up our work with Fast Forward and auditing 100% of our tier 1 UK supply chain

Third party brands

Approach

At The Very Group we provide our customers with access to 1,900 brands across fashion and home and living products, and we acknowledge that our responsibility to prevent modern slavery extends beyond our own brand and captures the efforts of third-party supply chains too.

Currently all branded suppliers who work with Very are required to sign up to our code of conduct covering social and environmental standards. However we recognise that we have more of a responsibility to better understand our partners actions to protect workers within their supply chain and, as such, we have reviewed our approach to working with third party brands ready to launch in 2021. Our approach is based on three pillars of work:



We have set out a number of actions for the year ahead with this new approach in mind and will regularly review progress to ensure our approach is thorough and effective in driving a higher standard through global supply chains.



Third party brands

Issues & actions

Issue area

Steps taken

Actions for 20/21

- **Visibility of third-party brands' supply chains, policies and due diligence procedures**

- Through issues such as those that have taken place in the UK over the last 18 months, we have recognised the need for more robust processes to ensure the practices of third-party brands we retail are protecting workers rights

- All third-party brands are required to either sign up to our code of conduct or submit for approval an alternative code of conduct which forms part of the signed agreement with brands

- Develop a set of minimum requirements for fashion and home and living brands, and communicate this with them
- Implement a system to support effective monitoring of enhanced requirements
- Work with existing fashion brands to ensure they all publish a tier 1 factory list
- Third party brands with UK sourcing to be mapped
- Third party brands with UK sourcing and that fall into scope to join Fast Forward by December 2021
- Brands which fall into scope to publish a legally compliant modern slavery statement within their next financial year

Malaysia migrant worker update

Case studies

In our last statement we talked about the challenges faced by migrant workers in Malaysia, particularly with their recruitment journey and the recruitment agents they deal with.

We recognised that in order to reduce the risk of bonded labour, associated with migrant workers paying fees to secure jobs, we would need to better understand the recruitment process and try to positively influence that journey for workers.

With this in mind, we have partnered with Fifty-Eight, who are experts in utilising technology to equip workers and companies with trustworthy information to develop their Just Good Work app for use within the Malaysian context.

Just Good Work is a free interactive mobile app, giving jobseekers and workers critical information and advice for everything needed on the journey to work, from recruitment, through employment and life in a new destination, to moving on or returning home. The aim of the app is to empower workers to be able secure jobs that are safe, profitable and legal, equipping them with the tools to make more informed choices and connecting them with organisations on the ground that can support them if needed.

Prior to the Covid-19 pandemic we worked with one of our key suppliers and their recruitment agent to design and develop the app, alongside working with a local NGO called Our Journey who supported us with information, as well as being an ongoing contact for workers through the app. In order to ensure the app would be helpful to migrant workers and had the information they would require we tested this with workers currently in the factory to get their feedback.

Nearly all said that they wish the app had existed when they were looking for employment as it would have supported them in making more informed decisions, they did though feedback that it would be useful being available in both Nepali and Hindi, which we have since developed.

Unfortunately, just before we were going to launch the app with recruitment agents Covid-19 hit and the recruitment corridors into Malaysia were closed.

The pandemic also changed our focus to be on supporting workers in country and we have worked closely with suppliers to ensure additional distancing, cleaning and education is in place to minimise the risk, particularly to migrant workers. Thankfully through the measures our factories have put in place we have seen no positive tests amongst the workers within our Malaysian supply chain.

We are aware though that the situation will be ongoing so will carry on working with our suppliers to ensure workers are protected. Alongside this we will continue to develop the Just Good Work app so that when recruitment corridors are reopened we can roll this out to better support migrant workers seeking employment in Malaysia.

South India mills project

Case studies

Last year we spoke about the challenges faced by young women in Southern India when seeking employment in textiles factories and mills, and talked about our community engagement programme to raise awareness and build confidence with workers and their families.

The engagement educated potential employees about their rights before joining the mills and gave them the tools to avoid falling prey to any sort of ill practice during recruitment. The workers gained confidence at the workplace leading to better productivity for the employers and these mills became a preferred place of work for the communities. Women received respect both at work and in their families due to training received on mental wellbeing, stress management and critical thinking. This work, done in partnership with Next, Warner and local NGO SAVE, reached over 8,500 people, across 5 key recruitment communities.

The greatest success of year 1 was the trust developed with the communities and mills, enabling us to bring about significant change in the lives of the spinning mill workers. To continue nurturing this relationship we recognised the need to expand this project adjusting its scope to offer longer term support to the communities and enabling us to respond to the changing landscape of risk to workers in South India.

Over the past 12 months we have scoped 7 locations to establish local community centres, enabling scalable efforts for the communities feeding labour into our mills.

We also identified the need to have an accessible platform for workers to raise grievances and as such introduced TIMBY, an app-based grievance mechanism available in local language where workers from the mills and communities can raise their concerns anonymously. The grievances will then be supported through to remediation, utilising the resource of the community centres and the brands.

Unfortunately, once Covid-19 hit we were unable to continue our work in the communities, meaning we were unable to roll the app out to as many workers as we would have liked. However we did utilise this within the mills and will continue community roll out when possible.

Due to the pandemic, India witnessed a mass exodus of migrant workers to their native places. This too affected the textile industry in Southern India and due to the shortage of workers many mills adopted the practice of recruiting adolescents through unfair practices. To address this concern all the 7 resource centres have been linked to the local Child Welfare Commissions to mitigate the risk of child labour and human trafficking. We will continue to work with the CWC's going forward, helping to uncover and remediate cases of child labour within mills.

We see this programme as a step towards adopting a collaborative approach to protecting workers' rights in the spinning mills through working at the grass root level.

Partnerships



Partnerships

Intro & key data

We recognise that some of the issues we face are incredibly complex and that in order to make the most meaningful impact, we need to partner with external organisations to share best practices and gain access to expertise to resolve any potential issues throughout our operations.



6

UN working groups

2

Key new partnerships in 2019/20

10

Key in country partnerships

Partnerships

Intro & key data

We ensure that we are active participants in any initiative that we commit to and also only partner with organisations with whom we know we can add value throughout our supply chain and in the communities we operate in.

Partnerships for us are key to ensuring effective protection of workers and so we play an active role with each of our partners to respond to the risk and needs of our supply chain. We continue to build and maintain strong relationships with varied stakeholders including NGOs, trade unions and government departments to ensure integrity in our work and provide the best solutions to complex issues, and deliver positive outcomes for workers.

Over the past 12 months we have maintained our relationships with existing key partners including the UN Global Compact, Ethical Trading Initiative and British Retail Consortium, but have also launched some new partnerships to further our work in this space, including with the International Slavery Museum, based in Liverpool. We have also signed up to the ILO Garment Industry Call to Action, following the impacts of Covid-19 on our supply chain. Alongside our partnerships in the UK, we also have several key partners in country who support our work on the ground and enable us to respond to challenges. We will continue working in collaboration with these partners and other brands to tackle key issues in our supply chains and develop sustainable solutions.

A new partnership

International Slavery Museum

In November 2019, we reached out to the International Slavery Museum in Liverpool to explore what opportunities there may be in collaborating to raise awareness of modern slavery.

The ISM has its own challenges of helping to educate visitors of the museum on slavery in order to demonstrate to them that it is not just an issue of the past.

By collaborating with ISM, we will be able to help demonstrate to visitors how brands that they shop with every day are facing into this issue.

In addition to helping ISM with their objectives, we are also able to use the partnership to help educate colleagues on modern slavery and how to spot the signs.

The partnership allows us to work with experts in the field to be a critical friend to the work we are doing and the targets we set.

We will continue to work with ISM in order to raise expectations for work that we do across all of our operations to identify signs of and eradicate modern slavery in any form.



Dr Richard Benjamin

International Slavery Museum



A handwritten signature in black ink, reading 'R. Benjamin'.

Dr Richard Benjamin

Head of International Slavery Museum

“Cross-sector partnerships can be innovative, creative and drive change. Writing these few words, that both The Very Group employees, and various stakeholders and consumers globally might read, is the result of the first steps of what we hope to become a truly unique partnership between The Very Group and the only national museum on the subject of slavery, the International Slavery Museum.

Liverpool is home to both Very Group and International Slavery, and is a city of inventiveness, ingenuity and pioneering developments. Liverpool is truly global city and one that was part of a British Empire that by the 19th century spanned the globe but let us not forget that to a great degree, Liverpool and the British Empire in the 18th and 19th centuries were built on the blood and toil of enslaved people, brutalised and dehumanised, to fuel the labour needed to make vast profits for merchants, businesses and governments.

Cotton, coffee and sugar are commodities that most of us use each day, yet each has its own dark story to tell. Slavery in our world today is different from 400 hundred years of

state-sponsored transatlantic and chattel slavery (where people are owned and treated as a commodity with no rights) from the 15th - 19th centuries. Nevertheless, it is still a story of exploitation and greed, and working with the International Slavery Museum is a commitment by the Very Group in trying to end this so that we can still use and buy such goods but in the knowledge that they were ethically sourced and made, and ecologically friendly.

The Very Group, through the work of its CSR team, has made a commendable decision to be transparent about its challenges, and their plans to address these, all whilst working with a national museum that is not neutral, that actively fights the legacies of transatlantic slavery, such as racism and discrimination, and works with some of the UK's leading NGOs to play its part in ending forms of slavery and exploitation today.

If the public knows that their products are sometimes made using exploitative practices, they would be shocked, surprised, and angry. That is why it makes sense for an ethical company to be proactive, yet reflective too, so that they learn from the past, to help make a more equitable future. “



Working together

United Nations Global Compact

Throughout the course of this year we have continued to be an active participant of the UNGC UK network.

We are also a member of the inaugural Target Gender Equality programme. The TGE programme is designed to support companies to set ambitious targets around women's representation and leadership in business. The programme will cover topics including equal pay and sexual harassment, allowing us to explore best practice in these areas to implement not just in our own business but across our supply chains, enabling us to support women's advancement. Although in the early stages, this programme has allowed us to gain a better understanding of the work we need to do to ensure that all the people we work with are treated equally regardless of gender. Participating in this innovative new programme shows our ongoing commitment to gender equality after also signing up to the UN Women's Empowerment Principles in January 2020.

Alongside this we are also a contributing member of the network's Child Labour Working Group (CLWG) which was launched in November 2019 with the aim of encouraging network members to share the challenges faced in supply chains. The CLWG was formed with a clear ambition at the outset to share findings and encourage conversations with other national and global networks focussed on human rights issues in business and supply chains, such as the ILO Child Labour Platform, Ethical Trading Initiative and UN Women UK. By trying to better understand the challenge, look at best practice ways of mitigating child labour and developing methods of advocacy the group will ensure that effective approaches to ending the worst forms of child labour can be developed and utilised in the wider programme to end child labour in fragile contexts (EAPEC).

One of the key findings of the discussions amongst participants was that whilst the Modern Slavery Act has had a positive impact in encouraging other countries to set up similar measures, there is still more collaboration needed in the UK, particularly between the Government and the private sector to ensure that issues of Modern Slavery are being thoroughly addressed.

As a result of our active participation and membership of several working groups, we have been invited to speak at a number of UNGC events throughout the course of the year to share our key achievements and encourage other businesses to become active members of the network too.

Our work with the UNGC enables us to form partnerships with like minded businesses so that we can work together to tackle potential issues that we face across our global supply chain.



