

# HARVEY NICHOLS

## MODERN SLAVERY STATEMENT 2022-23

*This statement sets out the steps taken by Harvey Nichols to mitigate against the risk of modern slavery in our business operations and supply chains. This statement is made on behalf of Broad Gain (UK) Limited and its subsidiaries and is published in accordance with section 54 of the Modern Slavery Act 2015.*

*It constitutes our slavery and human trafficking statement for the financial year ending 31<sup>st</sup> March 2023.*

### ABOUT OUR BUSINESS

*Harvey Nichols is a premier luxury fashion retailer, selling clothing, shoes, accessories, beauty products, and food and drink products across our 8 stores in the UK and Ireland, and online.*

*All UK stores have luxury food markets and restaurants, cafes or brasseries. Harvey Nichols also owns and operates OXO Tower Restaurant, Bar and Brasserie on the South Bank in London.*

*We have approximately 1,800 employees across our business operations.*

*Our product supply chains are extensive and global, amounting to thousands of direct suppliers, agencies and concessions ("Associates"). Our Associates operate and manufacture globally.*

*We submit this statement as the Group Company Broad Gain (UK) Limited. The statement covers all of our subsidiary companies, namely:*

- *Harvey Nichols Group Limited*
- *Harvey Nichols and Company Limited*
- *Harvey Nichols (Own Brand) Stores Limited*
- *Harvey Nichols Beauty Bazaar Limited*
- *Harvey Nichols Regional Stores Limited*
- *Harvey Nichols (Dublin) Limited*
- *Harvey Nichols.com Limited*
- *Harvey Nichols (Distribution) Limited*
- *Harvey Nichols Restaurants Limited*
- *Amazon Café Limited*

*This statement, approved by the Board of Directors, sets out the steps taken by us to mitigate the risk of forced labour within our own business and in our supply chains.*

### OUR PRINCIPLES

*Harvey Nichols has a zero-tolerance approach to any form of modern slavery. We are fully committed to putting effective systems and controls in place to mitigate against the risk of modern slavery in our business operations and supply chains.*

*We operate with integrity in everything we do, and we recognise the wider responsibility we have to raise awareness of modern slavery and eradicate it from society.*

*We expect our supply chains (whether direct suppliers or those that directly or indirectly supply our direct suppliers) to share these same values.*

*We comply with all relevant legal and regulatory obligations in relation to employment and health and safety at work in the countries where we have a business presence. We ensure that all our employees are paid appropriate salaries in accordance with national legislation in each country where we operate.*

## **OUR POLICIES**

*Our internal policies cover recruitment, basic pay, working conditions and the use of contractors. These reflect our commitment to act ethically and endorse our zero tolerance approach on the use of forced labour across any part of our business.*

*We have a Whistleblowing Policy in place which encourages individuals to report any suspected wrongdoing within the business or any part of our supply chain, including human rights violations such as forced labour.*

*We have clear guidelines in place as to the steps required to be taken on the appointment of Associates, with robust controls in place that enable us to identify any concerns regarding the use of forced labour and to allow for an investigation where appropriate.*

*We believe that these policies are the foundation for a robust and effective approach to preventing modern slavery.*

## **INTERNAL TRAINING**

*We provide Modern Slavery training to all new starters as part of their induction programme.*

*This is so we can raise awareness of our zero-tolerance stance on forced labour, and ensure our teams fully understand the risks of modern slavery and human trafficking in our business and our supply chains.*

## **CONTRACTUAL COMMITMENT**

*Our standard supplier contractual terms include an obligation on our Associates to:*

- comply with the Modern Slavery Act 2015*
- warrant that their business and, to the best of their knowledge, their own supply chains do not use forced labour*
- implement appropriate controls to prevent forced labour, and to notify Harvey Nichols immediately if they become aware of forced labour within their supply chains.*

## **OUR SUPPLY CHAINS**

*We have carefully reviewed our own business operations and supply chains, and to the best of our knowledge, neither we nor our supply chains make use of forced labour.*

*We take the following steps to prevent, evaluate and address risks of forced labour in our supply chains:*

- a) *When entering into arrangements with suppliers, they undergo a supplier approval process in which we assess them from a qualitative and economic perspective. As part of that assessment, we are alert for any indicators of forced labour;*
- b) *When working with our Associates, we employ best practice measures. This prevents us from putting undue pressure on our Associates which could increase the risk of forced labour. Such measures include paying market prices, not withholding undisputed payments, and avoiding applying unnecessary pressure for the early delivery of products.*
- c) *We have adopted a Supplier Code of Conduct, which we communicate to our Associates and ask for them to contractually commit to.*

*The Code of Conduct rejects the use of forced labour. We expect our Associates to comply with the Code of Conduct and to place similar expectations on their respective supply chains. A copy of the Code of Conduct can be found on our website – [www.harveynichols.com](http://www.harveynichols.com).*

*The Code of Conduct sets out our right to audit compliance by inspecting Associates' facilities, reviewing records, policies and practices and interviewing personnel. We reserve the right to request that our Associates complete a questionnaire regarding the use of forced labour and the steps they have taken to ensure that neither they nor their supply chains make use of it. This will facilitate our due diligence process and allow us to identify red flags.*

*Focusing on responsible and ethical sourcing, the Code of Conduct also incorporates our animal sourcing principles and environmental responsibility.*

*If we identify or suspect non-compliance with the Code of Conduct we will work with our Associates to execute an improvement plan to rectify matters. Failure to address non-compliance in an appropriate and reasonable manner will lead us to cease trading with the Associate.*

*This statement is made pursuant to the Modern Slavery Act 2015 s54(1) and constitutes our group statement for the financial year 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023.*

*Manju Malhotra  
Chief Executive Officer  
April 2023*