



**The Harbourough Hare Limited**

**Modern Slavery Transparency Statement 2023-24**

It is a priority for The Harbourough Hare Limited (the “Company” or “Joules”) to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We take any allegation of human rights abuse in all its forms seriously and will not tolerate human rights abuse against individuals within Joules’ own organisation or our supply chain.

Modern slavery can take many different forms and is a complex issue. Joules has taken steps to identify areas where there are risks of modern slavery occurring within our business and supply chain and we are working to eliminate that possibility.

This is our 1<sup>st</sup> statement made under the Modern Slavery Act 2015 and constitutes the Company’s modern slavery statement for the financial year ended 27 January 2024. It highlights the key activities we have undertaken during the year and aims to provide useful information to understand our commitment as a responsible retailer to reduce those modern slavery risks that could be connected to our business.

*Alistair Hill*

Alistair Hill

Chief Operating Officer, The Harbourough Hare Limited

26th September 2024

## KEY ACTIVITIES IN 2023/24

### **Supply Chain Transparency**

- Mapping of Tier 1 factories with active business.
- Meetings with key suppliers to outline Joules expectations in relation to supply chain transparency.

### **Training & Awareness**

- Carried out in-person supplier presentations in India and China. Virtual supplier presentations held in Bangladesh, Turkey, Vietnam and Sri Lanka. The sessions were to introduce the suppliers to the NEXT Code of Practice approach, our auditing process and the tools available to support them in aligning with our standards.
- Internal training and awareness sessions were carried out with the Joules product teams to ensure their understanding of the NEXT Code of Practice, including audit processes and supplier responsibilities.
- Dedicated resource at Joules Head Office to implement the NEXT Code of Practice ways of working. Steps taken included collaboration between Joules and NEXT to ensure a smooth transition of shared processes and internal systems.

## OUR BUSINESS & COMMITMENT

### **Our Business**

We believe in dressing well for the weekend, every weekend. We are inspired by the countryside, coasts and towns in which we love to spend time. And we champion our customer every step of the way. At Joules we want to help our customers be the best, most original versions of themselves.

### **Our Company**

The Harborough Hare Limited is a private company limited by shares. Its immediate parent company is The Harborough Hare Holdings Limited, which is 74% owned by Next Holdings Limited, part of the NEXT plc group of companies.

### **Our Product Supply Chain**

We source from 9 countries - China, Bangladesh, India, Turkey, Cambodia, Great Britain, Sri Lanka, Vietnam and Pakistan.

We have 55 active Tier 1\* product suppliers

\* For details of our supply chain tiers, please refer to 'Our Customer and Products' section of the NEXT plc Corporate Responsibility Report at [nextplc.co.uk/corporate-responsibility/our-suppliers](https://nextplc.co.uk/corporate-responsibility/our-suppliers).

### **NEXT CODE OF PRACTICE COLLABORATION**

Our relationship with NEXT plc affords us at Joules an opportunity to collaborate on Modern Slavery. During the year we have begun working with the NEXT Code of Practice (CoP) team to systematically audit, understand, and improve the conditions across our supply chain. We will have auditors in our key sourcing regions working as part of the NEXT CoP team visiting and improving our factories systematically. We will audit our Tier 1 suppliers through the financial year ending January 2025 and have a programme of work in place to go beyond to Tier 2 audits thereafter, whilst drawing on the audits of those suppliers we share with NEXT.

NEXT's CoP programme is world-leading and we look forward to working closely and learning from their expertise to develop our own programme.

## **Our Commitment**

Joules is committed to finding and preventing modern slavery and human trafficking throughout our business and supply chain and to understanding the modern slavery risks that may be present.

We do this by:

- Finding effective methods to work to eliminate slavery and human trafficking practices in our supply chain. We are working towards full transparency of our supply chain.
- Ensuring our policies and procedures are reviewed regularly and that we have development and training processes in place to enable our internal teams to have appropriate awareness and understanding of the issues and our responsibilities.
- Ensuring new suppliers understand our requirements before they commence working with us, and that existing suppliers comply with those requirements.
- Ensuring the people who provide the products and services we buy and use are treated fairly, and that their fundamental human rights are protected and respected.

## **GOVERNANCE FRAMEWORK & POLICIES**

### **Our Governance Framework**

A robust governance structure and clear risk management and internal controls framework, both of which are embedded throughout the business, are core to our approach. Our executive management team is responsible for prioritising actions and helping to monitor emerging Environmental, Social and Governance risks. On a day to day basis, significant issues seen by the COP team as part of their work are discussed with the executive directors where appropriate.

As part of the risk management process, detailed risk registers are maintained. Where local business risks are identified, assessed and managed, which include risks relating to human rights, modern slavery and bribery, specific corporate responsibility risks are recorded, considered and managed as part of this process.

### **Due Diligence**

Our CoP auditing process is a vital due diligence tool as it delivers assurance that our suppliers and their factories understand their responsibility to comply with our ethical standards. Details of our Principle Standards and Auditing Standards, which are aligned to those of NEXT, are available at <https://www.nextplc.co.uk/corporate-responsibility/code-of-practice>. We also invest time and resources to support effective communication and work collaboratively with our suppliers to prevent issues arising or help resolve issues we have identified. We use the UN Guiding Principle Reporting Framework to help us build a more detailed picture and better understand the salient human rights issues across our business (i.e. those human rights that stand out because they are at risk of the most severe negative impact through the Company's activities or business relationships).

### **Policies**

Joules has clear policies and monitoring processes in place combined with robust supply chain management which are aligned to those at NEXT. We review and update these policies and practices regularly as we learn from our experiences. They are designed to ensure that people are treated with dignity and respect and include internationally recognised human rights principles and indicators encompassed in the Universal Declaration of

Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

Business policies relating to third party relationships and modern slavery are published on our ultimate parent company's corporate website at <https://www.nextplc.co.uk/about-next/corporate-governance/policies>:

- Human Rights and Modern Slavery
- Whistleblowing for NEXT's third parties
- Code of Practice Principle Standards and Auditing Standards
- Health and Safety
- Anti-bribery & Anti-Corruption

We also have the following employee related policy:

- Whistleblowing for employees

The NEXT CoP Principle Standards comprise:

- No forced labour or modern slavery
- Freedom of association and the right to collective bargaining
- Safe and healthy working conditions
- No child labour
- Fair wages and benefits
- Lawful working conditions
- No discrimination practices
- Employment security
- Respectful treatment of workers

We also have additional policies on our supplier portal system covering specific supply chain issues:

- Migrant Labour
- Child Labour
- Agency Labour
- Homeworkers
- Laundry Management
- Syrian Refugee Remediation Programme
- Wage Retention
- Shared Premises

During the year we have revised our auditing standards and communicated these to our suppliers via our supplier portal. We also developed tools for suppliers to use as part of their due diligence processes, including a critical issues assessment, a site tour checklist and worker dialogue questions.

## **RISK ASSESSMENT & DUE DILIGENCE**

### **Where are our highest risks?**

We believe those areas which give rise to the highest modern slavery risk are:

- Joules' product supply chain
- Joules' suppliers who subcontract manufacturing processes e.g. dyeing and finishing
- Specific country risks where modern slavery is higher e.g. India (restriction of freedom of movement), China (state-imposed forced labour)
- Specific goods or services not for resale e.g. logistics service providers, warehousing, cleaning services, waste recycling, employment agencies

Our salient human rights risks are aligned to those of NEXT and are as follow:

- Freedom of association and collective bargaining
- Health and safety (including mental health)
- Children's rights
- Modern slavery (including wage retention)
- Wage levels (including fair wages)
- Harassment and discrimination
- Water, sanitation and health
- Working hours

#### **Key activities this year:**

**Supplier presentations** Virtual supplier presentations held with suppliers in Bangladesh, Turkey, Vietnam and Sri Lanka. These sessions covered topics such as sourcing country challenges and supply chain risk areas. They also provide the opportunity for valuable conversations with our suppliers to understand each others' focus areas and improve ways of working together. We held in-person events for suppliers to introduce them to the CoP approach. These events took place in China and India alongside online meetings and one-to-one sessions where necessary.

**Forced labour** In line with NEXT's approach, we continue to closely monitor developments in relation to allegations of forced labour in the Xinjiang Autonomous Region (XUAR) of Western China. Our Cotton Sourcing Policy includes a ban on the use of cotton from the XUAR. We do not directly source products from the XUAR at Tier 1 (product factory). Our work to ensure that products made or sourced for Joules are free from forced labour is undertaken by the CoP team and covers Tier 1 suppliers. Traceability of our Tier 1 supply chain is a key area of focus given we do not directly source raw materials. In alignment with NEXT, we also work collaboratively with relevant NGOs and multi-stakeholder initiatives such as the Ethical Trading Initiative and the British Retail Consortium to share knowledge of challenges and solutions.

We take allegations of forced labour in our supply chain extremely seriously and take appropriate steps to investigate them. There are significant challenges in investigating issues of this nature. We are engaging with relevant internal and external stakeholders including the Ethical Trading Initiative and British Retail Consortium to explore proportionate and appropriate next steps.

#### **Due Diligence & Action Taken**

Concerns regarding modern slavery generally originate from one of the following sources:

- CoP audits
- Employee or third party communications

If our employees are visiting a factory as part of their role and identify something of concern, they can contact our CoP team directly. On the occasions when this may happen we would put an appropriate response or action plan in place. This reflects the positive engagement of our employees and their awareness of modern slavery issues which supports the work of the CoP team.

#### **Focus on child labour**

We continue to engage with our suppliers on child labour risks and encourage them to use the tools available to them via our supplier portal to carry out appropriate due diligence prior to introducing a new site to Joules and as a means of continuous monitoring with existing sites.

## Looking Forward

Over the year we plan to focus on the following areas:

- Ensuring all Joules suppliers are declaring contracts to factories using NEXT internal systems. This enables us to maintain transparency and visibility in the Joules supply chain at Tier 1 level.
- Roll out first initial announced audits for active Tier 1 Joules factories.
- Map Tier 2 sites used for Joules production.

## TRAINING & COLLABORATION

### Training & Awareness

#### Our employees & suppliers

Raising awareness and providing our employees with appropriate training remains a key focus area. Our bespoke online training course is completed by employees. Ongoing communication with our suppliers is crucial and our one-to-one supplier presentations have been a vital part of our approach to maintaining close contact with our supply chain partners.

#### Collaboration

Our business cannot tackle modern slavery alone, so it is important and valuable for Joules to work with others to develop solutions for some of the more complex and systemic problems found within global supply chains. We believe that by maintaining strong direct relationships and undertaking collaborative work with others we are able to deliver real benefits to workers in our supply chain.

NEXT continues to be an official partner of Unseen - the UK National Modern Slavery & Exploitation Helpline. This collaborative approach is essential in helping to mitigate risks and manage emerging threats.

Our membership of the Unseen Business Portal continues to be a valuable tool which allows us to monitor potential modern slavery concerns flagged through the helpline and cross-check to provide early insight to any potential issues relating to Joules. Proportionate action would be taken where appropriate.

## Looking Forward

Over the coming year we intend to:

- Work alongside NEXT with Unseen to develop and deliver a collaborative supplier event in the UK
- Hold in-person supplier events in our key sourcing countries, including China, to map and gain visibility into Tier 2 manufacturing units.
- Continue to enhance our in-person training sessions for Joules head office employees
- In-country CoP teams to monitor information regarding internal migration in key sourcing countries e.g. India and China and identify opportunities for information-sharing with suppliers and factories.

# Audit trail

## Details

FILE NAME Modern Slavery - 26/09/2024, 12:54

STATUS ● Signed

STATUS TIMESTAMP  
2024/09/26  
11:56:37 UTC

## Activity



SENT

pam.cousins@joules.com **sent** a signature request to:  
• Alistair Hill (alistair.hill@joules.com)

2024/09/26  
11:54:53 UTC



SIGNED

**Signed** by Alistair Hill (alistair.hill@joules.com)

2024/09/26  
11:56:37 UTC



COMPLETED

This document has been signed by all signers and is **complete**

2024/09/26  
11:56:37 UTC

The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.