

SELFRIDGES GROUP

Selfridges Group  
**Modern Slavery Statement 2019/20**

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## **Introduction from the Selfridges Group Managing Director, Anne Pitcher**

As a family-owned, values-led business, modern slavery in all its forms goes against everything we stand for. We are supportive of and uphold the aims of the UK Modern Slavery Act and our own Modern Slavery Statement 2019/20 sets out the steps we are taking to help prevent modern slavery from occurring in our businesses and supply chains across Selfridges Group. In this statement, we outline the sustainability framework we have put in place across Selfridges Group to help us focus on key issues, including modern slavery.

Collaboration is key to tackling modern slavery and we are committed to working collectively with our brand partners and suppliers, with experts, and as part of the retail industry and wider business community. Our approach, which is part of our sustainability programme, focuses on ensuring that appropriate governance mechanisms are in place, clear expectations are set for team members and suppliers, and key groups are engaged on the issue.

Crucially we extend our collaborative approach and collective action to our supply chains, which pose the greatest risk due to limited visibility or direct control of their operations, to help protect everyone who works with us.

In the coming year, we will explore opportunities to further align our policies, due diligence and communications across Selfridges Group.



**Anne Pitcher**

Selfridges Group Managing Director

24<sup>th</sup> April 2020 | Signed for and on behalf of Selfridges Group, SHEL Holdings Europe Limited Board of Directors

## **Who we are**

We are SHEL Holdings Europe Limited, the UK Head Office of Selfridges Group. Selfridges Group comprises of operating businesses that provide leading luxury shopping experiences for millions of customers around the world. The five iconic retailers we consist of are Brown Thomas and Arnotts in Ireland, Holt Renfrew in Canada, Selfridges in the UK and de Bijenkorf in the Netherlands.

## Our group

Selfridges Group consists of five multi-brand retailers - our businesses - which provide leading luxury shopping experiences through our stores and websites for over 320 million visitors. We have stores totalling over 3 million square feet of retail space, in 4 countries, and we deliver to over 130 countries online.

### **Brown Thomas** *Ireland*

Brown Thomas is Ireland’s premier lifestyle retailer. Through its internationally acclaimed and award winning window displays, renowned fashion shows, exclusive product launches and unique luxury boutiques, Brown Thomas offers an unparalleled luxury shopping experience. It is a destination for Irish and international customers alike.

**6 stores 1 digital store**

### **Arnotts** *Ireland*

Arnotts is Ireland’s oldest and largest department store. It opened its decorative brass-clad doors in Dublin in 1843 and has been greeting visitors from all over the world ever since.

**1 store 1 digital store**

### **Holt Renfrew** *Canada*

Holt Renfrew is Canada’s specialist luxury retailer. Home to some of the world’s most prestigious labels and innovative designers, Holt Renfrew is acclaimed for offering leading luxury fashion and lifestyle shopping experiences to its customers.

**8 stores 1 digital store**

### **Selfridges** *UK*

Selfridges & Co is simply one of the world’s most iconic names. Since first opening its doors more than a century ago, it has been famed for its style, creativity and innovation.

**4 stores 1 digital store**

### **de Bijenkorf** *The Netherlands*

de Bijenkorf is the Netherlands’ leading luxury retailer, admired for its beautiful merchandise, exceptional window displays and fabulous in store events.

**7 stores 1 digital store**

Dynamic people that love our businesses are the bedrock of our success. Our businesses house a community of more than 10,000 diverse and hugely talented team members. In addition to our business teams we have a central Selfridges Group team, made up of around 50 people, whose purpose is to support the businesses in thought leadership, cross-group project management, reporting and governance. Our team members are complemented by thousands of other people. These include agency workers, contractors, concession staff, consultants and of course the people within our supply chains. All of these individuals come together to enable the delivery of our luxury shopping experiences. Throughout this Statement where team members, brand partners and suppliers are mentioned we refer to those people or companies engaged by the five businesses within Selfridges Group.

## Staying on track

We have a sustainability framework in place across Selfridges Group which helps us focus on key issues including modern slavery. It is split into four elements - Destinations, Product, People and Customer.

The Group Managing Director is ultimately accountable for our compliance with the Modern Slavery Act reporting requirements, supported by the Group Executive Committee who oversee progress of our wider sustainability strategy. Our Group Director of Sustainability is responsible for the day to day running of our group sustainability programme.

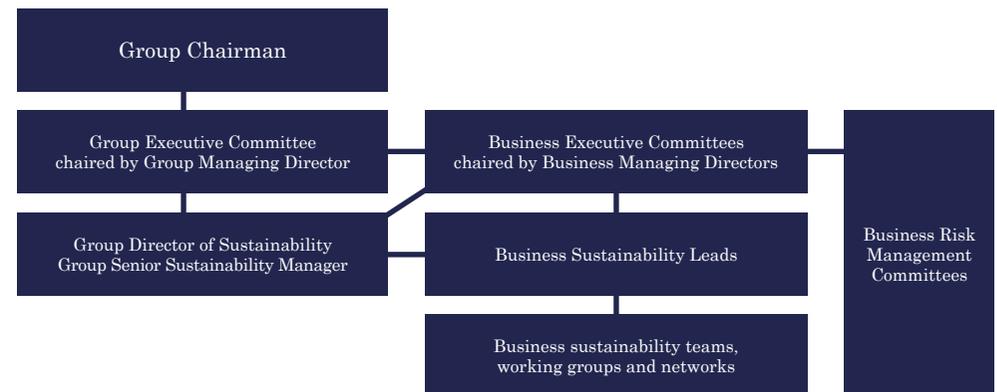
The Group Director of Sustainability and Group Senior Sustainability Manager work closely with each of the Business Managing Directors and Sustainability Leads to drive the development and implementation of our sustainability programmes. Each business works within the sustainability framework to a consistent set of goals, but has the flexibility to develop an approach and design support mechanisms most relevant for their own business and supply chains. Opportunities for collaboration and good practice sharing across Selfridges Group are sought through regular calls between the Business Sustainability Leads. Sustainability risk including that relating to modern slavery is also included in relevant business risk management mechanisms. Our approach to tackling modern slavery is included within our Selfridges Group sustainability framework. This is adapted by the businesses as they develop their own unique approaches. Throughout this document the consistent Selfridges Group approach is described, with an example of some of the additional business specific activities highlighted in each area.

Selfridges Retail Limited has published its own Modern Slavery Statement setting out the steps taken to prevent modern slavery from occurring with the business and supply chains.

## Case study

The businesses within Selfridges Group each have their own sustainability governance and management arrangements in place, which they continue to enhance. **De Bijenkorf** continues to embed sustainability and strengthen their governance structures to manage progress throughout the whole business. These include a Sustainability Steering Committee, which meets monthly, chaired by the Managing Director. The Committee focuses on progress against sustainability targets and is the decision-making body for sustainability within the business. The Steering Committee has assigned clear roles and responsibilities to team members across the wider business helping to embed sustainability into the day to day work of many employees.

## Our governance



## Our approach: Risk assessment

To be most effective with our actions, it's imperative we take a people-focused, risk-based approach. In addition to considering sustainability risks in our risk management processes we also consider specific modern slavery risks in relation to the three main ways we engage people. These include team members, other people working on our sites, and people working off site in our supply chains. Our businesses consider a variety of factors in their own varied assessments for these groups of people. These may include industry; worker location; role type, skill and pay level; contract type; level of direct control; and our impact and influence including considering where we have strategic and long-standing relationships or where we directly specify goods or services.

- **Team members:** Our team members include everyone who is directly employed by Selfridges Group or one of our businesses, including those who work in our stores, in our head offices and in our support centres. This population increases as we employ further temporary team members to meet seasonal needs. The modern slavery risks within our team member population are relatively low, due to the nature of the roles and the human resources policies, processes and controls we have in place. For this group of people our priority is raising the awareness of modern slavery issues, indicators and where to seek support.
- **People working on our sites:** Alongside our direct team members we have a number of other individuals who work on our sites, including agency workers, contractors, concession staff and consultants. These individuals are not directly employed by us and are managed by the brand partners and suppliers we contract with. We are aware that industries such as construction, cleaning, security, and those that more commonly use temporary workers have a higher inherent modern slavery risk. For this group, our priority is ensuring that the suppliers who manage these people have appropriate measures in place to tackle modern slavery, and are actively promoting available support.

- **Brand partners and suppliers:** In addition to those people who work directly for us and on our sites, we have extensive supply chains. Our brand partners and suppliers produce the products we sell in store and online, and the products and services we need to operate our businesses. The products we sell are primarily goods from third party brands, but our businesses also have own brand or exclusive ranges for which we can oversee and manage the supply chain more directly. Our supply chains for both own and third party brands include suppliers in countries and industries which are known to have higher incidence of modern slavery, and suppliers which we have limited control and visibility over. We recognise this as a high priority area for modern slavery risk. For our brand partners and suppliers our priority is ensuring we set out clear expectations and that we engage and collaborate with our suppliers regularly based on the risk in their supply chain.

### 2020/21 plans:

We will review the sustainability and ethical trade risk assessments completed by our businesses to identify opportunities to align approaches and share learnings in respect of our retail businesses and related activities, such as property holding. This will help us more consistently and effectively evaluate and manage risk across Selfridges Group.

### Case study

During 2019/20 all of the Selfridges Group businesses continued to develop their approaches to risk assessment. For example, **Holt Renfrew** completed a risk assessment of their supply chain to help ensure key suppliers were aware and adhere to their Ethical Trade Requirements. This prioritisation was risk-based considering the relationship the suppliers have with Holt Renfrew, focusing on those who provided goods and services not for resale and own brand goods. They plan to further roll out a targeted engagement plan in 2020/21.

## Our approach: Policies

**HR policies and processes:** Our Codes of Conduct, HR policies and HR processes set out our expectations of, and our responsibilities towards, our team members. These policies are provided to new starters with contracts, are referenced in inductions and are available on businesses' intranet sites.

**Ethical Trade Requirements:** We work collaboratively to explain our requirements and understand how suppliers are able to meet those requirements. We issue our Ethical Trade Requirements (or Supplier Codes of Conduct) to our brand partners and suppliers, including many of our contractors and concession partners as part of our Terms and Conditions. These include clauses on zero tolerance of forced labour, are aligned with the ETI Base Code and ILO Principles and apply across all tiers of our supply chain. These are discussed and referenced in brand partner and supplier conversations and with team members who liaise with these partners.

### 2020/21 plans:

We will further align our Ethical Trade Requirements across the Selfridges Group businesses in the coming year, in respect of our retail businesses and related activities, such as property holding. This consistency will help increase supplier understanding, particularly where suppliers partner with more than one business, and aid collaboration on supplier communication, engagement and due diligence.

## Case study

Our business' Ethical Trade Requirements and Codes of Conduct set out the expectations of brand partners and suppliers. **Selfridges, Brown Thomas** and **Arnotts** reissued their Ethical Trade Requirements during 2019/20 to all brand partners and suppliers. This was following further alignment with good practice including expanding existing forced labour clauses, specifically referencing zero tolerance of modern slavery, and adding an explicit expectation of compliance with all relevant modern slavery legislation.

## Our approach: Due diligence processes

### Onboarding

**Right to work:** We review our new team members' right to work as part of our onboarding processes. Our systems are automated to ensure right to work and visa statuses are up to date.

**Contractor, concession, agency and supplier checks:** We rely on our contractors, concessions, agencies and suppliers to ensure people working for them are eligible to work and are compliant with our policies and procedures. This is set out in our Ethical Trade Requirements.

### Monitoring

**Grievance process:** We have grievance processes for team members to address any concerns or issues that they have. In addition, our Group-wide Speak Up Helpline allows team members, anyone working on our sites or with us, to raise concerns anonymously.

**Responsible managers:** Managers in our businesses, concession partners and contractors are responsible for the safety and wellbeing of those who work in their areas.

**Team member monitoring:** We monitor key team member details via our HR system to identify and investigate any unusual patterns which might indicate an issue.

**Supplier due diligence:** Our approach to supplier due diligence is the area which varies the most across the Selfridges Group businesses. Each business has a risk-based approach in place which include a variety of measures such as seeking warranties from suppliers, reviewing bespoke or Sedex (Supplier Ethical Data Exchange) Self-Assessment questionnaires, asking questions at tender, reviewing ethical audits, performing desktop reviews of policies and processes, and engaging suppliers in individual discussions. The Selfridges Group businesses target due diligence where risk is higher to workers, as well as where they have greater control and influence. This includes suppliers of own brand products or goods not for resale.

### Case study

Each of the businesses within Selfridges Group continues to develop its approach to due diligence. For example during 2019/20 **Brown Thomas** and **Arnotts** continued to develop their Responsible Sourcing risk assessment and due diligence framework which incorporates modern slavery compliance. This included engaging, capacity building and risk assessing their supplier base. One element of the framework involves requiring suppliers to complete a bespoke Sustainability Supplier Questionnaire. The purpose of this is to identify the measures suppliers have in place to help ensure compliance with Brown Thomas Arnotts Ethical Trade Requirements. All goods not for resale suppliers (36), and the top 10 (by sales) brands and concessions by department (over 180 organisations) were risk assessed using this framework.

## Our approach: Due diligence processes

### Escalating

**Whistleblowing:** We have a dedicated whistleblowing and support line, our Speak Up Helpline. This is accessible 24 hours a day all year by anyone who works for or with us and is promoted through team member guides, on payslips and in team member communications. 75 calls were made in total to the Helpline this year, none relating to modern slavery. We also work with our suppliers and concession partners to resolve any issues which are brought to our attention via them or through other channels.

### 2020/21 plans:

- In our general and modern slavery communications we will continue to raise the awareness of our Selfridges Group Speak Up Helpline; and in addition, in the UK, the Modern Slavery Helpline.
- We will look for opportunities to align our due diligence approaches across Selfridges Group to further collaborate in targeting areas of higher risk.

### Case study

In the reporting year ended 31 January 2020, we became aware of concerning reports of labour abuses in a factory associated with one of the brand partners of **Selfridges** and **Brown Thomas**. Selfridges and Brown Thomas immediately requested a detailed account of the investigation and its outcomes, including remediation, which has been on-going with an ethical trade consultancy on the ground since the discovery. They have been assured that no current orders are in place with this facility and that future business will be evaluated when the actions are successfully completed. Selfridges and Brown Thomas will continue dialogue with the brand in relation to its due diligence of this site, and all other production sites.

## Our approach: Training and communications

**Inductions:** All new team members complete an induction which includes an introduction to sustainability.

**Team member communications:** The businesses have their own team member engagement approaches for sustainability which include standalone sustainability messaging, as well as sustainability being woven into business communications in line with business strategies.

**Buying team communications:** Our Buying teams are engaged in various sustainability communications and engagement activities through the year and are made aware of modern slavery as part of our Ethical Trade Requirements.

**Brand partner and supplier briefings:** Brand partners and suppliers are engaged generally on our sustainability programme, specifically on key sustainability issues and on our Ethical Trade Requirements in a variety of ways across the group. These include formal issuance of requirements, supplier engagement conferences, informal supplier briefings, supplier guides and targeted discussions with suppliers in higher risk areas.

**Modern slavery briefings:** Some businesses have provided specific briefings on modern slavery to key groups of stakeholders to raise the level of awareness and understanding of the issue.

### 2020/21 plans:

We will review the modern slavery communications and training in place around the group and seek opportunities to further share and communicate across businesses.

## Case study

Some areas of Selfridges Group have promoted specific modern slavery briefings, for example in **Selfridges**. Selfridges' Ethical Trade and Modern Slavery Working Group consists of stakeholders from key business areas who meet fortnightly. The Working Group provides additional oversight, structure and focus to a range of ethical trade activities which address key opportunities and risks including modern slavery. They have received and promoted modern slavery briefings in their teams and with suppliers.

## Our approach: Monitoring effectiveness

Monitoring key measures helps us evaluate whether our sustainability approach is effective, directs our future activity, and highlights potential areas of improvement. Each year we review the measures we use to help us continue to do this. We intend these measures to grow and evolve as our approach does.

Our businesses report on their sustainability performance internally and to the Selfridges Group Head Office Team each month using sustainability dashboards. These sustainability dashboards include measures on team member awareness and engagement, supply chain visibility, non-compliances and brand and supplier engagement. In addition to this, sustainability risk is considered in monthly business risk reviews.

## Collaborating with our partners

Internal and external collaboration remains integral to our approach to sustainability and in tackling modern slavery. We recognise the need and importance of this to learn, share and collectively make progress in understanding and addressing issues. Some of our businesses have partnered with external organisations including the below. They share learnings from these collaborations around the group.

### Stronger Together

Selfridges continue to partner with Stronger Together, a business-led multi-stakeholder collaborative initiative which provides practical knowledge and resources to tackle modern slavery in businesses and supply chains. Selfridges partner on the delivery of their modern slavery action plan, to seek subject matter expertise, to engage in collaboration opportunities and to further develop their approach. They actively encourage suppliers in categories of higher risk to attend workshops delivered by Stronger Together. Next year Selfridges will be taking part in Stronger Together's programme in South Africa which supports South African agri-businesses to address the risk of forced labour within their businesses and supply chains. Brown Thomas and Arnotts will also be engaging their suppliers in a training workshop with Stronger Together in the coming year.

### Sedex

Selfridges Group has partnered with Sedex, the Supplier Ethical Data Exchange, for a number of years to increase transparency across supply chains. Sedex membership is used differently across the businesses including, requesting brand partners and suppliers share information via the Sedex platform, participating in Sedex events and working groups, and referring to Sedex Members Ethical Trade Audits.

### Sustainable Apparel Coalition

de Bijenkorf take the lead on Selfridges Group's membership of the Sustainable Apparel Coalition (SAC), the leading alliance of sustainable production in the apparel, footwear, and textile industry. They seek to engage brand partners and suppliers in understanding and mitigating supply chain risks through the use and development of The SAC's tools such as the Brand and Retailer Module.

## SELFRIDGES GROUP

In accordance with section 54 of the Modern Slavery Act 2015, this document sets out SHEL Holdings Europe Limited and each of its key operating businesses' (Selfridges Group's) Modern Slavery Statement for the reporting year from 1 February 2019 to 31 January 2020.

This Modern Slavery Statement covers SHEL Holdings Europe Limited, together with the following entities that are direct and indirect subsidiaries of SHEL Holdings Europe Limited and the key operating subsidiaries that comprise Selfridges Group:

Selfridges Retail Limited, UK; Magazijn de Bijenkorf B.V., the Netherlands; Brown Thomas & Co Limited, Ireland; Arnotts Limited, Ireland; Holt Renfrew & Co., Limited, Canada.

In addition to this statement, Selfridges Retail Limited has published its own Modern Slavery Statement setting out more detail on the steps taken to prevent modern slavery from occurring with its business and supply chains.

For all comments or queries in relation to this document, please contact us at [ethics@selfridgesgroup.com](mailto:ethics@selfridgesgroup.com)

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