

Modern Slavery Statement
April 2019 – March 2020

hush

Our promise

It is so important to us that our products are made, and our business operations are delivered, in an ethical way and one that conforms to our principles as a brand.

Kindness to environment.

Kindness to customers.

Kindness to community.

Kindness to employees.

We are pleased to share our second Modern Slavery Statement which covers the financial year ending 28th March 2020 and is produced in line with the requirements set out in Section 54 of the Modern Slavery Act 2015.

This statement will outline the steps hush has taken to prevent Human Trafficking and Modern slavery from taking place in our business and supply chains.

As we publish this statement, we are in the midst of a global pandemic which has created great difficulties for supply chains around the world. We want to reassure our customers that we will do everything in our power to stand by our suppliers and colleagues and support them through this difficult time and going forward.

We are also living through a social revolution linked to the Black Lives Matter movement and we are working hard to ensure that we are actively anti-racist as a brand. Please view our [Inclusivity and Diversity statement](#) for more information on this journey.



Our promise cont.

While we have always had high standards for our suppliers and employees, in February 2019 we established an ethical and sustainability department. The past 12 months have therefore been instrumental in focusing our efforts and setting a foundation for how we want to operate as a business with ethical trade and sustainability at our heart. Below is a snapshot of what has been implemented and this will be explained further in our statement:

- We launched a factory assessment programme with The Re-Assurance Network (TRN) and visited and assessed factories producing 53.2%* of our goods.
- Our product teams have visited suppliers producing 66%* of our goods.
- We established a robust factory onboarding process and mapped 100% of Tier 1 sites.
- We commenced mapping Tiers 2, 3 and 4 with the aim to have 2/3 mapped by end of 2020.
- We had a complete overhaul of policies for our Stock, Non-Stock, 3rd Party branded suppliers, HR team and employees.
- We introduced regular steering group meetings with senior management to drive ethical and sustainability strategy.
- We consulted with the Centre for Sustainable Fashion, who delivered masterclasses to all staff.
- We conducted a supplier survey to collate supply chain information and gain visibility on areas for improvement.

We have big plans for our ethical and sustainability programme, and we hope to become industry leaders in this field. We know it will take time and investment, but it is important for us to be a brand that our customers, suppliers and employees can be confident in.

Honesty and transparency are at the forefront of how we are working to improve our supply chain and we are excited to share our progress with you as our journey continues.

Signed



Rupert Youngman on behalf of the board of directors,

Job Title **Managing Director**

Date **28|09|20**

* Unfortunately, owing to Covid-19 some trips had to be cancelled but, once travel restrictions are lifted and the situation improves, our teams will be able to travel safely to visit our suppliers once again.

About hush

Hush was founded in 2003 by our creative director Mandy Watkins and is an online fashion and lifestyle brand selling women's clothing, footwear and accessories.

Our products are currently sold through our website (hush-uk.com), on John Lewis & Partners' website (johnlewis.com) and across 35 John Lewis concessions.

Our Head office is in Battersea, London and our warehouse is based in Leeds, where it is managed through a third-party.



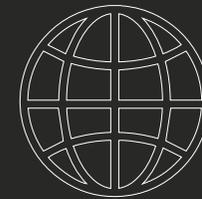
5 OUT OF 6

of our directors are women



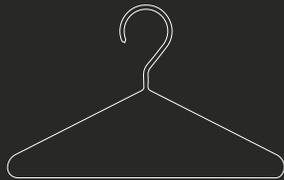
140 EMPLOYEES

with 101 based in head office,
and 39 across John Lewis concessions



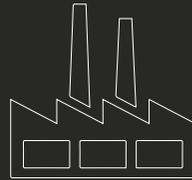
10

How many countries around the world
our products are manufactured in



97.7%

of our production is from China,
India, Turkey, Tunisia and Portugal



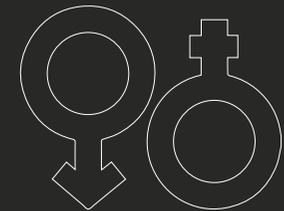
118

How many Tier 1 manufacturing
sites make our products



20,722

The number of workers
in our Tier 1 manufacturing
sites of whom...



52% Male

48% Female

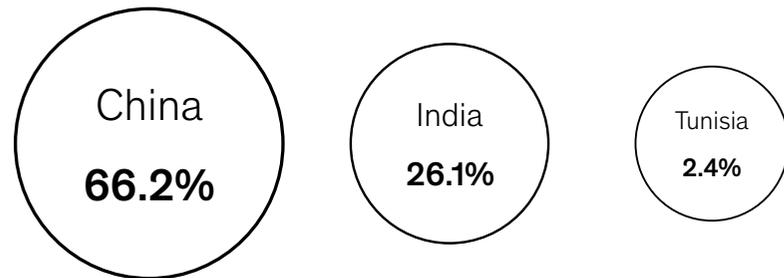


Our supply chain

Our products are currently manufactured in China, India, Turkey, Tunisia, Portugal, Vietnam, Spain, Italy, UK, and Greece. We have 118 approved factories in these countries and for the financial year ending 2020 we were manufacturing our products in 87 of these.

The suppliers we use are especially important to our business and we choose them very carefully. We pride ourselves on the fact that some of our supplier relationships are as old as hush itself and we aim to build working relationships based on trust and transparency.

Percentage of units placed for production per country



Turkey	1.7%	Italy	0.2%
Portugal	1.3%	Greece	0.05%
Vietnam	1.1%	UK	0.05%
Spain	0.9%		



Our supply chain cont.

Traceability of our Stock Supply Chain is a key component to assessing and combatting risks of modern slavery.

This year, to gain clear visibility of all our Tier 1 factories that produce our product, we started a supply chain mapping exercise. We have now mapped 100% of our Tier 1 suppliers and have also introduced an onboarding process for all new factories and suppliers to ensure that this remains the case.

We are now focusing on mapping the lower tiers of the supply chain as this is often where the risks of modern slavery increase. We are reviewing the expansion of our Ethical and Sustainability team to ensure that sufficient resource is allocated to this

Tier	Process	Status	Details
Tier 1	Main Production Site	100% mapped	Implemented a process to onboard all new factories and suppliers to ensure that this remains mapped
Tier 2	Primary Process Subcontractor E.g. stitching, cutting, packing	Partially mapped	Will be complete by end of 2020
Tier 3	Secondary Process Subcontractor E.g. embroidery, embellishment, laundry	Partially mapped	Will be complete by end of 2020
Tier 4	Fabric and Components E.g. fabric mills, trims	Partially mapped	Target completion date is end of 2023. However, we aim to map 50% of our Fabric Mills by end of 2021.
Tier 5	Raw materials	Partially mapped	Target completion date is end of 2025. We are growing our number of certified raw material products; in turn this means that we can be confident that they have met the social criteria requirements for certification. We have set a target to source 100% sustainable cotton by end of 2023 through our work with Cotton 2040.



Our supply chain cont.

Stock Suppliers

We work closely with our Stock Suppliers and make regular trips to their factories and showrooms. Our product teams have visited suppliers in China, India, Portugal and Turkey during the year and use these visits to develop relationships, discuss new products and talk over any issues including ethical compliance. *

Third Party Branded Suppliers

Whilst much of our business is own brand product, we also work with and stock product from several third-party brands, principally as part of our 'Hush Loves' range. It is important to us that these brands share our ethos.

Non-Stock Suppliers

Our reach as a retailer goes beyond just product and we work with many Non-Stock Suppliers - e.g. catalogue printers, packaging suppliers, florists etc. These partners allow us to source a range of goods not for resale (GNFR) and services which are an integral part of our business operation. We therefore must ensure that we manage procurement of these suppliers responsibly and in keeping with the law.

* From April 2019 to March 2020, our product teams visited suppliers who were supplying 66% of units to us. However, further overseas trips to our manufacturing countries are currently postponed as a result of the COVID-19 pandemic, but we will resume these as soon as it is safe to do so.

Our policies

ETHICAL TRADE INITIATIVE (ETI) BASE CODE

Our Code of Practice sets out our expectations from suppliers to ensure safe and fair working environments and practices within our supply chain.

This year we have aligned our Code of Practice to the ETI Base Code as this is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. The core principles include:

1. Employment is Freely Chosen
2. Freedom of Association and the right to collective bargaining are respected
3. Working conditions are safe and hygienic
4. Child labour shall not be used
5. Living wages are paid
6. Working hours are not excessive
7. No discrimination is practiced
8. Regular employment is provided
9. No harsh or inhumane treatment is allowed

All suppliers must meet the base standards outlined in our Code of Practice and we have now implemented a robust onboarding process for new suppliers to ensure compliance. Our revamped supplier manual contains our Code of Practice and these core principles. It has been communicated to all existing suppliers and forms part of the new supplier onboarding process.

To read the ETI base code visit <https://www.ethicaltrade.org/eti-base-code>



Our supply chain policies and procedures to address the risks of modern slavery

STOCK SUPPLIERS

Supplier Manual

For a business relationship to commence with our stock suppliers, there are a set of standards and policies to which all suppliers are required to sign up and adhere. These are contained in our Supplier Manual.

To provide clearer information regarding updated processes to suppliers and to strengthen our position with regards to ethical trade and eradicating modern slavery, we have given our Supplier Manual a complete makeover and it now contains our requirements regarding ethical trade and our Code of Practice

Conditions of Purchase

We have also added a set of Conditions of Purchase, so that all business between us and our suppliers is governed by that framework. While the majority of the clauses in these conditions refer to the product (prices, delivery, quality etc), we have also included clauses specific to Anti-Slavery and Human Trafficking and Assignment and Sub-Contracting.

Prohibited Activities policy

We have made the decision to ban some specific industry practices in our supply chain within our Prohibited Activities policy. Owing to ongoing concerns about forced and/or child labour involvement in the picking of Uzbekistan and Turkmenistan cotton, for instance, we have prohibited this from being used in our products. Anti-Slavery International states that approximately half of all Uzbek cotton was picked by state-sponsored forced labour, involving what was estimated to be hundreds of thousands of children and adults each year.

As part of our fibre sustainability targets, we are increasing our use of organic and sustainable cotton. This will also allow us to have higher levels of visibility of our raw materials.

We have also prohibited the use of sandblasting in our products. Sandblasting is a technique used for processing denim to give it a worn look. In this process, the material is sprayed with an abrasive material e.g. sand. Sand contains a material called silica. There is an extremely high health risk associated with this practice. If the worker performing this process inhales the silica dust, this can cause serious respiratory conditions.

Child Labour and Remediation Policy

Whilst Child Labour has always been explicitly forbidden through our Code of Practice, we have introduced a specific Child Labour and Remediation Policy to elaborate further and secure our position on this issue.

Sub-Contracting Policy

We have also introduced a Sub-Contracting Policy so that suppliers are clear that we will not accept the use of unapproved manufacturing sites in our supply chain and that the existence of any of them will jeopardise our business relationship. The risk of modern slavery is higher in these sites due to their 'off-the-radar' nature.

THIRD PARTY BRANDED SUPPLIERS

3rd Party Branded Supplier Code of Conduct

This was implemented because of potential differences to the way these types of businesses operate. Clauses and policies detailed include: The ETI Base Code, Anti-Slavery & Human Trafficking, Anti-Corruption & Bribery, Health & Safety, Environment and Animal Welfare.

NON-STOCK SUPPLIERS

Supplier Code of Conduct

This is a document which sets out our requirements for our non-stock suppliers. Clauses relevant to eradicating modern slavery include: Anti-Slavery & Human Trafficking, Human Rights and Anti-Corruption & Bribery.

Our internal business policies

Our HR team strictly follow our Recruitment Process, which includes appropriate due diligence on right to work and proof of identification.

When agency work is required, we only work with reputable recruitment agencies with whom we have signed terms. We are committed to promoting equal opportunities in employment and have an Equal Opportunities policy, which guides our HR team on the avoidance of discrimination at work.

We have policies in place to protect employees at hush through the employment process and during their time in the business. All employees have access to our HR Policy Booklet, which includes our Anti-Slavery and Human Trafficking, Anti-Corruption & Bribery and Whistleblowing policies.

All employees must follow our code of conduct, which makes it clear the actions and behaviour expected of them when representing the company.



Our internal business policies cont.

ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships. This policy forms part of the induction process and sets out our commitment to implement and enforce systems to ensure that modern slavery is not taking place in our business and supply chain.

ANTI-CORRUPTION & BRIBERY POLICY

It is our policy to conduct all our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. This policy sets out our expectations and prohibits any bribes.

WHISTLEBLOWING POLICY

We encourage an open and honest working environment, but we recognise that there may be times when an individual employee may feel that they need to raise certain concerns/issues in a confidential way. This policy provides guidance for individuals on how to do this without detriment.





Planned Policy Amendments

This year we have worked hard to implement robust policies across different areas of our business. But there is still work to do in this area and we have some policy amendments planned for the next year.

While our Supplier Manual contains our Code of Practice and Child Labour & Remediation Policy, we acknowledge that our Anti-Slavery and Human Trafficking, Anti-Corruption & Bribery and Whistleblowing policies should also be shared with our suppliers, not just employees.

We understand that we have some work to do here to ensure that our expectations, policies and procedures align across our business and supply chain and we look forward to sharing progress with you next year.

Risk Assessment

We acknowledge that there is always a risk of modern slavery in any fashion business and supply chain. We have identified key areas where modern slavery could exist and those are the areas where we are focusing our risk assessment and management activities. This could be through working with our external partners and/or modifying our own business operations where necessary.

Since October 2019, for example, we have been working with The Reassurance Network (TRN), an independent company who will help to improve our supply chain from both a legal and ethical standpoint.



Who are TRN?

The Reassurance Network was established in 2003 and is an international team of specialists who work closely with clients to build more sustainable supply chains.

Their tight-knit network of 39 associates, based in Bangladesh, China, India, Pakistan, Romania, Turkey and the UK provide services throughout Asia, Europe, the Middle East and North Africa.

They share a passion to make supply chains safer and fairer by working collaboratively to map, monitor and improve working conditions and labour practices.

By building relationships based on transparency, TRN support our suppliers and factories via site visits, factory assessments, bespoke workshops, and on-site training. This support mechanism is invaluable and allows us to educate our suppliers and factories to recognise indicators of exploitation and modern slavery and drives open dialogue throughout our supply chain.

Working collaboratively, we can best ensure compliance to our Code of Practice and prevent human trafficking and modern slavery from taking place in our business and supply chains.

Progress and Future Commitments

Our ethical and sustainability programme is always evolving and developing so that we can improve and strengthen our processes and practices. We know that to eradicate modern slavery we need to push forward and drive our programme throughout our business and supply chain and these initiatives will support this vision.

We are pleased to report the progress that we have made with last year's initiatives and we are now sharing the new future initiatives that we are planning. We recognise that, for all our desire to move forward at pace, there is a limit to what can be achieved in a year so we continue to be realistic about this.

What we are looking at

What we have done

What we plan to do

Business Policies

- This year we have worked hard to implement robust policies across different areas of our business:
- Strengthened Supplier Manual by aligning code to ETI Base Code, and introducing specific Child Labour and Remediation Policy, Prohibited Activities Policy, Conditions of Purchase and Sub-Contracting Policy.
- Introduced Codes of Conduct for Non-Stock and 3rd Party Branded Suppliers.
- Implemented HR Policy Booklet which includes our Anti-Slavery and Human Trafficking, Anti-Corruption & Bribery; and Whistleblowing policies.

- We will strengthen our policies in our Supplier Manual, Supplier Code of Conduct and 3rd Party Branded Supplier Code of Conduct to ensure that all suppliers and factories understand our expectations. This includes beginning the work to share our Anti-Slavery and Human Trafficking, Anti-Corruption & Bribery; and Whistleblowing policies across our supply chain.

Progress and Future Commitments cont.

What we are looking at

What we have done

What we plan to do

Supply Chain Transparency

- This year we have established an onboarding and approval process for Tier 1 factories. All Tier 1 factories producing for hush must now go through an approval process before a business relationship can commence.
- This involves the completion of comprehensive factory set-up forms and the submission of a recognised third-party audit, which must be at a satisfactory standard.
- Where there are issues that are unable to be resolved during the set-up process, the factory will be rejected and cannot be used to produce hush goods. Once Tier 1 factories are approved, they must be regularly audited or they will be unapproved.
- This year, to gain clear visibility of all our Tier 1 factories that produce hush product, we also commenced a supply chain mapping exercise. We have now mapped 100% of our Tier 1 suppliers and factories and through our new onboarding procedure, we will ensure that this remains 100% mapped.

- We are now focusing on mapping the lower tiers of the supply chain as this is often where the risks of modern slavery increase.
- Our target to map Tiers 2 and 3 by the end of 2020 remains the same and we are working hard to meet this.
- The supply chain for our fabrics, fibres and trims is more complicated and will therefore take more time. We have set targets to have Tier 4 mapped by the end of 2023 and Tier 5 mapped by the end of 2025.
- We have engaged with Cotton 2040 from Forum for the Future and as part of this project have committed to sourcing 100% sustainable cotton by end of 2023.
- Through our product development, we are also growing our number of certified raw material products meaning that visibility of our fibre sourcing is growing and will continue to do so as we move to more sustainable fibre choices.

Factory Assessment Programme

- As most of our business is our own brand product manufacture, this is our main priority. In October 2019 an assessment programme for our factory base was launched and TRN have been supporting this programme by conducting factory assessments and providing improvement support where issues are identified. By working together with factories, we can work towards eradicating modern slavery risks.

- As part of our factory assessment programme, we are committed to visiting and assessing factories manufacturing 80% of our products by the end of the next financial year. Obviously, this is subject to review, based on how the Covid-19 pandemic develops.

Progress and Future Commitments cont.

What we are looking at

What we have done

What we plan to do

Factory Assessment Programme

- Modern slavery indicators are a fixed part of the assessments and this allows us to gain a clear picture of the risk and/or existence of modern slavery within the facility.
- We focus on social, chemical and environmental factors within these sites and if/when issues arise, we work together with the site to implement the necessary improvements.
- Working with TRN, we have visited and conducted assessments on factories manufacturing 53.2% of our products.

- With TRN, we are implementing Health & Safety workshops and training for both suppliers and factories where there is a need for this. This engagement with sites is invaluable and allows for open and honest working relationships.

Purchasing Practises

- In October 2019 we began to roll out our supplier survey for all suppliers and factories working to supply our product.
- This survey allows us to collate beneficial information regarding our supply chain and contains confidential questions to give us visibility of working practices and areas for improvement. It has also supported our supply chain mapping exercise.
- It also allows our suppliers and factories to make recommendations on how we can improve our processes and systems. We understand that some of our behaviours can have unintended consequences and we want to ensure that we avoid these in all instances.

- Once all surveys are complete and we have gathered all the information, we will use this to develop our internal training for teams to drive any improvements required within our business and supply chain.
- We will continue to encourage suppliers to be honest and open with us about our business relationship through conducting regular surveys of this nature in the future.
- This will also allow us to review the effectiveness of internal training developed from our findings and promote continuous improvements.

Progress and Future Commitments cont.

What we are looking at

What we have done

What we plan to do

Internal Strategy Driving

- To elevate the importance of driving ethical trade and sustainability in the business, we introduced half yearly steering group meetings with all directors. As part of the fixed agenda we discuss issues, projects and progress on a regular basis.
- We have run a six-month project with the Centre for Sustainable Fashion (CSF), a research centre affiliated to the London College of Fashion who used interviews and scoping sessions with all departments in the business to conduct a full investigation into our business practices.
- One of the recommended improvements was to continue building our supplier list and mapping our supply chain, which is something we have been working hard on and will update progress in line with our commitments detailed in this statement.
- Another was to integrate our ethical trade policies into existing processes, something which we have now strengthened and which is part of our internal and external processes via handbooks, manuals and policies.

- We will continue to regularly engage the steering group on issues related to ethical trade and sustainability to drive progress.
- We will continue to strengthen existing - and implement new - ethical trade and sustainability processes based on the findings of the CSF report. This is a work in progress and will continue over the next few years as our ethical and sustainability programme develops.

Industry Collaboration

- Our aim is to strengthen and promote our core values - and by working collaboratively we can work towards eradicating modern slavery. In the last statement we acknowledged that there is a limit to how much we can achieve by ourselves and said we would explore opportunities to work with multi-stakeholder initiatives, NGOs and other retailers so that we can tackle this issue through collaboration.

- We are currently reviewing requirements for various certification bodies so that we can get a 'stamp of approval' for the processes and systems that we are implementing, and we are also growing our number of certified raw material products.

Progress and Future Commitments cont.

What we are looking at

What we have done

What we plan to do

Industry Collaboration

- We have now partnered with TRN who are supporting us with our ethical programme and working with our suppliers and factories. By working with TRN we can collaborate with their client base and conduct visits and implement remediation projects with factories that we share. This sharing of knowledge and resource allows us to better support our factories.
- We have also joined the Leather Working Group. The Leather Working Group aims to improve the leather manufacturing industry by creating alignment on environmental priorities, bringing visibility to best practices and providing suggested guidelines for continual improvement.
- We have engaged with Cotton 2040 with Forum for the Future and we will work collaboratively with other retailers to improve cotton sourcing in the industry.

- We will be making an application for GOTS certification this year through the Soil Association. This will allow us to certify our organic products to the highest level in the industry.
- We are in early stages of conducting our B Corp Impact Assessment which we hope will lead to us becoming a B Corp certified business. This assessment in itself will highlight where we need to improve in order to achieve certification. We welcome this feedback as it will help us to become a better business for our customers, suppliers, employees and community.

Warehouse

- We currently use one third party UK based warehouse for logistics and fulfilment activities. This is where our product arrives, is processed and then dispatched within the UK and overseas.
- We have committed to TRN conducting a review of their recruitment systems and labour practices to ensure that all recruitment and ethical standards are in line with our own.

- TRN will conduct a review of the recruitment systems and labour practices at our UK based third party warehouse.

Progress and Future Commitments cont.

What we are looking at

What we have done

What we plan to do

Internal Training

- Last year we said that we would look at effective ways to deliver modern slavery training to all relevant staff and assess whether more in depth training is required for specific job roles where there is an increased risk of encountering modern slavery.
 - All staff have been trained on the steps that must be taken before engaging business relationships with stock suppliers, non-stock suppliers and individuals. This is to ensure that all policies have been communicated and signed up to prior to commencement of business.
 - This year, The Centre for Sustainable Fashion delivered five masterclasses to staff, two of which were relevant to ethical and social issues:
 1. To the whole company as a top-level introduction into the social and environmental impacts of the fashion industry.
 2. To relevant staff in the business on Modern Slavery and Ethical Trade principles and best practice. During the Modern Slavery session, buyers were trained on red flags that they might become aware of when in a factory, as well as how they could act on their findings if they were concerned.
- We will engage an independent body such as Slave Free Alliance and Hope for Justice to deliver modern slavery training to all staff.
 - We will ensure that this is delivered to all existing staff but is also given as part of the induction for any new starters.
 - We will continue to research further opportunities to engage staff on this issue and elevate the importance of the implications that our business activities could have on its existence in our business and supply chain.



COVID-19

As we publish this statement our business (in common with others worldwide), is facing a global pandemic. We are experiencing unprecedented times as we experience and witness the impact of COVID-19 on our business operations and supply chains.

We are working very hard to reduce the impact and damage that this could cause to our supply chain. We have continued to support our suppliers with our business throughout this period and have not cancelled orders due to the situation.

And where some might be struggling with cashflow as a result of cancellations from other clients, we are trying to support them with things like more flexible payment terms. We will document and record these initiatives and will report on these in the next statement.

Inclusivity and Diversity

Inclusivity and diversity are extremely important to us and we are working hard to ensure this is realised throughout the business.

Our commitment is to make our business more representative of the community from which we recruit - in all areas and at all levels - and to introduce training in unconscious bias for all members of staff to ensure that this commitment is driven throughout our business.

We have now implemented a People Committee, which will be made up of volunteers from within our business and will provide a voice for our employees. This will allow our teams to work with people they may not have worked with previously and will provide valuable input and ideas into future projects, plans and initiatives.

Things will not change overnight, but we are determined to do our part and are confident that by regularly reviewing the way we work and implementing changes, we can ensure our business lives up to its ambition.

