

*hush Modern Slavery Act  
Transparency Statement 2020-2021*

*hush*

# Introduction

We are committed to conducting our business and our relationships ethically and with integrity, and to ensuring that the rights of all those working on behalf of hush are respected and protected, in line with the UN Guiding Principles on Human Rights.

We acknowledge that while modern slavery exists in all sectors, our industry is particularly high-risk due to the countries we source raw materials from and manufacture our products in and because of the types of workers vulnerable to modern slavery found within our supply chains. We do not tolerate any form of modern slavery, including forced and compulsory labour, slavery, servitude and human trafficking anywhere within our business or supply chain, and we fully advocate for the continued introduction of legislation worldwide that seeks to provide increased protection for workers.

We are pleased to share our third Modern Slavery Statement which covers the financial year ending 27th March 2021 and is produced in line with the requirements set out in Section 54 of the Modern Slavery Act 2015. This statement outlines the steps hush has taken to prevent human trafficking and modern slavery from taking place in our business and supply chains and sets out our 2021-2022 commitments for tackling modern slavery.



## STRUCTURE, BUSINESS AND SUPPLY CHAINS

### About hush

hush was founded in 2003 by our Creative Director Mandy Watkins. We are an online fashion and lifestyle brand selling women's clothing, footwear and accessory products through our website ([hush-uk.com](https://hush-uk.com)), John Lewis & Partners' website ([johnlewis.com](https://johnlewis.com)) and across 31 John Lewis concessions. We have 123 employees based at our head office in Clapham, London and 19 working out of John Lewis concessions stores. Our employees are directly employed by us. We also use a third-party managed warehouse based in Leeds, UK. Our company registration number is 3480753.

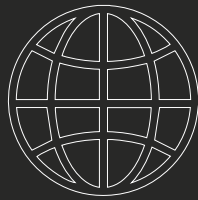
Our CEO is responsible for overseeing hush's human rights, ethical trade and modern slavery programmes.

hush began the B Corp certification process during the last year. We're currently strengthening our sustainability programme and team so that we can achieve their rigorous ethical and environmental standards and become a B Corp by the end of 2022.



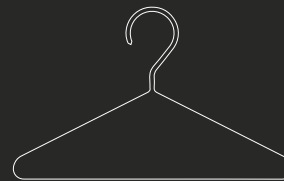
# Our Supply Chain

We divide our suppliers into three categories, stock, non-stock and third-party branded suppliers.



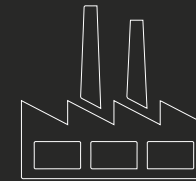
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The number of countries around the world our products are manufactured in



97.1%

of our production takes place in the following 5 countries China, India, Turkey, Lithuania and Portugal



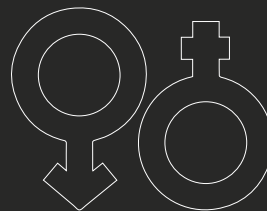
127

The number of Tier 1 manufacturing sites which make our products

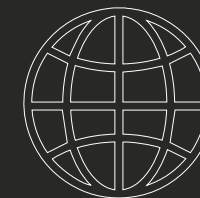


23,601

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



50% Male  
50% Female



22

The number of third-party brands sold through our website



# Our Supply Chain cont.

Our products are currently manufactured at sites in China, India, Turkey, Portugal, Spain, Lithuania, Vietnam, Italy, Latvia, Romania, UK, Tunisia, Greece and Ecuador. We have 127 Tier 1 approved factories in these countries, defined as our main manufacturing sites, and for the financial year ending March 2021 we placed orders with 94 of these. There are 23,601 workers within our Tier 1 supply chain, split equally between female and male.

## Percentage of Units Placed for Production per Country

Countries	%
China	64.6%
India	25.5%
Turkey	4.8%
Portugal	1.3%
Lithuania	0.9%
Spain	0.8%
Tunisia	0.7%
Vietnam	0.5%
Latvia	0.3%
Romania	0.2%
United Kingdom	0.2%
Italy	0.1%
Greece	0.05%
Ecuador	0.05%

We undertake supply chain traceability to help us assess and combat risks of modern slavery. We have mapped 100% of our Tier 1, 2 and 3 sites. Our onboarding process for all new factories and suppliers ensures we continue to have full visibility of these three levels of our supply chain.

We are now focusing our efforts on mapping tiers 4 and 5 as this is often where the risks of modern slavery are greater. Gaining transparency becomes more difficult as we reach the lower tiers of our supply chain. However, we are increasing the number of products that contain sustainably certified raw materials which will enable us to have greater visibility of the farm or plantation where our raw materials derived from. We have set a target to source 100% sustainable cotton by end of 2023, through our work with Cotton 2040 and our membership of the Better Cotton Initiative.

## Supply Chain Mapping

Tier	Process	Status	Target
Tier 1	Main Production Site	100% mapped	Complete
Tier 2	Primary Process Subcontractor e.g. stitching, cutting, packing	100% mapped	Complete
Tier 3	Secondary Process Subcontractor e.g. embroidery, embellishment, laundry	100% mapped	Complete
Tier 4	Fabric and Components E.g. fabric mills, trims	Partially mapped	Target completion date is the end of 2023
Tier 5	Raw Materials	Partially mapped	Target completion date is the end of 2030

## Our Supply Chain *cont.*

**Non-Stock Suppliers:** Our non-stock suppliers allow us to source a range of goods not for resale (GNFR) and services, such as printing, packaging, office cleaning, recruitment, warehousing, transport and shipping which are integral to the smooth running of our business operations. They are contractually required to comply with the policies described below. We have begun the process of assessing our higher risk suppliers. We are currently providing support to our warehouse to help it strengthen its management systems further. During the next two years, we will start to map and perform risk assessments of our non-stock suppliers in more detail.

**Third-Party Branded Suppliers:** While much of our business is own brand product, we also work with and stock product from 22 third-party brands, principally through our 'Hush Loves' range. We only select brands that share our ethos, and they are contractually required to comply with the policies described in the next section. Over the next two years, we plan to start rolling out a more comprehensive third-party brands programme.



## OUR POLICIES

# Modern Slavery Governance

Our sustainability, HR and product teams are responsible for developing and implementing our modern slavery related policies and procedures. The sustainability and product teams are in regular contact to discuss how best to support our suppliers. They also hold a supplier strategy review session twice a year to discuss all aspects of a supplier's performance, including those related to modern slavery.

hush's Sustainability Manager is responsible for the day-to-day management of our modern slavery and ethical trade programme.

### Business Policies

We have policies and procedures in place to protect our employees throughout the recruitment and employment processes, and during their time with us. These include:

**1) A recruitment process which includes appropriate due diligence on right to work and proof of identification.**

**2) Inclusivity & Diversity Statement**

**3) A HR Policy Handbook that contains the following related policies:**

- Anti-Corruption & Bribery Policy
- Anti-Harassment and Bullying
- Anti-Slavery & Human Trafficking Policy
- Disciplinary Procedure
- Inclusivity & Diversity Statement
- Equal Opportunities Policy
- Health & Safety Policy
- Whistleblowing Policy



Our Anti-Slavery & Human Trafficking Policy applies to all those working on behalf of hush. It sets out our commitment to implement and enforce systems, including transparency and reporting procedures, to ensure that modern slavery and human trafficking is not taking place in our business and supply chain.

All new employees are given these policies to review when they receive their contract of employment. They are also available for review on our internal HR portal.

# Supply Chain Policies

Our policies were developed in conjunction with and are reviewed annually by external human rights experts. During the last year, we have made our key human rights related policies more robust by strengthening supplier transparency and modern slavery prevention requirements and extending the scope of our policies. The table below provides a description of each policy, code or statement, its scope (who it applies to) and the amendments we have made:

Policy, Code or Statement	Description	Scope	2020-2021 Amendments
Supplier Code of Conduct	This sets out our supplier expectations to ensure safe and fair working environments and practices within our supply chain. It is based on the ETI Base Code, an internationally recognised code of labour practice, founded on the conventions of the International Labour Organisation (ILO).	All stock, non-stock and third-party brand suppliers, recruitment agents, labour providers and sub-contractors.	Extending the scope of the Code to cover all suppliers, incorporating sub-contracting policy into its own section in the Code, additional sections on Code implementation, assessment and definitions, additional clauses to ensure suppliers are complying with all modern slavery legislation including the UK Modern Slavery Act.
Child Labour & Young Worker Policy	This sets out our requirements for ensuring children are not working within our supply chains and that young workers are adequately protected at work.	All stock, non-stock and third-party brand suppliers, recruitment agents, labour providers, homeworkers and sub-contractors.	Extending the scope of the Policy to cover all suppliers, emphasising the vulnerability of children and young workers to forced labour in the intro, strengthening the young worker section to ensure they are employed voluntarily and young migrant workers are not employed to reduce the risk of them being trafficked or exploited.
Cotton Sourcing Statement	This sets out our reasons for prohibiting cotton sourced from Uzbekistan, Turkmenistan and XUAR region in China owing to ongoing concerns about child and/or forced labour.	Stock and third-party brands.	Updated to include cotton sourced from XUAR.
XUAR Statement	This sets out our requirements for our suppliers to ensure forced labour and human trafficking of Uyghur and other Turkic and Muslim-majority people is not taking place in XUAR or other regions of China.	Stock suppliers and third-party brands.	This is a new statement developed in 2021.
Supplier Terms	These set out a framework governing how business should be conducted between hush and our suppliers. It contains agreements relating to production as well as our sustainability, anti-slavery & human trafficking and sub-contracting standards.	Stock, non-stock and third-party brands.	Additional section included on our sustainability standards, requiring adherence to all our sustainability standards, including transparency, standards assessment, bribery and corruption and performance improvements.



# Supply Chain Policies *cont.*

Suppliers are sent copies of the relevant code and policies and are required to sign a declaration confirming their compliance when they start our new supplier on boarding process. Once we bring on board a new supplier, they are contractually required to meet our standards. We set out in the Due Diligence section below how we monitor compliance with our policies and what we do when suppliers are not able to meet our standards.

## **Planned Policy Amendments**

We have established a formal system for updating our policies annually. As well as reviewing our existing policies we also have the following policy developments planned for the next year:

- Migrant and Contract Labour Policy
- Homeworker Policy
- Business Human Rights Policy
- Further strengthening of our whistleblowing policies and procedures.



## DUE DILIGENCE

We are committed to developing long-term relationships with suppliers who share our values, who are open, honest and transparent about their business and supply chain operations and who are prepared to demonstrate continuous improvements with respect to their human rights performance.

### **New Suppliers**

Through our new supplier onboarding process, all new suppliers undergo a selection process to assess their ability to meet hush's sustainability and technical standards. Suppliers must provide hush with an audit that was undertaken within 18 months. We will only commission new suppliers if they meet our requirements.

### **Existing Suppliers**

hush currently operates an ethical audit programme for its Tier 1 stock suppliers. We are currently focusing on these suppliers because they represent the majority of our spend. We provide support via site visits, factory assessments, bespoke workshops and on-site training. We work in partnership with a third-party sustainable supply chain consultancy called The Reassurance Network who support us with our policy and programme development and undertake site assessments and training.

During site assessments, the auditor will review a factory's ability to meet hush's Supplier Code of Conduct, which includes looking for indicators of modern slavery as shown below. They will also select vulnerable worker groups, such as migrant or young workers, for worker interviews to identify if modern slavery indicators are present.







## DUE DILIGENCE cont.

### **Modern Slavery Indicators**

- Presence of migrant workers
- Use of labour providers and recruitment agents
- Evidence of informal or indirect recruitment
- Accommodation tied to employment
- Harsh terms of employment, including paying of recruitment fees
- Harsh working conditions and environment, including restriction of movement
- Child labour

We assessed factories producing 63% of our products over the last year. Due to COVID-19, we were unable to visit as many suppliers as we would have liked, so instead our teams have remained in regular contact through virtual meetings.

We plan to incorporate Tier 2 and 3 suppliers into our factory assessment programme over the next two years.

One of our commitments from last year was to assess our third-party warehouse. Rather than conduct an assessment during the height of the pandemic, we offered the warehouse support to further strengthen its human rights and management systems. We will continue to support the warehouse over the next year and we are now in planning stages for an assessment.

## DUE DILIGENCE cont.

### **Remediation**

Our approach to site assessments is based on problem solving rather than fault finding. If we do identify any non-compliance during assessments, we will work together with the supplier, factory and The Reassurance Network to put in place a corrective action plan and resolve any issues found. We follow up with regular calls, visits, audits and record reviews to confirm that any issues identified have been addressed. We expect the factory to make continuous improvements over time with our support. If serious non-compliances are found or if repeated violations occur, hush reserves the right to terminate all business with the supplier, following consultation at a senior level within hush and with the supplier.

### **COVID-19**

We worked hard to reduce the impact of COVID-19 on our suppliers and supply chain workers over the last year. We continued to place orders with our suppliers and where necessary accepted stock and held it for an extra season rather than cancelling. We offered more flexible payment terms to suppliers who were struggling with cashflow so they could continue to employ and pay their workers. We also paid some suppliers up front to alleviate pressure where possible. During our factory assessments our auditors spoke with the sites about COVID-19 prevention measures and provided advice when required. We also shared Factory Resilience Guidelines with our suppliers with in-depth advice on protecting employees by managing the risk of infection.

### **Uyghur and Other Turkic and Muslim-Majority People**

In 2020, we became aware of reports of forced labour and trafficking of Uyghur and other Turkic and Muslim-majority people, particularly in the Xinjiang Uyghur Autonomous Region (XUAR) of China. We undertook due diligence of our stock



suppliers to ensure we were not sourcing from factories located in XUAR or from factories situated elsewhere in China where Uyghurs were working under forced labour conditions.

### **Grievance Mechanisms**

We have a Whistleblowing Policy in place for our employees. We encourage anyone within the business to raise human rights concerns through these safe channels of communication without fear of reprisal. We aim to investigate all reports confidentially and fairly and provide remediation in the best interests of those affected.

During the last year we also developed a Supply Chain Whistleblowing Policy to support suppliers in establishing proper worker dialogue channels that are accessible, safe and understandable and enable workers to raise concerns or disclose information confidentially. We will look to strengthen our grievance mechanisms further over the coming year.



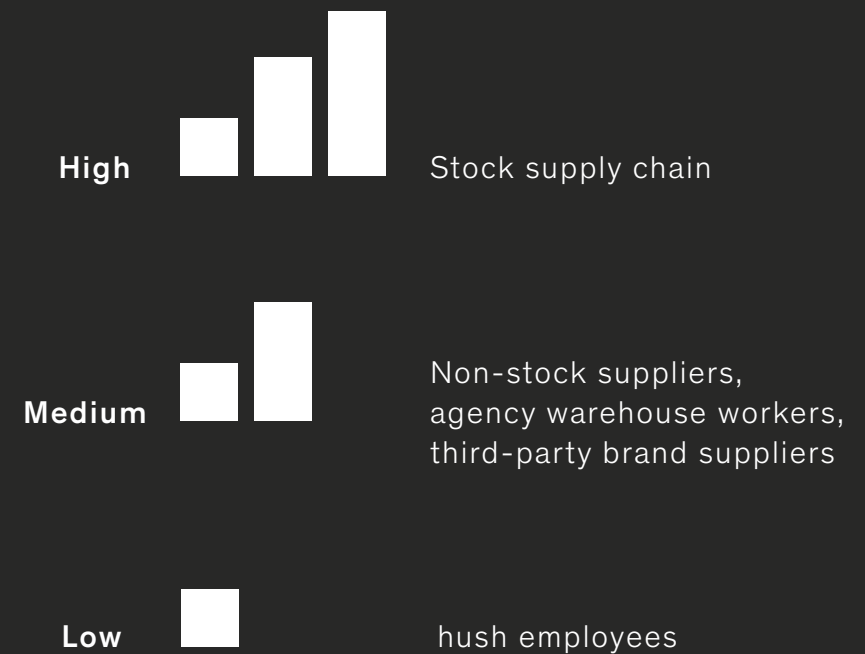
# Modern slavery risks within our business and supply chain

## RISK ASSESSMENT

Our risk assessments are undertaken by specialists in our internal teams and within external organisations such as The Reassurance Network and Slave-Free Alliance. Risk assessments take the form of desk-based research, supply chain mapping, assessments and site visits and supplier and stakeholder engagement. We consider the following risk factors: product and service type, geographical location, worker type, including vulnerable worker groups, and the likelihood of involvement of recruitment or labour agencies. Our risk assessments have determined that our stock supply chain contains the greatest risk of modern slavery, so this is where we have been focusing our efforts through our ethical trade programme.

Within our own business we believe the risk of modern slavery to be low as all of hush's employees are employed directly by us, with the majority on permanent contracts. However, our warehouse and cleaning companies infrequently use agency workers, who due to the nature of their employment, may be at a greater risk of modern slavery. We will continue to review the risks related to these workers in 2021.

Over the next year, we will formalise in more detail our business and supply chain modern slavery risk assessment approach with support from external experts.



# TRAINING AND CAPACITY BUILDING

## Employee Modern Slavery Training

We partnered with Slave-Free Alliance to deliver seven modern slavery awareness webinar sessions to 120 or 85% of our employees, including sessions tailored to our Product team, our managers and our Senior Leadership Team. By the end of each training session delegates were able to understand what modern slavery is and the different types that exist, recognise the signs and indicators of the different types of modern slavery and understand the appropriate reporting pathway if a victim or incident is identified. We will be rolling this training out to our remaining employees and introducing this into our inductions for new starters over the next few months.

*“As a fashion industry client of Slave-Free Alliance, hush has already taken enormous steps to mitigate the risk of modern slavery in its supply chains and processes. This year alone, we have delivered seven engaging and interactive training sessions, which have made around 120 Hush employees aware of the signs of human trafficking, and how to respond to them. We are looking forward to continuing to work together with hush to help bring about our shared goal of slave-free supply chains and operations.” - Marc Stanton, Director of Slave-Free Alliance.*

## Supply Chain Capacity Building

Due to COVID-19, we were not able to carry through on our planned supplier training sessions for this year. We plan to undertake a supplier survey during the coming year, alongside our assessment findings, to identify the training and capacity building needs of our suppliers.



## EFFECTIVENESS OF OUR APPROACH

We have not identified any incidents of modern slavery within our business and supply chains throughout due diligence and risk assessment processes. We have also not had any reported modern slavery grievances through our grievance mechanisms. However, we know modern slavery, though prevalent, is difficult to find and that we must continue to strengthen our policies and processes so that we place ourselves in the best possible position to identify and prevent modern slavery.

### **Progress and Future Commitments**

We are pleased to share below the progress we have made with our modern slavery prevention programme and our commitments for the coming year.



Statement Section	2020-2021 Commitments	Progress	New 2021-2022 Commitments	Future Commitments
Structure, business & supply chains - Transparency	Map Tier 2 & 3 supplier sites	Completed		Risk assess Tier 2 & 3 sites and prioritise for follow up. Map and risk assess homeworkers.
	Map Tier 4 by 2023, map Tier 5 by 2025	In progress	Continue to Map Tier 4 & 5 sites	Map Tier 4 by 2023, Tier 5 by 2030
	New	New		Map non-stock suppliers
Structure, business & supply chains - Governance	New	New	Establish a sustainability working group to provide a forum for discussing modern slavery risks and programme development	
Structure, business & supply chains - Certification	Apply for GOTS organic certification through the Soil Association	In progress – application has been made	GOTS audit to be conducted	
	Apply for Responsible Animal Fibre Standard certification through Control Union	In progress – application has been made	RAF audit to be conducted	
	Source 100% sustainable cotton by end of 2023	In progress – we have applied to join BCI	Finalise BCI membership and engage our suppliers	Source 100% sustainable cotton by end of 2023
	Increase the number of sustainably certified raw materials used in our products	In progress – 63% of our products contained sustainably certified materials by the end of the last financial year	Develop long term certified raw materials strategy	
	Apply to become B Corp certified	In progress – we have undertaken B Corp assessment and are working through our action points	Continue working through action points and roadmap	Become B Corp certified by the end of 2022



Statement Section	2020-2021 Commitments	Progress	New 2021-2022 Commitments	Future Commitments
Policies	Review and strengthen our key supplier policies	Completed	Develop Migrant and Contract Labour Policy, Homeworker Policy, Business Human Rights Policy, further strengthening our whistleblowing policies and procedures	Continually review and improve policies
Due diligence	Assess factories manufacturing 80% of our products by the end of the next financial year	Due to COVID restrictions we managed to assess 63 %	Assess factories manufacturing 80% of our products by the end of the next financial year	Roll out assessment programme to Tier 2 & 3 suppliers
	Conduct a review of the recruitment systems and labour practices at our UK based third party warehouse	In progress - audit planning in progress	Complete warehouse assessment	Audit warehouse at least every 2 years
	New	New		Risk assess non-stock suppliers
	New	New	Develop a more comprehensive modern slavery indicators list and incorporate into site assessments	Develop a modern slavery toolkit, including questions and checklists for hush employees to use when visiting or talking to suppliers
	New	New		Develop a third-party brands sustainability programme
	New	New	Conduct further due diligence on Chinese factories to ensure there is not forced labour or human trafficking taking place	
Training & capacity building	Develop employee modern slavery training	Completed – 85% of workforce trained	Roll out to remaining employees and new starters - include in induction programme	Continue to train all new employees and provide refresher courses to existing employees
	New	New	Train all new employees on our sustainability standards, including modern slavery and our ethical trade programme as part of their induction	Update training as sustainability programme develops
	Use supplier survey results to train internal teams on purchasing practices	In progress – Survey conducted in 2019 but business and supply base has changed in that time.	Run another supplier survey to establish in more depth current supplier sustainability standards supplier training needs and opportunities to strengthen the business relationship	

Signed

A handwritten signature in black ink that reads "Kate Bartman". The signature is fluid and cursive, with the first name "Kate" and last name "Bartman" clearly distinguishable.

**Kate Bartman** , Chief Executive Officer on behalf of the board of directors,

Date **27|09|21**

