



MODERN SLAVERY STATEMENT

At Fred Perry, we are committed to respecting the human rights of everyone who works for us, whether directly or indirectly. We believe all workers must be treated with dignity, respect and fairness and we will not knowingly tolerate forced or compulsory labour or human trafficking in any parts of our business or supply chain.

This statement has been published on behalf of Fred Perry Ltd (the trading entity) and Fred Perry (Holdings) Ltd (the non-trading holding entity) in accordance with s.54 of the Modern Slavery Act 2015. It details the steps we have taken in the financial year 2018/2019 to prevent modern slavery throughout our business and supply chain and outlines our plans and commitment going forward.

Our Business

What started out as a small company selling polo shirts to tennis players in 1952 has grown into a global brand inspired by music – our “subculture” - and the street. Whilst the range has expanded to include apparel, footwear and accessories for men, women and children, the polo shirt remains at the core of what we do. Always at the heart of the brand is the Laurel Wreath – our symbol of success and excellence across all that we do.

Fred Perry employs 357 staff globally of which 145 are in our London head office. We trade around the world through direct retail outlets, international wholesale partners and select international distribution routes, as well as online.

Our Supply Chain

We source our products from a small range of national and international suppliers. We keep our list of suppliers small so that we can build strong working relationships and are able to get to know our partners well. This makes it easier for us to be sure that things are being done in the right way, and if things go wrong we are able to resolve issues directly.

Our products are sourced from the following seven countries: UK, China, Vietnam, Portugal, Italy, Germany & Cambodia. In total, Fred Perry have 45 live factories most of which we have long standing partnerships with - the longest relationship being twenty years. The majority of our products are sourced directly from the manufacturer with only 4% sourced through 3rd party agents.

All factories, suppliers and agents sign up to the Fred Perry Code of Practice. Our COP principle standards clearly set out the minimum standards and requirements that Fred Perry require all our product suppliers to follow in relation to worker’s human rights, safety, employment and working conditions.

We are aware there are many people involved in making Fred Perry product so to gain transparency we map our supply chain using the following 5 tiers:

Tier	Definition
1	Main factory where products are manufactured.
1+	Sites providing additional support to Tier 1 factories.
2	Material & component production.
3	Yarn & dye stuff suppliers.
4	Raw materials.

Our Policies Relating to Modern Slavery

At Fred Perry, we are fully committed to respecting, protecting and advocating the human rights of all persons working directly or indirectly for us. To support our zero-tolerance approach, we regularly review and update our policies to ensure they reflect the latest legislation. In August 2018, we published our revised Code of Practice and new Human Rights and Anti-Slavery Policy:

Code of Practice; Sets out the ethical standards (which mirror the terms of the Ethical Trading Initiative Base Code) that we require all our staff at Fred Perry and those working for us directly and indirectly to comply to. The principle standards of our Code of Practice are listed below:

- Freely chosen employment
- Respect for freedom of association & collective bargaining
- Safe and hygienic working conditions
- No child labour
- Fair wages & benefits
- Lawful working hours & treatment
- Equal opportunities/no discrimination
- Employment security
- Fair treatment/no intimidation
- Legal working rights

Human Rights and Anti-Slavery Policy; This reflects our commitment to conduct all our business relationships ethically and with integrity. We ensure effective controls are in place to identify, prevent and eliminate human rights risks, slavery and human trafficking.

Due Diligence

Our Governance

Whilst the Managing Director and Board of Directors are ultimately responsible for ensuring that Fred Perry meets all its human rights obligations, they are supported by a CSR and Technical team. This team sits within the sourcing department so they can support the Fred Perry Modern Slavery Statement 2019

procurement function ensuring products are sourced and manufactured ethically and sustainably.

Our Risk Assessment and Management

We recognise that there is a greater risk of modern slavery or human trafficking affecting people throughout our supply chain where the following factors are present:

- Migrant labour is used.
- Temporary or agency workers are required, who may not be subject to adequate due diligence checks.
- Lower cost materials are being sourced locally.

Our approach to risk assessment is through supplier mapping, self and 3rd party auditing and concentrated due diligence.

To effectively identify and mitigate risk, we appreciate transparency of our supply chain is key. Due to our small, well established supply base we have been able to successfully map all Tier 1 and Tier 1+ factories. Whilst we have partially mapped our Tier 2 supply base we are working hard, hand in hand with our Tier 1 factories, to gain further visibility of Tier 2 and beyond.

Although we appreciate audits only provide a snapshot in time we believe they are still a worthy risk assessment tool. At Fred Perry, we use our own internal ethical audit to check all our Tier 1 and 1+ factories and increasing Tier 2 suppliers, these audits are conducted by our CSR and Technical team during a visit. In addition, independent third party audits are used as a further monitoring tool. If issues are identified, we require that corrective action is taken within an agreed timeframe and compliance is monitored.

In the UK, we have engaged with Fast Forward to use their slavery focused audit methodology to access our UK manufacturing sites and evaluate any modern slavery risks.

At Fred Perry, we recognise that in order to build and maintain healthy relationships - and to ultimately manage risk - it is critical that we regularly visit our suppliers. As such, we manage a rolling programme of visits by our staff, especially the CSR and Technical team, to all Tier 1, 1+ and Tier 2 sites. Any new Tier 1 or Tier 1+ factory will benefit from regular visits by members of the Fred Perry team during the initial trial period. If we are satisfied with the new Tier 1/1+ factory during the trial period, it will become one of the sites regularly visited by the CSR and Technical team as part of the rolling programme.

Where required, we support our factories by placing our own personnel or employing independent 3rd party personnel on site. This means of support is invaluable to our business and the CSR and Technical team.

During FY18/19 our legal contracts including; Terms and Conditions, Code of Practice and new Human Rights and Anti-Slavery Policy have been updated to take into account our Modern Slavery responsibilities. Our revised contracts have been entered into with our current supply base.

Our Actions Taken and Steps to Take

Through our due diligence process, we have identified a number of areas at greater risk to modern slavery. The table below highlights risk areas along with the targets we have set ourselves, our achievements to date and our future aims.

Modern Slavery Risk	Action Taken to Reduce Risk
<p>Lack of visibility of supply chain = increased risk of undetected modern slavery</p>	<p>Target:</p> <ul style="list-style-type: none"> • Increase our understanding and visibility of our supply chain. <p>Achievements to Date:</p> <ul style="list-style-type: none"> • We have mapped our factory base giving visibility of Tier 1 and Tier 1+ suppliers. • We have mapped tanneries used as part of our leather supply chain for footwear. • We have engaged with Fast Forward to audit our UK manufacturing sites. • New suppliers are now required to provide full mapping of their supply chain along with all 3rd party audits so we can make a full assessment whether to engage prior to set up. • Following our engagement with Better Cotton Initiative (BCI), we have achieved increased visibility of the cotton supply chain for our top four suppliers. We are working closely with these suppliers to agree sourcing targets for BCI cotton beyond the next financial year. <p>Future Aims:</p> <ul style="list-style-type: none"> • To continue mapping Tier 2 suppliers and beyond. • Progress to mapping our wet processors. • The completion of Fast Forward UK audit programme. • Obtain BCI membership and source at least 5%+ of our cotton intake for the coming year from BCI suppliers. Aim to increase this % year on year.
<p>Contract, Agency and Temporary Workers</p>	<p>Target:</p> <ul style="list-style-type: none"> • Improve our knowledge of the risk faced by contract, agency and temporary workers in our supply chain. <p>Achievements to Date:</p> <ul style="list-style-type: none"> • We have conducted contract, agency and temporary workers risk assessment across all sourcing regions and identified the UK, Italy and China as our highest risk areas. • In the UK, we have engaged with Fast Forward to map our labour providers and screen for compliance. <p>Future Aims:</p> <ul style="list-style-type: none"> • The completion of Fast Forward UK mapping and screening programme of labour providers. • Fully map our Italian and Chinese supply chain and 3rd party audit to gain visibility of labour providers. • Completion of supply chain mapping and auditing in the UK, Italy and China will enable us to fully evaluate the risks of modern slavery to agency workers.

Training

The Modern Slavery Act has brought the issue of modern slavery to the forefront, we are committed at Fred Perry to ensuring it remains there and those within our business and supply chain continue to develop their awareness and understanding of the risks posed.

Regular internal meetings are conducted by the CSR and Technical team to ensure that all heads of departments are fully converse with modern slavery and human rights issues and able to engage in regular discussions. We plan to develop an internal training programme to roll out to all our employees to improve their understanding of modern slavery and awareness of the actions required if they suspect it. This training programme will initially be rolled out to all procurement functions.

We recognise the need to raise awareness of modern slavery externally through our supply chain. To facilitate this, we plan to engage our product suppliers in training on this subject and provide them with the required training tools so they can extend their knowledge further through the supply chain.

The Fred Perry Modern Slavery Statement 2019 has been prepared by our CSR team and approved by Fred Perry Board of Directors on the 22nd March 2019.



Richard Gilmore
Managing Director
Fred Perry Limited
Fred Perry (Holdings) Ltd

