

# GENDER DISCRIMINATION POLICY

## Definition of Gender Discrimination

Gender discrimination refers to any unequal treatment, exclusion, or harassment based on an individual's sex, gender identity, gender expression, or pregnancy or maternity status. This includes, but is not limited to:

- Unequal pay for equal or equivalent work
- Discrimination in recruitment, hiring, training, promotion, or termination based on gender
- Dismissal, demotion, or other adverse treatment due to pregnancy, childbirth, or maternity leave
- Sexual harassment, inappropriate conduct, or gender-based violence
- Denial of access to safe and appropriate facilities consistent with an individual's gender
- Discrimination against transgender or gender-nonconforming individuals

Debenhams Group is committed to addressing gender-based discrimination, harassment, or violence in its supply chain.

Any incidents of discrimination or harassment must be reported and addressed immediately. Please contact [ethicalcompliance@debenhamsgroup.com](mailto:ethicalcompliance@debenhamsgroup.com) if you are aware of any related concerns that involve a site supplying Debenhams Group.

## Responsibilities

As an employer and a Debenhams Group supplier, it is your responsibility to create a work environment that is fair, inclusive, and free from bias or prejudice based on an individual's gender. It is our expectation that all suppliers adhere to these responsibilities.

We require that all suppliers:

### A. Ensure Equal Opportunities

- Pay workers equally for the same work regardless of gender.
- Ensure women have equal access to employment, training, promotion, and leadership opportunities.
- Amend hiring, performance evaluation and disciplinary procedures to reduce opportunities for gender bias.

### B. Prohibit and Prevent Harassment

- Develop and implement a policy addressing gender-based violence and sexual harassment.

- Provide workers with safe, accessible, and confidential grievance channels.
- Take immediate and appropriate disciplinary action where instances of gender discrimination, harassment or violence are discovered.

### **C. Support Women's Rights and Health**

- Respect all legal protections related to maternity, including leave and job security.
- Ensure that pregnant workers are safe at work and are not assigned hazardous or overly strenuous tasks.
- Provide safe and sanitary restroom facilities and ensure breaks are not withheld.

### **D. Promote Gender Sensitivity**

- Deliver training to all workers, supervisors, and management on gender awareness and anti-harassment policies.
- Encourage the participation of women in worker committees and grievance mechanisms.

All expectations listed above must be applied with sub-contractors (which must be approved by the Debenhams Group) and intermediaries (which must be approved by the Debenhams Group) used in the Debenhams Group's supply chain.

### **Due Diligence Process**

To uphold gender equality throughout the supply chain, Debenhams Group will:

- Review supplier gender practices as part of regular audits, site visits, and worker interviews.
- Require suppliers to maintain and share upon request:
  - Gender-disaggregated workforce data
  - Anti-discrimination policies
  - Harassment prevention training records
  - Grievance and disciplinary logs

Suppliers must take prompt action to address any identified gaps or risks in their workplace practices.

### **Prohibited Practices**

The following are considered violations of Debenhams Group's policy:

- Unequal pay for the same work based on gender
- Gender-based discrimination in hiring, promotions or dismissals
- Denial of maternity rights
- Any form of sexual harassment or abuse
- Lack of safe facilities or accommodations for women
- Discriminatory treatment of gender-diverse or nonconforming individuals

## **Consequences and Correction Plans**

Where gender discrimination, harassment or unequal treatment is identified, suppliers must take action to develop and implement appropriate corrective action. This may involve:

- The implementation of a corrective action plan in coordination with Debenhams Group
- Follow-up assessments to verify compliance
- In serious or unresolved cases, temporary suspension or termination of the business relationship with Debenhams Group