

DEBENHAMS GROUP APPROACH TO RESPONSIBLE DISENGAGEMENT

Reason for responsible disengagement:

- Brand consolidation exercise
- Serious breach of the Debenhams Group code of conduct. Zero tolerance violations:
 - Child labour
 - Underpayment of national minimum wage
 - Health and safety - critical risk to workers
 - Any form of forced or bonded labour
 - Physical abuse
 - Disciplining of workers
 - Discrimination of any form
 - Undeclared subcontracting

***If a zero tolerance violation is found within an undeclared subcontracting site Debenhams Group reserve the right to disengage the factory with immediate effect.**

If any of the above are found within our supply chain, then the supplier/factory in question are placed on hold immediately and no new purchase orders can be raised.

The Groups team will then conduct an investigation – this can take 1-4 weeks.

The process of investigation is:

- Supplier/factory placed on hold and notified of the issue
- Debenhams ethical team create a report and share evidence, notes and images
- Debenhams meet with supplier/factory to discuss the issues and expectations for remediation
- Debenhams ethical team or third-party may conduct an audit at any stage during or after the investigation has been concluded
- Supplier will then share remediation/evidence (if any) for review

Once the investigation has concluded, the ethical compliance team will make a decision on next steps for the factory/supplier. The decision will be made based on the following factors:

- Nature of the ZTV
- Worker welfare
- Debenhams group reputation
- Supplier/factory engagement and transparency throughout the process

The key focus is remediation, however if remediation is not a viable option Debenhams group reserve the right to responsibly disengage the supplier/factory.