

DEBENHAMS GROUP PLC (“BOOHOO”) SUBCONTRACTING POLICY

Debenhams Group (boohoo, boohooMAN, Pretty Little Thing, Debenhams, Karen Millen)

Definition of sub-contracting

- Subcontracting is the practice of assigning, engaging or outsourcing work to a company or third party outside of your company.
- It includes bringing in an outside company or party to perform a contract or certain parts of it
- Any subcontracting requires prior approval from Debenhams Group. Otherwise, the sub-contracting will be “unauthorised”. Please email **ethicalcompliance@boohoo.com** if you are aware of any new sub-contracting or sub-contracting which has not been disclosed to us.

Responsibilities

- As a supplier, it is your responsibility to ensure all sub-contracting is declared in accordance with the Debenhams Group production tier definition (see Debenhams Group modern slavery statement).
- Only sub-contracting that has been declared and approved can be used for any form of Debenhams Group production.
- You must ensure all sites that you are approved to sub-contract to adhere to Debenhams Group Code of Conduct (which you have been provided with).
- You must ensure strict processes are implemented to prevent unauthorised sub-contracting.

Due diligence process

To ensure that all Debenhams Group suppliers (including factories) do not sub-contract to unapproved third parties, Debenhams Group shall:

- Perform unannounced production spot checks by Debenhams Group and a third party auditor, in all regions
- Complete regular capacity and compliance monitoring, including:



- monitoring the capacities and number of purchase orders going to each supplier and factory; and
- maintaining an up-to-date supplier scorecard enabling Debenhams Group to review each supplier's order book and factory details at any time.

Consequences and correction plans

- Where unauthorised subcontracting is found and proven, you and/or your unauthorised sub-contractor(s) may be suspended and/or responsibly disengaged

This policy is to be read in conjunction with Debenhams Group manufacturing tier definitions, which can be found in the ethical compliance and trade guidelines on the group supplier portal:

- <https://supplier.boohoo.com/ethical-compliance-trade-supplier-guidelines/>

Other related support and guidance includes:

- New supplier and factory on boarding guidelines - <https://supplier.boohoo.com/supplier-onboarding-guidelines-handly-links-key-contacts/>
- Boohoo group Code of conduct - <https://supplier.boohoo.com/code-of-conduct-2/>
- Supplier terms & conditions - <https://supplier.boohoo.com/supplier-terms-and-conditions-of-purchase/>

If you have any questions, please contact us at
ethicalcompliance@boohoo.com