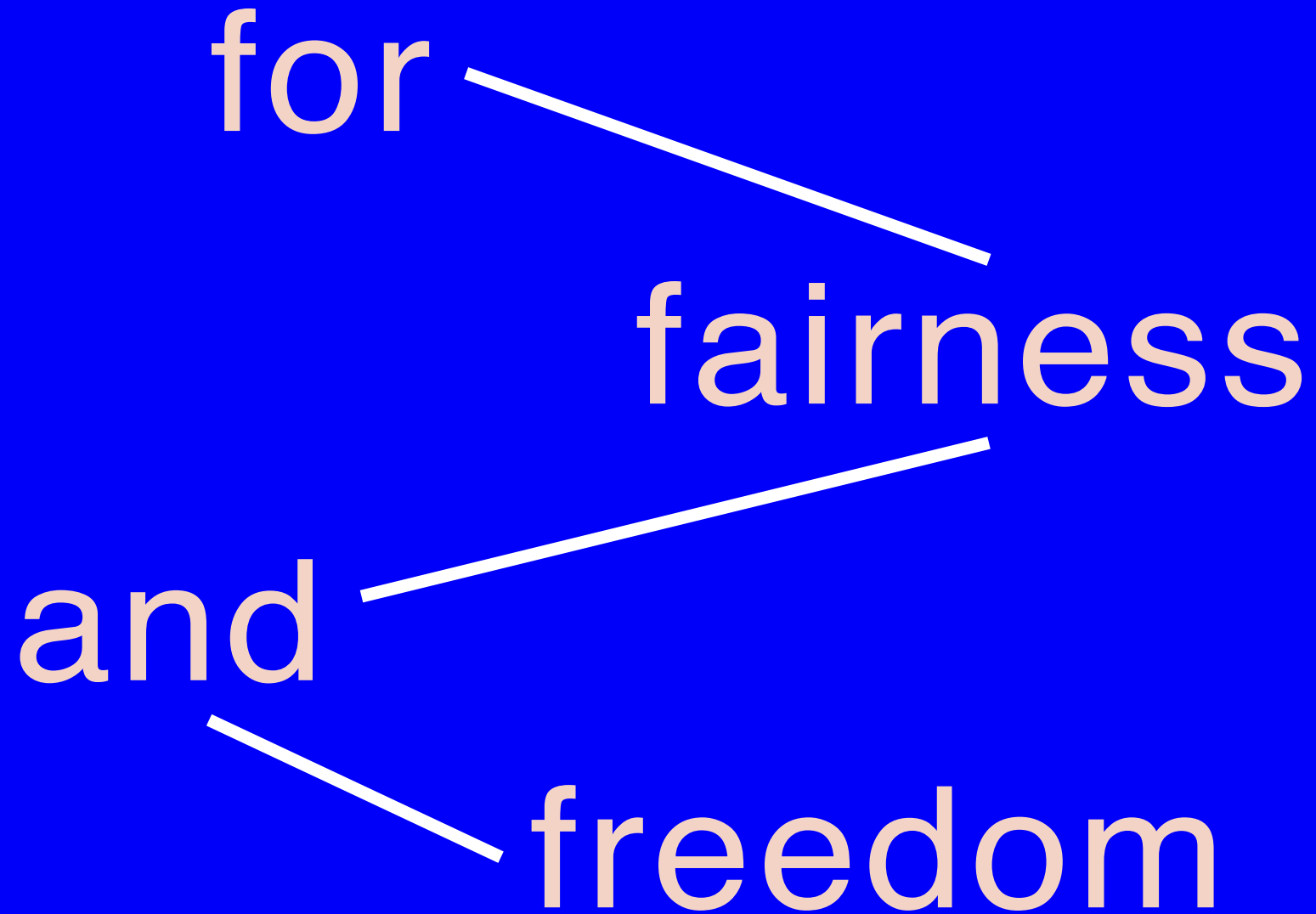


for
fairness
and
freedom



Contents

This is Pentland Brands' fifth annual Modern Slavery report, reviewing the progress we've made and setting our direction for years to come. It was approved by the Pentland Brands executive team on 11/05/21.

This report covers our progress from January to December 2020.

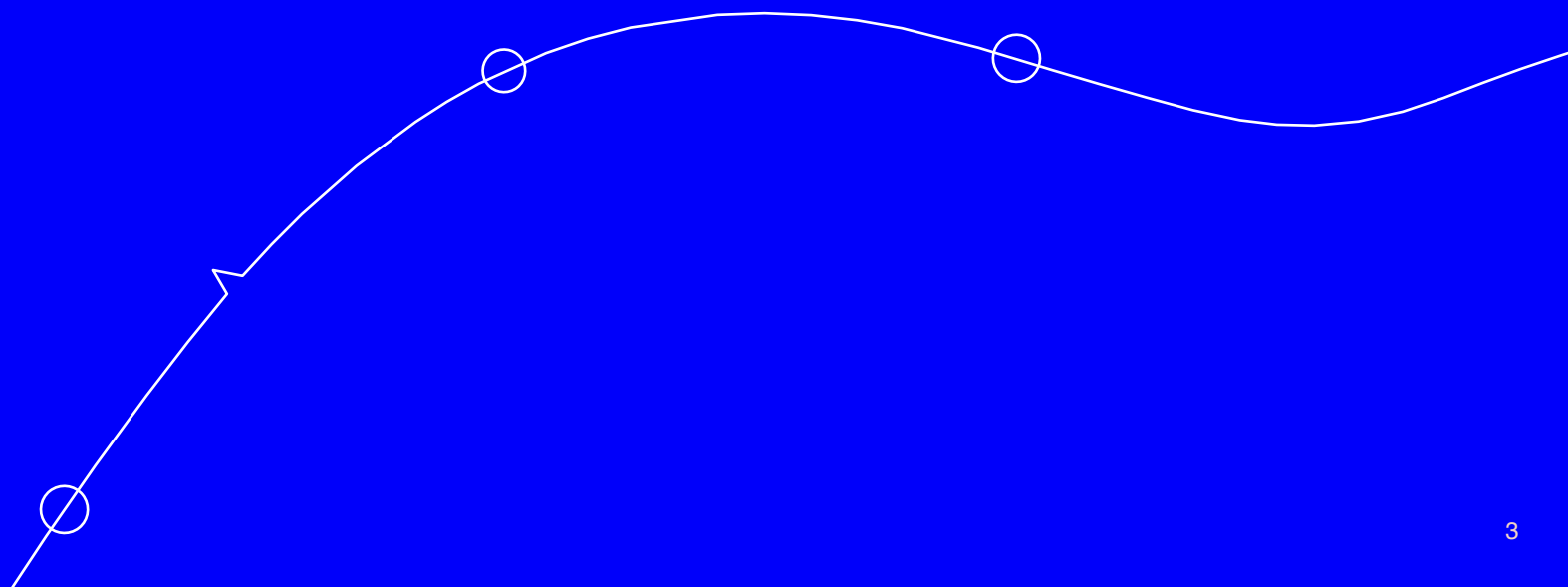
Feedback

We welcome your feedback on how we can improve our policies and approach. To get in touch, email us at corporate.responsibility@pentland.com

<u>1.0 Introduction</u>	<u>3</u>
A view from our CEO, Chirag Patel	4
About us	5
Positive Business	7
UN Sustainable Development Goals	9
2020: a year in review	10
Our supply chain	14
<u>2.0 Managing our risks</u>	<u>16</u>
<u>3.0 Our governance</u>	<u>22</u>
<u>4.0 Taking action</u>	<u>30</u>
<u>5.0 2021 and beyond</u>	<u>35</u>

1.0

Introduction



A view from our CEO, Chirag Patel

Although the year 2020 presented some truly unprecedented challenges, it also demonstrated the vital importance of protecting the most vulnerable people in our supply chain from the risks of modern slavery.

We believe everyone has the right to fair pay, safe working conditions, and to be treated with dignity and respect. We know there's always areas to improve and we're working hard to ensure the human rights of those working in our supply chain are protected.

As with many international businesses, the COVID-19 pandemic had a significant impact on our operations in 2020. Faced with the challenges of store closures, travel restrictions and the cancellation of sporting events, our top priority was and remains supporting our people, partners and those working in our supply chain. We consequently endorsed the calls of the International Labour Organisation (ILO) to protect workers in the textile, clothing and footwear industries and committed to paying for any goods produced for Pentland Brands during the pandemic.

As a global family business, 'doing the right thing' has been in our DNA from the beginning. In 2020 we accelerated our Positive Business strategy to take action for people and our planet. In my first year as CEO, a particular focus will be on ensuring we build brands with purpose, that make a positive difference to our people, partners and the communities in which we operate.

Modern slavery can occur in any global supply chain and is particularly prevalent in the apparel and footwear industry, so understanding where the risk is higher helps us evolve our approach. Our ambition is to increase our due diligence processes, with a particular focus on gender and human rights issues, as this is an area where we know we can improve. [Our Standards](#) provides our partners with guidance on working ethically and transparently, and is now available in the languages of all our major sourcing markets.

We're continuing to look at how we can work collaboratively with our suppliers to manage risks. When accessibility to factories was limited due to travel and social distancing requirements, we widened the scope of our auditing practices

to include remote auditing. We also supported many of our suppliers, including the maker of the world famous Speedo Fastskin, to use their wholesale production capabilities to produce personal protective equipment for frontline workers.

The COVID-19 pandemic continues to influence many of our efforts to manage ethical risks, including how we support our suppliers and the people working in our supply chain, our approach to wellbeing and our industry partnerships. While we expect the crisis to have an impact on our supply base over the years to come, we remain committed to improving our approach to tackling the risks modern slavery.

I look forward to sharing our progress with you.



Chirag Patel
CEO, Pentland Brands

About us

Pentland Brands is the name behind some of the world's best sports, outdoor and lifestyle brands. We own Speedo, Berghaus, Canterbury of New Zealand, Endura, ellesse, SeaVees, KangaROOS, Boxfresh, Red or Dead and Mitre. We're the licensee for Kickers in the UK and we have a joint venture partnership for Lacoste footwear. We also manage the Fitco business.

Our products are available in over 190 countries and are sold either directly or are represented by licensees and distributors.

Pentland Brands is a division of **Pentland Group**, a privately-owned family business that owns and invests in companies, primarily in the retail, sports, outdoor and lifestyle markets.



Our brands

berghaus

Boxfresh

ENDURA

Kickers

KangaROOS

ellesse

FITCO
ACTIVERETAIL

mitre

speedo

Red or Dead

SEAVEES

canterbury

LACOSTE

*footwear licensee **joint venture

Our business

We employ around 1,400 people around the world. We have 19 offices in four continents, including Europe, America, Australia and Asia.

We own one factory in Scotland, through the Endura brand, and we co-own four further factories; three in Sri Lanka and one in Vietnam. We also operate three distribution centres in the UK, with two located in Lancashire and one in Tyne & Wear.



December 2020

Positive business

Taking action for people and our planet

We strive to make all our decisions in line with our business principle 'in good conscience'. In 2020, we accelerated our strategy to be a positive business, targeting our actions across three distinct pillars so we can make a real difference.

1. Building brands with purpose

Our brands lead the way in making a difference, helping us maximise our positive impact.

2. Owning our footprint

We make a positive impact on the world around us, minimising our environmental footprint and supporting the communities in which we operate.

3. Promoting circularity and collaboration

We strive to embed circular processes and collaborate to create positive change.



Our approach to modern slavery

Modern slavery is unacceptable. We strive to build a fair, ethical and transparent supply chain and we have policies, risk assessments and committees that help us put this into practice. We believe that building long-lasting and transparent

partnerships with suppliers is the most effective way to mitigate risks of modern slavery. We also assess risk through a regular programme of audits.

We recognise that the COVID-19 pandemic has posed unprecedented challenges to those already at risk of modern slavery, which is why we will continue to work hard to protect rights and improve working conditions for everyone in our supply chain.

To find out more about our approach to modern slavery and important issues such as forced labour, excessive working hours and workplace discrimination, view [Our Standards](#).



We're part of something bigger

We support the UN Sustainable Development Goals (SDGs), which address the social, economic and environmental challenges we face. We've selected the eight goals where we believe we can make the biggest difference. These goals underpin our Positive Business strategy to ensure that we're focusing on where we can make the most significant contribution to people and our planet.

This report focuses on our contributions to goal 8.7; reducing inequalities by taking immediate and effective measures to end modern slavery.

For more information on how we're contributing to the UN SDGs, visit our [website](#).



2020: a year in review

Topic	2020 Objective	Status	Progress
Understanding our risks	Complete annual risk assessments of our tier 1 suppliers	Ongoing	Although we were unable to carry out our usual risk assessments due to COVID-19 restrictions, we carried out a financial risk assessment and COVID-19 risk assessment of our tier 1 suppliers. We continued to map risk by region and carry out monitoring through a combination of announced, semi-announced and unannounced audits.
	Continue mapping and risk assessing our tier 2 suppliers	Ongoing	We published 70% of our tier 2 nominated fabric suppliers and factories on our website 75% of tier 2 nominated fabric suppliers and 77% of tier 2 nominated trims suppliers have signed our Supplier Agreement and we will look to increase this in 2021.
	Continue social audits of suppliers to investigate risks	Complete	We carried out 103 audits, 88 of which were by third party auditors, five of which were part of the Better Work programme and one of which was undertaken by our Corporate Responsibility team. We carried out 9 Initiative for Compliance and Sustainability (ICS) audits as part of our joint venture with Lacoste.
Policies and governance	Review and improve the governance of modern slavery within our business	Complete	We formalised our internal governance mechanisms for preventing and addressing modern slavery issues.
	Review our policies and training for identifying and remediating issues and create new due diligence policies specifically relating to human rights.	Ongoing	We formalised our Zero Tolerance policy which sets out our approach and remediation process for zero tolerance issues. We will publish this as part of our wider business strategy in 2021. We updated our Audit policy to reflect our commitment to continual assessment of suppliers.
	Review and update Our Standards	Ongoing	We completed a review of Our Standards which will be published in 2021. It will be made available in three additional languages (16 languages in total) and applies to all stakeholders including employees, partners and suppliers.
	Review our vulnerable worker policies	Complete	We're committed to reviewing and updating our vulnerable worker policies every year in line with best practice. In 2020 we reviewed our policies for child labour, migrant labour and homeworking. We also updated our Ethical Materials policy.
	Increase transparency of our supply chain	Ongoing	We published key documents including our Corporate Responsibility charter and Responsible Exit policy. We published additional data on our tier 1 suppliers around gender balance, freedom of association and audit type. We also published gender balance data for our tier 2 suppliers.

2020: a year in review

Topic	2020 Objective	Status	Progress
Training our people	Offer modern slavery training for employees, including all new starters	Ongoing	We updated our compulsory all-employee modern slavery training to include details of our new whistleblowing service.
	Offer training for employees who are most likely to observe modern slavery indicators in our supply chain	Complete	Due to COVID-19, our focus shifted to online training for relevant employees. We trained key members of the newly acquired Speedo North America brand on our corporate responsibility processes and audit protocol. The Corporate Responsibility team received training on understanding the UN Sustainable Development Goals.
Taking action	Evaluate and assess the impact of our project with Homeworkers Worldwide to establish living wages for homeworkers of one supplier in India	Complete	Our supplier continues to use a paper-based system to track orders and payments to workers, based on tools provided by Homeworkers Worldwide. On average homeworkers now receive a 30% higher piece rate. We supported the development of a homeworking toolkit with Homeworkers Worldwide. We've continued to share what we've learned and raise awareness about the importance of protecting homeworkers.
	Begin implementing ACT's global purchasing practices commitment	Ongoing	We're working to improve our purchasing practices through responsible sourcing and fair payment terms. We're aligned with ACT's COVID-19 commitments designed to minimise the impact of the pandemic on workers.
	Remedy any issues discovered through social audits	Ongoing	We continued to remediate issues discovered through a combination of training and auditing.

At least 40.3 million people are in some form of slavery¹

Although modern slavery can be found in any global supply chain, we recognise that the fashion industry is particularly susceptible. The [Global Slavery Index](#) says that 58% of people in slave labour are in the major cotton or garment-producing countries of the world. It estimates that this makes fashion the second biggest contributor to modern slavery after technology.

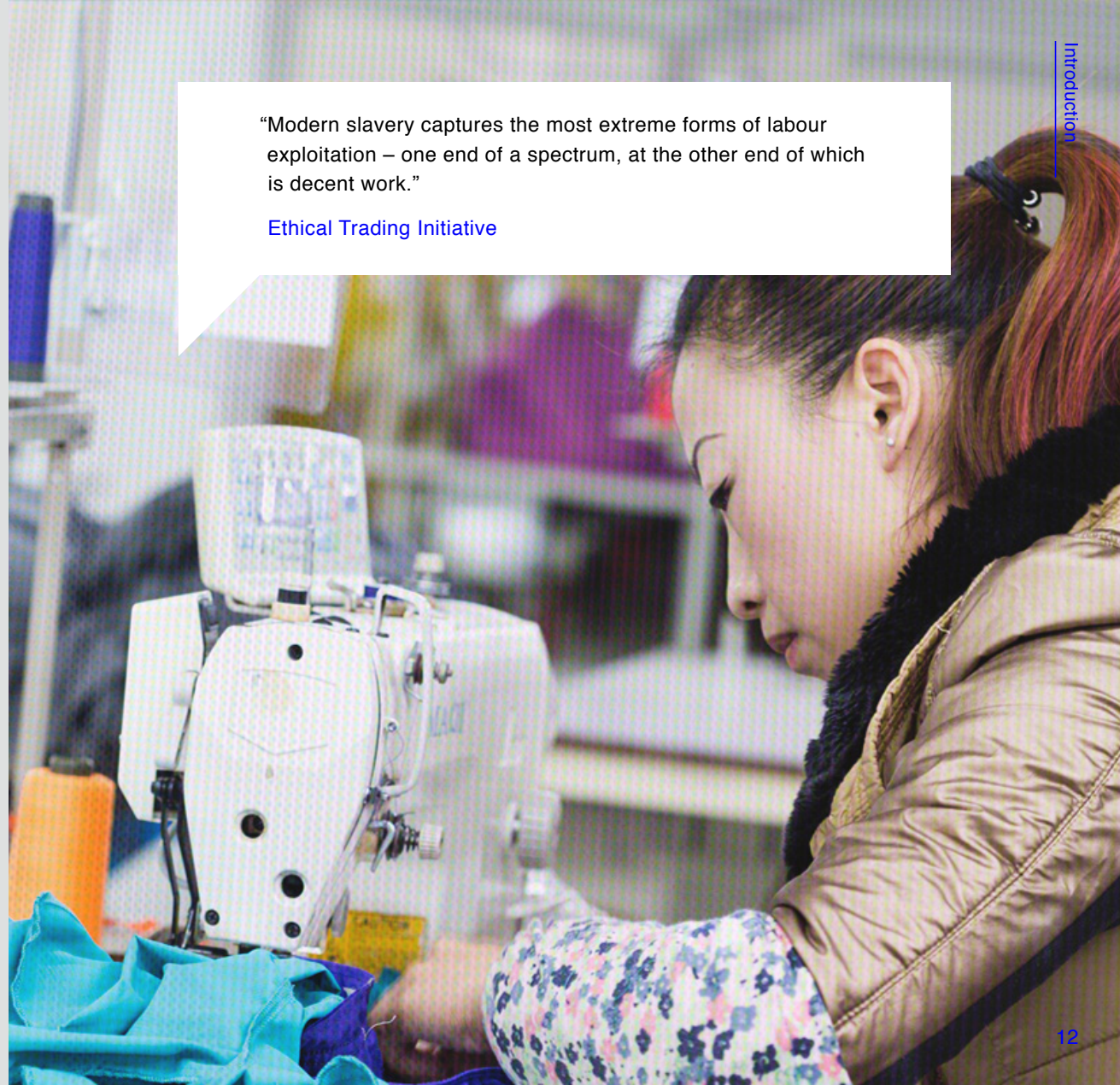
We therefore take protecting the rights of the people who work in our supply chain extremely seriously.

Types of modern slavery

We use the ETI definitions of modern slavery, including forced labour, human trafficking and bonded labour, which can be viewed [here](#).

“Modern slavery captures the most extreme forms of labour exploitation – one end of a spectrum, at the other end of which is decent work.”

[Ethical Trading Initiative](#)

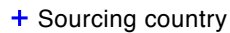


1. International Labour Organisation (ILO)

*direct sourcing only

We closely monitor each stage of our production process, to ensure we're doing all we can to mitigate the risks of modern slavery.

- + 164 tier one suppliers manufacturing in 19 locations
- + 31 nominated fabric suppliers manufacturing in 7 locations
- + 103 audits in 2020



Our supply chain

Our supply chain model varies for owned and licensed brands. We operate the footwear license for Kickers in the UK and manage the footwear supply chain for Lacoste, our joint venture partner. We also act as the licensor for our owned brands; for example, elleste is managed by our partners in France, Italy and the UK.

Find out more about our supply chain model [here](#).

Where we source

There are over 130,000 people working in our supply chain across 21 locations around the world. Our tier 1 and tier 2 factories lists can be viewed on our [website](#).



Our challenges

At each stage of our supply chain, there are risks which need to be managed. We've identified the challenges at each stage of our supply chain, as aligned with the SAC definitions.

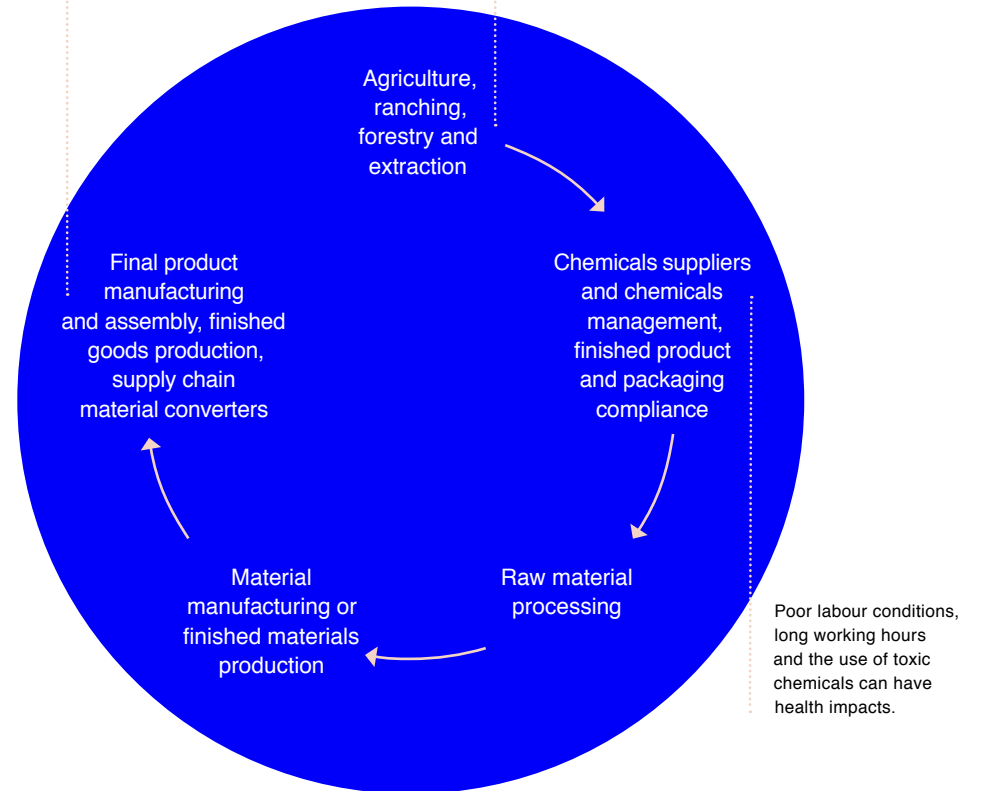
Using third party agents to identify suppliers or manage relationships can make it harder to maintain visibility of supplier activities. It can also conceal forced labour or other types of modern slavery.

We work to four annual peaks in demand. Excessive periods of work can result in excessive working hours, or cause suppliers to use temporary methods like casual labour or unauthorised subcontracting.

Migrant workers are also linked to risks of modern slavery, as they are vulnerable to exploitation, trafficking and low wages.

Homeworkers carrying out hand-stitching often occurs in low income, rural areas. This could cause a lack of visibility in this particular area of our supply chain and make it more difficult to manage human rights issues.

In the world's poorest countries, more than 1 in 4 children are engaged in [child labour](#).¹ Forced or bonded labour can also occur in developing countries.



Managing our risks

As a global business managing a combination of owned and licensed brands, our supply chain is complex and far-reaching. At each stage, there are risks which need to be managed.

We assess risk in our supply chain based on:

- + Geographical risk
- + Level of supply chain control
- + Political stability
- + Worker demographics
- + The presence of governance and management systems
- + Environmental risk



Risk by region

We regularly carry out risk assessments to understand the vulnerability of different regions to modern slavery and inform our decisions on where to source our materials. We also use regular audits to provide a comprehensive picture of risk.

In 2020 we carried out country-based risk assessments as part of a review of our sourcing strategy.

We will continue to carry out country-based risk assessments as part of our ongoing integration of the Speedo North America business into our brand portfolio, which we anticipate will be completed in Autumn 2021.

Risk profile by region

Very high risk

Pakistan
Cambodia

High risk

India
Thailand
Malaysia
Indonesia
Turkey
South Korea
China
Sri Lanka
Romania
Bosnia and Herzegovina
Vietnam
Taiwan
Italy
Japan

Medium risk

Germany
Belgium
United Kingdom
Portugal

Data sources: ILO Global Estimates of Modern Slavery Report (2017), The Walk Free Foundation's Global Slavery Index (2018), The US State Department's Trafficking in Persons Report (2019), Transparency International's Corruption Perceptions Index (2019), Freedom House's Freedom in the World All Data (2020).

Working with factories

We work closely with our suppliers to ensure ethical, social and operational compliance with Our Standards.



Audits

We undertake social audits to ensure compliance with the ethical, social and operational criteria set out in Our Standards.

Our tier 1 factories are audited by either our in-house Corporate Responsibility team or independent third-party auditors. We accept a combination of announced, semi-announced and unannounced audits.

As part of our membership of the Sustainable Apparel Coalition (SAC) and our effort to reduce audit fatigue, we also accept verified SLCP assessments, which are being used by many global brands and retailers. Find out more about our work with the SLCP on page 34.

Audit data

In 2020, we carried out 103 audits, 88 of which were by third party auditors, 8 ICS audits, 5 as part of the Better Work programme and one which was undertaken by our Corporate Responsibility team.

This is slightly fewer than our total number of 134 audits in 2019, due to COVID-19 travel and social distancing restrictions.

40% of our audits were announced, which is slightly higher than usual. This is due to the impact of COVID-19 and the need to guarantee certain health and safety measures for all workers and auditing staff.

Audit format	Number of audits
Full audit	86
Risk assessments and audits by our in-house CR team	1
Follow-up audit	2
Better Work full assessment	1
Better Work follow-up assessment	4
ICS Audit	9
Total number of audits	103

Factory audits by location

Audits by location

Country	no. audits
Cambodia	4
China	68
India	4
Indonesia	1
Pakistan	3
Portugal	1
Romania	1
Sri Lanka	3
Taiwan	1
Thailand	2
Vietnam	15

103

Audits by type

Audits by type	no. audits
Announced	41
Semi - Announced	57
Unannounced	5
	103



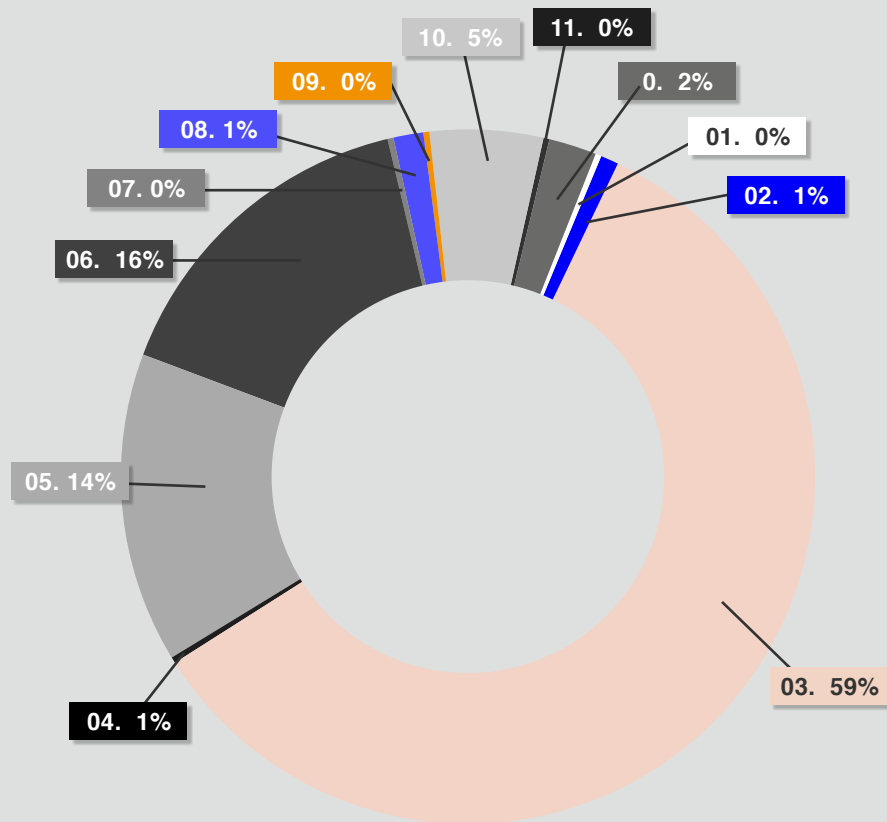
Issues identified

2% of the issues we identified in 2020 were zero tolerance issues, compared to 0.8% of issues in 2019. 40% were classed as critical (compared to 33% in 2019) and 58% of issues were classed as minor (compared to 67% in 2019).

The majority of zero tolerance issues were due to health and safety concerns, with a limited number due to excessive working hours and wages paid. In all cases, we worked directly with the supplier to remediate the cause for concern and all zero tolerance issues have now been resolved and closed.

More information on our remediation process for potential modern slavery issues can be found on page 23.

Issues by type



This includes both open critical and minor issues. There are no open zero tolerance issues. A minor issue can be more quickly addressed, often by improving management practices. A critical issue is one of serious concern that could potentially turn into zero tolerance issue. We work closely with factories to remediate all issues identified.

Issue type	% prevalence in 2020
Minor	58%
Critical	40%
Zero tolerance	2%

- 0. Management Systems and Code Implementation
- 01. Employment is Freely Chosen
- 02. Freedom of Association and Collective Bargaining:
- 03. Working Conditions (H&S)
- 04. Child Labour and Young Workers
- 05. Wages & Benefits
- 06. Working Hours
- 07. Discrimination
- 08. Regular Employment
- 09. Harsh Or Inhumane Treatment
- 10. Environment & Waste
- 11. Subvcontracting



Policies and governance

As a privately-owned family business, our reputation is our currency. Good governance is an essential part of ensuring we can continue to do business in the right way.

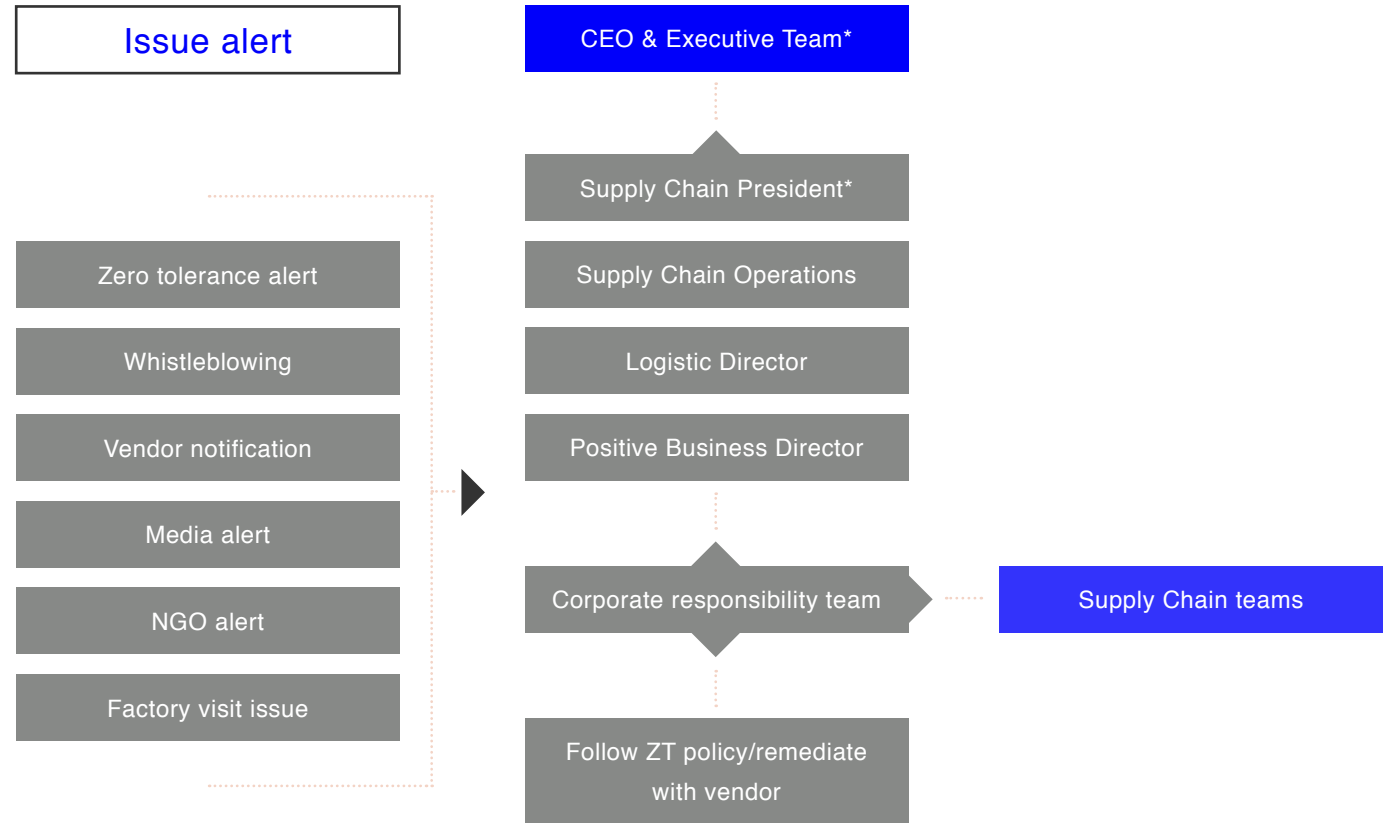
We have dedicated teams, leaders and committees to help us put our principles into practice. Our code of conduct is outlined in Our Standards, which we regularly review to set out what we expect from our employees, suppliers and partners.



Modern slavery governance

Managing modern slavery issues

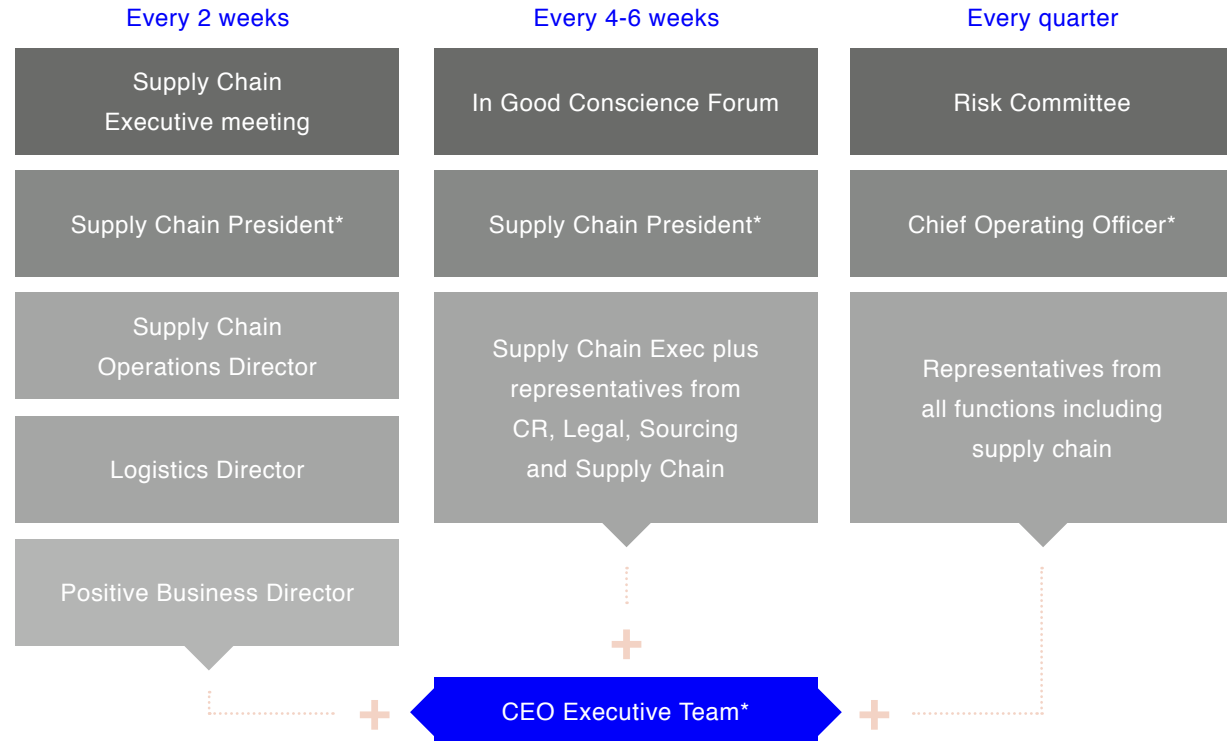
We follow a robust process to resolve potential incidences of modern slavery. Our team of experts in supply chain, logistics and corporate responsibility work together to remediate any issues with the relevant supplier



*Includes Executive team members

Preventing modern slavery issues

We strengthen our approach to corporate responsibility through regular collaboration across the business. This ensures we're continuously evaluating the risks and opportunities in our supply chain, allowing us to make more informed and coherent decisions. All committees are overseen by our Executive Team.



*executive team member.

Policies

We have detailed policies in place to minimise the risk of modern slavery and protect the most vulnerable people in our supply chain.

In 2020 we formalised our Zero Tolerance policy, which allows us to escalate and remediate zero-tolerance issues more effectively and transparently. We also updated our Ethical Materials policy, which guides our buying teams in selecting new suppliers and ensures the compliance of existing partners.

We have a number of policies in place to protect vulnerable workers, including a Child Labour & Young Worker policy, Homeworking policy and Migrant Worker policy. These policies were reviewed in 2020 and can be accessed on our [website](#).

We continue to strengthen governance mechanisms for our tier 2 vendors. 75% of tier 2 nominated fabric suppliers and 77% of tier 2 nominated trims suppliers have now signed our Supplier Agreement.

See it in action: speaking up

In 2020, we introduced a new service to encourage our people to speak up about any issues of concern within our business, including those related to ethical trade. The service allows any employee internationally to raise an issue either by phone or online. We also updated our Speaking Up policy to reflect our commitment to conduct our business in an honest, ethical and transparent manner.



Operating in good conscience

We have committees that guide how we take action across issues relating to sustainability, diversity and inclusion, and supply chain. Our 'In Good Conscience' forum evaluates risks and opportunities in our supply chain, including those related to ethics, integrity and the environment. It allows us to make coherent and informed decisions around our supply chain, ensures that we understand business risks and aligns communication with our suppliers.

The forum is made up of representatives from supply chain, sourcing, corporate responsibility, legal and is overseen by our supply chain executive. It has contributed to updating our process for resolving zero-tolerance issues in factories, reviewing our restricted substances list and strengthening our corporate responsibility approach to new portfolio acquisitions.



Training

Our training programme supports everyone in our organisation to do business ethically, whether it's through our all employee modern slavery training or bespoke courses for factory-facing team members.

All employee training

We offer a compulsory all-employee online training module on modern slavery and the issues which are most prevalent in our industry, which we updated in 2020. It includes information on how our people can speak up about issues of concern, with contact details for our dedicated whistleblowing service.

We also offer three compulsory online legal training modules - anti-bribery and corruption, personal data and competition law – providing resources to help our people do business ethically and responsibly.

Targeted training

We carry out targeted training for people within our organisation who work in factory-facing roles or who work closely with our suppliers. Following our acquisition of Speedo North America in April, we've focused on integrating our businesses and ways of working. Our Corporate Responsibility team carried out training on our processes and audit protocol for relevant employees of Speedo North America as part of the acquisition.

Our Corporate Responsibility team also received training on the UN Sustainable Development Goal (SDG) processes so we can continue to ensure our work addresses the most important global challenges we face.



Taking action

Here are some examples of how our business addressed the complex issue of modern slavery in 2020.



COVID-19

COVID-19

During the ongoing COVID-19 pandemic, our number one priority has been the health and wellbeing of our employees, those working for our partners and within our supply chain, and the communities in which we operate, while also keeping our business running for our retail customers and our consumers.

Distribution centres

While we closed our offices, in-line with the relevant Government guidelines in 2020, our distribution centres remained open. However, we significantly reduced the number of people working in our warehouses and introduced changes in working practises to minimise the risks and to protect the wellbeing of our teams.

Supply chain

Pentland Brands endorsed the call-to-action initiative convened by the International Labour Organisation (ILO) to address COVID-19 impact on the global garment sector. We also committed to paying for goods produced for Pentland Brands and continued this throughout the pandemic. This commitment is in line with ETI (Ethical Trading Initiative) enhanced expectations.

We also worked together with our suppliers on any rephasing of orders and looking to mitigate impact and, in some cases, our suppliers switched to producing personal protective equipment for frontline workers. Speedo waived its exclusivity conditions for its goggle supplier in China, so it could manufacture PPE visors and protective goggles.

Health and safety

Due to the need for increased safety and hygiene measures during the COVID-19 pandemic we also shared industry best practice guidance with our suppliers.

To find out more, view our online COVID-19 Corporate Responsibility statement [here](#).

Improving purchasing practices

We're a founding member of the ACT Foundation, which is committed to transforming wages in the textile apparel and footwear industry through collective bargaining linked to purchasing practices. We remain committed to improving our purchasing practices, which can impact payment times to suppliers, working hours and the use of unauthorised subcontracting by suppliers.

The pandemic demonstrated that upholding workers' rights is one of the most critical challenges in the garment and textile industry. During the crisis, we aligned our approach and our actions where applicable with the commitments

details in ACT's From COVID-19 to Living Wages report which states that as an ACT brand;

- + We responded to any additional requests from suppliers and trade unions for COVID-19 specific purchasing practices
- + We committed to communicating any possible projections for the following months and the overall business and stock situation.
- + We committed to taking responsibility in cases in which a supplier has incurred a fabric liability as a direct result of order amendments.



Improving purchasing practices

Despite being unable to carry out our regular supplier assessments in 2020 due to COVID-19, we continued to work to implement the changes needed to meet [ACT's five global purchasing practices commitments](#) by the end of 2023.

+ In April 2020, we adapted our payment terms from 30 days to 60 days due to COVID-19 implications. This change has since been made permanent and we're monitoring improvements in responsible payment practices across our business and brands.

+ In 2021 we will gather data on our purchasing practices from our suppliers through an anonymous ACT purchasing practices assessment, as well as conducting an internal purchasing practices self-assessment.



Sharing homeworking best practice

Homeworkers, who carry out hand-stitching for our footwear, are a vital part of our supply chain. However, lack of visibility over their employment and working conditions increases the risk of modern slavery.

Since we started working with Homeworkers Worldwide in 2016, homeworkers at one of our suppliers now receive a 30% higher piece rate on average.

We worked closely with Homeworkers Worldwide to support one of our suppliers to track orders and payments through a paper-based system. This has helped us map a network of over 200 homeworkers, increasing transparency of this area of our supply chain.

In 2020 we supported the development of a homeworking toolkit with Homeworkers Worldwide, which provides practical guidance and examples of good practice for protecting homeworkers in global supply chains.

We continue to share advice and learnings from our ongoing work with Homeworkers Worldwide. In 2020 we participated in events including the OECD Forum on Due Diligence in the Garment and Footwear Sector and a Fair Labour Association (FLA) webinar on homeworking practices.



Memberships

We collaborate with organisations in our industry to bring about positive change. This ensures we adhere to best practice and allows us work with other global brands to address the complex issue of modern slavery

Ethical Trading Initiative (ETI)

We're a founding member of the ETI, which is the leading membership organisation promoting respect for workers' rights across the globe. We align our work with their principles – Our Standards is based on the ETI base code and we align our work to combat modern slavery with their core principles.

Our most recent ETI report called out gender in our supply chain as a recommended focus area. Next year we plan to pilot a gender due diligence framework to focus on improving women's human rights.

ACT (Action, Collaboration, Transformation)

We're a founding member of ACT, which is a collaboration of 21 global brands and the union IndustriALL to achieve living wages for workers in the garment, textile and footwear industries. Find out more about how we work with ACT on page 30.



Memberships

Social & Labour Convergence Programme (SLCP)

We are a signatory of the SLCP, which aims to eliminate audit fatigue in the apparel and footwear industries. We use SLCP tools to align our audit data with other industry stakeholders, which increases transparency and allows us to focus our efforts on improving working conditions.

Sustainable Apparel Coalition (SAC)

We're part of the Sustainable Apparel Coalition, which is the apparel, footwear, and textile industry's leading alliance for sustainable production. We use their Higg Index tool to measure environmental and social labour impacts across our supply chain.

Better Work

We collaborate with Better Work to make improve working conditions for the people in our supply chain through assessments, training and advocacy. In 2020 we carried out 5 supplier audits as part of the Better Work programme.



2021 and beyond

Much of our activity in 2020 focused on protecting our people and those working in our supply chains from the impact of COVID-19. In the coming years, we'll look at where we can improve our approach to tackling ethical risks, with the ultimate goal of eradicating modern slavery.

While there's always more we can do, we'll continue to be guided by our Positive Business strategy so we can make a tangible difference to the lives of people working in our supply chain.



2021 and beyond

2021

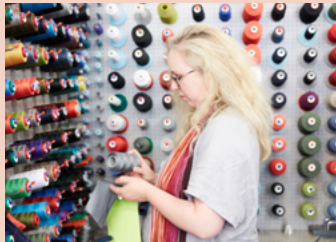
Continue to review and publish our ethical trade policies.



+

Improve our due diligence processes around human rights.

Focus on gender equality in our supply chain to improve women's rights



+

Review and update our modern slavery training and awareness-raising.

Focus on reviewing our grievance mechanisms and processes.



2022

Completing and evaluating purchasing practices as part of the ACT framework to improve living wages for workers.












Pentland Brands

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To find out more about CR at Pentland Brands,
please contact corporate.responsibility@pentland.com
or visit our website

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