

# **Purepay Retail Limited**

incorporated in England with registration number 11741716,  
and registered office at One St Peter's Square, Manchester, M2 3DE

## **Trading as Bonmarche**

This document refers to Purepay Retail Limited and subsidiary and associate companies, which meet all of the criteria for reporting under The Modern Slavery Act 2015, being;

- A body corporate
- Carry on business in the UK
- Supply goods or services
- Have annual turnover of £36M or more

## Statement on Slavery and Human Trafficking

### 1. Overview

We are a clothing retailer, operating primarily from over 350 bricks and mortar stores in the UK and online at; [www.bonmarche.co.uk](http://www.bonmarche.co.uk).

Purepay Retail Limited is a newly trading business, Financial Accounts to end November 2020 show that the company was dormant with no sales. Accounts for the years ending Feb 2022 and Feb 2023 are not yet published.

Purepay Retail Limited (PPR), has over 3,000 employees and estimated turnover in the year to February 2023 is expected to be in excess of the £36M which would trigger compliance with the Slavery Act.

This statement is pursuant to section 54, part 6 of the Modern Slavery Act 2015 and sets out the steps which the company and any subsidiaries have taken to identify, monitor and remediate any issues relating to slavery and trafficking within our UK businesses and our worldwide supply chain.

We recognise that slavery and trafficking exists and the eradication of slavery and trafficking is a live and on-going issue which will require constant vigilance. We aim to work in a cooperative and supportive manner with the partners in our supply chain to assist, educate and train where possible and to seek out potential areas of concern and resolve or remediate these in the best interests of the workers affected.

We recognise, that while we have controls, measures and reporting procedures in place, there is more to do, development will continue as the macro environment changes and more knowledge and understanding is gathered.

**The existing controls are set out below, these measures have currently revealed no issues relating to slavery and trafficking.**

**PPR has, in regard to its own employees, and seeks to ensure for the employees of its suppliers and other business partners, complied with the ETI Base code as follows;**

- **Freely chosen employment**
- **Freedom of association**
- **Safe and hygienic working conditions**
- **No use of child labour**
- **Living wages paid**
- **Working hours which are not excessive**
- **No discrimination is practiced**
- **Regular employment is provided**
- **Harsh or inhumane treatment is not tolerated**

### 2. In relation to the company's own employees:

The HR function is centrally controlled and managed with appropriate controls and policies to safeguard the rights and welfare of our employees including policies on Grievance, Bullying and Harassment, Discrimination, Prevent (identification and prevention of radicalisation) and Safeguarding (identification and prevention of abuse of young workers) and Whistleblowing to allow the safe reporting of any abuses.

Senior staff, reporting to the Board of Directors have received training with regards to Safeguarding and Prevent issues.

Safeguarding issues are discussed and reported to the Board in a regular Apprenticeship Report.

Management staff working with the young people in the Apprenticeship programme have been trained in safeguarding and prevent issues. The Apprenticeship programme is actively promoted and is growing. Young persons are encouraged to become apprentices and receive training which is monitored by OfSted.

Employees are paid into their own bank accounts at no greater intervals than monthly. The payroll process is managed by a central payroll team and overseen by a professional Payroll Manager.

However, we recognise that our employees could be subject to exploitation outside of the businesses which may be difficult to identify. We have measures which may assist with identifying such risks and we are continuing to develop staff education, particularly for store management personnel to provide them with the tools to recognise exploitation and thereafter provide support or ensure that vulnerable employees are sign posted to the correct support organisations.

### **3. UK Suppliers, Non Clothing**

We also have considered other supplies into the business;

- Food (restaurants and coffee shops) – were we operate food premises we will insist on supplier compliance and understanding with anti-slavery legislation from our food services suppliers.
- Concessions – any concessions in our premises are required to confirm compliance with anti-slavery legislation, this is a contract term in our Concession Agreements.
- Contractors who do maintenance and shop opening work – we have confirmation from existing suppliers with turnover in excess of £36M that they are in compliance with the Modern Slavery Act. This is part of the on-boarding process for new suppliers and contractors.
- Third party transport and distribution – UK based company subject to the Modern Slavery Act reporting.

### **4. Main UK and Overseas Supply Base**

PPR has policies, procedures and practices in place to assist with the identification of issues of slavery or trafficking within the supply chain, these include;

- Written and published policy on ethical trading.
- Suppliers are only taken onto the supply base having gone through a detailed approval process, including site visits.
- Terms and Conditions of trade.
- Online Supplier Manual containing details of our clear expectations with regards to the treatment of the people in the factories and other facilities we are supplied from.
- Guidance on the basics of health, safety and welfare.

We check compliance with our requirements by;

- Requiring that suppliers confirm compliance at a senior level.
- Requiring that suppliers complete a SEDEX self-audit.
- Requiring a SEDEX SMETA Audit dated within the last 12 months, including a corrective action plan and progress report.

Each supplier provides a self-evaluation return in a standard format, this includes an ethical evaluation and a plan to deal with any non-conformities.

Where new businesses are acquired into the business a review takes place to learn from their existing practices or to bring them up to the standards of the practices of the company.

The Head of Sourcing is responsible for the Goods for Resale Supply chain; assistance is provided by the Company Secretary in the application of the legal aspects of the legislation and in the policy writing.

As the business grows and develops, it is the intention that an Anti-Slavery Steering Group be set up to co-ordinate development and understanding in the area of slavery and human trafficking, including a programme of education and training for any employees who may come in contact with the supply chain and may be able to assist in the identification of slavery, welfare and health & safety issues in the factories we use.

The Company Secretary reports into the Board on issues of compliance including Modern Slavery Act issues.

## **5. Small UK Supply Base**

There is a group of small UK suppliers, All of these suppliers fall under the requirements for Modern Slavery Act reporting. However, these Suppliers are still required by the company to comply with the Company Supply chain rules which include adherence to anti-slavery legislation, whether or not they produce and publish a Slavery Act Statement.

## **6. Action to Engage**

The objective will always to be that we will work with our suppliers to resolve issues in the best interests of the workers.

## **7. Area of Concern for further vigilance**

We consider it prudent to listen to the concerns of NGO's and to assess what risk there might be within our supply chain in light of reports made.

We actively consider reports from various sources, including SEDEX, of which we are an "A" member.

We are considering how best to develop relationships with our suppliers which will provide comfort that the treatment of the workers in the supply chain meets or exceeds the requirements of the ETI Base Code.

## **8. How Do We Know what is going on?**

We acknowledge that it is important to know the market well to network with fellow retailers and others in the industry, in other words keep our ears to the ground.

This has been a significant challenge following the COVID pandemic and is an area for development over the next few years.

Being knowledgeable about global reporting in this area and the findings of NGO's and following up any reports made to see if they are also reflected in our supply chain is also important. We have considered the BMI's risk index by country and mapped this against our existing supply bases. We will also consider it when looking at new supply bases.

We strive to know our factories well. The Buyers meet the factory managers both in the UK and by visiting them in situ, this has not been possible from 2020 to 2022 but is now improving. It is important to build up a good and close working relationship with our supply partners.

We intend to maintain long term relationships with our suppliers and we will have more influence over how the factories operate and assist where we can to improve conditions where necessary.

It is the intention to continue with in person factory visits.

Visits will be carried out by;

- UK Buying team
- UK Technical teams
- Senior management.

A poor SEDEX audit will indicate that follow up work is required.

## **9. Forced Labour Indicators**

SEDEX have produced Forced Labour Indicators Reports and we will be engaging with SEDEX and have taken part in workshops to understand what the indicators are and how we use them to improve our risk assessment, due diligence and follow up investigations.

We are using the forced labour indicators as produced and defined by the International Labour Organisation (ILO).

## **10. Supply Chain Depth**

Like most retailers we have a supply chain of some length and depth. PPR has first and second tier suppliers (suppliers where we have direct contact) and third tier suppliers where we may not have direct contact as they are suppliers to our factories or are sub-contracted.

We see the majority of the work in relation to rooting out activities in relation to slavery and trafficking as being in the third tier area. This does not, however, mean that we will have less scrutiny on the first and second tier.

## **11. Strategic Areas of Development for the next 12 months**

Senior management have, pre COVID, attended an ETI (Ethical Trading Institute) course to assist with compliance under the Modern Slavery Act and to assist in the development of strategies to identify poor or illegal practices and to assist with the improvement of the conditions of workers within the supply chain.

Continuing education focus is as follows;

- Raising awareness of the issues at all levels.
- Training the key individuals in the business.
- Educating the supply base on the requirements.
- Reviewing the existing policies and guidance for suppliers.
- Developing Red Flag checklists for visiting staff on welfare, health, safety and conditions which would provide early indicators of problems.
- Using the new database to provide key performance indicators.

## **13. Concluding Statement**

Our focus will be to maintain a healthy and stable supply chain which benefits all stakeholders and encourages good and fair working conditions where employees are free from harm, threat or harassment of any kind, are paid regularly at a sustainable level and have a mechanism to raise issues.

Where there are issues we will seek to provide the support with the objective that the people in our supply chain are treated fairly, however, where satisfactory improvement is not made and we can find no other way forward,

we will move away from an offending supplier.

We will encourage an open and honest dialogue with our supply base and to encourage our teams in direct engagement with the supply base to report issues of concern to the Board, with a focus on improvement.

We will focus on working with suppliers who meet the standards required in terms of worker safety and welfare and production of quality product, working with PPR as a partner.

The single point of contact for issues of Modern Slavery is the Company Secretary, from this contact point the Board can be made aware of any issues.

**For and on behalf of Purepay Retail Limited**

**For the year ending February 2024**

**John Jackson**

A handwritten signature in black ink that reads "John Jackson". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

**Group Finance Director**

**Approved on behalf of the Board of Directors**