

# Modern Slavery Statement 2024

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## Introduction from CEO, André Maeder



At Selfridges, we are committed to operating in a way that respects our world, builds trust, and puts people at the heart.

As a business with a global network encompassing thousands of suppliers and workers, we have a responsibility to trade both ethically and responsibly. This forms a core component of our RESELFRIDGES sustainability strategy, which is embedded within every team in our organisation.

Our latest modern slavery statement for the year ending 31 December 2024 outlines our approach to managing ethical trade risks and tackling modern slavery. It's an important moment to take stock and evaluate our efforts in safeguarding workers' rights and wellbeing.

Throughout the past year, we have retained focus on fostering great relationships with our brands and suppliers, continuing to improve the ways we measure and support them so we can mitigate risk and deliver amazing product. We work in tandem with the wider Selfridges Group and are guided by our Ethical Trade Requirements and industry partners.

In 2024, we proudly became a Foundation Member of the Ethical Trade Initiative, an alliance of trade unions, NGOs and businesses who are working to advance human rights in global supply chains. This has been a hugely impactful forum for us to ensure we keep adapting and learning as an organisation.

We have activated new initiatives across our business to further enhance our responsible sourcing practices. From undertaking a Human Rights Impact Assessment on key products and launching a new Self-Assessment Questionnaire platform for third-party concessions and brands, to implementing an assessment of cotton sourcing in higher-risk areas and developing a Brand Investigation Process to strengthen accountability.

Alongside an audit of our Distribution Centre, we also held a dedicated Modern Slavery Awareness month in October 2024, delivering online training to our managers and leaders. There is always more to do, and we continue to commit to better purchasing practices by aligning with organisations like the Buying Better Institute to hold us accountable.

As we look ahead, our newly refreshed DEI strategy, Open to the World, will also support our work in ensuring our products, operations, and supply chains are inclusive, equitable, and transparent.

We will continue to embed high trading standards, deepen our due diligence processes, and ensure our team members, suppliers, and brand partners remain educated and vigilant as we pursue a brighter and fairer future for all.

A handwritten signature in blue ink, appearing to read 'A Maeder', written in a cursive style.

**André Maeder**

André Maeder, CEO of Selfridges Group

14th May 2025

Selfridges Retail Limited, 400 Oxford Street,  
London, W1A 1AB

## Who we are

### Our business

Founded by Harry Gordon Selfridge in 1909, Selfridges is a landmark destination and social centre where everyone is welcome. Powered by imagination and filled with creative spirit, Selfridges is committed to creating a more sustainable future for people and planet and continues to build on over a decade of retail activism. Selfridges is part of the wider Selfridges Group portfolio, along with Brown Thomas and Arnotts in Ireland and De Bijenkorf in the Netherlands.

**176.6**  
million visitors to our stores, website and app<sup>1</sup>

**£1.7**  
billion sales<sup>1</sup>

**26.4**  
million products sold<sup>1</sup>

**4** physical stores, **1** digital store, **2** office sites, **1** distribution centre<sup>2</sup>, **1** call centre operator<sup>3</sup>, **1** satellite returns centre<sup>2</sup>



#### Our people<sup>4</sup>

We have approximately **2,900** team members who work in our stores, offices and remotely.

#### People in our supply chains<sup>4</sup>

We don't manufacture any products ourselves, so working closely with trusted third-party brands and suppliers is crucial in providing our customers with extraordinary shopping experiences. We have extensive supply chains encompassing thousands of suppliers and workers around the world, across three areas:



**Private label suppliers:**  
**53**

These suppliers produce our Selfridges Selection products and a small number of other Selfridges-branded goods which we sell. These direct suppliers are managed by our Food and Buying teams who work closely on these branded products.



**Third-party brands: Over**  
**2,950**

Most of the products we sell in store and through our digital platforms are from third-party brands<sup>5</sup>. Our Buying and Merchandising teams manage our relationships with these brands.



**Procurement suppliers:**  
**2,540**

These suppliers we directly engage with to provide the products and services which, in the main, we don't sell but which keep our business going. Some of these suppliers provide us with products which carry our brand and name such as our packaging and famous yellow bags. Our Procurement team liaise with stakeholders across our business to help identify and manage these suppliers.

Most of the people who work in our supply chains are not based on our sites, however approximately **10,500<sup>6</sup>** people work alongside our team members in our sites. They include agency workers, contractors, concession team members and consultants. They aren't directly employed by us and are, in most cases, managed by the concessions or brands that employ them.

<sup>1</sup> These figures relate to FY24.

<sup>2</sup> We do not operate our distribution centre, but work closely with our third-party supplier who does.

<sup>3</sup> We do not operate our call centres but work closely with our third-party supplier who operate across two sites.

<sup>4</sup> Our supply chain and people figures are as of 31 December 2024.

<sup>5</sup> We work with many brands, some of whom supply us directly on a wholesale basis, and some of whom operate on a concession basis.

<sup>6</sup> This figure relates to all people who have crossed our threshold to work alongside our team members throughout 2024.

## Our governance

Our approach to sustainability is governed and managed by several groups and team members across the business. These include executive committees who set strategic direction and help integrate sustainability across the business; working sessions, where we develop and implement plans; and team members, who provide and access technical expertise and champion sustainability. These groups monitor key measures to help evaluate whether our approach is effective, to identify and tackle risks

and issues, and to direct our future action including determining areas of potential improvement. We also collaborate with external experts, other organisations and forums to supplement our knowledge and capacity, to further the development of our approach. Last year our governance of sustainability was streamlined, and we welcomed a new partnership focused on human rights within the supply chain.

### **Responsible Director:**

Our CEO and Board of Directors have ultimate accountability for tackling modern slavery, but our Executive Director, Buying & Brand has day-to-day responsibility within his remit for sustainability.

### **Executive Committee:**

The Committee of Executive Directors which has day to day responsibility for running the business has accountability for ensuring we are a sustainable and responsible business. They are provided with an annual update on our approach to tackling modern slavery, or more frequently if required.

### **Executive Risk Management Committee:**

The Executive Directors meet quarterly as an Executive Risk Management Committee and ensure the business risk management framework is effective, including monitoring activity in relation to the most significant corporate risks. Modern slavery would be discussed as a risk topic in this forum if a significant corporate risk was identified and needed to be addressed.

### **Ethical Trade and Modern Slavery working sessions:**

Key stakeholders are engaged regularly to review risk-based plans and their implementation in relation to ethical trade and modern slavery.

### **Sustainability & Innovation team:**

Helps set direction, embeds sustainable practices, engages key stakeholders, and monitors progress.

### **Selfridges Group businesses:**

Share resources and ideas and aligns approaches where appropriate.

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Key achievements  
of 2024

Achieved due diligence coverage across over **60%** of our brand and concession sales

Provided **70%** of managers and leaders with online modern slavery training

Improved our Better Buying score from **33** to **36** in relation to our purchasing practices

Launched a new Self-Assessment Questionnaire platform for our third-party concessions and brands

Developed an industry view of cotton sourcing in higher risk areas which we shared with key concessions and brands

Undertook a Human Rights Impact Assessment of a key product

Held a modern slavery awareness month

Developed and actioned a Brand Investigation Process


Conducted a social audit of our distribution centre


# Risk assessment/ Overview of our approach


In response to our risk assessment, we have three key action areas and objectives we target through our work:

1. **Policies: Embedding standards**
2. **Due diligence: Proactively investigating**
3. **Training and communications: Raising awareness**

Our risk-based approach helps us focus our efforts where we can have the greatest impact. We segment our people and those working in our supply chain into four groups, each with its own risk assessment and action plan. We consider the potential modern slavery risk associated with workers' **location** and **industry sector**, the **salient risks** that may materialise, the potential and actual **risk of occurrence** and our **sphere of influence**. These factors combined help us to **prioritise and direct our action** to areas of greatest risk in which we can have an impact. Our risk assessment process is not static, it continues to evolve as the risk landscape changes. Please see our [Investigating Issues](#) section for more detail on our consideration of risk in individual scenarios.

 <b>Our people:</b> Our team members who work in our stores, offices and remotely.	
<b>Location Risk</b>	Low: All our team members are in the UK. Most are also based on our sites, although remote working is often used by our office teams.
<b>Sector Risk</b>	Low: Our team members are in retail or central functions, which are comparatively lower risk areas.
<b>Risk of Occurrence</b>	Low: The relatively low location and sector potential risks are reduced further by the recruitment and people management controls we have in place.
<b>Sphere of Influence</b>	High: We have high influence and control as we directly recruit and manage our team members.

 <b>Private label suppliers:</b> Produce our Selfridges Selection products and a small number of other branded goods which we sell.	
<b>Location Risk</b>	Medium: These suppliers do not work on our sites, and some may operate from higher risk geographies (see our supplier list on <a href="#">page 12</a> ). These workers are less visible to us day-to-day.
<b>Sector Risk</b>	High: These suppliers span a range of sectors although are largely within food and drinks, some of which will be higher risk areas. A number of these suppliers are small and medium-sized businesses.
<b>Risk of Occurrence</b>	Medium: The locations and sectors these suppliers operate in and the general lack of extensive formal policies of small and medium-sized businesses means the risk of some lower severity issues occurring is moderate, despite being lowered by our contractual requirements and due diligence.
<b>Sphere of Influence</b>	High: We have more influence and control over these supply chains as we directly select these suppliers and specify the goods they produce.

 <b>Third-party brands:</b> Third-party brands whose products we sell in store and through our digital platforms.	
<b>Location Risk</b>	High: Some of these workers may be based on our sites (some brands operate concessions in our stores), although largely these people will form part of a global supply chain and may be based in higher risk locations.
<b>Sector Risk</b>	High: These brands are generally in apparel, accessories, beauty, food and drinks production. As the area of highest risk, we may apply a sector-specific lens to direct information requests or actions to better understand and mitigate risk in supply base sub-sets.
<b>Risk of Occurrence</b>	High: There are locations and sectors in which brands operate where modern slavery is more prevalent. Whilst our policies set out our standards and prohibit activities such as unauthorised sub-contracting, we are aware these issues exist in the industry generally, in some cases resulting in serious issues.
<b>Sphere of Influence</b>	Low: We have less influence and limited control over these supply chains. We work with third-party brands who manage these supply chains. Whilst we do have formal measures in place, including contractual requirements with our suppliers, we recognise that seeking meaningful assurance that issues do not exist and that measures are effective across all suppliers is challenging.

 <b>Procurement suppliers:</b> These suppliers we directly engage with to provide the products and services which, in the main, we don't sell but which keep our business going.	
<b>Location Risk</b>	Medium: Some of these suppliers may work on our sites (including cleaners, construction contractors and food services suppliers) or may work within higher risk sourcing regions.
<b>Sector Risk</b>	High: These suppliers span a wide range of industries including those which are higher risk such as property construction, building services, waste, food and restaurants, cleaning, security, logistics and recruitment.
<b>Risk of Occurrence</b>	High: There are locations and sectors in which our suppliers operate where modern slavery is more prevalent. Particularly in the higher risk service sectors listed above we are aware of higher instances of industry-wide issues.
<b>Sphere of Influence</b>	Medium: We have strong influence and moderate control over these supply chains. We directly select these suppliers and specify the goods or services they offer to us, but we rely on these suppliers to operate on our behalf. There are several stakeholders involved internally, in addition to our Procurement team, who select and manage these suppliers.

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## **Policies:** **Embedding** **standards**

We have a range of policies in place, aligned with the principles in the Selfridges Group Code of Ethics. These set out our standards which we work to embed across our business and supply chain. These policies are managed by our People, Buying and Merchandising, Food and Procurement teams who, along with our Legal team, review them regularly. They are communicated via the methods discussed below and are monitored and enforced using the due diligence techniques described later in this document.

### **People policies and processes:**

These policies and processes set out our expectations of, and our responsibilities towards, our team members. Our policies are provided to new starters, are referenced in inductions and are available on Workday, our remotely accessible HR system.

### **Grievance process:**

Our grievance process sits within our people policies and processes. It sets out how team members can raise any concerns or issues, and the process for us to follow to conduct a formal investigation.

### **Ethical Trade Requirements:**

Our Ethical Trade Requirements apply to the brands and suppliers we engage with, including contractors and branded concessions, across all tiers of our supply chain. They are part of our standard Selfridges' Terms and Conditions and are consistent with our sister businesses across Selfridges Group. This alignment is particularly helpful for brands and suppliers who work with multiple businesses within Selfridges Group, to build understanding and compliance with a common set of standards. Our Ethical Trade Requirements include clauses on our zero-tolerance of modern slavery, require compliance with local modern slavery legislation, and are aligned with the ETI Base Code and ILO Conventions. We made updates to our Ethical Trade Requirements last year, as part of our commitment to continuous improvement and improving our standards.

### **Supplier Guidelines:**

Our Supplier Guidelines provide further detail on our sustainability and ethical trade standards. They help our suppliers to understand the rationale for and detail of our contractual requirements.

### **Procurement Policy:**

Our internal Procurement Policy stipulates sustainability and ethical trade requirements and expectations for selecting and managing our suppliers of goods and services not for resale. These help us to integrate sustainability into our decision making and supplier evaluation.

### **Whistleblowing Process:**

Our Speak Up Helpline is a dedicated whistleblowing and support line. This is accessible 24 hours a day, all year, by anyone who works for or with us. It is communicated via a range of different channels.

### **Response Plan and Remediation Process:**

We have a formal process for investigating and where needed remediating ethical trade and modern slavery issues which is integrated into our Incident Response Plan. Our Incident Response Plan and Remediation Process outlines the steps we need to take should a potential issue be brought to our attention. Last year we developed a supplement to this - a third-party brand investigation process. Details of this can be found in the [Investigating Issues](#) section of this document.

# Our people

Risk Assessment Overview	
Location Risk	Low
Sector Risk	Low
Risk of Occurrence	Low
Sphere of Influence	High



Our people are our team members who work in our stores, offices and remotely.

## Our Priorities

Our priorities with this group are:

- To ensure our due diligence measures are effective in helping us to identify issues.
- To help equip our team members with the knowledge to spot the signs of modern slavery in their work or personal lives and with information on how to report any concerns.
- To further train key populations of team members who may interact with groups at higher risk of modern slavery.

## Action plan

### Due diligence: Proactively investigating

**Right-to-work:** We review our new team member's right-to-work as part of our onboarding process. Our systems support checks on a person's right-to-work in the UK and any visas required.

**Proactive monitoring:** Selfridges monitors unusual team member details in key areas via our HR systems.

**Concession team member approvals:** Both Selfridges and concessions approve concession team members before they can work in store. Branded concessions conduct checks, including written confirmation of right-to-work. We then hold a store approval interview to ensure these individuals are aware of and will work in line with our policies and values.

### Training and communications: Raising awareness

**Induction:** New team members complete our induction, the Big Yellow Welcome, which includes an introduction to sustainability.

**Guides:** Our team members are made aware of our policies and our Speak Up Helpline in our handbooks which also signpost information on sustainability.

**E-learning:** Our team member modern slavery e-learning module is an annual requirement for our management and leadership teams but is available for all team members to access and forms part of our induction process. Over the last year we further promoted this e-learning internally and achieved a completion rate of 70% of management and leadership.

**Tackling modern slavery month:** Aligning with Anti-Slavery Day, in October 2024 we held an interactive take-over of internal communications channel to help raise awareness of the issue. This included playing our modern slavery awareness video, a newsroom take-over and further signposting of our modern slavery e-learning.

# Private label suppliers

Risk Assessment Overview	
Location Risk	Medium
Sector Risk	High
Risk of Occurrence	Medium
Sphere of Influence	High



These suppliers produce our Selfridges Selection products and a small number of other branded goods which we sell.

## Our Priorities

As we have more influence and control of this group, this is a key area that we target. Our priorities are:

- To undertake more in-depth due diligence across a risk-based selection of suppliers.
- To support these suppliers in improving their ethical trade standards.

## Action Plan

### Due diligence: Proactively investigating

**Self-Assessment Questionnaire:** Our Food team identified a selection of suppliers, including those which are higher risk, and requested they complete our Sustainability Self-Assessment Questionnaire. This helps us assess compliance with our standards, fulfil our legislative obligations and identify opportunities to support our suppliers. Priority suppliers are required to complete our self-assessment questionnaire every two years.

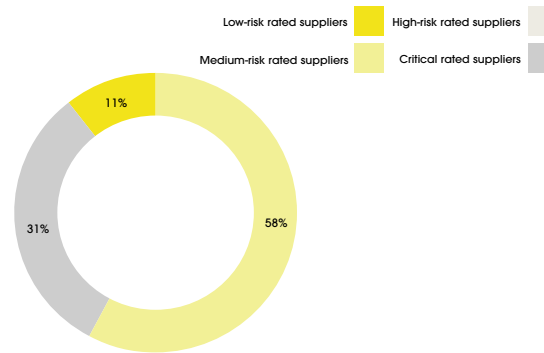
We reviewed the responses from our private label suppliers, rated them according to the severity of any findings, and agreed follow up actions where necessary to help ensure alignment with our standards.

### Self-Assessment Questionnaire Coverage (2023-24)

We requested 34 suppliers to complete a Self-Assessment Questionnaire

58% of these target suppliers completed a Self Assessment Questionnaire

9 of these suppliers improved their initial scores with our support



Supplier scoring at the end of 2024

Our 53 branded product suppliers in this area are from the countries shown below. A small number of these products are sourced through agents and not directly.



### Improvement areas highlighted

Over the course of 2024 Selfridges supported 9 suppliers in making improvements to their scores. Some of the key issue areas identified in the Self-Assessment Questionnaires included:

- Formal documentation of employee checks
- Formal supply chain mapping and auditing
- Grievance, escalation and remediation mechanisms

<sup>1</sup> Rating Definitions: Low-risk: suppliers show a strong commitment to sustainability and transparency, going above and beyond compliance; Medium-risk: suppliers overall have a strong commitment towards sustainability, with some areas that have an opportunity to be improved; High-risk: suppliers are in the early stages of their sustainability commitments or may not yet started to make any; Critical suppliers ("issues areas") have highlighted a breach of our Ethical Trade Requirements within a supplier's own operations. <sup>2</sup> Selfridges' private-label supplier self-assessment questionnaires are valid for two years.

## Private label suppliers

Risk Assessment Overview	
Location Risk	Medium
Sector Risk	High
Risk of Occurrence	Medium
Sphere of Influence	High

### Due diligence: Proactively investigating

**On-site visits and surveys:** Members of our Food, Quality Assurance and Technical teams regularly visit suppliers of our Selfridges Selection products. These visits provide visibility of production facilities and provide an opportunity to learn about the supplier's processes. Site visit surveys allow us to add a sustainability and modern slavery assessment to these. These cover spotting the signs of modern slavery and evaluates alignment with key aspects of our Ethical Trade Requirements.

**Human Rights Impact Assessment:** Last year we conducted a Human Rights Impact Assessment (HRIA), with Fair Working Conditions, a company which specialises in human rights due diligence, across the supply chain of our Selfridges hamper basket - from weavers through to the finishing factory. We aimed to understand the living and working standards of the communities that supply Selfridges own-label hamper and explore the future of this artisan craft. 115 weavers took part in the study which involved site visits, audits and worker engagement. We gained insights into the demographics of the people who make our hampers, and the standards and conditions of the factory and local facilities. We are working with our supplier on recommendations in key areas of working environment, minor health and safety issues and wages.

In 2025, we will be engaging key NGOs and industry experts to support a collaborative process to further improve standards. We plan to revisit progress against the recommendations made. We are working with our supplier to ensure that this is a fully collaborative and supportive project.

**ETI Engagement:** Following our approval by the ETI Board as a foundation member, we are working through the ETI's human rights due diligence (HRDD) progression framework to continually improve our approach to human rights in our supply chain. The ETI supports us through practical workshops, involvement in projects, guidance and feedback to ensure we are adapting and learning as an organisation.

Last year we became members of the ETI's Food, Fisheries & Farming, and Apparel & Textiles Working Groups, relevant to our private label food products, where we gathered industry insights and contacts, and shared our own experiences.

Moving forward, we look forward to collaborating with others to better understand and respond to risks in our supply chains, increasing our resilience. One area we intend to focus on is our sourcing of cocoa and coffee due to the associated sectoral and geographical risks. We look forward to collaborating with NGOs to better understand these risks and exploring the positive impacts we can have.

*"We were happy to welcome Selfridges as a member in March 2024 and are already pleased with their engagement and commitment to human rights and work as a member. As foundation members they are being supported through the progression framework to become full members. Selfridges is already engaging in projects relevant to their business and supply chains, taking clear steps to understand and mitigate the risk of human rights issues. We look forward to continuing that process with Selfridges over time."*

The Ethical Trading Initiative



## Third-party brands

Risk Assessment Overview	
Location Risk	High
Sector Risk	High
Risk of Occurrence	High
Sphere of Influence	Low



The third-party brands whose products we sell in store and through our digital platforms. Most of the products we sell are from third-party brands.

### Our Priorities

As we have limited influence over this group, our priorities are:

- To conduct high level due diligence across selected brands.

### Action Plan

#### Due diligence: Proactively investigating

**Self-Assessment Questionnaire:** Our Brand Self-Assessment Questionnaire helps us to assess compliance with our standards, fulfil our legislative obligations and identify opportunities to collaborate with our concessions and brands. Priority concessions and brands are required to complete our Self-Assessment Questionnaire every two years.

To drive further collaboration and ease of assessment, in 2024, we helped develop, test and roll out a new Selfridges Group Self-Assessment Questionnaire platform. Utilising this new platform, we targeted brands most prominent in our sales portfolio to maximise our due diligence coverage.

We reviewed Self-Assessment Questionnaire responses using the new platform and this gave us a rating for each brand. We engaged with all third-party brands who achieved learning or beginner scores to understand and discuss key improvement areas and we also liaised with ambitious concessions and brands who may want to reach leader status in their next assessment.

#### Self-Assessment Questionnaire Coverage (2024)

We requested 84 brands to complete a Self-Assessment Questionnaire

100% of these target suppliers completed a Self-Assessment Questionnaire

62% of sales was from third-party brands with a completed Self-Assessment Questionnaire

4 of these suppliers improved their initial scores with our support

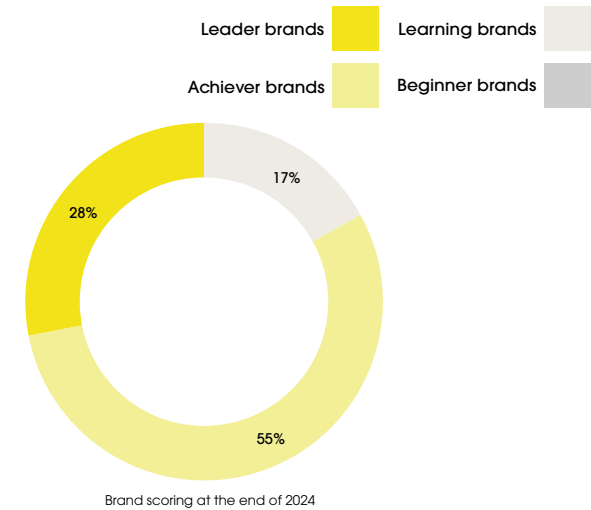
(Results shown opposite)

#### Improvement Areas Highlighted

Over the course of 2024 Selfridges supported 4 brands in making improvements to their scores. A critical issue area identified in the Self-Assessment Questionnaires included:

- Cotton sourcing from higher risk locations

The introduction of new ways of working across Selfridges Group means a total of **361** of Selfridges' brand partners hold a valid Self-Assessment Questionnaire.



<sup>1</sup> Rating Definitions: Leader: brands show a strong commitment to sustainability and transparency, going above and beyond compliance; Achiever: brands overall have a strong commitment towards sustainability, with some areas that have an opportunity to be improved; Learner: brands are in the early stages of their sustainability commitments or may not yet started to make any; Beginner: brands have completed the Self-Assessment Questionnaire with little to no detail provided of any steps towards sustainable commitments.

## Third-party brands

Risk Assessment Overview	
Location Risk	High
Sector Risk	High
Risk of Occurrence	High
Sphere of Influence	Low

### Due diligence: Proactively investigating

**High-risk cotton engagement:** Responses to our Self-Assessment Questionnaire highlighted potential geographical risks associated with small quantities of cotton sourced from five regions by some of our concessions and brands. In collaboration with Anti-Slavery International, Ethical Trading Initiative and selected cotton certification bodies we gained an understanding of the risks of higher risk regions. We then worked directly with key brands to share our findings and discuss steps that would mitigate this risk both for Selfridges and these brands.

As a result of our engagement our concessions and brands have taken a series of actions, including seeking alternative sources of certified cotton, conducting additional due diligence of suppliers or country-level certifying organisation, and in some cases changing their own sourcing policies.

*“We continue to emphasise the risks of forced labour in cotton supply chains and particularly state-imposed forced labour. We stress the need to remove all exposure from these regions in global supply chains. Our work with Selfridges has seen commitments to sourcing policy changes, brand connections and industry insights. We extend our invitation to the whole of the fashion sector to connect and take meaningful steps to respect human rights”*

**Anti-Slavery International**

In 2025, we hope to understand other key improvement areas across our third-party brands and to work with identified industry experts to continue to develop and share an industry view as a resource for our concessions and brands.

### Third-party brand investigations:

Last year we liaised with a small number of our third-party brands who were the subject of media articles highlighting human rights concerns in their supply chains. We discussed the individual issues and the brands’ responses. We were pleased to note some good practices were displayed in our concession and brands’ own remediation approaches during these conversations. In line with Selfridges’ commitment to not knowingly profit from serious human rights abuses, we took the decision to remove some stock from sale in response to these issues.

Aligned and in parallel to these investigations we created a specific Brand Investigation Process which is an addendum to our general Remediation Process. This outlines the necessary and consistent approach needed should any further issues be brought to our attention.

# Procurement suppliers

Risk Assessment Overview	
Location Risk	Medium
Sector Risk	High
Risk of Occurrence	High
Sphere of Influence	Medium



These suppliers we directly engage with to provide the products and services which in the main we don't sell but which keep our business going. Some of these suppliers provide us with products which carry our brand and name such as our packaging and famous yellow bags.

## Our Priorities

Our priorities with this group are:

- To conduct due diligence across suppliers where we can have the greatest impact or which sit in higher risk sectors: Property construction, building services, waste, food and restaurants, cleaning, security, logistics and recruitment.
- To raise awareness of modern slavery with workers based on our sites.

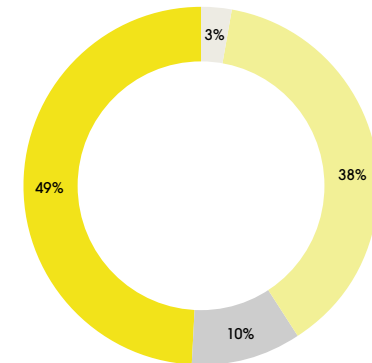
## Action Plan

### Due diligence: Proactively investigating

**Goods and services not for resale supplier request for proposal:** Our Procurement team have integrated standard sustainability questions including building our Ethical Trade Requirements into their tender process.

**Self-Assessment Questionnaires:** Our Procurement team identified a selection of suppliers, across branded goods not for re-sale (GNFR) products and higher-risk services<sup>1</sup>, and requested they complete our Sustainability Self-Assessment Questionnaire. This helps us assess compliance with our standards, fulfil our legislative obligations and identify opportunities to support our suppliers. Priority suppliers are required to complete our Self-Assessment Questionnaire every two years.

We have a tailored Self-Assessment Questionnaire for our Procurement suppliers and use the services of a third-party audit partner and an external platform to help review, evaluate and score responses and associated evidence. We agree follow-up actions and liaise with suppliers where necessary to help ensure alignment with our standards.



Supplier scoring at the end of 2024

### Self-Assessment Questionnaire Coverage (2023-24)

We requested 212 suppliers to complete a Self-Assessment Questionnaire

57% of these target suppliers completed a Self-Assessment Questionnaire

52 of these suppliers improved their initial scores with our support

### Improvement Areas Highlighted

Over the course of 2024 Selfridges supported 52 suppliers in making improvements to their scores. Some of the key issue areas identified in the Self-Assessment Questionnaires included:

- Formal documentation of employee checks
- Formal supply chain mapping
- Agency labour

<sup>1</sup> Higher-risk services are defined as: Property Construction; Building Services; Waste; Food & Restaurants; Cleaning; Security; Logistics; Recruitment

<sup>2</sup> Rating Definitions: Low-risk: suppliers show a strong commitment to sustainability and transparency, going above and beyond compliance; Medium-risk: suppliers overall have a strong commitment towards sustainability, with some areas that have an opportunity to be improved; High-risk: suppliers are in the early stages of their sustainability commitments or may not yet started to make any; Critical suppliers ("issues areas") have highlighted a breach of our Ethical Trade Requirements within a supplier's own operations. <sup>3</sup> Selfridges' procurement supplier self-assessment questionnaires are valid for two years.

# Procurement suppliers

Risk Assessment Overview	
Location Risk	Medium
Sector Risk	High
Risk of Occurrence	High
Sphere of Influence	Medium

**Labour provider due diligence requirements:** Our policy and internal guide sets out requirements for selecting and engaging with labour providers. This includes reviewing key measures they have in place to align with our Ethical Trading Requirements and manage the risks specific to recruitment and provision of labour.

**Auditing our Distribution Centre:** Our third-party auditor conducted an ethical audit of our Distribution Centre including a site audit and worker engagement. This helped us to gain a snapshot of the practices in place, and additional steps needed to ensure compliance with our standards. Following the recommendations made we are engaging directly with the site to address some minor health and safety recommendations. We will be focusing next steps in furthering our understanding of some of the employee feedback garnered through the onsite audit and via a 45-day employee survey.

## Training and communications: Raising awareness

**Contractor induction and information hub:** Key contractors who work on our sites at certain times complete a site induction, which includes a modern slavery video and related information. This is available electronically and in a contractor information hub.

**On-site communications:** We further signposted whistleblowing channels to on-site suppliers through posters.

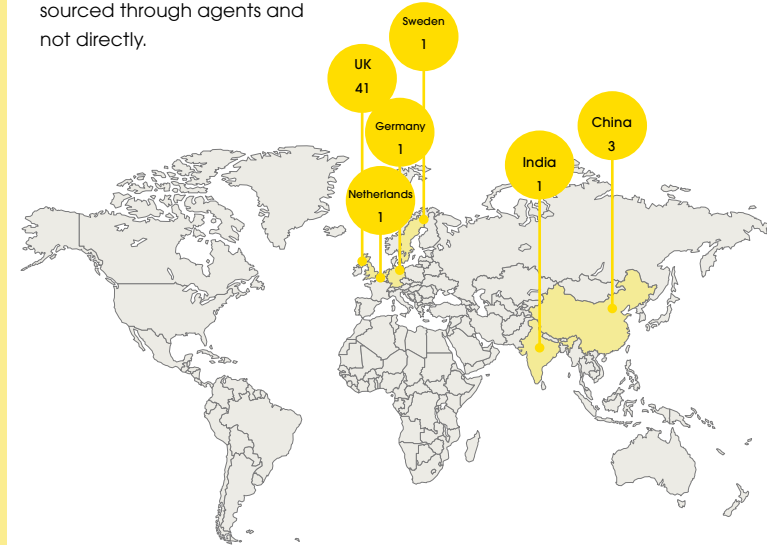
## Purchasing Practices Focus:

**Purchasing Practices:** Using Better Buying’s definition, we understand this to be “the day-to-day decisions and actions brands and retailers take to create products and bring them to market”

2024 again saw us focus on our own purchasing practices and the potential impact that this could have in our supply chains. We delivered a trial training session, which included problem identification and discussions around best practice. We modified our training from previous years to make it more suitable for multiple audiences and future use. We plan to roll out our purchasing practices series more widely in 2025.

We also engaged with Better Buying for the second time in 2024. Better Buying, approached some of our suppliers directly in an assessment of Selfridges’ own purchasing practices, collating feedback into an anonymous report for us to review. Last year we doubled the reach of our survey and the completion rate. Our headline score was 36 out of 100, an increase from 33 in the prior year but against a benchmark of 52. Areas of strength included having fair financial practices, our focus on reducing duplication of ethical and environmental audits and playing our part in improving working conditions in our supply chains. Areas we strive to improve are providing visible and efficient processes with enough time and asking for partner suggestions.

Our 48 GNFR branded suppliers in this area are from the countries shown below. A small number of these products are sourced through agents and not directly.



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## **Investigating issues**

Our approach to understanding and investigating potential breaches of our Ethical Trade Requirements, including modern slavery and forced labour, covers any issues related to people based on our sites and those within our supply chain located elsewhere.

### **Issues on our sites**

Any issues including those related to on-site forced labour concerning people working for our suppliers, and whilst unlikely in respect of our own team members, could be raised via our Speak Up Helpline, the UK Modern Slavery Helpline or through our People team. If an issue were to be raised, we would follow Selfridges' Modern Slavery, Ethical Trade and Sustainability Response Plan. This includes a thorough investigation, led by the circumstances of the issue, with the safety of any potential victims being paramount. It also helps us determine appropriate action needed. If needed we would follow our Remediation Process, which is centred around ethical trade issues, but which touches on broader sustainability topics. It is aligned with the UN Guiding Principles on Business and Human Rights and contains case study examples.

### **Issues not on our sites**

#### **Individual issues**

Individual off-site instances of modern slavery are most likely to be brought to our attention through our own due diligence or investigative journalism reports.

Our incident and crisis management process also guides our action for any potential issues raised in relation to our supply chain. We immediately contact the relevant brand or supplier. This is to understand whether or not the issue has arisen in the supply of any of our own goods and services and what steps they are taking to investigate the potential issues, to support any victims, and to remedy individual instances. Each case will be different and would require us to consider various factors to determine our level of involvement and support.

#### **Third-party brand investigations**

Last year we liaised with a small number of our third-party brands who were the subject of media articles highlighting human rights concerns in their supply chains. We discussed the individual issues and the brands' responses. We were pleased to note some good practices were displayed in our concession and brands' own remediation approaches during these conversations. In line with Selfridges' commitment to not knowingly profit from serious human rights abuses, we took the decision to remove some stock from sale in response to these issues.

Aligned and in parallel to these investigations we created a specific Brand Investigation Process which is an addendum to our general Remediation Process. This outlines the necessary and consistent approach needed should any further issues be brought to our attention.

### **Systemic issues**

Systemic issues which indicate a risk of forced labour are most likely to be raised to our attention by the investigation of individual issues or investigative journalism reports. We consider how any issues may affect the focus of our risk assessment and due diligence processes. For example, our Ethical Trade Requirements prohibit materials sourced from countries or specific regions where there exists credible information to suggest that forced or child labour are used in the production of such materials. Our Self-Assessment Questionnaire asks for detail on provenance and processes in place to prevent the occurrence of forced labour and we follow-up on responses accordingly.

Please see our work exploring cotton sourced from higher risk regions on page 14.

## Measuring effectiveness

### Embedding standards

We set out the standards we expect to be upheld in our policies, codes and requirements documents which cover a range of topics including modern slavery where relevant. Anyone who works with us can report issues of concern and potential breaches of these policies via our Speak Up Helpline, 24 hours a day, all year. We also monitor reports of potential breaches in other channels for example through media reports. Any issues which are reported to us are investigated.

Issues raised	2021-22	2022-23	2023-24	2024 <sup>2</sup>
Calls to the Speak Up Helpline	23	13	12	35
Calls to the Speak Up Helpline relating to modern slavery	0	0	0	0

### Proactively investigating

We proactively conduct due diligence in areas of higher risk to provide assurance that we and the brands and suppliers that we engage with are operating in line with our standards, and to direct action needed to improve practices where necessary. In 2024, we took a more targeted approach and liaised with our sister businesses, which resulted in a smaller target pool than was seen in previous years, instead sharing the brand due diligence across Selfridges Group.

Below we describe results of third-party brands and suppliers that we have proactively targeted. In addition to the due diligence mentioned below, other supplier responses were reviewed from non-targeted brands and suppliers.

Due diligence	2021-22	2022-23	2023-24	2024 <sup>2</sup>
Brand partners and suppliers, including those defined as higher risk according to our criteria	456	432	422	328
Percentage of these brand partners and suppliers which have completed a Sustainability Self-Assessment Questionnaire	64%	62%	54%	68%

### Sustainability Self-Assessment Questionnaire Results

	Private label suppliers	Third-party brands	Procurement suppliers
Beginner brands or Critical-risk suppliers	31%	0%	10%
Learning brands or High-risk suppliers	0%	17%	3%
Achiever brands or Medium-risk suppliers	58%	55%	38%
Leader brands or Low-risk suppliers	11%	28%	49%
Suppliers that improved their score with our support	9	4	52
Improvement areas highlighted	Formal documentation of employee checks  Formal supply chain mapping and auditing  Grievance, escalation and remediation mechanisms	Cotton sourcing from higher risk locations  Alignment with Selfridges Ethical Trade Requirements	Formal documentation of employee checks  Formal supply chain mapping  Agency labour

### Raising awareness

We raise awareness of the issue of modern slavery, how it relates to our business, key signs to look out for and action to take through training and communications with our team members, brands and suppliers.

Training	2021-22	2022-23	2023-24	2024 <sup>2</sup>
Percentage of leadership team members trained through modern slavery e-learning modules <sup>1</sup>	59%	70%	37%	70%

<sup>1</sup> Figures relate to store leadership team members for 2021-22. In 2022-23 the target was expanded to include both store and non-store leadership.

<sup>2</sup> Our reporting year was amended to the calendar year in 2024.

## Our commitments for 2025

Over the next year we will continue to collaborate internally and externally with experts, other organisations and forums to help us to achieve the following actions:



### **Our people:**

Ensure our due diligence measures are effective.

Help team members spot the signs of modern slavery and know how to report any concerns.

Launch our internal purchasing practices series.



### **Private label suppliers:**

Refine our in-depth due diligence process through use of Self-Assessment Questionnaires and audits.

Increase sustainability literacy amongst our key suppliers.

Work with selected NGO, Civil Society and industry expert partners to further develop our understanding of higher risk key commodities.

Evaluate higher risk sourcing regions and alternative options.



### **Third-party brands:**

Widen the scope of brand engagement through our Self-Assessment Questionnaire.

Develop resources, hold one-to-one support meetings, and identify cross-learning opportunities.

Continuously improve our engagement with key brands of all sizes.



### **Procurement suppliers:**

Conduct due diligence across suppliers where we have the greatest sphere of influence.

Increase sustainability literacy amongst our key suppliers, develop resources and hold one-to-one support meetings,

Widen the scope of our purchasing practices series and impact measurement through our engagement with Better Buying.

Evaluate higher risk sourcing regions and alternative options.

In accordance with section 54 of the Modern Slavery Act 2015, this document sets out Selfridges Retail Limited's ("Selfridges") Modern Slavery Statement for the year ended 31 December 2024.

Our reporting year has changed from 1 February - 31 January to 1 January - 31 December for the 2024 reporting year. Prior year data aligns with the previous reporting year, whereas 2024 data is for the 2024 calendar year unless otherwise specified.

For all comments or queries in relation to this document, please contact us at [sustainability@selfridges.co.uk](mailto:sustainability@selfridges.co.uk)

Selfridges Speak Up Helpline: 0808 234 7287 / [www.selfridges.ethicspoint.com](http://www.selfridges.ethicspoint.com)  
UK Modern Slavery Helpline: 0800 012 1700 / [www.modernslaveryhelpline.org/report](http://www.modernslaveryhelpline.org/report)

In addition to this statement our activities are also summarised in the Selfridges Group Modern Slavery.