

NICOLA JANE

Nicola Jane Modern Slavery Statement 2019

0.1 Introduction

Introduction

The Modern Slavery Act (MSA) was introduced by the UK government in 2015, this legislation was implemented to ensure that slavery, servitude, forced or compulsory labour and human trafficking do not occur within UK businesses. At Nicola Jane we acknowledge our responsibility to prevent modern slavery and human trafficking throughout our business and supply chain. As a UK market leader within the post-surgery wear market we recognise we need ensure everyone who works for us or who produces goods under the Nicola Jane brand is treated well and chose said employment freely.

Business Overview

Established in 1984 in our MD's loft, Nicola Jane was born. Our mission, to restore confidence and femininity after breast surgery following a breast cancer diagnosis. Since our humble conception, Nicola Jane has grown exponentially to our current position with Nicola Jane stores and fitting services across the United Kingdom as well as independent wholesale stockists in the UK and the rest of the world, stocking the Nicola Jane brand. With the ever-evolving and changing retail landscape, Nicola Jane has diversified into a multi-channel retailer with a newly relaunched state-of-the art digital ecommerce website and mobile platform.

We now have an established team which work in the following departments and take key roles in addressing Modern Slavery; Design, Buying and Human Resources.

As Nicola Jane has evolved into a global multi-channel Post-Surgery brand, one thing remains at the heart of the business... our unwavering mission to restore confidence and femininity after breast cancer.

Today we continue to lead the market with inspirational, original and high quality products. We design our collections seasonally inspired by the latest fashion trends. All of our garments are 100% designed in the UK by an all-female design team. To read more about our story please see our website.

We recognise the Modern Slavery Act (MSA) covers both our own operations and our supply chain. At Nicola Jane we are committed to sourcing the highest quality garments for our customers from countries with diverse cultures and economies around the world. We value our longstanding working relationships with all our suppliers and strive to always work in partnership and collaboration to create the best possible product, whilst maintaining positive working environments for the factory teams. As such, we have many suppliers, some of which we have been working with for 20 years to ensure we offer the best technical bras and beautiful fabrics from around the globe. Over 90% of our product suppliers have been with us for five years or more. Our top sourcing countries are Germany, China and Lithuania, which account for 80% of our entire product. 100% of our suppliers are used by other retailers.

0.2 Our Policies

Our Policies

We recognise the MSA covers both our own operations and our suppliers.

Equal Opportunities at Nicola Jane

At Nicola Jane, we really value the diversity of our people. We recognise that everyone has a right to work in an environment which provides equal opportunities for all, regardless of race, colour, nationality, religion, sex, sexual orientation, gender reassignment, marital status, age or disability.

We are committed to being a business in which equality of opportunity is a reality and in which every individual can seek, obtain and enjoy employment without unfair discrimination. We will do our best to ensure that Nicola Jane is a place where individuals are treated equally and fairly. Decisions on recruitment, selection, training, pay, promotion and career management are based solely on objective and job-related criteria.

We will not tolerate, permit or condone any form of discrimination, harassment, bullying or intimidation and we will take these matters very seriously. However, we require our Team's help and co-operation to ensure that every team member complies with their obligations under our policy. We require all our team members

to co-operate with measures introduced by us to ensure equal opportunity and non-discrimination and to inform their manager or our Operations Manager if they suspect that discrimination is taking place. If any of our team members discriminate against or harass another member of our team, such conduct will not be tolerated and appropriate disciplinary action will be taken. If someone believes they have suffered discrimination, they should notify their manager or our Operations Manager as soon as possible. Team members can use either the grievance procedure set out in the Employee Handbook or the procedure in the harassment policy to complain about discrimination. If someone is unable to use either of these procedures, the complaint may be raised directly with our Operations Manager

Physical abuse or discipline, the threat of physical abuse, sexual harassment and verbal abuse or their forms of intimidation shall be prohibited

Whistleblowing

Nicola Jane wants to conduct its business with honesty and integrity. We believe that it has a duty to take appropriate measures to identify and correct any malpractice within or affecting the organisation. We expect all of our team members to maintain high standards and to report any wrongdoing that falls short of those standards. Nicola Jane's policy provides guidance on how to do this and is available to our employees in our Employee Handbook.

Supply Chain Policy

Our supply chain is segmented into four main categories:

1. Nicola Jane own-label products.
2. Goods produced by 3rd party brands supplied to and sold by Nicola Jane.
3. Goods not for re-sale. Goods that are produced for our use but not sold to consumers eg: store fittings and fixtures.
4. Services supplied to Nicola Jane eg: cleaners, catering, agency Staff.
5. Currently our focus on modern slavery within our supply chain focuses on Nicola Jane own-label products. We are working hard to ensure all of our factories adhere to the Nicola Jane Code of Practice (COP).

Supply Chain Auditing

All Nicola Jane suppliers must adhere to the Nicola Jane COP. Nicola Jane does not own or operate any factories. All suppliers that produce goods for Nicola Jane must

hold a valid third party ethical audit with corrected non compliances. Nicola Jane will not use a new supplier without a valid fully compliant third party ethical audit. To minimize audit fatigue for our suppliers, we accept ethical audit reports requested by other retailers or brands that meet our minimum requirements. These audits will include health and safety reports, working hours, site inspections, interviews with workers in their local language.

Our Product Team regularly visit our suppliers and their factories around the world and communicate our continued commitment to ethical trade.

Nicola Jane Code of Practice

Nicola Jane sources its products from many countries. Safety within the workplace is of paramount importance and we recognise the responsibility we have to maintain the human rights for workers in our supply chain. We specify the requirements before production can commence, that will provide workers with a safe and healthy environment, in accordance with all relevant local and international laws and legislation. We are committed to ensure Nicola Jane product is made by workers who are treated honestly and fairly for the work they do and with respect for their human rights and wellbeing. With this at the forefront of our ethos the ten core principles of our COP are as follows:

- No child labour
- Freedom of association
- Healthy and safe working conditions
- No forced labour
- Fair wages and benefits
- Equal opportunities
- Employment security
- Respectful treatment of workers
- Reasonable working hours
- Effective management systems

Child Labour

- No children under the age of fifteen years of age, or fourteen where the local law allows such exception consistent with international Labour Organisation (ILO) guidelines, or the minimum age established by national and local law.
- In the even child labour is found, the supplier should not terminate their employment but look for other ways of mediation.
- There shall be no recruitment of child labour

- Children and young persons under eighteen years of age shall not be employed at night or in hazardous conditions. The importance of safety towards young people is paramount, and Nicola Jane will not part of any such business.
- Equal treatment
- There shall be no discrimination in hiring, compensation, access to training and promotions, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Freedom of Association

- Workers, without distinction, have the right to join or not join trade unions, workers' associations and bargain collectively
- The employer adopts an open attitude towards activities of trade unions
- Where laws restrict, the supplier should facilitate the development of parallel means for independent and free associations and bargaining such as a 'workers council'
- Discipline
- Deductions from wages as a disciplinary measure shall not be permitted.
- All disciplinary measures shall be recorded and noted

Ethical Sourcing Policy

Ethical Sourcing Policy for Nicola Jane is being able to offer customers the newest products in all areas of the business. Nicola Jane Buyers continually search for new and exciting products from different parts of the world and have over the years developed long term working relationships with many suppliers. As a result Nicola Jane have consistently offered high quality products

Our Ethical Sourcing Policy recognises the complexity of the supply chain, diversity of product lines and global citizens that produce them. The approach therefore is realistic and objective and geared towards continual improvement. The intention to promote high ethical standards with the supply chain without imposing unachievable conditions, which may contour productive to the workers and suppliers interests or which may cause dishonesty. Instead the aim is to understand the diversity of the supply chain, embrace local cultures and through the trading relationship's with the suppliers support livelihoods.

Nicola Jane believes in the importance of responsible sourcing and the promotion of fair trade and safe working conditions within our supply chain and has introduced various policies and practices to ensure our products in our stores and website reflect our stance.

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All manufactures in the supply chain are subject to random factory compliance monitoring. New suppliers are required to complete a self-evaluation assessment on their sourcing principles and production capabilities followed by an audit.

Nicola Jane understands the complexity of the supply chain, diversity in product lines and global influences on employment issues and conditions. We understand that human rights are continually changing and in order to keep up-to-date with these changes and developments and will review the policies periodically.

As Nicola Jane is not a direct employer of workers within the supply chain, we are still passionate about the standards of working practices and the environment in which they work in. Where governments are not enforcing the law of the workers' rights, Nicola Jane aims to overcome these constraints through innovative partnerships through a partnership of continuous improvement.

Where noncompliance is reported to the buyer, the buyer will review the Ethical Sourcing Policy and will discuss remediation programme with the suppliers and agree a review of the changes within a realistic time period. Where the supplier is unable or unwilling to make the proposed changes Nicola Jane will disengage from the supplier without hesitation. This is to ensure a collection and active role in influencing good practices, in addition to encourage open and honest dialogue with suppliers.

Nicola Jane empowers the supplier to communicate and implement the Ethical Sourcing code within the supply chain. The supplier must assign a senior manager with the responsibility of impending the code and the Audits.

03. Due Diligence

Recruitment

We have an internal recruitment team meaning we can monitor and control our candidate journey. We carry out Right to Work checks on all new starters and offers are subject to qualified references. We endeavour to directly source all candidates, lowering the risks that come with suppliers. However for rare and niche roles, we might collaborate with select recruitment agencies from our preferred suppliers list.

Remuneration practices

All Nicola Jane employees are paid above government's National Living Wage. We are compliant with Gender Pay Gap Reporting obligations and our GPG report can also be found below. We always pay wages direct to bank accounts, never cash in hand.

Gender Pay Gap

As a female-founded business, we have found that mostly women have been attracted to our ethos, brand and products, resulting in 92% of our employees being women. While we treat all applicants equally, we find that it is mostly women who apply to work with us. We are proud that so many women love our brand and want to be a part of this journey. We pay women and men equally for comparable roles and we are committed to ensuring this continues.

Employee Breakdown by Pay Quartile

Proportion of males and females in each pay quartile

	Male	Female
Upper Quartile	100%	0%
Upper Middle Quartile	0%	100%
Lower Middle Quartile	25%	75%
Lower Quartile	0%	100%
TOTAL	8%	92%

One of our key values at Nicola Jane is flexibility. We actively support flexible working hours and will always try to accommodate requests for flexible and part-time working hours.

04. The plan going forwards

At Nicola Jane, we are constantly striving to greater heights in both our product innovation and the support of the people (staff and suppliers) who have enabled us to fulfil the Nicola Jane dream. We remain dedicated to driving continuous improvements of standards within Nicola Jane and our supply chain over the next year, with the key areas of further focus being:

- Training - Empowering the Buying and Design team to understand further their roles within the management of ethical trade and the subsequent impacts and responsibilities with the suppliers and how to mitigate risk.
- Policies - Ensuring our policies relating to Modern Slavery are evolving in reaction to the requirements within the industry.
- Supply chain visibility and risk assessment of four tiers - Continue to work in collaboration and partnership with our Suppliers and to improve visibility and clarity of full supply chain as we recognise this is vital in eradicating modern slavery challenges.

We will measure, monitor and report on future Modern Slavery statements using the following parameters:

1. All suppliers (including key tier two-three) signed up to the Nicola Jane Code of Conduct through the Nicola Jane's Supplier Manual.
2. Valid third party ethical audits submitted for all suppliers, including CAP reports.
3. Train relevant staff on ETI.
4. Identify and address high risks within our supply chain.