Anti-Slavery and Human Trafficking Statement

JANUARY 2019



Anti-Slavery and Human Trafficking Statement

This statement sets out THG's actions to understand all potential modern slavery risks in relation to its business and to put in place steps aimed at ensuring that there is no slavery or human trafficking in its business and supply chains. This statement relates to actions and activities during the period 31 March 2016 - 31 October 2018.

The ultimate parent company of THG is The Hut Group Limited. The Hut Group Limited has its head office in England. THG has over 4,000 employees worldwide and its head offices are in Manchester, England.

THG operates globally; in 2017 it operated 166 localised websites and shipped to customers in 193 different territories.

OUR BUSINESS

THG is an international technology company focussed on digital retail in the beauty and wellbeing sectors. THG's beauty and wellbeing divisions are both powered by THG's global technology ecosystem 'Ingenuity'.

BEAUTY

THG's beauty division:

- is the number 1 online global retailer by number of beauty brands and the number of territories it ships to;
- is, following its acquisition of Acheson & Acheson, the pre-eminent UK beauty manufacturer and product developer;
- provides Europe's market-leading beauty box subscription service (GLOSSYBOX);
- has built a portfolio of prestige beauty brands including ESPA, Eyeko, Mama Mio, Mio, Grow Gorgeous and Illamasqua.

WELLNESS

THG's wellness division:

- includes Myprotein (the number 1 online sports nutrition brand globally) and leading weight management brands Idealshape and Exante;
- is vertically integrated through proprietary technology, content and fulfilment platforms and in-house production.

INGENUITY

THG is powered by the Ingenuity platform, which is wholly owned by THG. Ingenuity is a globally integrated end-to-end technology stack that spans hosting, warehousing and fulfilment, data science and e-commerce technologies.

This end-to-end solution makes Ingenuity a unique technology platform which is proven to power brand growth on a global scale. Ingenuity powers all of THG's own brands and retail sites as well as providing platform services for some of the world's most innovative organisations.

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

THG is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business. THG's Anti-Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chains.

SUPPLIER MAPPING AND RISK ASSESSMENT

THG has also begun the process of mapping out its supply chain in order to identify particular risks which require attention. This will lead to an on-going program which will ensure THG's systems:

- identify and assess potential risk areas in its supply chain;
- mitigate the risk of slavery and human trafficking occurring in its supply chains;
- monitor potential risk areas in its supply chains; and
- protect whistle blowers.

Going forwards, THG intends to work with its suppliers to assist them in identifying any areas of risk in their own supply chains and to mitigate the risk of modern slavery occurring.

TRAINING AND AWARENESS

THG provides training to its key staff to ensure they understand and are aware of the risks of modern slavery and human trafficking and can assist in the prevention of it.

THG'S EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

THG regularly reviews the effectiveness of the steps it has taken to ensure that there is no slavery or human trafficking in its supply chains and implements a continuous improvement plan to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the financial year ending 2018.

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General Counsel On behalf of The Hut Group Limited

