

THG

Modern Slavery *Statement*

June 2024

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About This Statement

At THG PLC (“THG”), we are committed to eradicating modern slavery in all its forms. We recognise that modern slavery is a grave violation of human rights and a pressing global issue that requires our unwavering attention and action. THG is committed to upholding internationally recognised human rights in line with The Universal Declaration of Human Rights; the International Labour Organization’s (“ILO”) Core Conventions; and the UN’s Guiding Principles on Business and Human Rights, both in our supply chain and our own operations. This statement outlines our commitment to combating modern slavery and sets forth the steps

we are taking to address this issue within our Global business operations and supply chains.

We firmly believe in promoting and upholding the dignity and equality of all individuals. Our commitment extends to every aspect of our business, from our own employees to the workers within our supply chains. We condemn any form of exploitation, forced labour, human trafficking, or child labour and are dedicated to ensuring that our practices align with the highest ethical standards.





About the Company Structure

THG is a leading vertically integrated, global e-commerce technology group and brand owner, powered by its proprietary technology platform, Ingenuity, through which it also provides end-to-end e-commerce solutions for brands to reach a global e-commerce consumer base.

THG operates under three core individual businesses (THG Beauty, THG Nutrition, and THG Ingenuity), each operating in resilient, growing markets. These businesses leverage the Group's specialisms: the development of a portfolio of leading consumer brands; and the acceleration of D2C growth for third-party clients. Following the simplification of the Group in 2022, each business is now operated in separate and distinct legal entities.



Core businesses

THG Beauty

World's #1 pure-play online specialty beauty retailer – LOOKFANTASTIC, Cult Beauty, and eight popular online beauty and haircare businesses and a portfolio of eight owned prestige brands across skincare, haircare, and cosmetics, into 195 territories, with leading position in the UK, US, and Europe.

THG Nutrition

Myprotein, the world's #1 direct-to-consumer sports nutrition brand and its brand family, offering products across several associated categories in the global nutrition market, including protein and sports nutrition, vegan alternatives, health snacks, vitamins, and performance clothing through its activewear brand MP.

THG Ingenuity

Proprietary end-to-end e-commerce platform that powers digital experience and retail for FMCG, Beauty, and Retail brands globally, creating a seamless experience for consumers. Clients can purchase end-to-end or modular services to meet their needs, drawing on the Group's digital brand building capability, extensive proprietary e-commerce technology, and physical infrastructure.

Supply Chain and Collaboration

THG's Modern Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships. We work closely with our supply chain and partners, fostering long-term partnerships based on trust, transparency, and shared values.

We communicate our expectations regarding ethical practices, including the eradication of modern slavery, and actively engage with suppliers to promote responsible sourcing throughout the supply chain. We encourage them to implement their own policies against modern slavery and provide support and guidance where needed. 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 ensure evolution in our wider strategy.

THG sells products in over 100 countries worldwide, with products manufactured and distributed through THG-owned manufacturing and fulfilment facilities in the UK, Poland, United States and Australia.

THG has over 5,000 suppliers worldwide, with key supplier spend being in the UK, Europe, and China. The supply base is local where possible, but we access a global supply pool where appropriate. THG is implementing a program requiring all direct suppliers to become Sedex members and arrange 3rd party ethical audits in line with our risk based approach. In 2023, we continued to build our supply chain outreach programme, developing our Social Responsibility strategy, redefining our supplier tiering approach, and updating our internal guidance to follow a geographical risk-based approach to categorise our suppliers.

Additionally, we have launched THG's Supply Chain Standards, which replace the previous Ethical Code of Conduct, to add a tighter requirement across sustainability, including human rights across our supply chain. We successfully met our target as indicated in our 2023 ARA report of having all our suppliers commit to meeting THG's Supply Chain Standards. By the end of 2024 we aim to have 100% of our direct Tier 1 suppliers audited against the Sedex framework of SMETA (Sedex Members Ethical Trade Audit), with all existing production facilities audited to a standard and framework accepted in our policy.

SEDEX Members Ethical Trade Audit

THG recognises Sedex as an international ethical audit platform designed to drive Human rights, better working conditions, transparency, continuous improvement, and collaboration. THG is an active Sedex member, and therefore will require all suppliers (in line with THG Supply Chain Standards) and associated manufacturers to have AB (buyer/supplier) membership or B (supplier) membership. Suppliers without Sedex will not be approved.

All suppliers must link associated production sites directly to their Supplier account, and indirectly to THG.

All direct suppliers for THG branded goods are required to complete the Sedex self-assessment questionnaire, giving THG insight and visibility into the suppliers' policies and strategies including Modern slavery, grievance, human rights, freedom of association, environmental strategy and more. Data allows THG to conduct a comprehensive due-diligence assessment prior to onboarding.

Sedex reporting allows THG to monitor geographical industry-based risk indicators, as well as inherent risks attached to suppliers' geographical location, demographic and cultural areas of challenges.

THG recognises that modern slavery and human rights violations are a potential risk to our own operations as well as our supply chain. Due to this we also undertake Sedex audits of our own operations to support our commitment to abolishing modern slavery and other human rights violations.



Employee Awareness and Training

At THG we recognise the importance of raising awareness and providing education in our efforts to combat modern slavery. Our commitment to this cause is reflected in our goal of launching annual training to all employees. We continue to work towards this goal and aim to have it in place by the end of 2024. Through this training, we aim to ensure that our employees have a thorough understanding of the signs of exploitation, their responsibilities in reporting any concerns, and the actions they can take to mitigate the risks of modern slavery.

We take pride in maintaining open channels of communication with our employees and encourage them to report any suspected instances of modern slavery via our internal whistleblowing channel. This ensures that all concerns are promptly addressed and that we are able to take swift action to prevent and combat modern slavery. Details are also included within our employee code of conduct which was launched in April 2024.

By providing comprehensive training and fostering a culture of transparency and reporting, we are actively working towards creating a business environment where modern slavery has no place. We believe that it is our collective responsibility to contribute to the eradication of modern slavery and are committed to doing our part.

Monitoring and Improvement

We are dedicated to monitoring our efforts and continuously improving our practices against modern slavery. We conduct regular assessments and evaluations of our procedures, and supplier engagements to ensure that they are effective and continuously improving.

We are deeply committed to driving positive change and continuously improving our position against modern slavery. Our unwavering dedication to ongoing reviews and improvement serves as a catalyst for strengthening our anti-slavery measures.

By subjecting our policies, procedures, and supplier engagements to regular scrutiny, we establish a culture of accountability and responsibility. This culture reinforces our collective commitment to eradicate modern slavery and fosters a proactive approach to addressing any vulnerabilities within our organization and supply chains.

Looking Ahead

Looking to the future, we will remain proactive in addressing the risks of modern slavery and will adapt our approach as necessary to tackle emerging challenges. We are continuing to build a supplier portal to gather more information about our suppliers, their sustainability commitments, and the current performance across a range of metrics including human rights. We will expand our supplier engagement as we evolve our PACT (Partnership in Action) initiative and continue our collaborative approach to achieving our Sustainability Strategy.

We will collaborate with industry peers, NGOs, and governmental bodies to drive change and collectively combat this issue. Our commitment to combating modern slavery is unwavering, and we are dedicated to fostering a world where all individuals are treated with dignity, respect, and fairness.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for THG PLC for the financial year ending 31st December 2023, as approved by the Board of Directors in June 2024 and signed on its behalf by:



James Pochin

General Counsel and Company Secretary
THG PLC
25th June 2024