Modern Slavery Statement

May 2023
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. 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 divisions (THG Beauty, THG Nutrition and THG Ingenuity), each operating in resilient, growing markets. These divisions 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 division is now operated in separate and distinct legal entities.

Core divisions

THG Beauty

The #1 online pure-play prestige beauty retailer Lookfantastic, and several other popular online prestige beauty retailers. A portfolio of eight owned digital-first prestige brands addressing primarily skincare, haircare and cosmetics.

THG Nutrition

Myprotein, the world’s #1 direct-to-consumer sports nutrition brand and its brand family, offering products across several associated categories, including protein and sports nutrition, vegan alternatives, health snacks, vitamins and athleisure.

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 around 5,000 suppliers worldwide, with the 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 be signed up to SEDEX from an ethical sourcing perspective which includes a risk assessment for all suppliers and a process for reviewing and increasing audits for higher risk suppliers.

All new proposed suppliers’ sites are required to arrange regular 3rd party ethical audits. Once audit is conducted, the THG supply chain sustainability team review and assign criticality rating based on the THG ethical rating matrix.

To date, one year after the ethical audit programme was announced and implemented, 64% of our global suppliers are now linked on SEDEX with factory traceability. In addition to suppliers supporting the SEDEX program, 48% of suppliers associated production facilities have now submitted a 3rd party audit.

By the end of 2023 we aim to have 100% of suppliers linked on SEDEX with all existing production facilities audited to a standard and framework accepted in our policy.

SEDEX

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 requires all suppliers (in line with THG Supplier Tiering Policy) and associated manufacturers to have AB or B 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 suppliers 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.
Employee Awareness and Training

At THG we recognize 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 by the end of 2023. 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.

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 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 2022, as approved by the Board of Directors in May 2023 and signed on its behalf by:

James Pochin
General Counsel and Company Secretary
THG PLC
30 May 2023