Modern Slavery Statement 2021/2022

Our Group Businesses

Poundland Group Limited, the parent company of Poundland Limited was acquired by Steinhoff International Holdings NV on 16 September 2016 and is currently part of Steinhoff UK Limited. The company typically trades using the names "Poundland" in the United Kingdom or "Dealz" in the Republic of Ireland and international territories. It is one of Europe's largest single price retailers with over 800 stores in the United Kingdom, Republic of Ireland, Spain and Poland.

For the purposes of this statement the name "Poundland" is utilised to incorporate the companies that are included in the Poundland group, specifically Poundland Group Limited, Poundland Group Holdings Limited, Poundland Limited and Pepkor UK Retail Limited trading as Pep & Co.

Poundland sells top brands and great quality own brand products across approximately 17 categories including health and beauty, household, food and drink, gardening, pet, stationery, books and DVDs and DIY.

Poundland's Modern Slavery Statement is complimented by its Corporate and Social Responsibility policy. Poundland recognises its duty to operate its business in an ethical responsible manner and our Corporate and Social Responsibility policy focuses on three key areas:

- √ Environment
- ✓ Social Responsibility
- √ Colleagues

Company ethos

This is Poundland's second Modern Slavery Statement and we take our commitment to eliminating modern slavery very seriously. As a part of our commitment, we are continuously working to find an effective method to eliminate modern slavery and human trafficking from our supply base.

Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Poundland has a zero-tolerance approach to modern slavery which is communicated to all existing suppliers. Further, it is committed to acting ethically and with integrity in all business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business, or in any of our supply chains, and will always assist any enforcement bodies.

We have developed a Code of Conduct and are also ensuring new suppliers are aware of our Code of conduct and zero tolerance policy.

Identifying and managing risk within our supply chain

We recognise that certain countries may be higher risk with regards to modern slavery and human trafficking. To strengthen our compliance network, we have widened our supplier base in India, Pakistan, Turkey and Eastern Europe (Poland) and strengthened our Supplier Code of Conduct and Social Accountability awareness.

Key progress towards tackling modern slavery

Poundland, alongside it's local and international supply chain, continually strives to ensure that all economic activities are implemented with necessary care for our natural environment and each human being that is involved in our business. Continuous improvement of our ethical, moral and social processes remains one of our key priorities.

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy

We operate a robust recruitment policy, including conducting eligibility checks in the relevant territory for all new colleagues to safeguard against human trafficking or individuals being forced to work against their will.

2. Whistleblowing policy

We operate a whistleblowing policy so that all colleagues know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

We also implement colleague surveys to unsure we receive feedback on matters that are important to our colleagues.

3. Code of Conduct — Social Accountability Policy

We have undertaken a comprehensive review of our ethical trading policies and practises. We work closely with our suppliers to ensure that the standard to which their production sites operate are in line with our Code of Conduct. This Code explains the way we behave as an organisation and how we expect our colleagues and suppliers to act, including:

- 1. Employment is freely chosen: Poundland ensures there is no forced, bonded or involuntary prison labour and workers are free to leave their employer after reasonable notice.
- 2. Freedom of association and the right to collective bargaining are respected: Workers have the right to join or form trade unions to which the employer adopts an open attitude towards activities. Workers representatives are not discriminated against.
- **3. Working conditions are safe and hygienic:** All adequate steps are taken to prevent accidents and injury to health. Workers shall receive regular and recorded health and safety training.
- **4. Child labour shall not be used:** Suppliers shall develop or participate in, and contribute to, policies and programmes which provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until they are no longer a child. Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 5. Living wages are paid: Wages and benefits paid for a standard working week meet at minimum, national legal standards or industry benchmark standards. All workers shall be provided with written and understandable information about their employment conditions. Deductions from wages as a disciplinary measure shall not be permitted.
- 6. Working hours are not excessive: Working hours must comply with national laws, shall be defined by contract and shall not exceed 48 hours per week. All overtime shall be voluntary, and workers shall be provided with at least one day off in every seven-day period or where allowed, by national law, two days off in every 14-day period.
- **7. No discrimination is practised:** There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement.
- **8. Regular employment is provided:** To every extent possible, work performance must be based on recognised employment relationships established through national law and practise.
- **9.** No harsh or inhumane treatment is allowed: All forms of abuse, discipline or forms of intimidation shall be prohibited.
- **10. Anti-bribery:** Any attempts to offer money, benefits, gifts or other advantages to Poundland staff or second/third party representatives will be regarded as attempted bribery. Poundland will cease relationships with any supplier who breaches this principle with immediate effect.

- 11. Transparency and Full Access: Suppliers are obliged to be fully transparent and provide open and honest access to all manufacturing sites.
- 12. Unauthorised Subcontract: The subcontracting of any part of a purchase order to a factory without prior written authorisation from Poundland is considered a zero-tolerance issue. Violation will lead to cancellation of orders, financial penalty and/or termination of business with Poundland.

To ensure compliance with the Code of Conduct, our representatives visit supplier's facilities and any instances of violation are documented, reported upon and investigated to resolution. Where necessary, a corrective action plan is agreed and suppliers are expected to fully cooperate to avoid any further action by Poundland.

In the event any supplier is unwilling or unable to demonstrate continuous improvement towards full compliance with our standards the trading agreement will be terminated.

Poundland will not work with any organisation that is found to be knowingly involved with either human trafficking or modern slavery.

As part of the wider Steinhoff Group, Poundland will continue to evaluate the options available in terms of specific and definitive collaborative engagement both in the UK and internationally.

4. Internal audit function

Our internal audit function operates as an independent scrutiny of the adoption and furtherance of the above policies and standards. Auditing is an essential tool for identifying potential human right risk.

5. Our Partnerships

Poundland is a member of Sedex, the supplier of ethical data exchange. Sedex provides member companies with a secure web-based platform for storing and sharing information on four key pillars:

- health and safety;
- labour standards;
- business integrity;
- the environment.

Sedex helps businesses to identify opportunities for improvement and work with their suppliers to ensure positive change.

Poundland's board are fully supportive of the commitment it has made in this statement to eradicate modern slavery and related issues in all areas of its business.

Signed Allumi