

BAMFORD COLLECTION MODERN SLAVERY STATEMENT FOR 2023

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Bamford Collection and its subsidiaries (Daylesford Organic, Bamford, and The Daylesford Stays) during the year ended 31st December 2023.

INTRODUCTION

Slavery, servitude, forced labour and human trafficking (Modern Slavery) is prevalent across the world today. It is important that businesses do not deny or try to ignore this problem. Bamford Collection has a zero tolerance approach to Modern Slavery within our operations and supply chain and we are committed to ensuring that this approach is effective.

BAMFORD COLLECTION'S BUSINESS

Bamford Collection is a group of businesses dedicated to sustainable, organic, and ethical practices across various sectors:

1. Daylesford Organic: An organic farm and retail business, its activities include online sales of goods and events, and the operation of farm shops and cafes.
2. Bamford: A lifestyle brand offering clothing, skincare, and wellness products made with natural and organic ingredients. Its activities include online sales of goods and services, the operation of stores selling clothing and bath and body products, The Club by Bamford, and directly owned spas.
3. The Daylesford Stays: A collection of cottages and farm stay accommodations, offering sustainable eco-retreats. Its activities include food and beverage sales, accommodation and events.

EMPLOYEE POLICIES

Bamford Collection maintains comprehensive policies to prevent Modern Slavery and protect workers' rights. These include fair employment contracts, regulated working hours, non-discrimination practices, freedom of association, and strict prohibitions on forced labour and child labour.

We provide safe working environments, offer grievance mechanisms, and conduct right-to-work checks. Regular training ensures employees understand their rights and can report concerns without fear of reprisal. These policies apply across all Bamford Collection entities and are regularly reviewed for effectiveness.

SUPPLY CHAIN

The supply chains for our diverse businesses involve multiple tiers, from raw material sourcing to final product delivery. While this complexity presents challenges in managing Modern Slavery risks throughout the entire supply chain, we focus on actively managing our Tier 1 (direct) suppliers and using them as a conduit to communicate our expectations down through the supply chain.

Our suppliers span various industries, including agriculture, textiles, cosmetics, and hospitality. The majority of our suppliers are based in the United Kingdom and Europe, with some international suppliers for specific products or ingredients.

SUPPLIER ADHERENCE TO BAMFORD COLLECTION VALUES & ETHICS

Before appointing any supplier, Bamford Collection undertakes a comprehensive review of their commercial, financial, and ethical standing. This process includes an assessment of their labour practices and commitment to human rights.

SUPPLIER CODE OF CONDUCT

We have implemented a Supplier Code of Conduct that clearly communicates our social standards and business ethics to our supply chain. This code includes specific requirements directly relevant to preventing Modern Slavery within our suppliers' businesses.

Acceptance of our Supplier Code of Conduct is mandatory for all suppliers doing business with Bamford Collection. All new and existing suppliers are required to sign and adhere to this document.

CONTRACTUAL CONTROLS

Our standard Terms and Conditions of Purchase include dedicated clauses on Human Rights, Modern Slavery & Labour Law compliance. These clauses contractually oblige our suppliers to ensure Modern Slavery is not occurring in their business and to implement due diligence procedures for their own suppliers.

DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

We evaluate our suppliers across quality, ethics, and risk metrics. Key aspects of our due diligence process include:

1. **Supplier Engagement and Accountability:** All suppliers must accept our Supplier Code of Conduct, which explicitly prohibits Modern Slavery. Our standard Terms and Conditions include Human Rights and Modern Slavery compliance clauses. We require suppliers to implement management systems ensuring conformance to all requirements and to provide clear information about their production methods and supply chain.
2. **Risk Assessment and Auditing:** We regularly assess our supply chain to identify high-risk areas, considering factors such as geographical location and industry sector. We conduct on-site audits of suppliers to verify compliance with our Code of Conduct, with a focus on labour practices and traceability of materials and products.
3. **Continuous Monitoring and Improvement:** We monitor supplier compliance on an ongoing basis, tracking issues identified through our auditing processes. When non-conformities are found, we work with suppliers to develop and implement corrective action plans, prioritizing remediation over disengagement.
4. **Grievance Mechanisms and Transparency:** We require our suppliers to maintain accessible grievance mechanisms for workers, their representatives, and the community. We are committed to transparency in our anti-slavery efforts and continuously improve our due diligence processes to enhance their effectiveness in combating Modern Slavery.

FURTHER STEPS

Bamford Collection continues to work with our suppliers to increase supply chain transparency and more specifically in relation to ensuring Modern Slavery is not taking place within its supply chain.

Signed by Nick Fletcher, Chief Executive Officer of Bamford Collection