

H&M Group

Modern slavery statement

Financial year 2018-2019

This statement has been published pursuant to the UK Modern Slavery Act 2015 and sets out the steps that H & M Hennes & Mauritz AB and all companies included in the H&M group (hereinafter referred to as the H&M group) have taken during the financial year 2018 - 2019 to address modern slavery in its value chain – within its own business operations as well as in its supply chain.

The H&M Group

H&M COS **WEEKDAY** MONKL **H&M HOME** *& other Stories* ARKET **AFOUND**

The H&M group is one of the world's leading fashion and design companies and has nine independent fashion brands: H&M, H&M Home, COS, Monki, &Other Stories, Weekday, ARKET and AFOUND – as well as Sellpy, which we bought a majority stake in during 2019, our latest addition to the H&M group, launched in 2018. Each of these brands has its own unique identity but they are united by a passion for fashion and a drive to dress customers in a sustainable way.

We want to make fashion and design sustainable and sustainability fashionable. We are dedicated to creating a better fashion future and we use our size and scale to drive development towards a more circular, fair and equal fashion industry.

The H&M group brings together approximately 178,560 employees working for the eight brands across the world. We are dedicated to always creating the best offering for our customers and we all share a values-driven way of working, based on

fundamental respect for the individual. In 2019, we welcomed a net total of 1,755 new employees and we have 5,076 stores in 74 markets and provide online services in 51 markets. For more information about the H&M group, its organisational structure and group relationships, see [About us](#) and [Annual Report](#).

5,076

stores* in 74 markets and e-commerce in 51 markets.

232.8

billion SEK net sales.

93

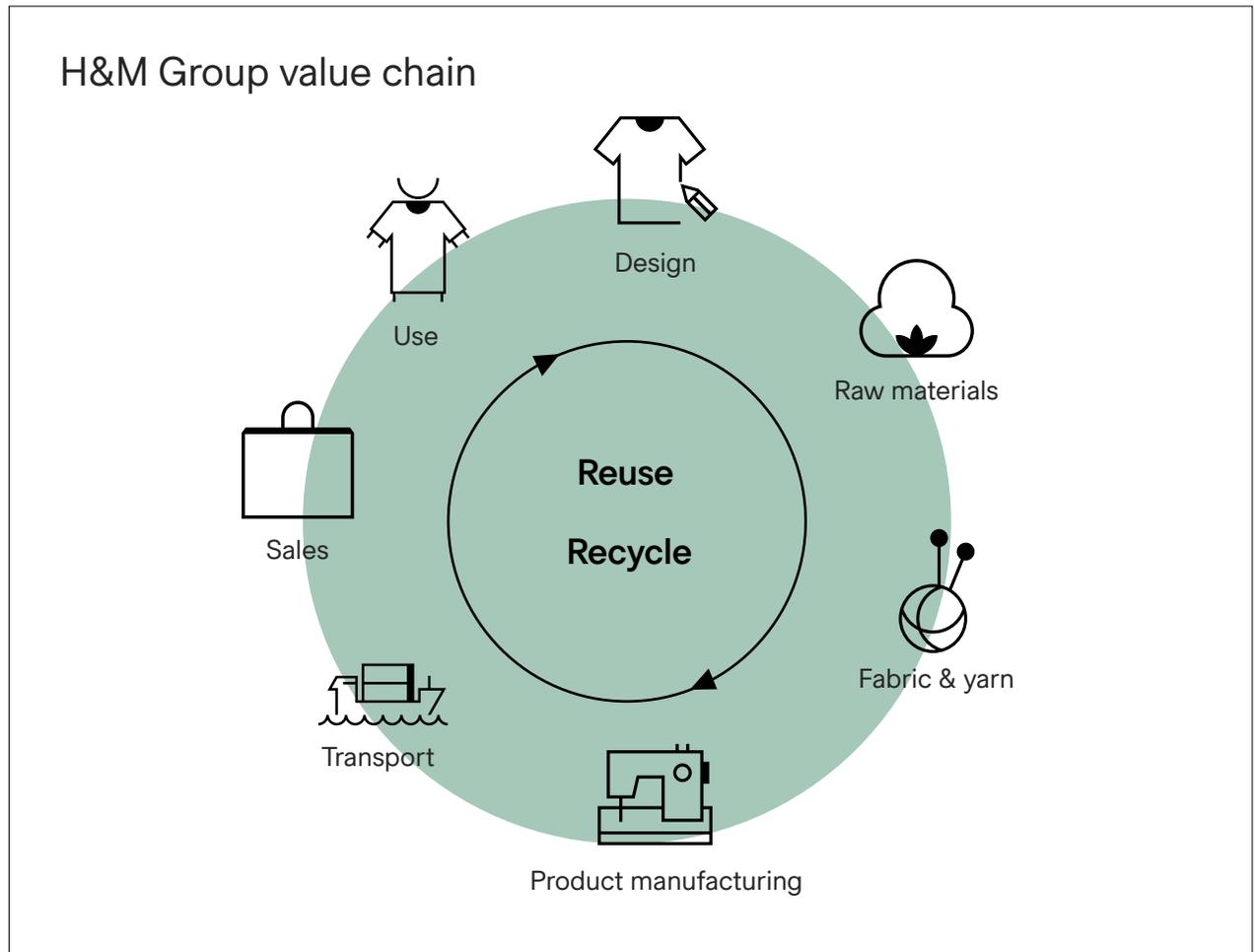
million online and 795 million in-store transactions for H&M brand alone.

*Includes 272 franchise stores.

A value chain approach

When we talk about our value chain, we mean the full range of activities it takes for us to bring our products to market – from the design idea and choice of material, through processing and manufacturing, distribution and sales, to consumption, including disposal and recycling. In other words, our whole supply chain and our own operations.

Forced labour has been identified as a salient human rights issue and can potentially occur in different forms throughout the entire value chain. The risks of forced labour related to our industry are most prominent upstream of the supply chain and are often linked to specific raw materials and processes. But there is also a potential risk connected to our internal operations in connection with staff outsourcing, logistic and facility management. We do recognise that the risk of modern slavery exists, in various ways, in all countries and sectors and across value chains, and therefore it is relevant for any company to understand and address this risk in its supply chain as well as its own operations. See our [Sustainability Report 2019](#) for more information about the risks and impacts identified throughout



our value chain, and how we address these, as well as full disclosure on our [Salient Human Rights issues](#) and related strategies and actions (see the chapters [Vision and Strategy](#) and [How we report](#)).

ILO Convention 29 defines forced labour as “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”¹ and in addition to be a serious violation of fundamental human rights, exacting forced labour from people is a criminal offence under domestic law. Both adults and children can be victims of forced labour. It can be exacted from them by State authorities, private enterprises or individuals, and can occur in all types of economic activities and in every country. Migration around the world has increased and is ongoing, and this group are consequently more vulnerable and exposed to various risks, including a higher risk of exploitation. To further strengthen our work to address the risk of forced labour in connection with migration we have signed a partnership with International Organisation of Migration. [IOM Statement](#)

The ILO forced labour definition also encompasses “traditional practices of forced labour, such as vestiges of slavery or slave-like practices, and various forms of debt bondage, as well as new forms of forced labour that have emerged in recent decades, such as human trafficking,” also called “modern-slavery” to shed light on working and living

conditions contrary to human dignity”. To ensure a strong assessment of our supply base we have developed our internal guideline on how to evaluate situations where migrant workers are recruited, [Migrant Workers Fair recruitment and Treatment Guideline](#).

Addressing modern slavery

Modern slavery is a comprehensive term used in the Modern Slavery Act 2015 and covers slavery, servitude, forced and compulsory labour, as well as human trafficking. These are violations of human rights such as the right to be free from slavery, servitude or forced labour and the right to freedom of movement and other human rights, which are upheld by both international and national legislation. According to the available data and experts in the field of research, these crimes are prevalent and occur in all parts of the world and economies, and affect all sectors and industries, and are unfortunately observed in all types of economic activities – and in every country.

We believe that a commitment to respecting human rights and ensuring human rights due diligence must be systematic and ongoing and needs to be a fundamental part of any business – just to begin with. As stated in the [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#), we believe our responsibility extends throughout the value chain and hence the risks identified need to be prevented

and mitigated, and their actual impact remediated. The risks to, and impact on, human rights are often complex, and consequently not always easy to manage effectively in isolation. Potential risks and impacts might also be identified upstream in the supply chain, where the leverage to influence and address the issue in a substantial way is very limited for any one actor. For these reasons, we place a strong emphasis on collaboration to increase our leverage and hence generate a bigger impact and greater change. For many of the identified risks and impacts, we work closely with our industry peers, business partners, global and local stakeholder organisations, and external human rights experts to more effectively address the issues, and thus improve our capacity to respect and uphold human rights principles in the value chain. More information on our partnerships and collaborations can be found in our [Sustainability Report 2019](#).

¹ C⁰²⁹ – [ILO Convention concerning Forced or Compulsory Labour](#)

Our policies and commitments

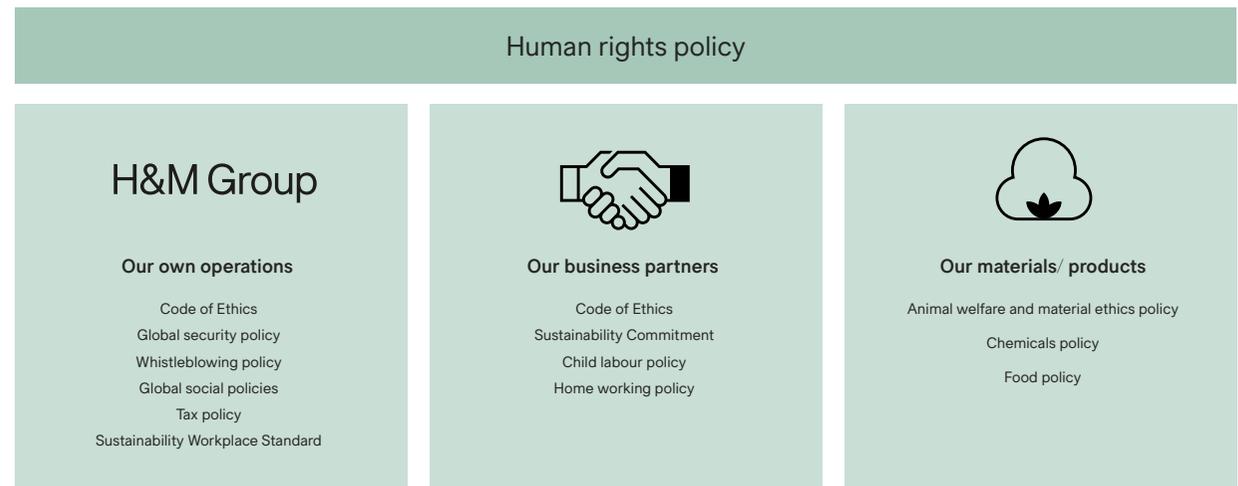
The H&M group publicly commits to respecting human rights and recognises its responsibility to respect human rights as stated in the UN Guiding Principles on Business and Human Rights (UNGP) through our Human Rights Policy. Our Human Rights Policy also covers modern slavery, as defined in the Modern Slavery Act 2015, since it is linked to human rights stated in the Universal Declaration of Human Rights. In addition to our Human Rights Policy, we place specific, mandatory requirements on all our business partners, and they are required to sign and implement our [Sustainability Commitment for Business Partners](#). This commitment clearly states that “forced labour, bonded, prison or illegal labour is not accepted. If contracted labour is hired, the employer is responsible for payment of employment eligibility fees of contract and/or foreign workers, including recruitment fees. Employees shall not be required to lodge ‘deposits’ or identity papers with their employer and shall be free to leave their employment after reasonable notice. The employee’s freedom of movement is not restricted. No part of their wages is withheld”. This is further outlined in our [Migrant Workers Fair Recruitment and Treatment Guideline](#). Our Sustainability Commitment also states that child labour is not accepted. To underline the importance of this requirement, we have a specific [Child Labour Policy](#) stating our requirements and

expectations, should child labour be found. All business partners are continuously trained in or kept informed about our commitments and policies and their content.

H&M group employees are continuously trained in our policies, including those related to human rights, and our company values. Specific e-learning courses on sustainability-related themes are also available to our employees via a web-based platform. More about training, our culture and values can be found on our website and in [The H&M Way](#). In addition,

training courses are customised for different roles and functions. In-depth training in the UN Guiding Principles on Business and Human Rights, human rights due diligence, and the implementation of our Human Rights Policy is customised for key roles and functions within the group. More about internal training related to human rights and modern slavery conducted in 2019 can be found below.

Our sustainability standards and policies*



* A list of our policies can be found at sustainability.hm.com

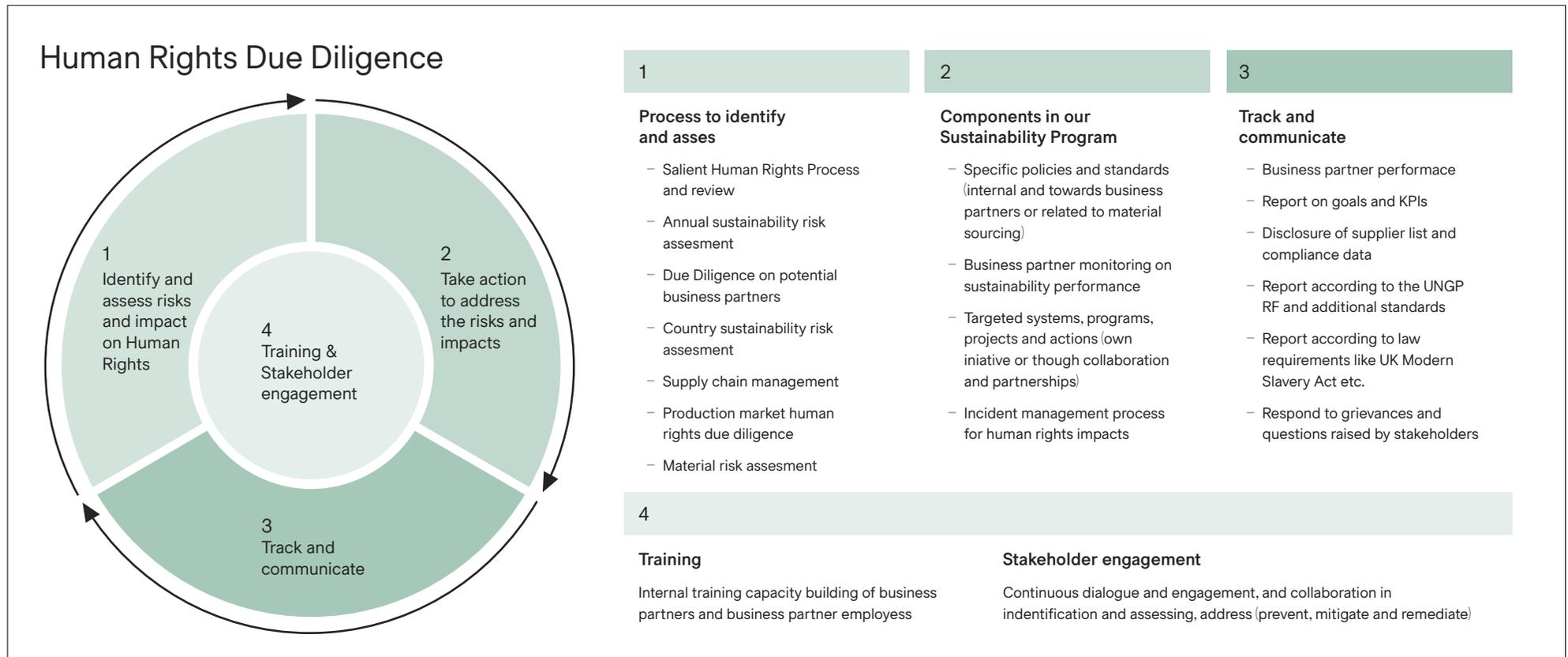
Human rights management: our approach

Our policies and commitments guide our approach to managing human rights and our aim is to ensure that human rights due diligence is carried out systematically and consistently as an integral part of all relevant processes. Ensuring this is of great

importance in fulfilling our obligations to respect human rights in practice and act with accountability.

For the H&M group, human rights due diligence is an ongoing process of **identifying, addressing** – meaning prevention, mitigation and/or remediation – and **accounting for** how we respect human rights in practice. Our processes including risk management processes, business partner due diligence,

stakeholder engagement and grievance handling, and specific internal training in our approach to human rights, all contain a clear component that deals with identifying and assessing risks to human rights and defining actions to address these. Together, these elements serve as the basis for our human rights management, illustrated below.



We work to ensure a human rights perspective in all relevant processes. Certain processes are critical for our human rights due diligence and hence integrate human rights comprehensively:

— **Identifying our salient human rights issues.**

This is the process of identifying the human rights at risk of the most severe negative impacts connected to our operations and supply chain. In 2015, the H&M group implemented a comprehensive process involving both internal and external stakeholders in order to identify our salient human rights issues and since then (in 2016, 2017 and 2019) we have conducted annual reviews to determine their enduring relevance. This process supplements our materiality analysis in the area of human rights with an understanding of risks to people.

— **Annual sustainability risk assessment conducted by all business functions.**

All business functions assess their sustainability risks, including risks to human rights, annually to ensure the existence and adequacy of prevention and mitigation plans. Sustainability risks are then aggregated and fed into the corporate risk process.

— **Due diligence on potential business partners.**

In line with the H&M group's Purchase Policy and due diligence guidelines, the legal, financial, social – including human rights – and environmental aspects of a purchase (of a product or service)

are duly assessed before entering a business relationship. Questions are customised to integrate relevant risks associated with the sector and type of purchase.

— **Country sustainability risk assessment.** All potential new retail and production markets are thoroughly assessed before deciding to set up operations. The sustainability risk assessment includes both an environmental and a social perspective. Stakeholders (global, and local when possible) are consulted and involved in reviewing the findings, provide additional input, and help to guide us in actions to address critical issues. Similar in-depth assessments have also been conducted for our existing production markets considered to be high risk from a sustainability perspective. Furthermore, the sustainability risks related to our production countries are reviewed annually.

Supply chain management and monitoring of business partners. We focus on building strong long-term relationships that are based on trust and transparency. All our business partners need to comply with our Sustainability Commitment and Code of Ethics, and only in exceptional cases do we agree to not have these documents signed. Production units for products of the H&M group must meet our minimum requirements, which are ascertained via an assessment prior to production

To ensure that our minimum requirements are met, including but not limited to the absence of child and forced labour, and to enable us to monitor the implementation of these requirements in our Sustainability Commitment for Business Partners, it is crucial for us to know where the production/ manufacturing of our products takes place. Consequently, unauthorised subcontracting to units not audited and approved by the H&M group is strictly forbidden. Should it occur, it would seriously damage our credibility and have commercial consequences. To ensure that our production takes place in audited and approved units, we keep track of where each order is manufactured and, for example, the associated fabric and/or yarn mills. The latter is possible through our coverage of second-tier suppliers.

Currently, our audit and monitoring programme covers 100% of first tier manufacturing units, including processing units, as well as second-tier component suppliers of fabric and yarn corresponding to approximately 67 % of our total production volume. Continuous follow-up of our business partners' implementation of the Sustainability Commitment is an important risk management and assessment measure. Since 2013, we have published our [Supplier List](#). For all our suppliers of commercial goods, we apply our Sustainability Impact Partnership Programme (SIPP), which monitors performance on a broad range

of social and environmental issues, and measures management systems within sustainability areas using the [Higg Index](#). This is an approach that aims to go beyond standard compliance and captures sustainability performance in relation to relevant social and environmental aspects, as well as driving ownership. We are also committed to rewarding good business partner performance. Our other business partners, for non-commercial goods and services, are also subject to regular monitoring of compliance with the requirements in the Sustainability Commitment, and these include our warehouse and logistics solutions partners and store construction sites. This is driven by each business function.

— **Human Rights due diligence process in production markets.** This is the annual process of identifying human rights risks and impacts related to our production markets and prioritising according to their severity and likelihood. The process includes perspectives on the materials used in our products, the type of manufacturing that takes place in the market, supplier performance data from SIPP, and issues raised by stakeholders as well as an assessment of the broader context in the country. This process is key in informing our goal setting process and consequently, prioritised issues are either addressed in local goals or through global program, as well as industry initiatives.

— **Materials risk assessment.** In 2016, we strengthened the risk assessment we conduct on the materials used in our products to more comprehensively integrate an assessment of associated risks to human rights. This assessment is conducted on all new materials and its aim is to also re-assess all existing materials – according to priority. The results of these assessments guide us in determining potential preventative, mitigation and remediation measures to ensure responsible sourcing of materials. The materials with specific sourcing requirements are outlined in our [Animal Welfare and Material Ethics Policy](#). This policy was reviewed in 2017/2018 and was re-launched in 2019. Our long-term aim is to have full traceability for all our products throughout the value chain and to have clear goals for specific materials used in our products. Read more in our Sustainability Report 2019 in the chapter titled Circular & Climate Positive.

— **Incident management.** For situations and cases with a human rights impact – which go beyond what is covered by and dealt with in our Sustainability Commitment – we apply a systematic approach to analysing our responsibilities under the UNGPs and determining appropriate remediation measures. This specific analysis is integrated into our existing routine for handling cases and incidents.

Various internal policies are in place to prevent violations and guide our actions. [Our Global Grievance Policy](#) aims to ensure that all employees within the H&M group have a channel for putting forward grievances and access to an efficient procedure for the handling of violations of our social policies. In 2017, key internal social policies related to human rights were reviewed, updated and re-launched with supplementary guidelines for their implementation.

— **Continuous training of business partners and employees.** See [Our Policies and Commitments](#)

— **Stakeholder engagement.** Often, improving issues in the value chain requires a collaborative approach because on their own, individual stakeholders lack enough leverage to generate substantial and sustainable improvements. We therefore seek to join forces with stakeholders such as our peers, suppliers and business partners, NGOs, trade unions, expert organizations and many others to collaboratively address and improve the sustainability of our industry. Additionally, we continuously invite stakeholders to inform us and provide feedback on our efforts in order to further improve our strategies and programmes. Read more about our partnerships and collaborations in our Sustainability Report 2019 in the chapter titled How we report and in [Stakeholder Engagement](#).

— **Acting on identified risks and impacts.** Together with partners or on our own, we engage in programmes, projects, initiatives and activities to address identified risks and impacts. In some cases, it is about prevention and mitigation, and in other cases about remedial measures and work towards systemic change. Read more about our sustainability work in our Sustainability Report 2019

On page 10 see examples of modern slavery, forced labour and child labour risks identified in the value chain, ongoing efforts to address these, and relevant updates for the financial year 2018 – 2019.

Additionally, in the financial year 2018-2019, we took the following actions:

- The Human Rights Due Diligence Process for our production markets was conducted, in its updated and strengthened form, in 2017. A process, method and tools for monitoring are now implemented in the production organisation and this will continue to be an annual process. All the major production markets have established heat maps of human rights related issues based on severity and likelihood and consequently this perspective is fed into the goal process.
- We reviewed our Salient Human Rights Issues, after consultations with relevant stakeholders, and updated our definitions of the same.

— The Global Human Resources department continuously updates our internal policies. Targeted guidelines are also updated to provide increased awareness and support to local HR Managers on certain subjects. To ensure, if our policies has been breached, employees can reach out to a neutral point of contact, Global Human Resources has strengthened the Global and Local Grievance process.

— Going forward, we will continue to engage throughout the value chain to ensure we fulfil our responsibility to respect human rights. We will continue to work systematically, and to ensure that human rights due diligence is conducted in all relevant parts of our organisation and is an integral part of all relevant processes. This implies the continued development and roll-out of relevant internal training courses for key roles and functions; ensuring the human rights perspective in relevant processes; systematic monitoring of actions taken, and goals set; ensuring the provision of information needed for required external disclosures; and continued engagement with various stakeholders.

This statement has been approved and signed by the Board of Directors.

Stockholm, 28 January 2020

- Stefan Persson, Chairman of the Board
- Stina Bergfors, Board member
- Anders Dahlvig, Board member
- Lena Patriksson Keller, Board member
- Christian Sievert, Board member
- Erica Wiking Häger, Board member
- Niklas Zennström, Board member
- Ingrid Godin, Board member
- Alexandra Rosenqvist, Board member
- Danica Kragic Jensfelt, Board member

Value chain step	Risks and impacts	Ongoing efforts	Update 2019
<p>Raw materials</p>	<p>The risk of forced labour and child labour connected to specific raw materials and sectors, for example agriculture, in specific countries</p>	<ul style="list-style-type: none"> - Ban on cotton from Uzbekistan, Turkmenistan and Syria - Engagement in the Better Cotton Initiative (BCI) - Goal of full traceability for cotton by 2020 - Full traceability of our Conscious collection materials (see our Animal Welfare and Material Ethics Policy for more information on the status of and goals for traceability for other materials) - Assessment of mica used in cosmetic products to enable us to outline a strategy to address child labour and forced labour in mica production in India - Improved the material-process-product risk assessments for both new and existing raw materials 	<ul style="list-style-type: none"> - Continued our engagement in the Better Cotton Initiative and been actively engaged in the revision of their standards. - Continued our engagement in Responsible Mica Initiative (RMI). Progress of the initiative can be followed on the RMI website. - Prioritized re-assessment of cotton, recycled PET and cellulose fibres. - A leather working group established to set strategy for 2025 traceability goal.
<p>Fabric and yarn processing</p>	<p>The risk of exploitative labour practices in various countries and sectors of Tier 2 and 3 suppliers.</p>	<ul style="list-style-type: none"> - Since 2013, we have been involved in an ETI /TNMS initiative addressing exploitative labour practices in Tamil Nadu, India, especially targeting the Spinning Mill Industry. TNMS Program consist of 3 components: 1) a worker peer group programme (WPGP) in which training related to health and safety and workers' rights and responsibilities is conducted for mill workers and management; 2) a community outreach programme aimed at educating and raising awareness within communities in which recruitment takes place; 3) a policy and legislative reform effort to tackle policy gaps at industry level. Since 2016, we have been involved in the Amsterdam Coalition, (AMCO) an initiative between major global brands and retailers which is supported by the OECD and which aims to contribute to the prevention and mitigation of harmful impacts on workers in spinning mills in South India, particularly in Tamil Nadu - Our monitoring programme covers our most important second-tier suppliers (fabric and yarn suppliers-to-our-suppliers) who are involved in making about 67 % of the production volume for the H&M group. See Supplier List. 	<ul style="list-style-type: none"> - TNMS: Taking part in this program is two of our spinning mill suppliers in Tamil Nadu, with 2 units each. Those 4 mills have also been part of a pilot of our global program WMS (Wage Management System) and WPD (Workplace dialogue). - AMCO: Our involvement in the Amsterdam Coalition (AMCO) continued with an officially announced platform for responsible business conduct with Indian Textile businesses and the OECD Responsible Business Conduct unit. The next step is for OECD to conduct a thorough baseline assessment in consultation with Indian business, government and workers. OECD India Assessment ToR. - During 2019 we continued further mapping up stream of our T2 supplier (fabric/yarn) to increase traceability. This work will continue during 2020.

Value chain step	Risks and impacts	Ongoing efforts	Update 2019
<p>Product manufacturing</p>	<p>Potential risk of forced labour in China</p> <p>Risk of involuntary overtime</p> <p>Vulnerable groups, such as migrants and refugees, at risk of being exploited</p>	<ul style="list-style-type: none"> - Ongoing. We work to ensure we know where production takes place and enforce the prohibition on the use of undeclared production units through our Sustainability Commitment for Business Partners. - All factories producing for us need to pass our audit on minimum requirements prior to being allowed to produce <ul style="list-style-type: none"> - then the production unit is enrolled in our monitoring programme - Our monitoring programme – the Sustainable Impact Partnership Programme (SIPP) currently covers 100% of first tier suppliers and the second-tier suppliers (fabric and yarn suppliers-to-our-suppliers) who are involved in making about 67 % of the product volume for the H&M group. - All new suppliers are trained in the content of our Sustainability Commitment as part of the onboarding process, and then continuously as an integral aspect of monitoring and capacity building. - Implementing Wage Management System (WMS) programmes in supplier factories, - Purchasing practices for planning and execution. - In production markets, we work to ensure that migrant workers are entitled to the same social benefits as local employees. In Turkey, we engage in continuous dialogue with our suppliers about our approach to Syrian refugees and how to act responsibly. We are also addressing the issue of the refugees’ situation collaboratively through multi-stakeholder efforts. 	<ul style="list-style-type: none"> - The Wage Management System (WMS) programmes have in total been rolled out in 804 supplier factories, covering 900,000 workers. - We continued our engagement in the Action Collaboration Transformation (ACT) initiative in which brands’ purchasing practices commitments is one important workstream for enabling the goal of the initiative, which is to improve wages in the industry by establishing industry collective bargaining agreements in different production countries. - Our effort to facilitate employment opportunities for Syrian refugees in our Turkish supplier chain continues. Approximately 500 refugees are currently employed under this initiative. Our aim is to reach 2000 employed refugees by 2025. - To increase our understanding and to explore further opportunities to positively contribute to refugees’ situation in different countries, we joined the TENT partnership for refugees, an initiative to mobilize the private sector to take steps to address the refugee crisis. https://www.tent.org - To further strengthen our work on securing fair recruitment of migrant workers we have signed a partnership agreement with International Organisation of Migration (IOM). At the same time we have strengthened our assessment method through our new guidelines on Migrant Workers Fair Recruitment and Treatment Guideline.

Value chain step	Risks and impacts	Ongoing efforts	Update 2019
<p>Sales</p>	<p>Our policies and guidelines are applied to any employee working directly in our stores and consequently also apply to all outsourced staff.</p> <p>The potential risk of forced labour and human trafficking in sectors encountered by our operations, for example in construction or logistics. These risks arise mainly in connection with staff outsourcing and when migrants and other groups who are at greater risk of being exploited are present.</p>	<ul style="list-style-type: none"> - The due diligence conducted on potential business partners for the H&M group, prior to entering a business relationship, includes questions to evaluate the risks of forced labour and human trafficking along with other relevant social, environmental, legal and financial aspects. - All partners producing our commercial products are continuously monitored regarding their sustainability performance through SIPP. Follow-ups are conducted on partners within logistics, construction and recruitment but using other methods. - We continued our engagement in The Mekong Club an organisation that works to “fight the business of modern slavery” by engaging, inspiring and supporting the private sector to take the lead in this fight. During 2017, the Mekong Club developed educational films about modern slavery, and we are now integrating these films into internal training courses going forward, to increase awareness and understanding of forced labour and human trafficking 	<ul style="list-style-type: none"> - During 2019 we launched an assessment method for business partners supplying us with non-commercial goods. - Workshops to discuss and identify sustainability risks for service functions have been held during 2019. The sessions intended to build knowledge and awareness of sustainability risks, from a human rights perspective, in order to include them in the due diligence process. - Workshops were held with global and local construction managers and logistic managers and audit team on Human Right Due Diligence. - Making the Mekong Club's educational films on Modern Slavery available to our suppliers through e-learning tools.

