

# HARDING

## RETAIL

TRUSTED SINCE 1930

### Harding Retail – Modern Slavery Statement

This statement is published in compliance with the requirements set out in the Modern Slavery Act 2015 and has been approved by the Board of Harding Retail.

Founded on the Harding family name and trusted since 1930, Harding Retail is a retail concessionaire across a fleet of 64 luxury cruise ships, operating the full onboard shopping experience of the highest standards in 250 shops. We work in partnership with 20 cruise lines, directly employing 200 people across our offices – predominately at our head office in Bristol, with regional account teams in Miami and Sydney – and indirectly over 800 retail staff within our multi-national shipboard teams.

In 2014, Harding Retail became part of the wider Flemingo International group, a fast-growing, global duty free and travel retailer. Flemingo is headquartered in the United Arab Emirates, under private ownership.

As a premier onboard retailer, our business model focuses on our clients, the cruise lines, and their guests, delivering highly recognised brands across each category. Our key categories include fine jewellery, watches, beauty and fashion, where we work directly with a range of premium brands. We source other categories, such as liquor and tobacco, through a mixture of direct brand and wholesaler relationships, and logo clothing via direct manufacturing agreements.

Our business operates on a 24/7 basis, 365 days of the year, on ships sailing between ports throughout all time zones. Our logistics operation delivers over 5,000 containers of merchandise to 56 global ports every year, fulfilling over 165,000 square feet of retail space. Our main operation centre is based in Avonmouth (Bristol) and comprises administration and warehousing services, with additional smaller warehousing functions located across the globe.

Harding Retail recognises that modern slavery is a distinct possibility within the sectors where we operate, and particularly within the complex tiers of supply chains that exist. The personnel employed to operate our concessions onboard cruise ships are recruited and trained by our own staff – some are recruited from countries where modern slavery is a high risk. We comply with all the requirements of the Maritime Labour Convention (MLC), as certified by Lloyd's Register.

All key directors and procurement staff at our UK headquarters have received comprehensive face-to-face training in modern slavery. As a result of this training, staff were able to understand:

- What modern slavery and human trafficking are and the different types of exploitation
- How to spot the signs and indicators and how to respond to a potential victim
- The requirements of the Modern Slavery Act 2015
- The potential risks within Harding Retail

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Avonmouth Way, Avonmouth, Bristol, BS11 8DD (Registered Office)

Harding Brothers Holdings Limited (company no. 06130156)  
Harding Brothers Retail Limited (company no. 06126331)  
Harding Brothers Retail Operations Limited (company no. 06489416)

Registered in England & Wales

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Key personnel who have been trained to understand the above conducted a comprehensive risk assessment process based on the key business activities of the organisation. As a result of this process, areas considered most at risk from modern slavery were identified and key mitigation steps identified to reduce these risks.

Furthermore, we are producing a stand-alone modern slavery policy which will drive all activity to prevent and reduce the risk of modern slavery within the organisation and our supply chains; we have enlisted the services of independent modern slavery consultants (Modern Slavery Consultants Ltd) to guide and assist us in this process.

A comprehensive 23-point organisational action plan has been created to progress internal activity to reduce the risk of modern slavery within the organisation and across our supply chains; each portfolio holder will use the action plan to identify key policies that will be adapted to fulfil this objective. The action plan also identifies a number of key performance indicators which will be monitored to measure progress and effectiveness.

New measures to be introduced to strengthen our due diligence process include: questionnaires and codes of conduct for suppliers, in particular third-party recruitment agencies; the creation of a specific modern slavery policy; and development of audits specifically to identify modern slavery issues.

A modern slavery working group has been formed which will monitor the progress of the action plan and performance indicators, and identify any further action required. This group will also plan and prepare for the modern slavery statements that are required to be published in future years.

**James Prescott**  
Managing Director

1 June 2019

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