

Non-Financial Reporting Compliance Statement

The table below, and the information it refers to, is intended to help stakeholders understand our position on key non-financial matters as is required by the Non-Financial Reporting requirements. All of the policies listed are communicated to the relevant persons via the business area responsible for that matter. Such communications are supported by e-learning training programmes to selected roles where required. Any outputs from the various policies are considered by the Risk Committee and escalated to the Audit Committee where appropriate. Further details of our Governance and Risk Management Frameworks can be found within our 2018 Annual Report & Accounts (see pages 46 to 51 and 30 to 31 respectively).

| Non-financial Reporting matter | Our policies | Description of policy | Associated Principal Risks & Uncertainties (For more information see pages 32 to 34 of the 2018 Annual Report and Accounts) |
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| Environmental Matters | <ul style="list-style-type: none"> Supplier Code of Conduct | <p>Debenhams will only engage with reputable suppliers, factories and service providers to ensure that our consumers can be sure that the goods they purchase from Debenhams have been produced under acceptable conditions. This policy sets out our expected acceptable conditions: lawfully, through fair and honest dealing, without exploitation of the people employed with the factories and organisations who produce the products, which must at all time be produced in decent working conditions and with consideration to the environment.</p> <p>The Code is designed to be ethical, achievable, auditable and applicable to all sourcing countries and product types.</p> | <ul style="list-style-type: none"> Supply chain and key suppliers |
| | <ul style="list-style-type: none"> Environmental & Chemical | <p>Debenhams has a responsibility to ensure that all products are produced to the highest standards, are safe for use, and exceed customers' expectations, whilst protecting their health and the environment. Therefore it is essential that we source responsibly by engaging with our suppliers and manufacturers by providing</p> | <ul style="list-style-type: none"> Supply chain and key suppliers |

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| | | training and support to ensure Debenhams meet all requirements and standards. Our Environmental & Chemical policy covers animal welfare, timber sourcing, electrical waste (WEEE), batteries, waste packaging & chemical management. | |
| Employees | <ul style="list-style-type: none"> • Code of Business Conduct | Debenhams is committed to achieving and maintaining the highest possible standards of conduct and seeks to ensure that every aspect of its business is conducted in accordance with integrity and high ethical standards. The code sets out the expected standards of all our colleagues when they are carrying out their duties at their normal place of work, when working from home, during business trips and whilst attending events when representing Debenhams. | <ul style="list-style-type: none"> • Legal and regulatory |
| | <ul style="list-style-type: none"> • Health & Safety at Work | This policy provides guidelines on the practices and procedures to be adopted by Stores and the Support Centres to ensure the health, safety and welfare at work of all our colleagues and any other person affected by Debenhams operations. | <ul style="list-style-type: none"> • Legal and regulatory |
| | <ul style="list-style-type: none"> • Bullying & Harassment | Debenhams does not tolerate any acts of bullying or harassment and takes any allegations very seriously. This policy sets out the process for raising and dealing with any issues in a fair, consistent and timely way to ensure that any problems are resolved as quickly as possible. | <ul style="list-style-type: none"> • Legal and regulatory |
| | <ul style="list-style-type: none"> • Colleague Privacy | This policy provides colleagues with information on how we use any personal information they may have provided to Debenhams both during and after their relationship with Debenhams, in accordance with the General Data Protection Regulation (EU) 2016/697. It also explains the length of time such personal information is stored and the rights of colleagues over their information. | <ul style="list-style-type: none"> • Legal and regulatory |

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| Human Rights | <ul style="list-style-type: none"> Human Rights & Modern Slavery Statement | <p>Both policies detail the steps and activities undertaken by Debenhams to protect the basic human rights of individuals within our supply chains, which extends to other parts of the business.</p> <p>This is done through the identification of risks focusing upon modern slavery, labour rights violations and discrimination, whilst supporting freedom of movement.</p> <p>We also highlight our future objectives going forward which take into consideration the salient risks and issues identified.</p> <p>These policies are in line with the UN guiding principles and are influenced by civil society, unions, NGOs, multi-stakeholder and industry collaboration.</p> | <ul style="list-style-type: none"> Legal and regulatory Supply chain and key suppliers |
| | <ul style="list-style-type: none"> Information Security | <p>The Information Security Policies apply to all of our colleagues including contractors, temporary workers and onsite third party teams. The suite of policies provide colleagues with guidance on the following matters: keeping information secure; use of antivirus and malware software; data protection & privacy matters; data retention; information classification, mobility and remote access to systems; and the use of mobile devices. The expected behaviours set out in these policies are also included within contracts with third parties.</p> | <ul style="list-style-type: none"> Systems availability and cyber security |
| | <ul style="list-style-type: none"> Data Protection | <p>This policy regulates our use of personal data to ensure that all colleagues and agents comply with relevant data protection legislation, including the General Data Protection Regulation (EU) 2016/697.</p> | <ul style="list-style-type: none"> Legal and regulatory Systems availability and cyber security |

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| Social Matters | <ul style="list-style-type: none"> Supporting Charities | This policy sets out the processes to be followed to ensure that all money raised by the Stores and the Support Centres is paid to registered charities. | <ul style="list-style-type: none"> Legal and regulatory |
| Anti-corruption & anti-bribery | <ul style="list-style-type: none"> Anti-bribery & Corruption | Debenhams Anti-Bribery and Corruption policy outlines the expected standards of behaviour across the end to end supply chain to ensure that none of Debenhams business affairs engage in or facilitate any form of bribery or corruption. | <ul style="list-style-type: none"> Legal and regulatory Supply chain and key suppliers |
| | <ul style="list-style-type: none"> Whistle-blowing | Debenhams Whistleblowing policy is in place to ensure all employees can raise genuine concerns about inappropriate conduct at the earliest opportunity, without fear of suffering detrimental treatment. Any serious matters are raised with the chairman of the Audit Committee. | <ul style="list-style-type: none"> Legal and regulatory Supply chain and key suppliers |