

OLIVER BONAS

Modern Slavery & Human Rights Risks Report 2025

Our company values are “Work Hard, Play Hard and Be Kind”
and we aim to Be Kind in every aspect of our company life.
We strive to do business in a way that has integrity, is ethical and
minimises the negative impact on others and the environment.

In 2015, the UK Government passed into law the Modern Slavery Act. Over the last eight years, we have played our part and recognise we have a responsibility to prevent modern slavery and human trafficking throughout Oliver Bonas and in our supply chain.

This is our ninth MSA statement and was published in July 2026. This highlights the work we have undertaken to identify, prevent and address modern slavery within our business over the previous financial year, January to December 2025.
The statement was approved by the directors and leadership team at Oliver Bonas.

Signed

A handwritten signature in black ink that reads "Olly Tress". The signature is written in a cursive, flowing style.

Oliver Tress, Founder & Managing Director,
Oliver Bonas Ltd, July 2026

Introduction

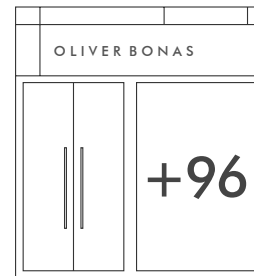
This report sets out Oliver Bonas' approach to identifying and managing modern slavery and wider salient human rights risks across our business and supply chains during 2025. It supports our annual Modern Slavery Statement and our reporting against the ETI Corporate Transparency Framework. We have aimed to be clear about our progress, learning and the areas where our approach still needs to develop.

The report covers the nine Modern Slavery Act reporting areas and relevant ETI expectations including:

- ① Labour Rights Commitment
- ② Our Impact Strategy
- ③ Governance and Accountability
- ④ Our Own Operations
- ⑤ Supply Chain Transparency
- ⑥ Policy Framework
- ⑦ Salient and Emerging Risks
- ⑧ Risk assessment, Monitoring and Remediation
- ⑨ Looking Forward

Business and supply chain overview:

Oliver Bonas is an independent British lifestyle brand offering fashion, homeware, gifts and accessories in store and online.



Our own brand products are where we have the greatest visibility and influence, so our ethical sourcing programme prioritises own brand finished goods factories and tier two process sites while extending due diligence further upstream.

Our supplier base spans multiple countries, processes and categories. In 2025, our risk assessment continued to focus on higher-volume and higher-risk sourcing locations, including China, India, Turkey and Vietnam.

We publish first-tier factory information annually on the Open Supply Hub. We continue to work with our suppliers to map as far down the supply chain as we can, prioritising higher-risk materials, processes and where we have more leverage with suppliers through greater volumes.

Labour Rights Commitment

Our company values are the foundation of how we operate, placing our team members, customers and the suppliers who make our products at the heart of our business. We are committed to respecting human rights, preventing modern slavery and driving meaningful positive change for people and planet through a practical, risk-based approach to due diligence and in line with the ETI Base Code.

Our commitment means working to identify, assess, monitor and address human rights risks across our own operations and supply chains. We set clear expectations for suppliers before entering business relationships, require suppliers to understand and acknowledge our ethical standards, and work with them to improve visibility of working conditions and potential risk factors throughout our supply chains.

We recognise that effective human rights due diligence is ongoing. We use supplier engagement, risk assessment, social audits, worker feedback, corrective action plans, internal controls and training to monitor risk and support improvement. Where issues are identified, we aim to understand root causes, take proportionate action and work collaboratively with suppliers and internal teams to strengthen safeguards, improve outcomes for workers and reduce the risk of harm over time.

Our Impact Strategy

In 2025, we defined a new five-year Impact Strategy to guide how Oliver Bonas makes better choices for people and planet while continuing to design products that bring lasting joy.

The strategy brings together 49 targets across three pillars: People, Planet and Product. It aligns with the United Nations Sustainable Development Goals and supports our ambition to contribute meaningfully to social and environmental progress by 2030.

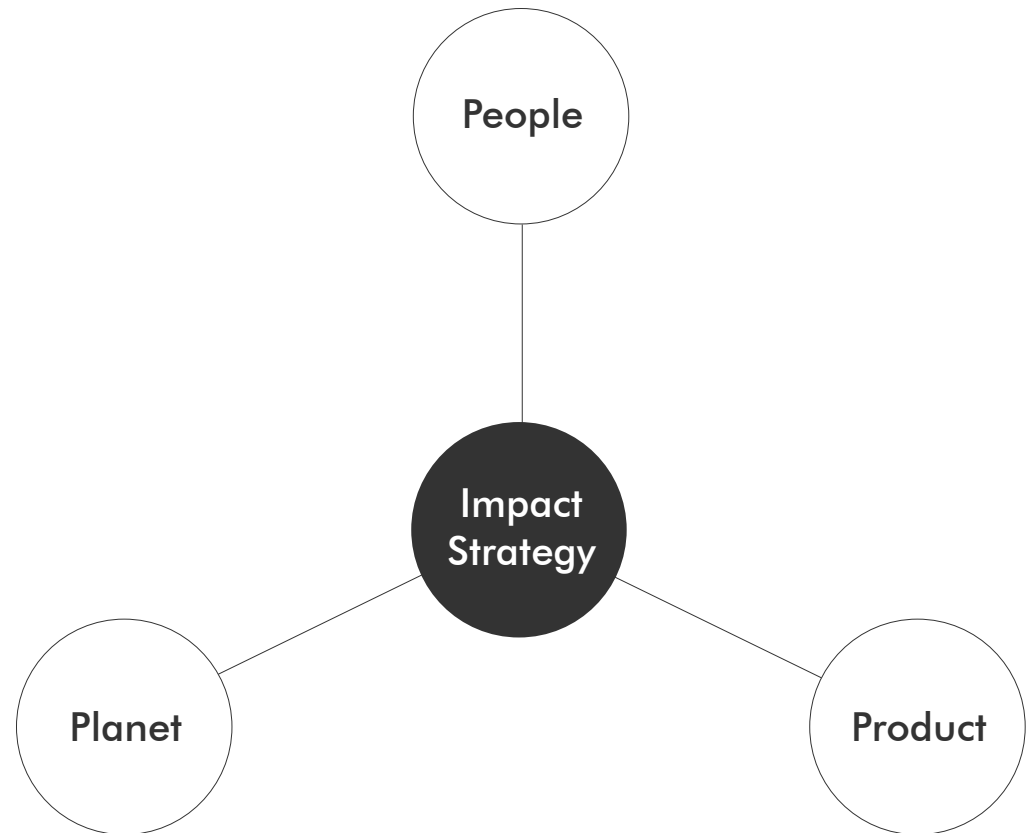
For this report, the Impact Strategy provides an important framework for our modern slavery and human rights work.

It reinforces our commitments to:

- Create positive shopping and working experiences
- Consciously design and source our products
- Maximise resource and energy efficiency while reducing waste
- Work collaboratively with suppliers for shared success
- Supporting our charity partners and communities
- Extending product life and promoting more care, repair and recycling

We are challenging ourselves to act with intention, integrity and openness, and to work collaboratively with suppliers, industry partners and other like-minded organisations where collective action can create greater scale.

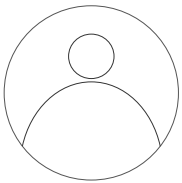
This means connecting ethical sourcing, environmental responsibility, product decisions and community impact more closely, while continuing to strengthen transparency, due diligence and measurable outcomes over the five-year strategy period.



Governance and Accountability

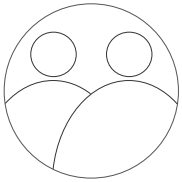
Overall accountability for human rights due diligence and modern slavery prevention sits with senior leadership.

The People Director is accountable for safeguards within our own operations including:



- Recruitment
- Employment practices
- Payroll controls
- Speak Up channels
- Team member welfare

The Buying and Merchandising Director and Chief Operating Officer are accountable for ensuring that human rights risks are appropriately considered, resourced and escalated within:



- Product sourcing
- Supplier relationships
- Production planning
- Operational decision-making

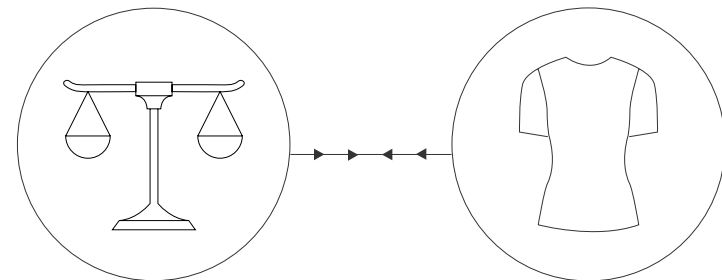
This senior accountability is supported by the wider leadership team, ensuring that human rights due diligence is embedded in business decision-making rather than sitting with one function alone.

Responsibility for delivery is shared across the teams that manage the relevant activities day to day. The Head of Ethical Sourcing and Sustainability leads delivery of the ethical trade programme, supplier due diligence, risk assessment, monitoring, remediation follow-up and reporting. People, Buying, Merchandising, Operations, Product, Technical and Compliance teams are responsible for implementing the controls, decisions and actions that sit within their functions. This distinction helps us separate senior accountability for oversight and decision-making from operational responsibility for implementation and follow-up.

Escalation routes are determined by the severity, source and potential impact of the issue identified. The Head of Ethical Sourcing and Sustainability coordinates supply chain escalations, bringing in the relevant Buying, Merchandising, Technical, Quality Assurance, Compliance, Operations or People teams as needed. Serious or systemic issues are escalated to the accountable senior leader for oversight, decision-making and allocation of appropriate resources.

Escalation discussions focus on assessing risk to workers, agreeing immediate safeguards, assigning ownership, setting time-bound actions and determining whether supplier engagement, remediation, order management decisions or wider business changes are required. We want to improve the working conditions for those in our supply chains rather than walk away from issues found, but if suppliers refuse or do not make significant corrective action on high risk issues, we will consider terminating the relationship.

This cross-functional model matters because commercial decisions, production planning, recruitment practices, supplier selection and remediation follow-up can all influence outcomes for workers. We are continuing to build more consistent internal understanding of these links, including the role of forecasting, lead times, order changes, pricing and supplier capacity. In 2025, this has included closer engagement between Ethical Sourcing and product-facing teams to strengthen awareness of how purchasing and production decisions can contribute to, prevent or reduce human rights risks.



Our Own Operations

People, monitoring and safeguards

Within our own operations, our in-house People team is responsible for advising on and implementing people policies and procedures that support line managers and team members across the business. This helps ensure that expectations are clear, high standards are maintained and all employees are treated fairly and consistently.

Our policies are accessible to team members through our 360L e-learning platform and form part of the induction process for new joiners. This supports awareness of our standards from the outset of employment and provides a clear route for team members to understand the behaviours, protections and reporting mechanisms available to them.

Internal reporting, compliance and verification

Where wrongdoing is suspected or identified within Oliver Bonas, team members can use our formal whistleblowing policy and internal Speak Up processes. These channels are designed to ensure concerns can be raised and corrective action can be taken in a timely and appropriate way. We have a dedicated in-house payroll team that administers payroll for all Oliver Bonas team members. As part of the new joiner process, bank accounts are verified to ensure they belong to the individual team member. All hours worked, holidays and other leave are recorded and monitored through our integrated HR system. Hourly paid team members clock in and out of this system to capture accurate hours worked, supporting monitoring against UK Working Time Regulations.

All applicants complete mandatory right-to-work checks through our Applicant Tracking System. This supports legal compliance and prevents candidates from progressing through the recruitment process where they do not have a legitimate right to work in the UK. During 2025, we implemented an improved imposter check process, providing a clearer audit trail that line managers have completed the check on each new team member's first day of employment.

Recruitment, agency labour and seasonal workforce controls

Our in-house recruitment team continued to make improvements across our third-party Applicant Tracking System and met with all agencies on our preferred supplier list to reinforce adherence to our employment practices. During the seasonal period, we reduced the number of agencies we worked with to improve oversight and control, while building stronger relationships with local job centres and the Department for Work and Pensions. All partner agencies are certified members of the Recruitment and Employment Confederation and hold valid Gangmasters and Labour Abuse Authority licences. During the October to December peak period, we recruited over 530 temporary team members across the business, alongside 200 agency workers. These controls help us manage heightened seasonal recruitment risks, including risks linked to temporary work, agency labour and worker vulnerability.

Internal training and development

Our Learning and Development team continued to deliver bespoke learning initiatives during 2025, including 106 workshops and courses, alongside updated online learning through our 360L platform. The trial of our Growth Leaders programme for managers was successful and has prepared the programme for wider rollout.

Compared with the previous year, we expanded learning activity into additional parts of the business, including targeted training with product teams. This helped build awareness in functions closely connected to sourcing and supply chain decision-making. We also continued to deliver sexual harassment workshops and introduced training on managing multi-generational teams for managers across the business, supporting broader safeguarding, inclusion and Speak Up awareness. We also carried out third-party risk assessment work within our operations, leading to tangible follow-up actions including updated in-store signage and reinforced expectations through our third-party code of conduct. We continue to review policies and training to ensure they remain aligned with employment law developments and emerging good practice.

Supply Chain Transparency

We currently source from 98 suppliers, using 231 factories in 15 different countries.

This data is correct as of 26th November 2025

Combined Supplier Map



Top Sourcing Countries:
China, India, Turkey,
Vietnam, Thailand & UK

Fashion

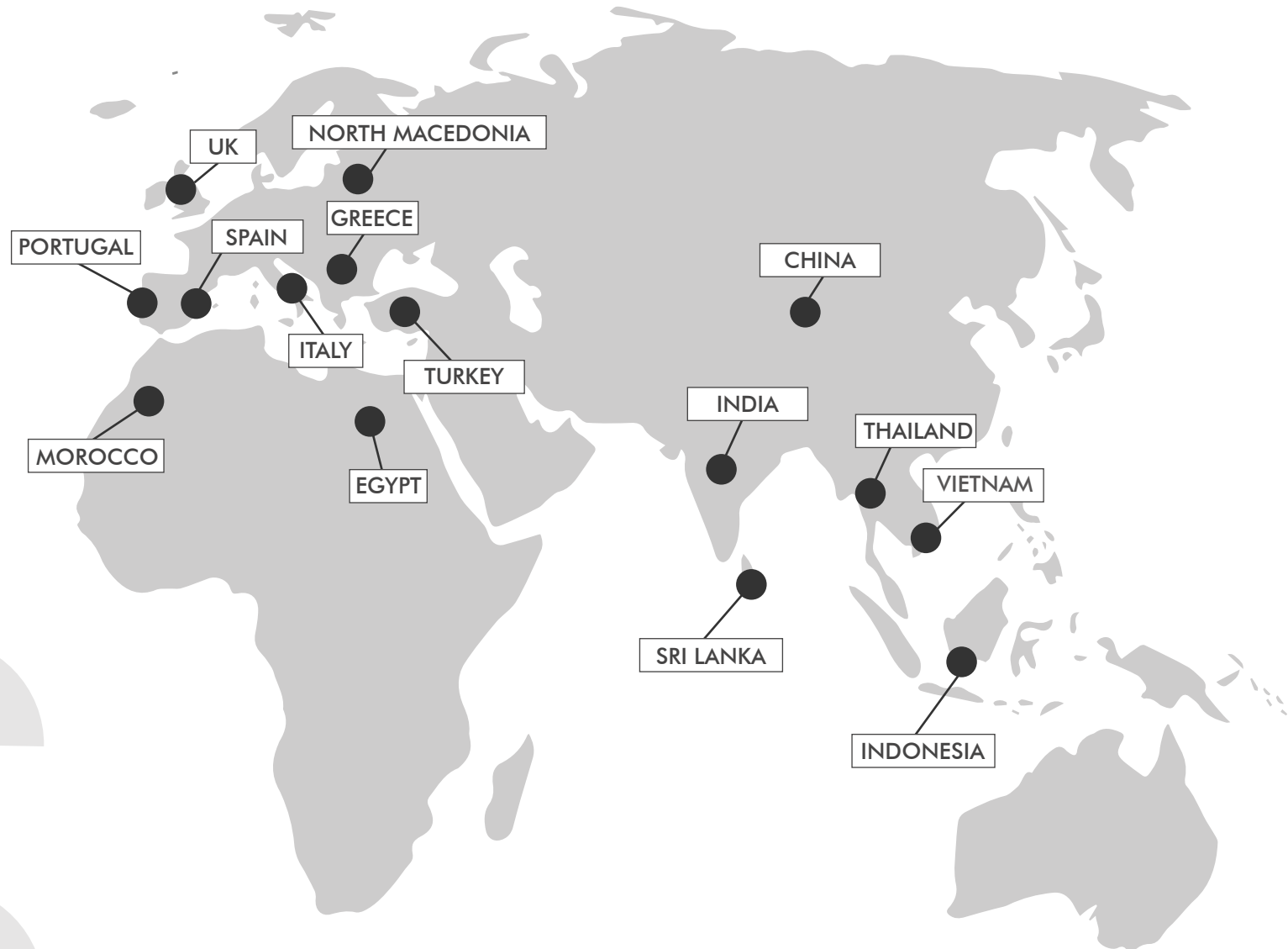


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Suppliers

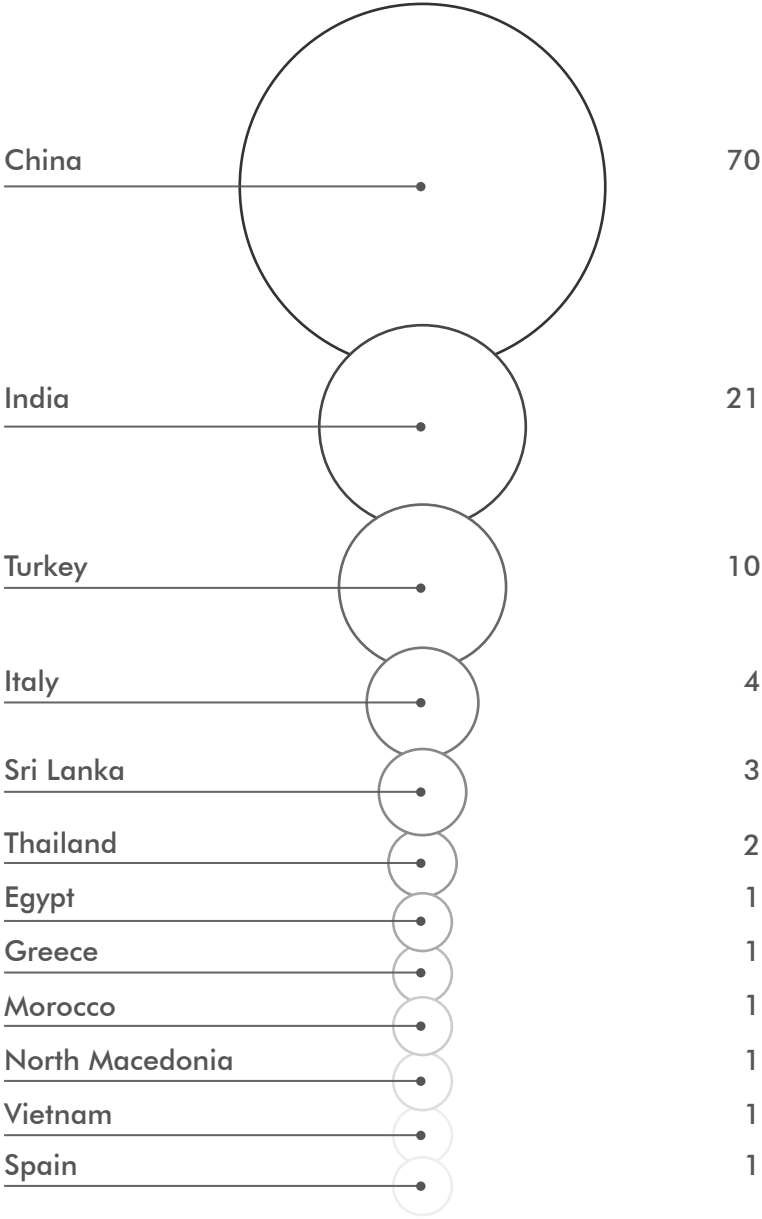
Home & Gift



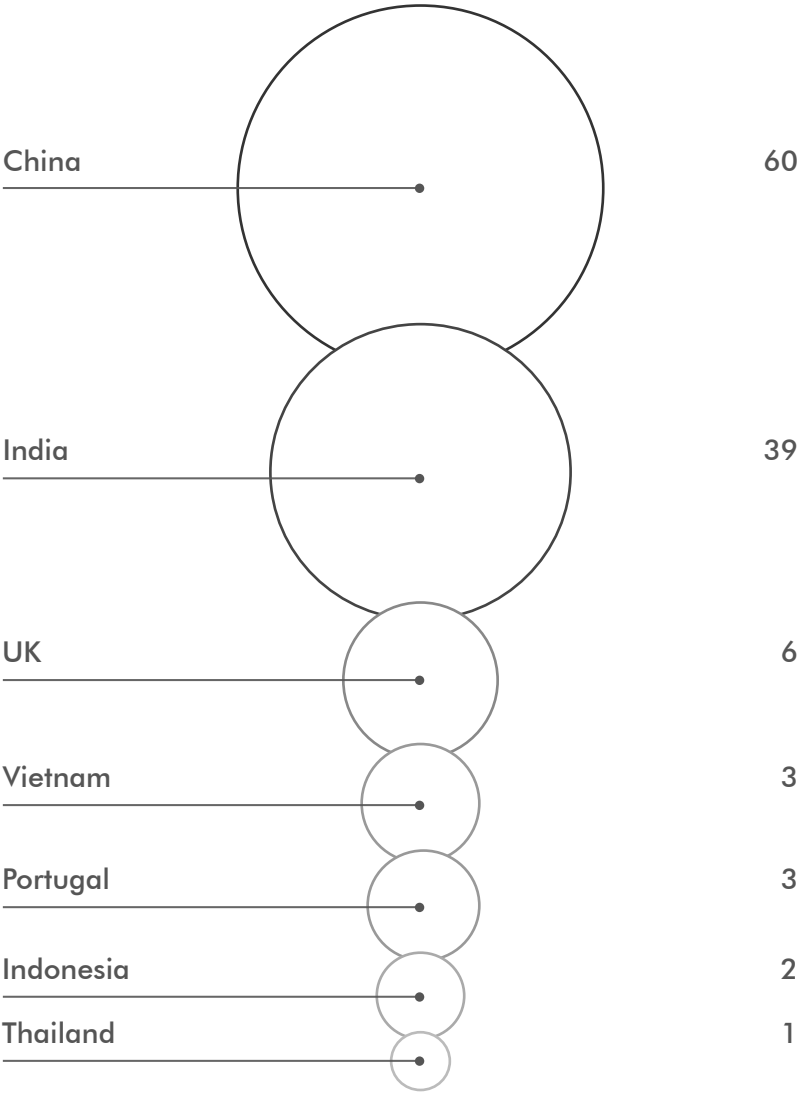
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Suppliers



Fashion Country Divide



Home and Gift Country Divide



Policy Framework

Our Supplier Code of Conduct sets out the minimum labour standards expected of suppliers producing Oliver Bonas own brand products.

It is based on the ETI Base Code and the principles of the International Labour Organization, including:

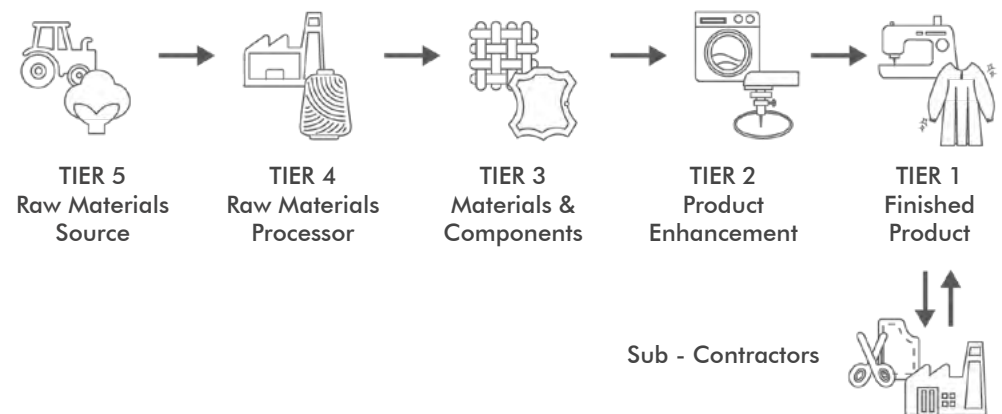
- ① Freely chosen employment
- ② Freedom of association and collective bargaining
- ③ Safe and hygienic working conditions
- ④ No child labour
- ⑤ Payment of wages
- ⑥ Reasonable working hours
- ⑦ No discrimination
- ⑧ Regular employment
- ⑨ No harsh or inhumane treatment.

We continue to support this framework with specific policies and guidance covering:

- Anti-slavery and human trafficking
- Responsible cotton sourcing
- Foreign migrant workers
- Homeworkers
- Child labour
- Freedom of association and collective bargaining
- Transparency of production

Suppliers are expected to review and acknowledge relevant policies through our supplier portal and to cascade expectations through their own supply chains. We know that having policies is not the same as demonstrating effective implementation. Our focus for 2025 is therefore on making policies more practical for suppliers and internal teams, improving evidence that suppliers understand and apply our expectations, and identifying where specific salient risks may need clearer guidance or stronger follow-up.

Supply chains can be simple or complex. This example of a simple supply chain shows how we define tiers 1-5:



Risk assessment:

We recognise that audits alone are not enough and continue to strengthen supplier relationships and capacity building, worker engagement and supplier dialogue. Stakeholder input remains an area to strengthen.

We use a variety of resources and tools to gather risk data including internal knowledge & expertise:

- The SEDEX Radar Assessment tool (which uses hundreds of different data sources)
- Human rights research reports published by NGOs & consultancy firms including but not limited to BSR, Human Rights Watch, Clean Clothes Campaign, Universal Human Rights Index (UHRI), the Asia Foundation and the International Labour Organisation (ILO)
- Verite's responsible sourcing tool
- The Ethical Trading Initiative forums, risk updates and working groups

But we need clearer evidence of worker, worker representative or trade union input into policies and processes.

Freedom of association and collective bargaining are included in our Supplier Code of Conduct. We are not yet able to report comprehensive trade union presence across supplier sites, and improving this remains part of our transparency work.

Trade union and worker committee presence is reported in factory audits, but we are acutely aware of the difference between well managed and effective worker committees and sites that implement the minimum in order to comply with customer or legislative expectations.

Our due diligence combines:

Supplier onboarding, risk assessment, audit and assessment data, supplier self-assessments, country and sector risk intelligence, purchasing practice insight, worker voice, supplier engagement remediation tracking.

In our own operations, it includes recruitment controls, right-to-work checks, payroll verification, working time monitoring, Speak Up routes, agency oversight and line manager accountability.

Risk indicators include:

Country, product type, production process, migrant or temporary labour, subcontracting or homework, audit findings, supplier transparency, spend order patterns, capacity and visibility beyond tier one.

Salient human rights and modern slavery risks:

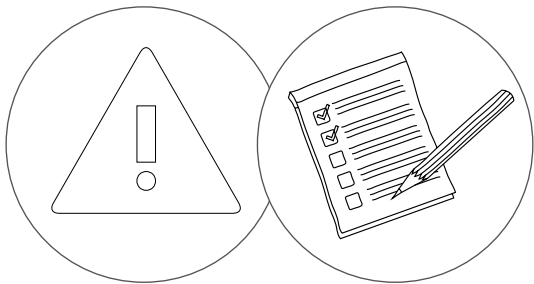
We assess salient risks by considering the severity and likelihood of harm to people. Priorities include forced labour, excessive working hours, wage non-compliance and low wages, restrictions on freedom of association, discrimination and harassment, unsafe conditions, risks to migrant, agency, temporary, homemaker and refugee labour, child labour risks in lower tiers, and raw material traceability.

We are working to better understand root causes, including how our own practices may contribute to risks. Late changes, short lead times, inaccurate forecasting, price pressure or poor subcontracting visibility can contribute to excessive overtime, wage pressure or production moving to less visible sites.

Our salient risk tables use data obtained from the most recent social audit at Tier 1 factories supplying Oliver Bonas in 2025. Factory audits were conducted in 2024/25.

We are mindful of limitations to audit data. They are a snapshot in time and may not always reflect the true conditions at a site. Audits are conducted on a semi-announced or unannounced basis, by independent specialists trained in identifying risk to workers and include physical attendance on site and worker interviews so can be useful in understanding risk.

Any audit non-compliances that contribute to the risk indicators in the salient risk tables are subject to corrective action plans. We work with factories on an individual basis to address these.



Salient Risk Table Descriptions:

Risk	Description
Freedom of association and collective bargaining ETI base code clause 2 and ILO conventions C87, C98, C135, R143, C154	The right of workers and employers to freely form or join organisations that promote and defend their interests at work, without interference from one another or the State. A voluntary process through which employers, and trade unions (or in their absence, workers’ representatives) discuss and negotiate their relations and interaction at the workplace, such as pay and other terms and conditions of work.
Employment is freely chosen, no forced labour ETI base code clause 1 and ILO conventions C29, C105	There must be no forced or compulsory labour in any form, including bonded, indentured, trafficked, or prison labour and overtime must be voluntary.
No discrimination is practiced ETI base code clause 7 and ILO conventions C100, C111, R111	No discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
Working hours are not excessive ETI base code clause 6 and ILO conventions C1, C30, C106, C14	Working hours and rest time that comply with national law, the ETI base code or collective bargaining agreements — whichever affords greater protection to the worker.
Living wages are paid ETI base code clause 5 and ILO conventions C131, C95	Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

Salient Risk Table

Risk	Where is risk most likely	Policies and action	Risk Indicators/ KPI's*
Freedom of association and collective bargaining ETI base code clause 2 and ILO conventions C87, C98, C135, R143, C154	In our own operations and in our manufacturing supply chains. Especially China, India and Turkey. Vulnerable groups include union members and representatives, labour activists, students, migrant and temporary workers.	Supplier Code of Conduct and Freedom of Association and Right to Collective Bargaining Policy. Suppliers are asked to review and sign before entering a business relationship with us. We encourage factories to implement worker committees, initially focused on H&S to promote worker-management dialogue. A non-retaliation letter should be posted in factories, a template is available for them in our supplier portal, and we provide an email address at OB for workers to contact us should those rights not be upheld. We are working with the key supplier programme to drive effectiveness of H&S committees for general worker-management dialogue and monitoring grievance mechanism effectiveness via anonymous worker surveys.	90% Tier 1 factories with worker representation structures 12% Tier 1 factories with worker H&S committee * See previous page for salient risk data considerations.
Employment is freely chosen, no forced labour ETI base code clause 1 and ILO conventions C29, C105	In our supply chains, especially beyond tier one, in key sourcing countries China, India and Turkey. In our operations in the UK. Vulnerable groups include home workers, migrant workers, young workers, female workers, cotton pickers, refugees, minority groups and agency/ temporary workers.	Homeworker Policy and Homeworker Guidelines - Tools and Forms. We encourage transparency and effective systems to manage homeworkers. Foreign Migrant Worker Policy to support suppliers and ensure systems are put in place to protect these at-risk workers. Anti slavery and Human Trafficking Policy. All suppliers sign our Cotton Sourcing Policy and must declare cotton country of origin (region of origin if China), before products are signed off. We continue to work with other brands and industry groups to monitor this situation. We are exploring anonymous worker surveys as a tool to identify circumstances which could indicate complex risks such as forced labour. We believe risks are more prevalent downstream in the supply chain, so we continue our focus mapping and monitoring beyond Tier 1.	75% Fashion suppliers mapped to materials/components * See previous page for salient risk data considerations.
No discrimination is practiced ETI base code clause 7 and ILO conventions C100, C111, R111	In our supply chains, especially in China, Turkey and India. Vulnerable groups include ethnic minorities or indigenous people, migrant workers, female workers, those with disabilities.	Supplier Code of Conduct. A site's capacity for preventing and managing discrimination is assessed during their social audit, Independent auditors will review the site's policies and procedures, assessing whether they cover the needs for all workers to be treated equally in all matters of employment. We are monitoring the ratio of female workers in supervisory roles to identify risk areas and opportunities to work with factories to strengthen representation.	33% females in managerial, supervisory or admin roles 72% female representation score * See previous page for salient risk data considerations.
Working hours are not excessive ETI base code clause 6 and ILO conventions C1, C30, C106, C14	In our supply chains, especially in China, India and Vietnam. Vulnerable groups include all production workers, especially migrant workers.	Supplier Code of Conduct. We conducted a supplier survey in Oct 2022 and delivered dedicated training on responsible purchasing practices to all product teams in 2023. The survey benchmarked us above industry average on all indicators but also helped highlight opportunities for improvement. Product teams were retrained on ethical sourcing and responsible purchasing practices in Q1 2026 so we ensure our practices are not putting additional pressure on the factory. We encourage suppliers to be transparent about working hours so we can discuss root causes if issues arise.	5 factories had occurrences of 7 consecutive days working 68: average monthly overtime hours worked in China * See previous page for salient risk data considerations.
Living wages are paid ETI base code clause 5 and ILO conventions C131, C95	In our supply chains, especially in China, India and Turkey where the legal minimum wage is significantly less than the defined living wage. Vulnerable groups include migrant workers, home and female workers.	Supplier Code of Conduct, workers wages are assessed as part of our factory monitoring programme. Independent auditors review working hours records, production records and interview workers to verify wages and hours via this method called triangulation, designed to spot inconsistencies. We are looking at factory management training as part of our China Landscape Assessment in collaboration with other brands. Training could include living wage gap analysis and ensuring all payments are made digitally to enable monitoring.	1% factories had a non-compliance relating to non-payment of local minimum wage 59% workers receive all wage payments by bank transfer * See previous page for salient risk data considerations.

Emerging Risks for 2025

① Migration, recruitment fees and debt bondage

Migrant and temporary workers may be more exposed to recruitment fees, document retention, poor accommodation, limited access to grievance mechanisms and dependency on labour intermediaries.

② Geopolitical and state-imposed forced labour risks

Forced labour concerns linked to specific regions, raw materials and sectors require ongoing traceability work, particularly where cotton or other higher-risk inputs are involved.

③ Climate-related disruption

Extreme weather, water stress and disrupted livelihoods can increase vulnerability to exploitative recruitment, informal work and unsafe working conditions.

④ Subcontracting and informal production

Capacity constraints, short lead times or specialist processes can increase the risk of production being moved to undeclared sites, including informal workshops or homeworker settings.

⑤ Digital and platform-enabled recruitment

Online recruitment and informal messaging channels can make it harder to identify abusive recruitment practices, misleading job offers or worker isolation.

⑥ Gender-specific risks

Women workers may face heightened risks of discrimination, harassment, limited progression, inadequate representation and barriers to raising concerns safely.

⑦ Increased pressure on wages and working hours

Inflation, volatile order patterns and cost pressure can increase the risk of excessive overtime, underpayment of wages or unauthorised subcontracting.

⑧ Regulatory and stakeholder expectations

Evolving UK and international expectations are increasing the need for transparent disclosure, evidence of practical action, stronger risk-based due diligence and clear remediation.

Monitoring and Remediation

At each stage of our supply chain, there are risks which need to be managed. All factories producing Oliver Bonas products are subject to ethical trade assessments through either regular audits delivered by independent third parties, visits by the Oliver Bonas team or smaller more artisanal producers, via self-assessment and direct engagement. Audits must cover the ETI base code principles and local law requirements.

Where issues are identified, our preference is to work with suppliers to understand root causes, agree time-bound corrective action plans and support meaningful remediation. We will consider exiting a supplier relationship where there is no willingness to improve, where serious harm cannot be prevented or remediated, or where continued trading would increase risk to workers.

In 2025, we continued to develop our worker voice programme. Our anonymous worker survey programme in collaboration with direct worker engagement and human rights due diligence specialists, &Wider, covered eight Key Supplier factories in China, India, Turkey and Vietnam, with 340 worker responses and a 56% response rate. We also continued to participate in the China Landscape Assessment with two other brands, which reached 416 workers with a 38% response rate.

The China Landscape Assessment surveyed 1,096 workers from 13 factories across four provinces supplying to three UK high street clothing brands, twice. The results were collated, to look for indicators by region. The findings highlighted risks around living wage, adequate rest breaks and feeling confident to report issues safely. We will use this insight to shape a collaborative training programme for suppliers, helping them understand the benefits of addressing these concerns to improve worker wellbeing. We also continue to engage product teams on responsible purchasing practices.

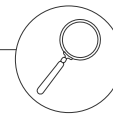
To better understand and validate worker feedback, we review participation rates, response consistency between survey cycles, alignment with audit findings, and differences between worker groups. We also monitor indicators of worker engagement and workplace culture, such as whether feedback is

encouraged, worker-only meetings are permitted, workers feel positive about their work and colleagues, and managers treat workers with respect. Findings are discussed with suppliers, follow-up actions are agreed, and results are triangulated where possible through site visits, grievance data, and social audits.

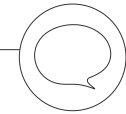
Our worker survey pilot with Key Suppliers has proven valuable so far. After two survey cycles, we met two Key Supplier factories in person to review learnings. Small practical changes, such as faster escalation through a group chat linking management, supervisors and maintenance teams, plus more regular worker engagement and training for all workers had delivered measurable improvements to worker morale and sentiment.

We recognise that anonymous surveys are useful but do not replace legitimate worker representation, trade union engagement or effective grievance mechanisms. We are also reviewing whether supplier grievance mechanisms are trusted, accessible and aligned with UNGP effectiveness criteria. Our visibility is currently stronger on whether mechanisms exist than on whether workers trust and use them.

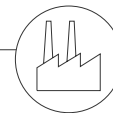
KPIs:



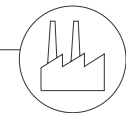
1,606 workers surveyed



42% average response rate



12 factories conducted
anonymous worker surveys



1 factory was unable to verify
working hours and wages due
to inconsistent record keeping

Case Study

Remediation of excessive working hours risk in Turkey

In 2025, a subcontracted garment washing and cutting facility in Turkey was identified as high risk through a SMETA audit, with excessive working hours of up to 16.5 hours per day and rest periods as low as five hours. We paused new orders, visited the site, reviewed root causes with management and agreed a corrective action plan focused on reducing overtime, improving production planning, strengthening timekeeping, protecting rest periods and using worker-level data for monitoring.

The supplier appointed a production planning manager, invested in additional machinery and improved oversight of working hours. A follow-up SMETA audit in November 2025 showed significant improvement, including reduced overtime and no recurrence of critical rest-period breaches. The site was removed from the high-risk category, and business was able to resume.

This case does not remove the wider risk of excessive overtime in the sector, but it has reinforced the importance of earlier capacity conversations, responsible purchasing practices, worker-level data and sustained follow-up after audit closure.



Monitoring and Remediation

Priority	Planned action	Intended Outcome	Success Measure
Supply chain visibility	Continue mapping tier two and higher-risk upstream sites, with focus on cotton, subcontracting, product enhancement, specialist processes and informal supply chains such as home workers.	Improved understanding of where the highest risks to workers sit beyond tier one.	Percentage of supply chain with visibility to material origin. Percentage of tier 1 and tier 2 covered by audits or assessment. workers sit beyond tier one.
Emerging risk response	Refresh the supplier risk assessment to include 2025 emerging risks such as climate disruption, informal recruitment, wage pressure and undeclared subcontracting.	More targeted prioritisation of supplier engagement and monitoring.	Updated resources communicated internally and to suppliers.
Worker voice	Review findings from direct feedback surveys with suppliers. Prioritise follow-up on wage adequacy, worker fatigue, safe reporting of concerns, grievance systems, overtime and rest-period compliance.	More direct insight from workers, including 340 responses from the 2025–26 direct feedback survey and 416 responses through the China Landscape Assessment, with clearer supplier follow-up on living wage gaps, purchasing practice influence, grievance effectiveness, overtime and rest between shifts.	Number of supplier meetings held to discuss worker feedback and establish improvement plans. Reduction in negative responses. Training and engagement in collaboration with wider industry.
Responsible purchasing	Continue internal engagement with buying, merchandising, design and technical teams on responsible purchasing practices and production planning.	Reduced risk that commercial practices contribute to excessive overtime, unauthorised subcontracting or wage pressure.	Ensuring all relevant team members attend responsible purchasing practices training. Achieving positive feedback through scorecards and surveys.
Own operations controls	Continue strengthening right-to-work checks, imposter checks, payroll verification, working time monitoring, agency oversight, Speak Up awareness and third-party risk controls.	Reduced risk of labour exploitation within our direct operations and stronger evidence of preventative controls.	Speak Up reporting trends. Successful agency compliance reviews. No significant breaches identified.
Supplier capability	Use the supplier portal and Key Supplier Programme to share practical guidance, policy updates and expectations on high-risk topics and third-party risk controls.	Stronger supplier ownership of human rights due diligence and remediation.	Number of Key Supplier meetings held. Percentage of suppliers engaging with new resources on the supplier portal.

Looking Forward

ETI-aligned objectives and areas for improvement

Our next stage of work will focus on practical improvements in supplier transparency, lower-tier mapping, disaggregated risk data, worker and stakeholder input, purchasing practices, grievance and remedy, and better evidence of outcomes for workers. We recognise that some of this will take more than one reporting cycle.

Measuring effectiveness

We measure effectiveness through indicators such as supplier scorecard scores, Code of Conduct sign-off, factory assessment coverage, audit findings and closure, worker feedback participation, grievance trends, training completion, supplier engagement, mapping progress and evidence of improved supplier management systems.

In our own operations, we monitor right-to-work and imposter checks, payroll verification, working time records, Speak Up and whistleblowing routes, agency compliance and relevant training completion.

We recognise that the absence of identified forced labour findings does not mean there is no risk. Modern slavery is often hidden and may not be identified through audit alone. Our approach therefore focuses on continuous improvement, triangulating data sources, encouraging transparency, building supplier trust and strengthening routes for workers to raise concerns safely.

For worker voice, we will track participation, response rates, themes raised, supplier follow-up and whether actions lead to clearer grievance routes, better working-hours controls, improved understanding of wage adequacy and stronger review of purchasing practices.

Training and internal engagement

Training remains important to embedding responsible business practice. We will continue to train relevant teams on modern slavery indicators, ethical sourcing requirements, responsible purchasing, escalation routes and the role different functions play in preventing harm.

All product designers, buyers, technologists and quality control teams were offered Ethical Sourcing Refresher training, covering the importance of decent working conditions, minimum requirements for factories, worker risks, production processes and responsible purchasing practices – a series of three sessions that reminds them of the people making our products and how we must work collaboratively to leverage continuous improvement.

Collaboration and transparency

We continue to value collaboration with suppliers, peer brands, industry bodies, multi-stakeholder initiatives and civil society organisations. Collaboration helps us share learning, increase leverage, understand complex risks and support practical solutions that individual businesses may not be able to deliver alone.



Transparency remains central to our approach. We will continue to maintain and improve supplier-facing resources, engage openly with suppliers on risk and remediation, and strengthen future reporting so that stakeholders can understand not only the policies we have in place, but also the actions we are taking, the progress we are making and the areas where we still have work to do.