

A group of young people, including men and women of various ethnicities, are sitting and standing on a concrete ledge in front of a multi-story brick building. They are wearing casual clothing, including t-shirts and shorts. The scene is outdoors, and the building has several windows and air conditioning units. The overall tone is urban and youthful.

MODERN SLAVERY STATEMENT MODERN SLAVERY STATEMENT MODERN SLAVERY STATEMENT

JD Group

JD Sports Fashion Plc
Modern Slavery Statement 2025/26

Modern Slavery Act Transparency Statement

JD Sports Fashion plc ("Group", "JD", "JD Group", or "We") recognises the importance of ethical sourcing and working to prevent modern slavery and human trafficking throughout our organisation and in our supply chain, both manufacturing and through our goods not for resale contractual agreements.

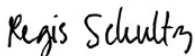
Human rights abuse allegations are taken seriously. We aim to protect individuals within both our own organisation, and our supply chains. We recognise that modern slavery has many causes and takes different forms across the globe.

Our Group Modern Slavery Transparency Statement is made pursuant to Section 54 (SB657). of the Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010.

The Group sets out our standards, policies and processes aimed to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. The JD Group definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

JD Sports Fashion Plc has operations overseas and this statement acts as our intent to comply with the following acts:

- Dutch Child Labour and Due Diligence Act
- German Act on Corporate Due Diligence In Supply Chains
- The French Corporate Duty of Vigilance Bill



Regis Schultz

Chief Executive Officer

Date 28/07/26



Dominic Platt

Chief Financial Officer

Date 28/07/26



Modern Slavery Act

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About Us

Our Business

Established in 1981 with a single store in the North West of England, the JD Group is a leading global Omnichannel retailer of Sports Fashion and Outdoor brands.

As of February 1st, 2025, the Group has 4,850 stores across 49 countries (including franchises and joint ventures) with a strong presence in the UK, Europe, North America and Asia Pacific.

Our Headquarters are in Bury, UK, with additional offices supporting our businesses in the USA, Canada, France, Spain, Poland, Malaysia, and Australia.

Our Modern Slavery statement focuses on the two key areas under our operational control – the Private Label products we sell, and our own operations, such as warehouses where we hold stock.

The Products We Sell:

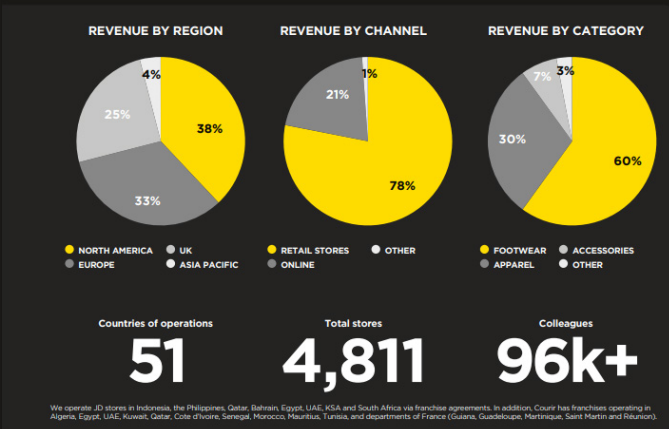
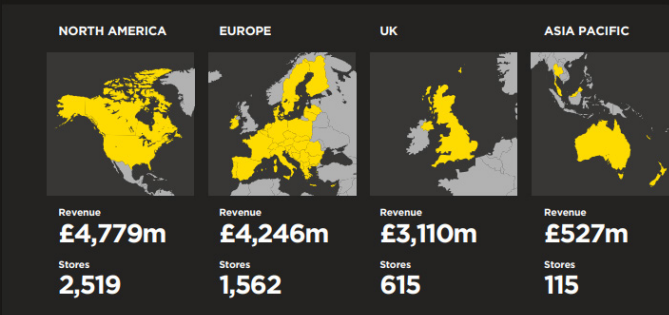
Group sales of branded sports fashion are made via two primary sources:

- Our third-party brand partners. Over 90% of sales are from globally recognised brands including Nike, Adidas, New Balance, Puma and The North Face. Our brand partners manage their supply chains.
- The balance of product sales are from quality private label brands managed and sourced by the Group, including McKenzie, Technicals and Unlike Humans. For private label, JD manages the supply chain.

Our Operations:

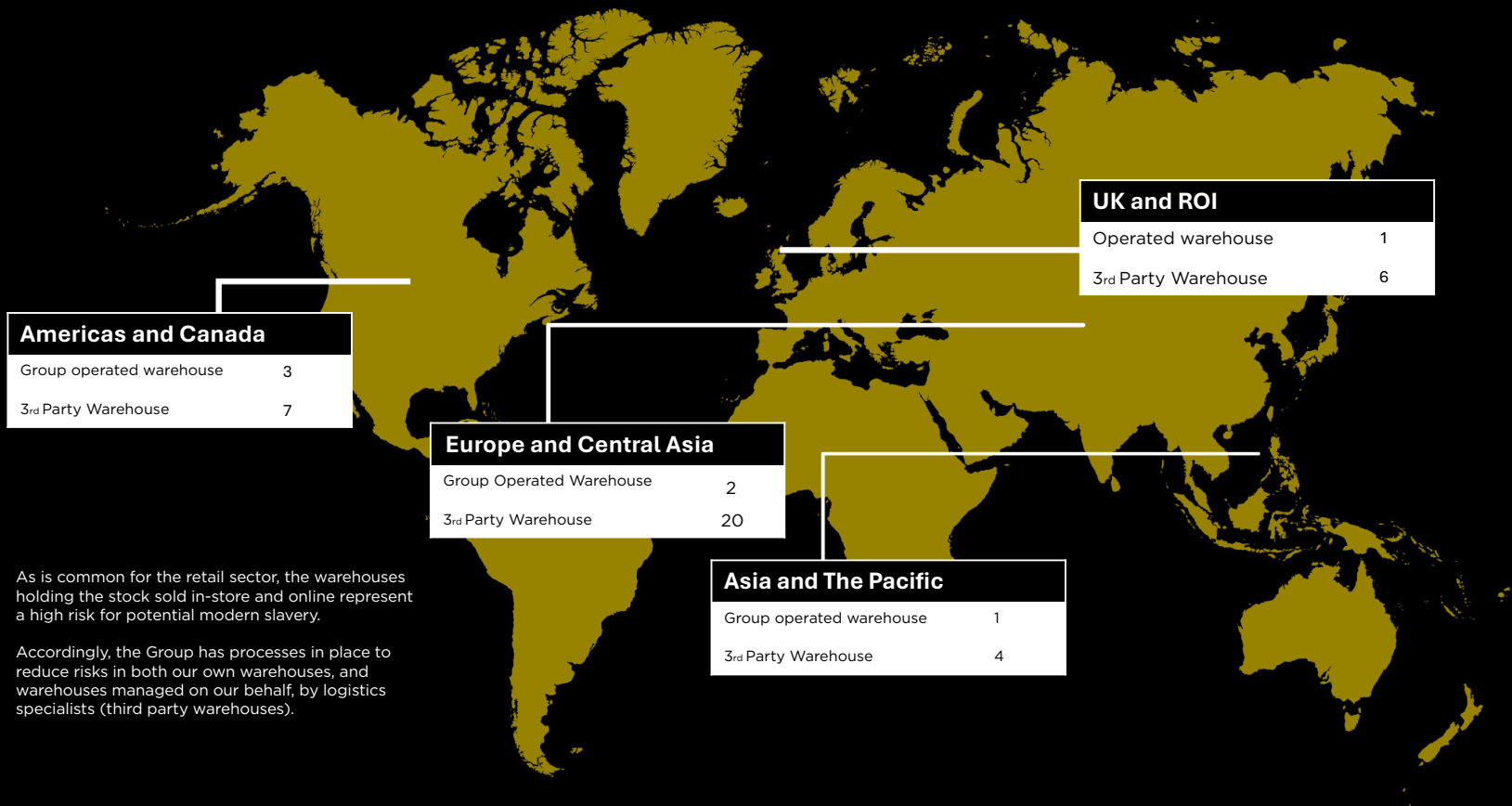
- The Group uses warehouse facilities to distribute goods to both our retail stores, and online customers.
- Our largest warehouse is located in Rochdale, UK, with additional warehouses in Europe, North America, and the Asia-Pacific region.

Our Markets



Organisational Structure

Operations - Our Warehouses



As is common for the retail sector, the warehouses holding the stock sold in-store and online represent a high risk for potential modern slavery.

Accordingly, the Group has processes in place to reduce risks in both our own warehouses, and warehouses managed on our behalf, by logistics specialists (third party warehouses).

Risks & Due Diligence

Our Operations

Due diligence undertaken within our own operations during the period included assessing and mitigating risks in our head office, warehouses, our stores, and across our GNFR supplier base.

OUR OPERATIONS - WAREHOUSES



Risk area – recruitment, including:

Workers from third-party agencies
Policies relating to recruitment
Specific worker status/checklists

Key mitigations in the period:

We reduced the number of agency workers used
Appointed and trained 'welfare champions'
Conducted agency labour audits
Audited warehouse recruitment files

GOODS NOT FOR RESALE



Risks include:

Lack of modern slavery awareness from small (<£30m) suppliers
Sub-contracted services

Key mitigations:

All new GNFR suppliers to the UK and UK-managed businesses are issued with the Ethical Code of Practice and policies relevant to modern day slavery form part of the tender documents.

OUR STORES



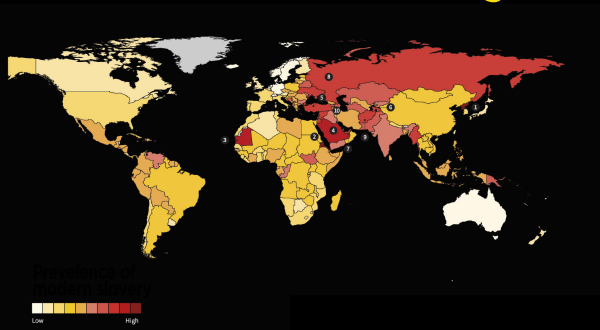
Key mitigations:

New colleague training
Increased focus on modern slavery indicators

Defining Modern Slavery

Modern Slavery - A Global Issue

Most People Are Living In Modern Slavery



On any given day in 2021 there were:

10 Million increase since the 2018 index

50 Million People Living in Modern Slavery

28 Million In **FORCED LABOUR**

22 Million In **FORCED MARRIAGE**

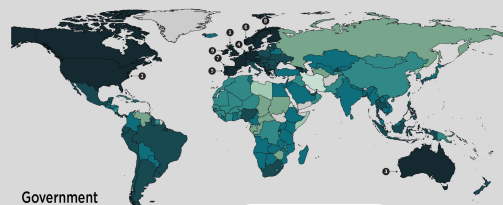
12 Million In **CHILDREN**

Highest Prevalence

- 1 North Korea
- 2 Eritrea
- 3 Mauritania
- 4 Saudi Arabia
- 5 Turkey
- 6 Tajikistan
- 7 United Arab Emirates
- 8 Russia
- 9 Afghanistan

Lowest Prevalence

- 160 Switzerland
- 159 Norway
- 158 Germany
- 157 Netherlands
- 156 Sweden
- 155 Denmark
- 154 Belgium
- 153 Ireland
- 152 Japan



Afghanistan, Palestine, South Sudan, Syria and Yemen have been excluded due to ongoing conflict and extreme disruption to government function

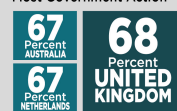
Most Action

- United Kingdom
- Australia
- Netherlands
- Portugal
- United States
- Ireland
- Norway
- Spain
- Sweden

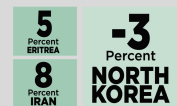
Least Action

- North Korea
- Eritrea
- Iran
- Libiya
- Somalia
- Equatorial Guinea
- Russia
- Gabon
- Chad

Most Government Action



Least Government Action



Governments Are not taking enough **Action**

Defining Modern Slavery

Our Business

Before summarising our policies and management frameworks to reduce and prevent modern slavery, it is important to recap on the key definitions of modern slavery, and the areas of highest risk.

What is Modern Slavery?

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including.

Defined in the 1926 Slavery Convention as the status or condition of a person whom any or all of the powers attaching to the right of ownership are exercised. In a later treaty, states agreed that there are also certain "slavery-like practices": debt bondage, forced or servile marriage, sale or exploitation of children (including in armed conflict) and descent-based slavery.

Human Trafficking

Defined by the UN Trafficking in Persons Protocol as involving recruitment, transportation, transfer, harbouring or receipt of a person by means of threat or use of force or other forms of coercion with the intent of exploiting that person for sexual exploitation, forced labour or slavery, among other forms.



Forced Marriage

Any situation where persons, regardless of age, have been forced to marry without their free consent.



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Worst Forms of Child Labour

Drawing on the 1999 Convention on Worst Forms of Child Labour, it includes situations where children are; exploited through slavery or slavery-like practices, including forced recruitment of children for use in armed conflict; used, procured, or offered for illicit activities, including prostitution and trafficking of drugs; engaged in hazardous work which may harm their health, safety or morals.



Forced Labour

Status or condition where one person has pledged their labour or services (or that of someone under their control), in circumstances where the fair value of that labour or service is not reasonably applied to reducing the debt or length of debt, or the length and nature of the service is not limited or defined.



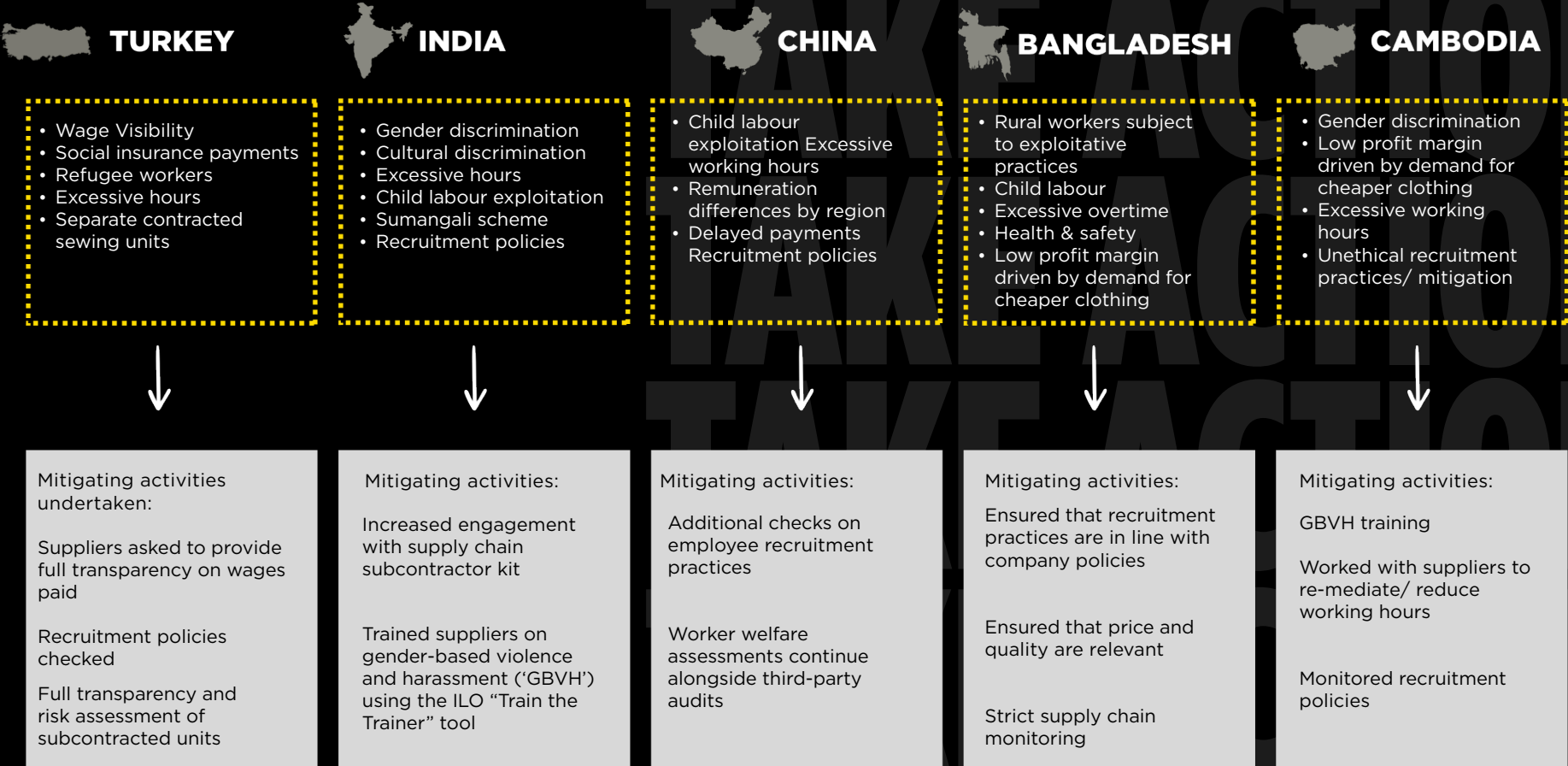
One World
One Market
One Objective
Identify & Work to
Eradicate Modern Slavery

Focusing On Risk
Private Label - Territory Risk Analysis

Focusing On Risk

Modern slavery risks differ based on geography and culture.

Examples of territory-specific risks identified within our private label supply chain include the following:



Policy & Framework

Code of Conduct – Key areas

Our Code of Conduct is embedded into the Ethical Code of Practice, used for both our private label suppliers, and Goods Not for Resale (GNFR) suppliers working across our own operations

EMPLOYMENT RELATIONSHIP

Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national and international labour and social security laws and regulations.

NON-DISCRIMINATION

No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination, or retirement, based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

HEALTH, SAFETY & ENVIRONMENT

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or because of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

FORCED LABOUR

There shall be no use of forced labour, including prison labour, indentured labour, bonded labour, including withholding identity documents and restricting free movement

CHILD LABOUR

No person shall be employed under the age of 15 or under the age for completion of compulsory education, whichever is higher.. "Any persons less than 15 years of age unless the local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. however, the local minimum wage is 14 years of age, this lower limit will apply as per the O exceptions for developing

EMPLOYER PAYS PRINCIPLE

No worker/employee should pay for a job - the cost of the recruitment should be paid not by the worker, but by the employer.

HOURS OF WORK

Employers shall not require workers to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. The regular work week shall not exceed 48 hours. Employers shall allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime work shall be consensual.

HARASSMENT OR ABUSE

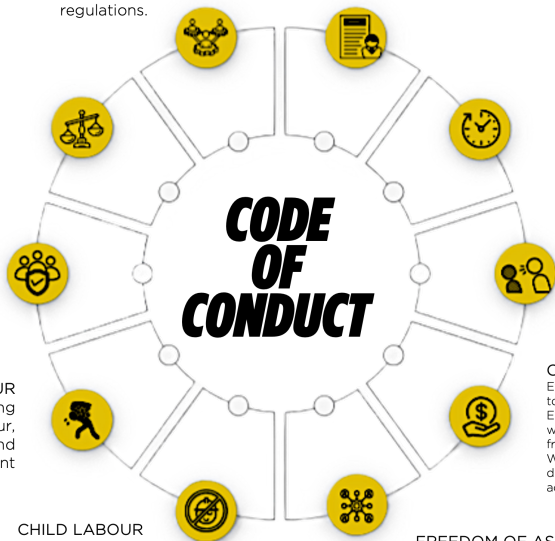
Every employee shall be treated with respect and dignity. No employee shall be subject to any physical, sexual, psychological, or verbal harassment or abuse.

COMPENSATION

Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's basic needs and provide some discretionary income. Employers shall pay at least the minimum wage or the appropriate prevailing wage, whichever is higher, comply with all legal requirements on wages, and provide any fringe benefits required by law or contract. Where compensation does not meet workers' basic needs and provide some discretionary income, each employer shall work with the FLA to take appropriate actions that seek to progressively realize a level of compensation that does

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Employers shall recognize and respect the right of employees to freedom of association and collective bargaining



We will not tolerate, nor will we condone, abuse of human rights within any part of our business or supply chains. Any allegations that human rights are not respected will be investigated, with appropriate action taken by the Group if the allegation is substantiated

TAKE ACTION

Policy & Framework

Our Approach & Commitment

Modern slavery is a risk for every business. Modern slavery and human trafficking are complex, often hidden issues that can affect any sector, geography, or supply chain. As a global retailer with diverse operations and supplier networks, JD Group recognises that these risks are not remote; they are an inherent consideration in how we operate and source our products.

We therefore take a proactive, risk-based approach, embedding safeguards across our business to identify, prevent, and address potential risks wherever they may arise.

Our Commitment

JD Group is committed to continuously strengthening its response to modern slavery across both its own operations and private label supply chains.

We go beyond our Ethical Code of Practice and Code of Conduct, implementing additional controls to help protect workers and uphold labour rights in the UK and internationally.

Policy Framework & Governance

Our Modern Slavery Policy sets out clear expectations for preventing forced labour and human trafficking across our business and supply chains.

We regularly review and evolve our policies, processes, and controls to ensure they remain effective in addressing emerging risks, regulatory developments, and stakeholder expectations.

Risk Management in our Operations

We recognise that risks can arise within our own activities, particularly in areas such as temporary and agency labour.

We therefore conduct ongoing risk assessments, engage regularly with third-party labour providers, and monitor recruitment practices in higher-risk areas to ensure alignment with our standards.

Private Label Supplier Engagement

Modern slavery risks can also exist deep within extended supply chains. We work closely with our suppliers to strengthen transparency, build awareness, and promote responsible labour practices. This includes reinforcing expectations on ethical standards, due diligence, and compliance with local laws in the countries where our suppliers operate.

Training & Awareness

Building awareness is critical to prevention. We provide training to colleagues and suppliers to help them recognise the signs of modern slavery, understand potential risks, and take appropriate action.

We go beyond our Ethical Code of Practice and Code of Conduct, implementing additional controls to help protect workers and uphold labour rights in the UK and internationally.

Working Together

Addressing modern slavery requires collaboration. By working with employees, suppliers, and wider stakeholders, we aim to drive continuous improvement and contribute to the eradication of exploitation from our operations and supply chains.

18,409

**COLLEAGUES COMPLETED
MODERN DAY SLAVERY
TRAINING**

Feb 2024 – July 2026 (UK Head Office and UK DC)

Policy & Framework

Our Approach & Commitment

Policy Commitment

We have adopted a Modern Slavery Policy that sets out our commitment to preventing modern slavery, including human trafficking and forced labour in all aspects of our business activities both in the UK and overseas.

Own Operational Risk

We conduct regular meetings with 3rd party labour providers to identify and evaluate the risk of modern slavery within our own direct operations in the UK and monitor their recruitment processes to ensure they align with our business.

Supplier Engagement

We work with our Private Label suppliers to promote awareness of modern slavery risks in their own supply chain and embed adherence to ethical standards and in-country legislation, in line with our own policies.

Due Diligence

We maintain robust due diligence processes to assess and monitor our suppliers' compliance with our Modern Slavery Policy and applicable laws and regulations

Training and Awareness

We provide training and awareness programmes for our employees and suppliers to educate them about the signs of modern slavery and their responsibilities in preventing its occurrence, considering at all times the importance of applying responsible purchasing practices.

Our Commitment

JD is committed to continuously improving our efforts to combat modern slavery and human trafficking. We will regularly review and update our Modern Slavery Policy, practices and procedure to reflect evolving best practices, regulatory requirements and stakeholder expectations. Together, with our employees, suppliers and stakeholders, we will work towards a future where every individual is free from the scourge of modern slavery and exploitation.



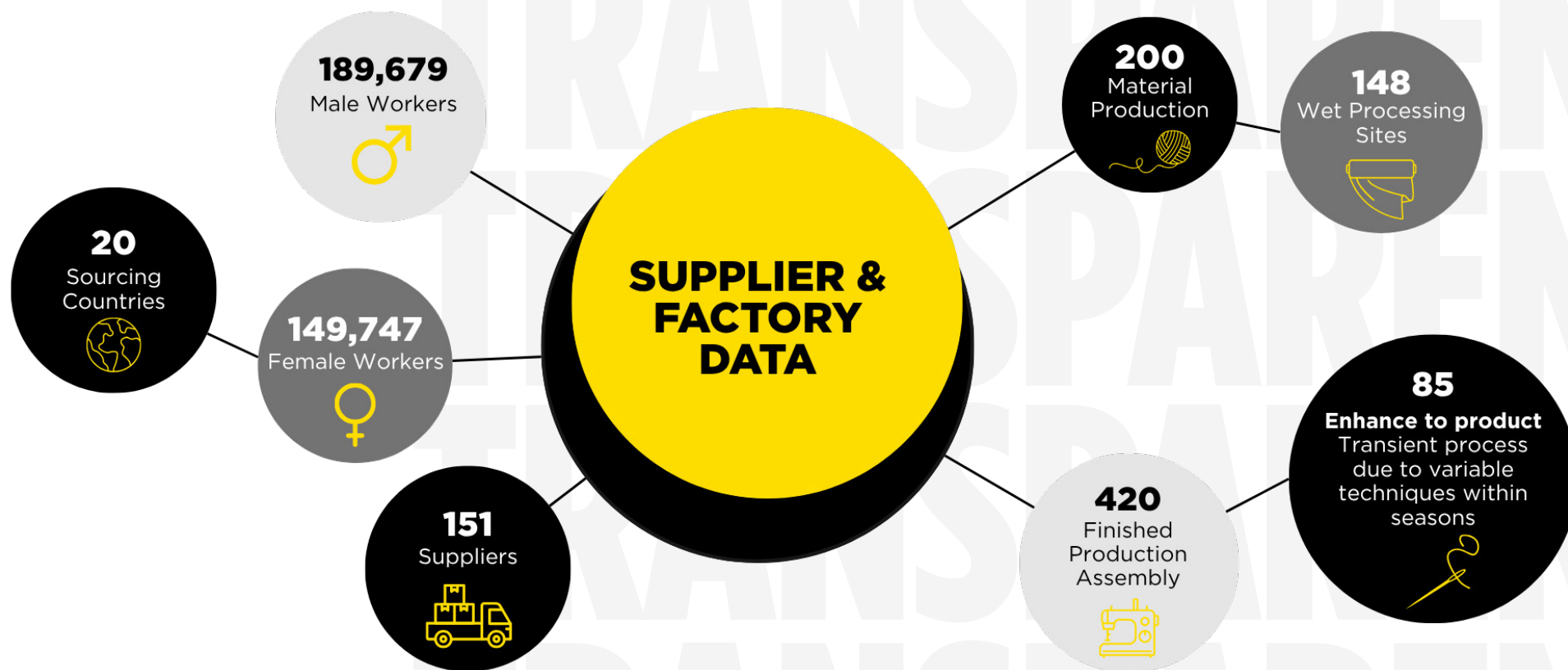
[Click here to read our Modern Slavery Statement](#)

JD Group

Supplier and Factory Data – Our numbers

The analysis and consolidation of the supply base allowed us to reduce the number of Tier 1 suppliers and work to collaborate with Tiers 2-4 sites, giving better transparency and engagement within the indirect supply chain.

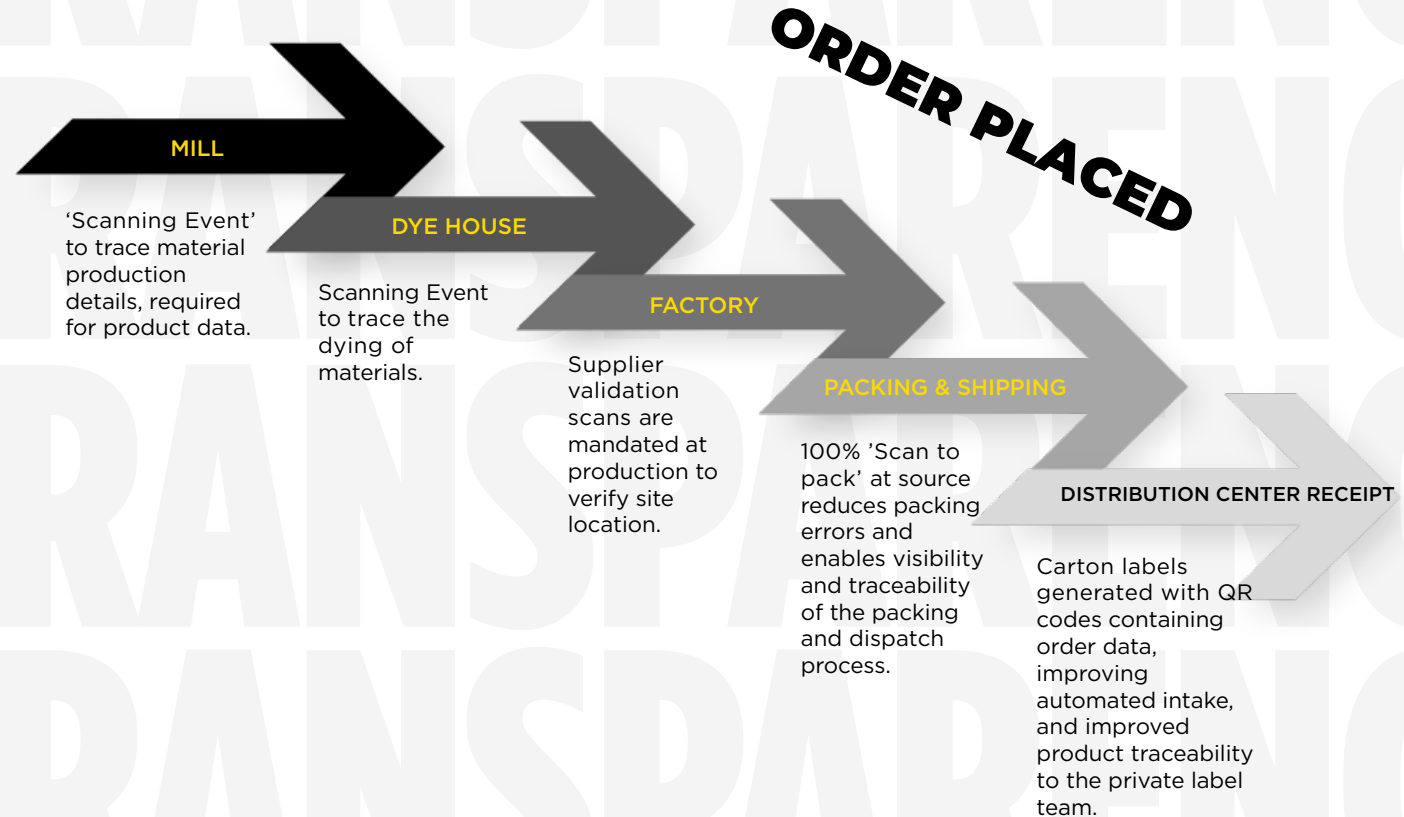
This has increased economies of scale in a narrower supply base and will establish closer ties with those not directly contracted to us and give greater opportunity to embed the company's strategy and standards.



Supply Chain - Transparency

Enhancing transparency and due diligence in our supply chain.

We have implemented scanning at each location in the private label value chain of each order, from raw material to packing and shipping to final receipt, providing real time visibility and full traceability. This immediately red -flags any unauthorized site and to prevent potential subcontracting giving better protection to workers.



Due Diligence

Private Label - Risk Analysis

Our methods of risk assessment within our private label supply chain include:

- Third party audits
- Self-assessment questionnaires
- Supply chain mapping
- Country-specific engagements

Risks that we pro-actively manage include:

- Potential prevalence of Modern Slavery
- Territory/geographical-specific risks (see next slide)
- Political factors
- Worker demographics
- Environmental risks

To reduce modern slavery risks within our private label supply chain, we undertake assessments for lower supply chain tiers, even when we do not hold direct contractual agreements however we do not hold contractual agreements which limits direct contact. Through supplier engagement, we work to ensure our standards and values are embedded in the full supply chain.

- Audits are not a fix to modern slavery, but aid the discovery and management of issues related to the principles within our Code of Conduct
- Our “Identify” “Act” and “Resolve” process ensures all non-compliance issues are investigated and resolved
- If a site is unable to provide an audit within the 12-month period, it is graded red, and the Group will not place additional orders

The onboarding process has been strengthened to include clear minimum requirements, including commitments to living wages and key social standards. A social grading been implemented which will assess performance at Tier 1, incorporating factors such as audit coverage, respect for freedom of association, progress towards living wages, worker engagement, and the timely resolution of non-compliances.



Supplier Risk Assessment and Monitoring

Driving Accountability

In line with our responsibilities under the **UK Modern Slavery Act 2015** and our alignment to the **UN Guiding Principles on Business and Human Rights (UNGPs)**, we have included a ‘**social grade**’, to the assessments of our Tier 1 supply chain.

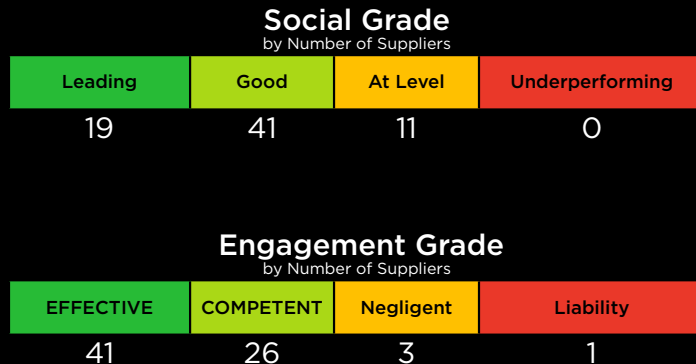
This framework is underpinned by defined **social performance indicators**, aligned to our priority risk areas, enabling consistent and transparent evaluation of suppliers’ labour standards and practices. Each supplier is assessed against these criteria and assigned a **risk-based score**, which contributes to an overall social grading.

As part of our ongoing **human rights due diligence approach (in line with UNGP Principle 17)**, supplier scores are regularly reviewed and updated to reflect current performance, encouraging continuous improvement and strengthening visibility of risk exposure across our supply

Key principles of the framework include:

- Assessment based on : **Freedom of Association , Demonstrable progress towards living wages, worker engagement and timeliness of non-compliance closures**
- Recognition that risk levels may evolve due to factors such as **non-compliance findings, audit cycles, and responsiveness to corrective actions**
- Maintenance of **historical performance data** to monitor trends over time, supporting more informed decision-making, including escalation, remediation, or potential disengagement where standards are not met
- To support a robust and proportionate approach, we conduct **periodic performance reviews** at key stages in the supplier lifecycle. These checkpoints enable us to assess supplier progress at defined points in time, strengthen internal governance oversight, and prioritise follow-up actions where risks are identified.
- This approach aligns with the “**identify, prevent, mitigate and account**” framework set out in the **UNGPs**, ensuring that we not only respond to identified risks but proactively work to prevent modern slavery within our operations and supply chain.

Some suppliers may not yet have a full risk profile where production has not commenced, or engagement is at an early stage. These suppliers are prioritised for assessment in subsequent review cycles to ensure full coverage.

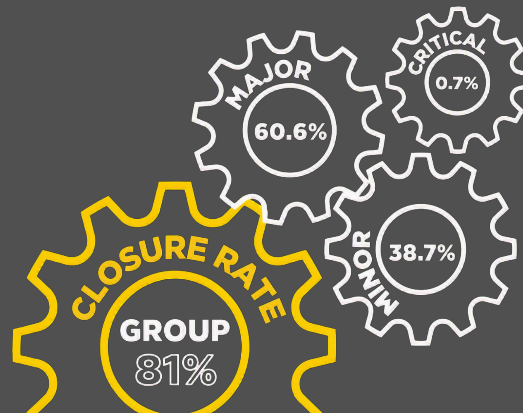


Identify, Act and Resolve

Addressing Non-compliance

As an organisation committed to promoting safe and inclusive workplaces, we recognize the importance of implementing robust remedial actions to ensure the wellbeing and dignity of all employees, both direct and indirect.

The Group compliance team categorise all non-compliances within the manufacturing supply chain using our internal “Identify, Act & Resolve (IAR)” methodology. It is important to Identify the root cause of the issues highlighted so that appropriate Action can be taken with the factory. Understanding the cause and effect results in the Resolution of these issues.



Identifying Issues and analysing the root cause, enables better collaboration with our supply chain achieving a higher success for resolution.

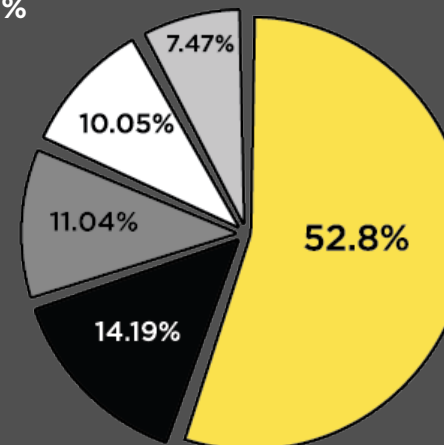
Realistic solutions can be implemented and affect long term change.

Our compliance team work consistently to apply the cause' to each non-compliance and detailed analysis reporting , giving a full picture of structures and policies that may be embedded into a factory process and lack of understanding of cause and effect on workers that may not have been realised.

Giving our suppliers this insight promotes open transparency and understanding of challenges that we can work together to overcome, often avoiding perceived costs and disruption to their business.

Top 5 Issues In Supply Chain %

- Working Conditions Are Safe & Hygenic
- Living Wages Are Paid
- Working Hours Are Not Excessive
- Freedom Of Association & Collective Bargaining
- Other Findings



NON - COMPLIANCE

MINOR NO: 1952

MAJOR NO: 3057

CRITICAL NO: 35

Actions Taken

Actions within the last reporting period

To reduce the risk of modern slavery within our own operations and private label supply chain, the Group completed the following actions and improvements during the period.

Ethical Compliance in the Supply Chain

340 independent audits were conducted and received between 1st January and 31st December, 2025. Each audit report was reviewed and non-compliances were categorised to provide a clear understanding of the underlying issues and their potential impact.

340

Independent audits conducted between 1st Jan 2025 – 31st Dec 2025

81

Of non-compliances identified in our audits were resolved

Improved Remuneration within our Private Label Supply Chain

To reinforce our Modern Slavery approach, a comprehensive wage benchmarking review was conducted across 342 factories within our supply chain, evaluating how supplier wages align with national living wage standards. The assessment focused on three key areas. Here are our findings in each:

Comparison of Basic Wage to Living Wage Benchmarks

53%

Of factories meet the living wage through basic pay alone

Total Compensation (Basic Wage plus Benefits) versus Living Wage

63%

This figure increases to nearly two-third when benefits are included

Suppliers Paying at Least 10% Above the National Minimum Wage (NMW)

63%

Reflecting meaningful progress beyond basic legal compliance



Freedom of Association & Collective Bargaining:

Supply Chain Impact Assessment

Both freedom of association and the right to collective bargaining are fundamental human rights. These rights allow workers to enter in a constructive dialogue with employers. Unfortunately, in many countries workers face all kinds of obstacles when trying to organise themselves to take part in social dialogue.

Allowing workers to collectively express concerns, negotiate better wages, improve working conditions and protect themselves from exploitation, this is especially vital in the garment sector, where workers - often women from marginalized communities - may otherwise lack the power to advocate for their rights.

Our Stakeholder Engagement Framework

- Regular surveys and gap analysis
- Implementation of solutions
- Key metrics reporting:
 - Resolution and quality metrics
 - Complaint resolution rate
 - Resolution rate by type/location
 - Repeat complaint rate
 - Escalation rate

We completed a supply chain impact assessment across territories, identifying next steps and areas of opportunity.

- **Key Findings**
- Suggestion boxes were present, however there is opportunity to further encourage employee participation to strengthen engagement and visibility
- Grievance record keeping varied across facilities, with an opportunity in some locations to formalise procedures and improve consistency in tracking
- There is an opportunity to strengthen evidence of grievance follow-up and documentation of post-remediation engagement with workers

Remediation Strategies

We are piloting and evaluating the following:

- Visual Posters
- Scenario-Based Tools & Training
- Standardised Templates
- Suggestion Box Innovations
- Round Tables



Promoting freedom of association and collective bargaining in overseas manufacturing can be challenging, but it creates clear opportunities for stronger, more resilient supply chains.

Many sourcing countries have complex legal or cultural environments, but through long-term partnerships, transparent dialogue and worker-centred solutions we will work to overcome these barriers. Meaningful freedom of association and collective bargaining are achievable with proactive engagement with our Tier 1 partners.

Looking Forward

- **Internal Assessment:** Ongoing assessment of practices and controls.
- **Metrics Development:** KPIs for engagement and grievance resolution.
- **Supplier Engagement:** Targeted support for regressive suppliers.
- **Transparency:** Reporting on progress and challenges.

Actions Taken



Transparency

We strive to maintain transparency in our supply chain, achieving 100% transparency on our Tier 1 factories across the Group and working with our contracted factories to ensure the full transparency of Tier 2 and 3 (Mill and Dye Houses). Risk assessing all factories prior to on-boarding and requiring information at the first stage on the names and locations of their value chain.

We recognise the importance of assessing the environmental practices of the manufacturing chain and the need to minimize the impacts they may have on the communities they operate in.



Ethical Recruitment

We ensure that all recruitment practices, for both direct and indirect employees, including agency workers, are conducted ethically, transparently, and in compliance with applicable laws and regulations in the relevant country.

In our UK operations we work collaboratively with 3rd party labour contractors to affect a joined-up approach



Worker Welfare

We uphold the rights and welfare of our employees, including indirect workers throughout our operations, including but not limited to, legal wages, safe working conditions, and freedom from discrimination and harassment.



Reporting Mechanisms

We provide reporting mechanisms for direct employees in our global operations via an external program called One Trust.

This gives a confidential voice to our employees to raise concerns and grievances.

Regular reporting to the UK team ensures that such reports are investigated and addressed promptly and confidentially.

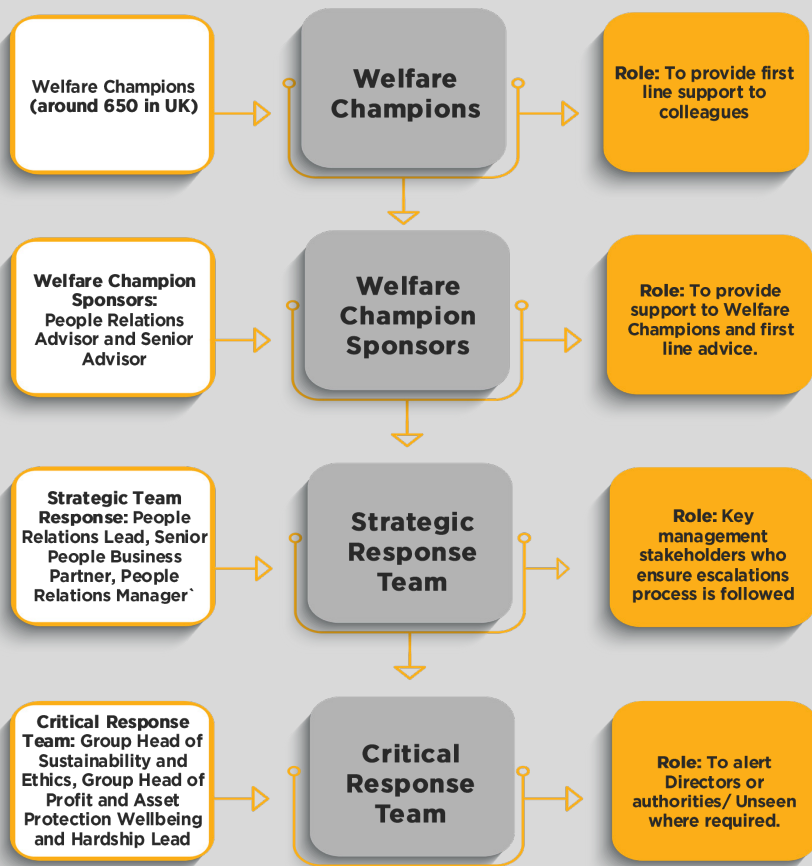


Policies

Policies for our supply chain, relating to modern day slavery and labour exploitation, are found on our PLC website below and the company Share Point system for suppliers, in several languages.

Select here to read our Policies





Escalation process flow

The JD Group Distribution Centre in the UK is our largest site and has the greater number of employees on one site and can increase in number, according to peak seasons.

Consideration has been given to the level of risk at this site which involves recruitment practices and specific training in red flag areas is embedded and the below escalation process is in place to mitigate and report labour exploitation/potential modern slavery concerns.

Our UK Distribution Centre and Retail Stores operate a structured escalation process designed to identify, report and respond to worker welfare concerns, including indicators of labour exploitation and potential modern slavery risks. Welfare Champions play a vital role as the first point of contact for colleagues, providing trusted front-line support, guidance and a safe route for raising concerns. Welfare Champion Sponsors provide additional expertise and support to Welfare Champions, helping to ensure concerns are appropriately managed and escalated where necessary.

Where issues require further investigation, they are escalated through the Strategic Response Team and, for the most serious cases, the Critical Response Team. This layered approach ensures concerns are addressed consistently, appropriate support is provided to affected individuals, and specialist intervention can be accessed quickly, including engagement with external authorities or support organisations where required. This process helps create a safe working environment where colleagues feel supported, protected and empowered to speak up.

Collaboration With Our Charity Partners

Our work with the JD Foundation

The JD Foundation contributes to **SDG 10: Reduced Inequalities** by targeting support towards young people from the most socially and economically disadvantaged communities, where inequality significantly increases vulnerability to exploitation.

Through partnerships with youth organisations such as **Manchester Youth Zone**, the Foundation helps ensure that young people who face barriers linked to poverty, exclusion and limited access to opportunity are given structured support to improve their life outcomes. Evidence from delivery partners shows that a high proportion of beneficiaries come from the most deprived areas in the UK, reinforcing the Foundation's focus on **reducing inequality at its source**.

This is demonstrated through the case study of **"A"**, a young person at risk of child criminal exploitation, who had disengaged from education, become involved with negative peer groups, and experienced repeated missing-from-home episodes. Through targeted intervention, consistent mentoring, and the provision of a safe, trusted environment, youth workers were able to build a relationship that enabled him to move away from exploitation, re-engage positively, and secure stable employment

By funding and partnering with organisations that provide early intervention, trusted adult relationships, and community-based support, the JD Foundation helps reduce inequality in access to safeguarding, opportunity and positive life pathways, ultimately breaking cycles of disadvantage and lowering the risk of exploitation for vulnerable young people.



24 Charities
8,723 young people supported
£126,000 donated specifically to address this goal



Case Study A – Criminal Exploitation and Support

"A" showed clear signs of county lines exploitation, including frequent missing episodes, travelling across the UK to known hotspots, and being found by police with drugs and high-value items. While **A** initially denied concerns, these behaviours reflected coercion, control and involvement in criminal activity linked to modern slavery.

A's vulnerability was heightened by disrupted education, lack of routine, and influence from peers already involved in exploitation. Manchester Youth Zone and safeguarding partners provided intensive, consistent support, including daily contact, mentoring and a safe space. This approach built trust over time, enabling **A** to disclose being pressured to supply drugs and begin stepping away from exploitative networks.

Outcome: **A** reduced exposure to exploitation, re-engaged in positive routines, and moved into employment, strengthening long-term resilience.

CREATING PURPOSE, PASSION AND PATHWAYS FOR ALL YOUNG PEOPLE

www.manchesteryz.org | info@manchesteryz.org | 0161 203 5333
 Manchester Youth Zone, 931 Rochdale Road, Harpurhey, Manchester, M9 8AE

Spotlight on Young People at risk

Our work with the JD Foundation

The **JD Foundation** (funded by JD Sports), is dedicated to supporting disadvantaged young people by funding and partnering with youth charities across the UK. Working to address the heightened risks faced by young people growing up in lower socio-economic backgrounds, where vulnerability to exploitation is significantly increased. Delivery evidence shows that a large proportion of young people accessing these services come from the most deprived communities in the UK, underlining the **strong correlation between deprivation and exposure to harm**.

Young people in these environments are more likely to experience a combination of risk factors, including **poverty, unstable home lives, exclusion from education, poor mental health, and limited access to safe community spaces**. These conditions can create pathways into child criminal exploitation, serious youth violence, and harmful peer influence, particularly where there are gaps in trusted adult support and positive opportunities.

By supporting specialist youth charities, the JD Foundation provides funding to support early-stage intervention, **before risks escalate into more severe forms of exploitation**. These organisations are uniquely positioned within communities to:

- **Build trusted relationships** with young people who may disengage from statutory services
- **Identify early warning signs** of exploitation, such as association with negative peer groups or missing-from-home episodes
- **Provide safe, structured environments** that reduce exposure to harmful influences
- **Deliver targeted mentoring and intervention programmes** that strengthen resilience and decision-making

Programmes supported through these partnerships focus on improving key protective factors: confidence, emotional regulation, social skills and future aspirations, which are critical in helping young people resist coercion and make positive life choices. Importantly, youth charities also act as a bridge between young people and wider safeguarding systems. Through collaboration with police, local authorities and community safety partners, they contribute to a more joined-up response to child criminal exploitation and vulnerability, ensuring that support is coordinated and tailored to each individual's needs.

Ultimately, the JD Foundation's investment in youth charities reflects a preventative, community-led approach, recognising that tackling exploitation requires not only responding to harm, but addressing the underlying social inequalities and vulnerabilities that place young people at risk in the first place.

Spotlight on Recruitment

DUE DILIGENCE 3RD PARTY PROVIDERS

Training and due diligence for workers at our UK warehouses (both agency, and directly employed) are extensive, and act to both identify and deter forced labour and modern slavery.

Working closely with our labour agency provider, on processes and mitigation, has ensured increased identity checks and to close gaps in the management of personnel through application, to interview, induction to placement and on transfer to permanent employment. We recognised the need to ensure the person applying is the person on site, throughout the process.

- Periodic checks for duplicate property addresses, bank account numbers, and phone numbers, supported by welfare interviews. Weekly 'red flag' reports completed.
- Checks with local councils for unlicensed HMO's and alerts across the entire agency for multiple occupancy houses that would not otherwise flag in one company and can identify multiple occupants at other businesses

Due diligence processes – worker identity:

- Risk assessments identified an increase in the use of fraudulent ID . Agency labour managers developed in house training on reporting mechanisms and methods to identify potential coercion/exploitation
- Photographs are taken at multiple stages – registration, induction, and placement. This ensures applicant identification and reduces the risk of 'employee substitution', a regular modern slavery risk

- All agency employees receive mandatory modern slavery training. Detailed policies and procedures are available to all on the company system and apps.
- Agency labour account managers receive advanced training and meet with our critical response team bimonthly
- Agency labour operations and account managers regularly attend events and webinars hosted by the ALP, S2G, GLAA etc to ensure company processes remain relevant

Worker awareness:

- Worker newsletters – topics include modern slavery information and how to report concerns or request help
- [Compliance Hub](#) site link is included on payslip emails, to make workers aware of their rights

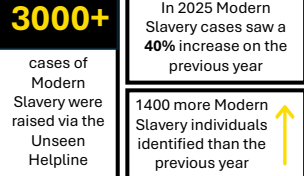
Risk Assessments:

- Annual risk assessments are undertaken by the agency Head of Compliance, in addition to site-specific risk assessments introduced June 2025

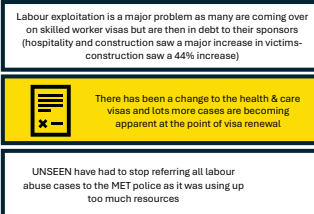
Unseen 2025 Results

Overview

GENERAL



RISKS



COUNTRY

UNITED KINGDOM

78% of Modern Slavery cases in UK were in England

UK has seen an 115% increase in potential victims

UK is now in the top 3 countries for sexual exploitation

UK has highest number of Child victims in sexual exploitation

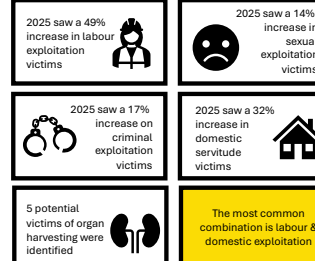
OTHER TERRITORIES

405 cases of Modern Slavery were identified in another country with Libya seeing a major increase

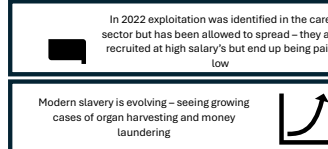
Somalis are 11x more likely to now be victims than before due to severe drought & flooding (exploiters usually related to terrorist group Al-Shabaab)

India is the highest victim nationality received from the hotline

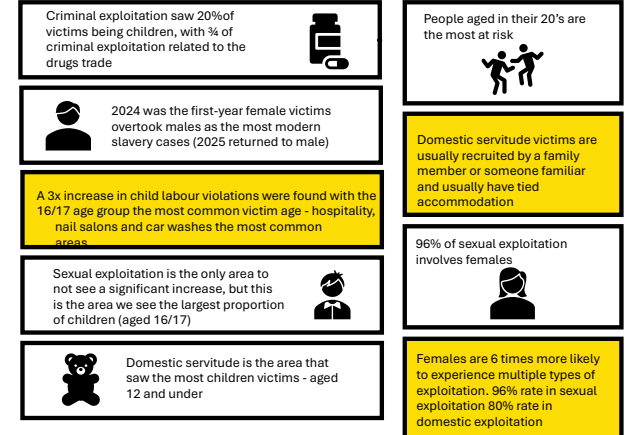
TYPES



FUTURE



DEMOGRAPHICS



Our partners Unseen released their 2025 report in 28 April 2026. Almost 3,000 cases of Modern Slavery were raised by their helpline. Sadly, 2025 saw a 40% increase in modern slavery cases on the previous year, involving 1,400 more individuals than the previous year.

Unseen 2025 Results

Overview

Our partners Unseen released their 2025 report in (DATE). Almost 3,000 cases of Modern Slavery were raised by their helpline. Sadly, 2025 saw a 40% increase in modern slavery cases on the previous year, involving 1,400 more individuals than the previous year.

Risks

Labour exploitation is a major problem as many are coming over on skilled worker visas but are then in debt to their sponsors (hospitality and construction saw a major increase in victims- construction saw a 44% increase)



There has been a change to the health & care visas and lots more cases are becoming apparent at the point of visa renewal

UNSEEN have had to **stop referring** all labour abuse cases to the MET police as it was using up too much resources

By Country

UK

78% of Modern Slavery cases in UK were in England

The UK has seen a **115% increase** in potential victims

UK is now in the **top 3 countries** for sexual exploitation

UK has the **highest number** of Child victims in sexual exploitation

Other Territories

405 cases of Modern Slavery were identified in another country with Libya seeing a major increase

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Demographics

Criminal exploitation saw **20% of victims** being children, with ¼ of criminal exploitation related to the drugs trade

2024 was the first-year **female victims overtook males** as the most modern slavery cases (2025 returned to male)

Sexual exploitation is the only area to not see a significant increase, but this is the area we see the **largest proportion of children** (aged 16/17)

A **3x increase in child labour** violations were found with the 16/17 age group the most common victim age - hospitality, nail salons and car washes the most common areas

People aged in their 20's are the most at risk

Domestic servitude is the area that saw the most children victims - aged 12 and under

Females are 6 times more likely to experience multiple types of exploitation. 96% rate in sexual exploitation 80% rate in domestic exploitation

96% of sexual exploitation involves females

Types

2025 saw a 49% increase in labour exploitation victims

2025 saw a 17% increase on criminal exploitation victims

2025 saw a 14% increase in sexual exploitation victims

2025 saw a 32% increase in domestic servitude victims

The most common combination is labour & domestic exploitation

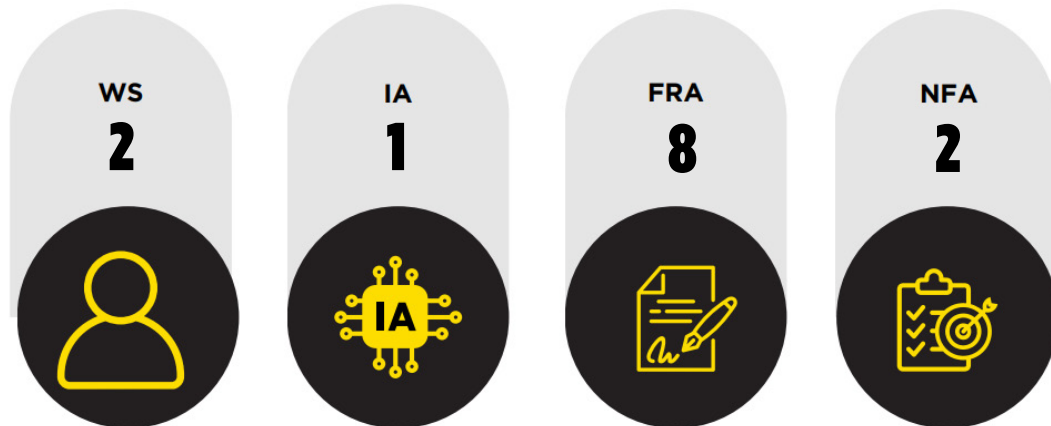
Future

Modern slavery is evolving - seeing growing cases of organ harvesting and money laundering

In 2022 exploitation was identified in the care sector but has been allowed to spread - they are recruited at high salary's but end up being paid low

Disclosures in our UK Operations

Last 12 months:



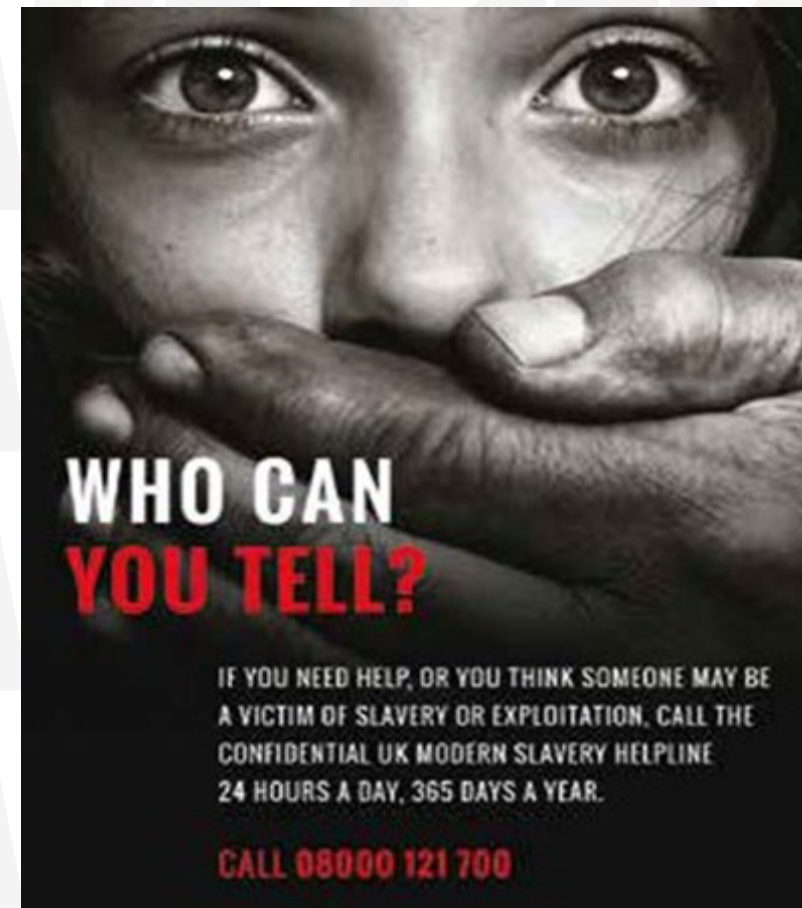
WS Welfare Support

IA Internal Action

FRA First Responder Advice (Unseen, Police)

NFA No Further Action

Working with UNSEEN in the UK and a sponsor of their helpline, we have developed a classification system for reporting potential Labour Exploitation and Modern Slavery concerns raised by employees. Handling a potential victim of labour exploitation in the workplace requires a careful, victim-centered, and legally compliant approach. The priority is always safety, dignity, and protection, not investigation or punishment.



Modern Slavery Training

An ongoing commitment

We are continuously strengthening our policies to enhance clarity for supply chain partners and ensure training materials remain current and relevant across all UK operations.

We are implementing a three-tier training programme through our bespoke learning platform, designed to ensure all colleagues across the business have the appropriate level of knowledge and capability, with enhanced focus on roles where risk exposure is greater.

- **Level 1:** Mandatory for all colleagues, this module focuses on increasing awareness of labour exploitation indicators, strengthening understanding of reporting obligations, and ensuring familiarity with internal escalation processes. This training has been extended to our overseas territories, ensuring a consistent global approach.
- **Level 2:** An enhanced, role-specific module, mandatory for colleagues involved in:
 - i) procurement and commercial negotiations,
 - ii) recruitment and employment of staff,
 - iii) international operations in higher-risk geographies, and
 - iv) Welfare Sponsors.

This level provides deeper insight into risk identification, due diligence responsibilities, and practical response mechanisms.



***89% of Colleagues in our UK Operations completed core level 1 training to date**

JD Group

The main common risk identified is that of forced labour both globally and in the UK. JD recognises the importance of our direct and indirect workers and those in the extended supply chain. It is important that they can raise any issues of concerns with either JD personnel or an escalation team in confidence and safety.

JD Groups approach to auditing is to reduce audit fatigue for both factories and businesses.

Recruitment Practices

- Ensuring correct recruitment policies are in place and agencies are registered with no fees in place for workers
- Particularly difficult in rural areas, where recruitment is informal
- Ensure contracts are in place for all workers, inclusive of probation and termination
- Identify and protect home workers where used

Continue to communicate and review our policies and adapt them accordingly as needed. These are available on our PLC site and on a supplier SharePoint link in multiple languages.

Countries and regions of risk have been identified using documented data with a number of assessments trailed and introduced in China. This has been successful and proven to be more informative than worker interviews. For example, an issue with delayed payments was identified, which otherwise had not reported in the standard audit process. This issue was immediately remedied by working with the supplier and factory to align the payments. All workers now receive the payment in a timely manner, and this will continue to be monitored.

Procurement Contracts

Training

Regularly conduct a needs analysis for workers within the UK sites to determine and meet its need for internal capacity building training and specialist support. Upwards of 230 personnel within the UK Distribution center and key subsidiaries have been trained as welfare champions and sponsors. The JD Academy continues to train new starters and make training mandatory in key areas.

[illegible]

Focusing on Risk in the Supply Chain

Modern slavery risks differ based on geography and culture.

Examples of territory-specific risks identified within our private label supply chain include the following:

MODERN SLAVERY RISKS Freedom of association Migrant workers/ refugees Forced & bonded labour	
MODERN SLAVERY RISKS GBVH Forced and bonded labour Child labour Low Wages	
MODERN SLAVERY RISKS Freedom of association Gender based violence and harassment Child labour Culture and caste discrimination Sumangala system/ Dowry payments	
MODERN SLAVERY RISKS GBVH Forced and bonded labour Child labour Low Wages	
MODERN SLAVERY RISKS GBVH Forced and bonded labour Child labour Building Safety	
MODERN SLAVERY RISKS Freedom of association Migrant Forced & bonded labour	
MODERN SLAVERY RISKS Freedom of association Forced & bonded labour	

MODERN SLAVERY RISKS
Freedom of association
Forced & bonded labour