

B O D E N

Modern Slavery *Statement*

2022

Modern Slavery Statement

Financial Year 2nd January 2022 – 31st December 2022 (FY2022)

As part of our continued commitment to ensuring ethical working conditions in our supply chain and operations, we fully support the legislation put in place for the prevention of modern slavery and human trafficking.

This includes:

UK legislation: Transparency in Supply Chains Provision (Section 54) of the Modern Slavery Act (2015)

USA California legislation: The California Transparency in Supply Chains Act SB657

Australia legislation: The Modern Slavery Act 2018 (Federal Act)

What is modern slavery?

Modern slavery is the possession or control of one person by another which significantly deprives the individual of their freedom, with the aim of exploiting them through use, profit, transfer or disposal.

Modern slavery is an overarching term used to describe its various forms:

- **Human trafficking** - a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion
- **Forced and compulsory labour** - any work or services which people are not doing voluntarily, and which is exacted under a threat of some form of punishment
- **Bonded labour** - any work or services demanded as a means of repayment of a debt or a loan
- **Slavery** - a situation where a person exercises (perceived) power of ownership over another person

Boden acknowledges the complexity of modern slavery but remains dedicated to enhancing our practices to combat it, fostering stakeholder and industry collaboration towards its eradication.

In 2022, travel restrictions were lifted in two of our key sourcing countries India and Turkey. This allowed our Product teams including the Responsible Sourcing team, to visit suppliers and factories in these countries. These visits are crucial for establishing trust in our supply chain and conducting in-person factory inspections, to ensure that our health and safety and ethical standards are being adhered to.

War in Ukraine

In February 2022, Russia invaded Ukraine. While Boden does not work with any garment factories in Ukraine, at the time of the invasion our international outsourced IT engineering partners had approx. 80 engineers located in Ukraine, Belarus and Russia working on our account.

Boden reacted quickly and worked with our engineering

partners to ensure that affected team members in Ukraine and Russia were relocated to new countries wherever possible / desired by the individuals.

COVID-19

At the time of writing this statement, China has reopened its borders after 3 years of covid travel restrictions. We plan to visit our suppliers in China this year.

Earthquake in Turkey

Turkey suffered a devastating earthquake in the southeast of the country in Feb 2023. Boden has suppliers in Turkey, and we are in touch with the teams there to understand the impact and how Boden can support them.

Three of our denim factories are in the most affected region; in the immediate aftermath all production stopped and instead their facilities were used to offer shelter, food and warmth to people in the area. These suppliers have now resumed production, we continue to work closely with these suppliers on a revised production plan.

In 2023, Baptist World Aid Australia will not conduct a survey, however, we maintain active engagement with the organisation.

This modern slavery statement has full sign off by the Executive Board.

Signed by



Paul O'Leary,
Chief Operating Officer,
J. P. Boden & Co. Ltd
Date

Our Impact

432

workers
in India

1,113

workers
in Turkey

1,120

workers
in Sri Lanka

1,120

workers
in China

1,746

workers in
the Philippines

Boden provided a working feedback survey through
&Wider to 5,619 workers across the global supply chain

8 Active HERprojects

67

Peer Educators

2,935

Female workers

1,946

Male workers

296

Managers

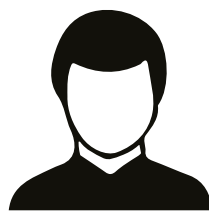


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“I enjoyed attending the to PHE-led sessions; especially the one on HIV. I’m excited to be able to pass on the information to my children.”

Factory worker in China

”



“

“...educated his wife on the nutritional intake of food, he explained to her the vitality of nutrition and healthy food. As a result his wife now gets her haemoglobin checked and eats green leafy vegetables. She also ensuresto have regular breakfast which has resulted in her good health..“

Factory worker in India

”



“

“The “peer educator” role at the HERrespect program, built my confidence that being a woman I can also have big dreams. The in-depth knowledge of gender roles, gender differences, joys, and challenges in working relationships between managers and workers is quite insightful. The sessions are useful and helpful in managing stress at work and very importantly how to communicate respectfully with my subordinates.”

Factory worker in India

”

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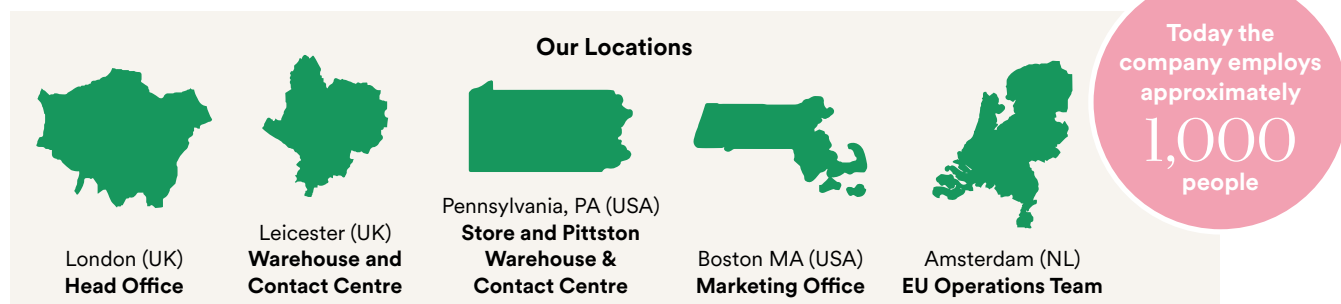
In accordance with [The Home Office's statutory guidance](#),
this Modern Slavery Statement covers the following six areas:

Boden Statement		Home Office Guidance
05	Our Company and Supply Chain	Organisation structure and supply chains
06	Process, Policies and Due Diligence	Policies in relation to slavery and human trafficking
06	Process, Policies and Due Diligence	Due diligence processes
08	Assessing Risks	Risk assessment and management
12	Monitoring	Key performance indicators to measure effectiveness of steps being taken
12	Cascading Knowledge	Training on modern slavery and trafficking

Our Company and *Supply Chain*

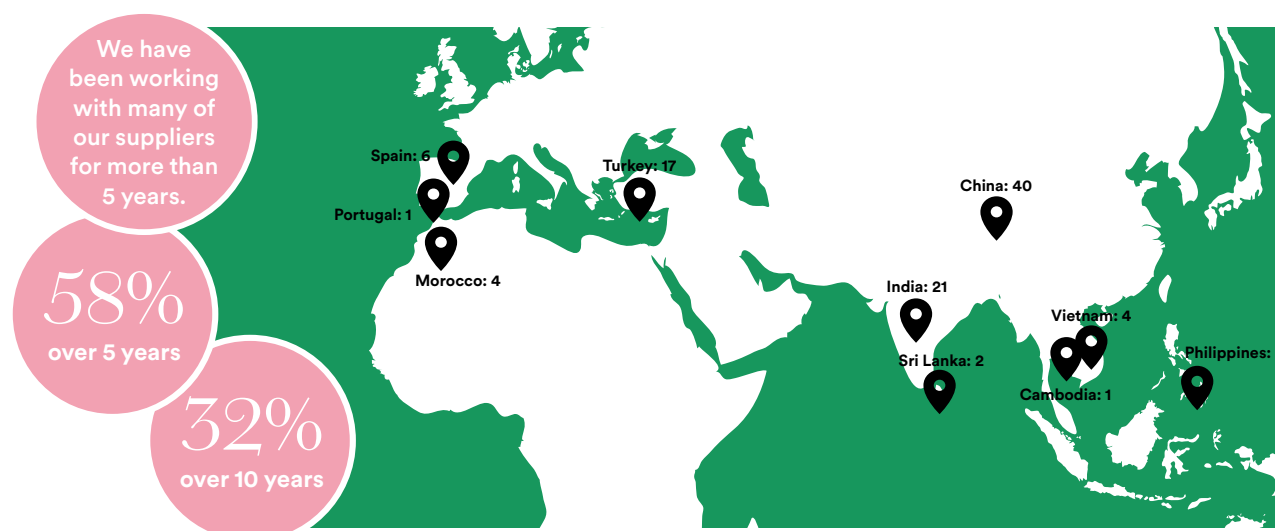
Company

A British brand founded in 1991 with eight pieces of menswear on a kitchen table. Boden began life as a mail-order business, and we are now a multi-channel brand, selling predominantly online as well as through catalogues, retail stores and several wholesale partners.



In total, we work with 62 apparel and footwear suppliers. Our suppliers work with 98 first-tier factories who employ over 44,170 people, producing diverse product lines from dresses to handbags to children's t-shirts across 10 countries. Since May 2018, we have published our first-tier factory list on our website. Our latest factory list, published in April 2023, includes a breakdown of department, product category and gender at factory level.

The map below shows you which countries we source from and how many factories we work with:



To manage the complexity of our garment and accessories supply chain, we work closely with suppliers, building long-term relationships where we can, to maintain our focus on traceability of production, working conditions, and quality. Boden's sourcing strategy has always been to maintain long term relationships with suppliers.

Process, Policies and *Due Diligence*

Ethical Trading Initiative (ETI) and our Responsible Sourcing Commitment

Boden joined the ETI in 2008, to support the on-going development of our responsible sourcing programme and to have the opportunity to work collaboratively with external stakeholders to improve the working conditions in international supply chains.

Our [Responsible Sourcing Commitment \(“RSC”\)](#), is based on the ETI base code, which includes provisions on forced labour and human trafficking. Suppliers must commit to “meet and strive to exceed” Boden’s RSC and relevant policies outlined in the Supplier Manual. Compliance is ensured through the signing of Terms and Conditions (T&Cs) during onboarding and the contractual agreement in Purchase Orders (POs).

Our Supplier Manual gives guidance on Boden policies in areas including (but not limited to) health, safety, hygiene, minimum working age, child labour, working hours, remuneration of workers and home working.

Boden has a requirement for all suppliers to provide full and open access to all facilities within the product supply chain. This must be granted both to Boden staff and any third-party representative that we have engaged to work on our behalf. Suppliers should also conduct and submit an unannounced 4-pillar third-party audit using the SMETA ethical auditing protocol.

Other audit methodologies will be reviewed on a case-by-case basis to help reduce audit fatigue.

Collaborations

Boden works with the following trusted partners in the prevention of modern slavery:



Ethical Trading Initiative (ETI)

The [ETI](#) is a leading alliance of companies, trade unions and non-governmental organisations (NGOs) that promotes respect for workers’ rights around the globe. ETI’s vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.



Business for Social Responsibility (BSR)

The [BSR](#) is a global non-profit organisation that works with its network of more than 250-member companies and other partners to build a just and sustainable world.

BSR envision a world in which everyone can lead a prosperous and dignified life within the boundaries of the Earth’s natural resources.



&Wider

[Wider](#) is an anonymous direct worker reporting initiative which conducts due diligence and monitoring of working conditions using worker engagement technologies. The &Wider system provides actionable results to drive material improvements in workers’ lives and in the businesses that employ them.



Sedex

[Sedex](#) is a membership organisation that provides an online platform; to help manage social compliance in global supply chains. They also provide practical tools, services and a community network to help companies improve their responsible and sustainable business practices.



Better Cotton (BC)

[BC](#) is a global not-for-profit organisation. It is the largest cotton sustainability programme in the world.

Together with their partners, BC provides training on more sustainable farming practices to more than two million cotton farmers in 21 countries.



The Good Cashmere Standard (GCS)

The [GCS®](#) considers all aspects of sustainable cashmere production, including ecological, social and economic production such as animal welfare, improving working conditions on farms, and protecting the environment. This also means we can trace our cashmere via an online tracking system.



Textile Exchange

[Textile Exchange](#) are global non-profit organisation driving positive action on climate change across the fashion, textile, and apparel industry. They guide and support a growing community of brands, retailers, manufacturers, farmers, and others committed to climate action toward more purposeful production, right from the start of the supply chain.



Open Supply Hub (OSH)

The [OSH](#) is an open data tool, mapping garment facilities worldwide and allocating a unique ID to each.

Accountability and Governance

The responsibility for human rights due diligence, including modern slavery due diligence, sits with the Chief Operating Officer (COO), Chief Commercial Officer (CCO) and the Executive Board. Their work is supported by relevant directors and teams, including the Responsible Sourcing team and the Legal Counsel. Boden's responsible sourcing strategy, including this Modern Slavery Statement, has full sign off by the Executive Board.

We have a formal escalation process in place to report serious issues affecting working conditions within our own operations and supply chain. The escalation process includes a briefing to the Senior Director of Buying & Product Development, Garment Technology and Responsible Sourcing and the Product Managers with a proposed action plan for remediation with agreed timescales.

The Boden Risk and Compliance Committee was set up to discuss all potential risks across different areas of the business. Occurring quarterly, this meeting is attended by the senior leadership team and Executive Board, along with department heads from across the business including Responsible Sourcing. The agenda includes an update of issues discussed in the previous session and emerging risks. Any new concerns that have arisen from current risk assessments are addressed in this meeting and remedial actions are agreed. Modern slavery risk areas are reviewed, and progress updates are provided.

Implementation

Many people across the business support the implementation of Boden's modern slavery due diligence, including the Responsible Sourcing team, the People team, the Operations team and the Legal Counsel.

We share information about our [Responsible Sourcing programme](#) on the [Sustainability](#) section of our website, including our [Responsible Sourcing Commitment](#).

Assessing *Risks*

Ongoing risk assessments

Several factors heighten the risk of modern slavery occurring.

Modern slavery risk factor	Those at risk in Boden's supply chain	Boden's work to protect workers' rights
Migrant labour	Migrant workers who may face debt bondage for recruitment or travel costs.	Boden collaborates with suppliers and external stakeholders to address concerns regarding migrant labour. We regularly assess and monitor independent third-party ethical audits that capture relevant information in this regard.
Presence of refugees	Undocumented refugee labour in Turkey	Boden fosters social dialogue and worker representation in production sites to enhance workers' access to effective representation. In Turkey, Boden employs a regional representative who conducts regular visits to the factories whom we collaborate with to actively drive improvements in working conditions.
Outsourced recruitment processes and the use of contract/agency/temporary employees	Workers in our UK Warehouse and US Warehouse	Boden works with trusted labour agencies in recruiting temporary workers. Boden drives awareness of modern slavery with induction training at our warehouses, and by displaying information posters in multiple languages detailing Boden's whistleblowing contact.
Presence of young workers in regions of increased likelihood of child labour	Mill workers in the Tamil Nadu region of India being subject to Sumangali schemes	Boden regularly engages with its supply chain to ensure that our RSC in particular our Young Workers and Child Labour policy, is being communicated to all tiers. We also remain actively engaged with stakeholders (on the ground).
State-imposed forced labour	Ethnic and religious minorities	Boden maintains regular communication with its supply chain to ensure effective dissemination of our RSC, including our Young Workers and Child Labour policy, across all tiers. We actively engage with stakeholders on the ground to stay connected and informed.

Gender-Based Violence

Workers in our value chain

Global events such as the COVID-19 pandemic have seen an increase in reports of domestic abuse and workplace harassment in all our sourcing countries.

We are working with suppliers to ensure that they have the correct internal reporting procedures in place and are continuing to roll out the direct worker reporting programme, to assist us in spotting trends.

We will continue to collaborate with our peers in shared sites to provide training programmes designed to promote gender equality and to tackle gender-based violence in our supply chain.

Boden conducts regular risk assessments of its supply chain by reviewing audits and researching emerging risks associated with indicators of concern in the countries where production is sourced, based on this information each site is given a risk rating. This rating is shared with the Buying teams.

Suppliers and factories are then managed on a risk-basis, prioritising those at highest risk of human rights abuses including those related to modern slavery.

The Responsible Sourcing Team utilises various tools, such as internal knowledge, local expertise, NGO research, the ETI community hub, industry peer groups, and credible independent publicly available tools, to gather risk data.

We have listed some of the publicly available tools and websites we use to help us below:

- [Oxfam](#)
- [Anti-Slavery International](#)
- [Trafficking in Persons report \(TIP report\) US State Dept. 2020](#)
- [List of Goods produced by Forced and Child Labor US State Department.](#)
- [Walkfree Foundation](#)
- [Verité](#)
- [UN Universal Human Rights Index \(UHRI\)](#)
- [International Labour Organisation \(ILO\)](#)
- [Connecting the Dots in Xinjiang: Forced Labor, Forced Assimilation and Western Supply Chains Report](#)
- [U.S. Department of Labor \(DOL\)](#)
- [Occupation Safety and Health Administration \(OSHA\)](#)
- [Fair Labor Standards Act \(FLSA\)](#)
- [BSR](#)

Where required, for example where country/sector risk factors demonstrate a higher potential risk of modern slavery, we engage specialist expertise (on the ground) to support more in-depth assessments.

Human Rights risks

Based on risk assessments of our global supply chain, we have prioritised countries that pose a higher risk of human rights or modern slavery related issues arising.

Boden's product range is diverse, and we have identified products that are at higher risk of modern slavery which include product that have elements of homeworking or hand embellishment. Boden acknowledges the existence of homeworkers within the supply chain and is open and positive towards homeworking as part of the production process.

In support, Boden has published Homeworkers Policy in the Appendix of our [RSC](#) which clearly explains our position on homeworking including our commitment to homeworkers and suppliers who contract them, as well as our expectation of suppliers employing homeworkers.

Boden recognises that sustainable, long-term improvement in working conditions requires collaborative efforts to address human rights issues and exploitative practices. We actively seek opportunities to collaborate with other brands and retailers, either through the ETI or separate partnerships, to mitigate risks in these areas.

We have focused on the following countries due to the level of assessed modern slavery risk: China, India, Mauritius, Turkey, the UK and the US:

China	Based on our conversations with NGOs and collaborations with brands that also source from China, we have gained insights into the prevalent risks of modern slavery in the country. These risks include limitations on freely chosen employment, excessive overtime, child labour, and significant restrictions on workers' ability to engage in collective bargaining and form trade unions. Given that China is a significant sourcing country for Boden, we are deeply concerned about allegations of state-imposed forced labour that have been reported in the media. To ensure that our products are free from any involvement in forced labour, we conducted a thorough review of our supply chain in 2020 to identify any connections to companies associated with these allegations. We found no such links. Nonetheless, we remain committed to ongoing due diligence in this area and have requested all our suppliers to provide detailed information about the source of their cotton. The risks related to forced labour in China are pervasive across the industry, and we understand that addressing these risks requires a collaborative approach to achieve meaningful impact. We are dedicated to remaining transparent and working together with our peers to drive improvements in this crucial area.
India	In 2011, Anti-Slavery International highlighted the presence of modern slavery issues related to Sumangali schemes in Southern Indian state of Tamil Nadu. These exploitative labour practices are predominantly found at the raw materials processing level of production, where brand influence can be limited, and monitoring can present challenges. To address these industry-level issues, we supported the Tamil Nadu Multi-Stakeholder (TNMS) program, a collaborative initiative. Although the program has now ended, we continue to remain engaged, actively reviewing government and NGO updates, and seeking collaboration opportunities to combat modern slavery in the region.
Turkey	As well as identifying Turkey as a high-risk country due to the Syrian refugee crisis, we have read reports of increased gender-based violence. In response to this, we have been working with a local NGO to devise an awareness programme aimed at providing women in our supply chain in Turkey with information on their rights and where they can go to get help. As Turkey becomes an increasingly important production hub for Boden, we will continue to monitor the risks and work collaboratively, where possible, to address them as well as act within our own supply chain to ensure decent working conditions for all workers employed.
UK	We recognise that the modern slavery risk is not limited to our global operations and modern slavery is very much present in the UK. We take time to realistically understand our local risks and take necessary actions. An area of risk is our Leicester warehouse. At the warehouse, we employ temporary/agency workers to support during peaks in workload. We work with Encore Personnel to recruit these employees. Encore Personnel are licensed labour providers under both the Gangmaster Licensing Act (2004) and the Association of Labour Providers. They have also signed up to the principles of the multi-stakeholder initiative, Stronger Together, with the aim to reduce modern slavery. Information regarding Encore Personnel's modern slavery statement and reporting mechanism are available on their website. To further mitigate risks, we have put several measures in place to drive awareness of this issue within the workforce at Boden's Leicester site (which includes the warehouse and the contact centre). Modern slavery awareness is included in the induction training that all employees based at the site complete before starting work on the warehouse floor or in the contact centre. Employees also do annual refresher training. The site also has Stronger Together posters and materials posted in prominent places. These are displayed in multiple languages and give several options for workers to be able to communicate an issue, including Boden's own whistleblowing contact email.

US

In Pittston (Pennsylvania) an area of risk is our warehouse. In the warehouse, we use several temporary employment agencies to help with employment needs.

These agencies, along with Boden, are required to follow the federal laws under the US Department of Labor (DOL), which governs standards for wages, child labour and workplace health & safety, among other statutes.

Specifically, the Occupational Safety and Health Administration (OSHA) regulates the health and safety standards within the workplace to ensure safe working conditions. Under the Occupational Safety and Health Act of 1970, employers are required to comply with all health and safety standards to provide employees a safe workplace free from recognised and serious hazards.

In addition, the Fair Labor Standards Act (FLSA) governs the standards for wages and overtime pay, and requires employers to pay covered employees, who work in non-exempt roles, a wage of at least the federal minimum wage and overtime pay. The Act also contains Child Labour Provisions that protect minors and ensure that working conditions are safe and not detrimental to their health, well-being or educational opportunities.

In 2021, we successfully completed modern slavery training in our Pittston operations and now have a system in place, so they now align with our UK contact centre and warehouse.

Transparency & Traceability

Since May 2018, we have prioritised transparency by publishing our first-tier factory list, which we update annually. The list includes product category and gender breakdown at the factory level. We analyse our audit demographic data by parameters such as gender and ethnicity. This approach acknowledges the heightened risk of modern slavery for women and migrant workers.

The first tier of production represents only a small portion of the overall supply chain. To comprehensively understand the risks, we need to gather detailed information on factory operations as far down our supply chain as possible. In pursuit of this goal, we have actively pursued supply chain transparency and have now successfully mapped our tier 2 and 3 suppliers. We are reassessing risks across our 806 tier 2 and 3 suppliers as part of our ongoing efforts.

We define our supply chain tiers as below:

Tier One

Making main production – cutting, sewing, finishing

Tier Two

Embellishment, embroidery,
printing, dyeing, washing, handwork
(e.g. crochet), homeworking

Tier Two

Re-processors,
post-arrival in the UK

Tier Three

Components (e.g. zips,
buttons, polybag etc.)

Tier Three

Tanneries, mill
(e.g. fabric production)

Tier Three

Packaging, catalogues
and marketing materials

Tier Four

Dependent on fabric type - raw material processing
(e.g. cotton), slaughterhouse (e.g. leather)

Tier Five

Raw materials origins (e.g. farmer)

Monitoring

First-Tier

All factories producing Boden products are subject to ethical trade assessments through regular audits delivered by independent third parties. Audits must cover the ETI base code principles and local law requirements.

Where possible, we share audits with other brands to reduce audit duplication. Our membership with Sedex supports this approach as it helps to limit the number of audits a site undertakes each year and therefore focuses resource on improving working conditions.

Beyond Monitoring

In addition to monitoring, it is crucial to prioritise listening to and giving workers a platform to voice their views. Boden remains committed to collaborating with &Wider on a direct worker reporting program, aiming to extend this service to all our first-tier factories by 2030.

The insights gathered through this program have enabled Boden to work in partnership with the factories involved to address emerging priorities. In cases where serious issues related to health and safety, physical abuse, confinement, or labour rights are identified, we adopt a comprehensive approach. We engage local expertise and NGOs on the ground to provide support to the factory and workers throughout the remediation and improvement process.

Assessing conditions further down the supply chain

As COVID-19 travel restrictions in Turkey and India are lifted, Boden has resumed including suppliers further down our supply chain in country visits. We aim to expand these visits as we gather more information, enabling us to develop collaborative relationships with suppliers and other brands for continuous improvement initiatives.

Cascading *Knowledge*

Building knowledge in our business

Our Responsible Sourcing Team builds their knowledge in this area through external training, conferences, and events (including ETI modern slavery and human rights training).

We also have our own internal training and awareness-raising programme that provides regular opportunities for learning for everyone in our business. This includes:

- A dedicated Intranet page with information about Boden's Responsible Sourcing strategy, including our [RSC](#)
- Mandatory annual eLearning on modern slavery, which is compulsory for all employees to complete
- Collaboration on a weekly newsletter distributed to the Senior Leadership Team (SLT) about ethical and sustainability headlines from the fashion and textile industry, including emerging and current risks in Responsible Sourcing

Building knowledge amongst our customers

This Modern Slavery Statement has been translated into French and German and will be published on all our websites. Although this is not a legal requirement, we consider it to be best practice in cascading modern slavery knowledge and making it accessible to customers in Australia, Austria, France, Germany, and the United States as these markets continue to be important to Boden.

Building knowledge in our supply chain

To reach our wider supply chain, our Supplier Manual has a section on modern slavery to support suppliers' understanding of this topic. This document includes links to the [Anti-Slavery International website's resources](#) and recommended steps suppliers should take to prevent these issues at factory-level.

Monitoring progress

We are tracking progress and reporting through the following mechanisms:

- Quarterly Risk and Compliance Committee meetings - updates on activities and progress are shared and further actions agreed where needed
- Taking part in the annual Baptist World Aid Australia survey which produces the Ethical Fashion Report
- The ETI's Member Progression Meeting which has replaced their requirement for annual reporting. This meeting is based on non-financial reporting and other public reporting requirements in order to reduce repetition in reports.

Next steps

In 2023, we aim to;

- Expand access channels for workers to provide feedback on their working conditions. Utilise this valuable information to shape and refine our strategy, as well as to address and resolve any conflicts that may arise between factory workers and owners.
- Increasing transparency in tiers 2 and 3 of our supply chain, using the Open Supply Hub and asking suppliers to claim their sites and upload their factory lists
- Expand workers' rights resources to more countries within our supply chain
- Review and revise policies on forced labour, conflict minerals and responsible exit
- Begin the introduction of a direct grievance mechanism for workers in our supply chain to report any issues directly to Boden