

B O D E N

Labour Rights Risks and Modern Slavery Statement

2025

Modern Slavery Statement

Financial Year 29th December 2024 – 27th December 2025 (FY2025)

As part of our ongoing commitment to ethical practices across our operations and supply chain, we fully support and adhere to legislation aimed at preventing modern slavery, human trafficking, and all forms of labour rights abuses.

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.

What are labour rights risks?

Labour rights risks are potential or actual abuses within a supply chain that prevent workers from accessing the rights and protections afforded to them under local, national, or international law (such as ILO conventions).

These risks can manifest in various ways, including wage theft, unsafe or unhealthy working conditions, confiscation of identity documents, restrictions on freedom of association, and other forms of worker exploitation.

Many of these issues are not isolated—they often act as early warning signs or precursors to more severe human rights violations, including forced labour and modern slavery.

Supply Chain Disruptions

In 2025, the supply chain faced several environmental shocks such as earthquakes in Türkiye and floods in South and Southeast Asia. In production countries effected we liaised factories to ensure workers were accounted for, buildings were safe to return to and donated to relief efforts.

External accountability

The year had some highs and lows, but we are committed to prioritising improvement in our supply chain.

One key highlight was the successful launch of a trial of the WOVO worker education platform, developed by Labour Solutions, and we look forward to building on this progress.

One area for improvement is increasing engagement with trade unions and legitimate worker representatives, to help identify and address any potential blind spots in our supply chain risk assessments.

While we recognise that further progress is needed, we remain proud of our ongoing commitment to transparency and accountability. We also continue to value the insights and feedback provided by external stakeholders to whom we disclose, including the ETI and Baptist World Aid Australia.

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

Signed by

A handwritten signature in black ink, appearing to read 'Ben Dreyer', with a stylized flourish at the end.

Ben Dreyer, CEO
J. P. Boden & Co. Ltd
Date: June 2026

Our Impact

2,354

workers
in India

1,199

workers
in Turkey

1,120

workers
in Sri Lanka

2,649

workers
in China

1,746

workers in
the Philippines

350

workers in
Vietnam

Boden provided a worker feedback survey through
&Wider to 9,418 workers across the global supply chain

19 Active
HERprojects

490

Peer Educators

7,886

Female workers

3,254

Male workers

413

Managers

“My view of sex education for children has drastically changed. When asked where babies come from, I used to answer that they came from the river. Now, I think it's important to have open and honest conversations with our children about reproduction. I also recognize the importance of teaching children about their private body parts to help them learn healthy boundaries and appropriate behaviour.”

- Female Factory Worker in China
(RISE Health Attendee)

“This training was a turning point for me. I learned to clearly understand the difference between sex and gender, the importance of gender equality, and how to communicate effectively in different situations. I also became aware of the various forms of gender-based violence, their consequences, and how to respond to such situations, both at work and in my personal life.

- Female Factory Worker in India
(RISE Respect Attendee)

“The training helped me reflect on my dreams and goals and made me realise how important it is for women like me to think about our future and self-development. I also developed skills in expressing myself respectfully and confidently, and in listening to others without causing harm. These lessons have improved my relationships with coworkers, family members, and friends.”

- Female Factory Worker in India
(RISE Respect Attendee)

“Through this training, I gained valuable insights into workplace respect and gender equality. Before the training, I believed that only men were capable of making decisions and taking leadership roles in the factory. However, this experience changed my perspective. I now understand that women also have the ability and the right to lead and contribute to important decisions in the workplace.”

- Male Factory Worker in India
(RISE Respect Attendee)

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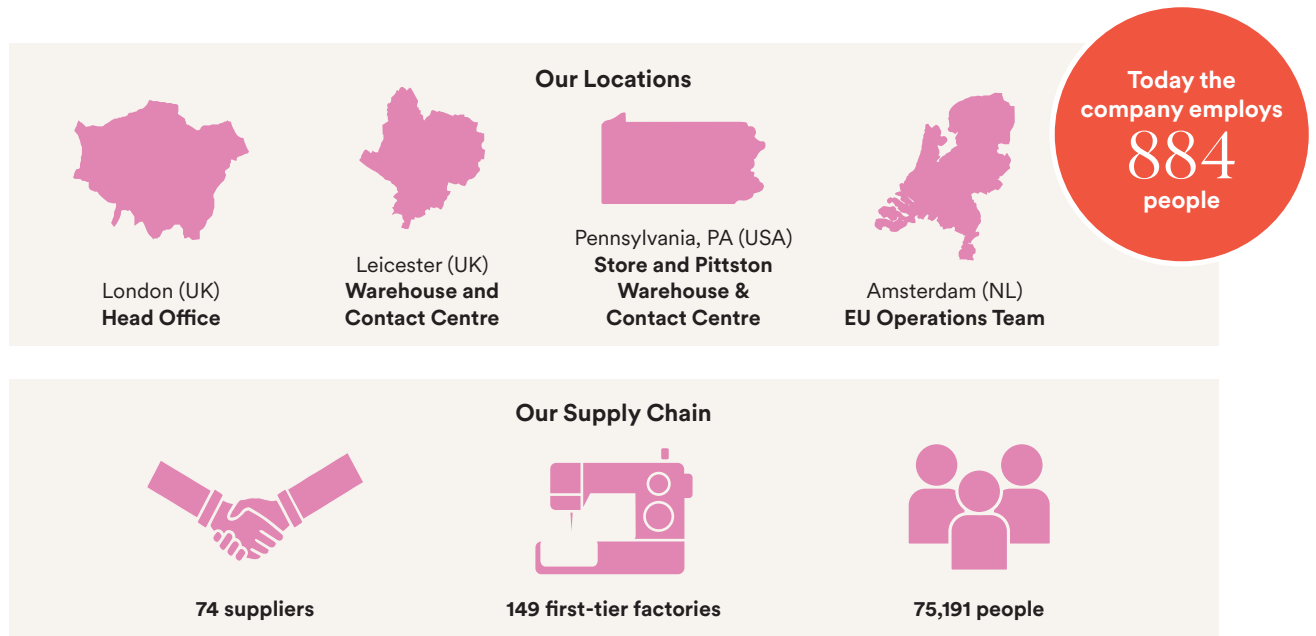
In accordance with [The Home Office's statutory guidance](#), this Modern Slavery Statement covers the following six areas as well as salient risks to labour rights:

Boden Statement		Home Office Guidance
06	Our Company and Supply Chain	Organisation structure and supply chains
07	Process, Policies and Due Diligence	Policies in relation to slavery and human trafficking
07	Process, Policies and Due Diligence	Due diligence processes
09	Assessing Risks	Risk assessment and management
13	Monitoring	Key performance indicators to measure effectiveness of steps being taken
14	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 74 apparel and footwear suppliers. Our suppliers work with 149 first-tier factories who employ over 75,191 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, 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, prioritising long-term partnerships to support traceability, uphold working conditions, and ensure product quality. Our sourcing strategy is centred on maintaining these long-term relationships to enable greater transparency and continuous improvement.

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 RSC and Supplier Manual details 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's requirement is that all suppliers 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 conduct and submit an unannounced 4-pillar third-party audit using the SMETA ethical auditing protocol on an annual basis, 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:



For workers' rights.
For better business.

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.



&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

Responsibility for human rights due diligence, including labour rights and modern slavery, rests with the Chief Executive Officer (CEO), Chief Commercial Officer (CCO), and the Executive Board, supported by relevant directors and teams, including Responsible Sourcing and Legal.

The responsible sourcing strategy, and this modern slavery and labour rights statement, are approved 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 Chief Product Officer (CPO) and the Product Managers with a proposed action plan for remediation with agreed timescales.

The Boden Risk and Compliance Committee was established to review risks across the business and meets quarterly to discuss them. Attended by the senior leadership team and Executive Board, along with department managers from across the business including Responsible Sourcing. Each meeting includes a review of actions and issues from previous sessions, as well as the identification and discussion of emerging risks. New risks identified through ongoing assessments are presented, and appropriate mitigation actions are agreed.

Progress against all identified risk areas is tracked and reviewed at subsequent meetings, ensuring accountability and the effective management and resolution of risks.

Implementation

Many teams across the business support the implementation of Boden's due diligence programme, including Responsible Sourcing, People, Operations, and Legal.

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

Below is a list of our most salient risks within our supply chain, which could contribute to labour rights abuses and 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	Debt bondage from costs relating to recruitment and travel. Migrant workers in the supply chain can face heightened risks of exploitation, especially those not from the place of their employment.	Boden works in partnership with suppliers and external stakeholders to address these risks, regularly reviewing independent third-party ethical audits and direct worker reporting to monitor and identify potential issues.
Presence of refugees	Exploitation of refugees in the supply chain. Refugees can be taken advantage as their access to labour rights information and protections.	Boden promotes social dialogue and worker representation across its production sites to strengthen workers' access to effective representation. In Türkiye where the risk is more heightened, Boden also employs the services of a local representative who conducts factory visits and will work directly with suppliers and factories to drive continuous improvements in working conditions.
Outsourced recruitment processes and the use of contract/agency/temporary employees	Workers in our UK 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	Sites beyond tier 1 have an increased risk of child labour due to reduced visibility in the supply chains as they are often involved in informal production.	Boden engages regularly with its supply chain to ensure that its RSC—particularly our Young Workers and Child Labour policy—is clearly communicated and understood across all tiers. We also maintain active engagement during visits with in-country stakeholders to support effective implementation and address risks at source.

State-imposed forced labour	Ethnic and religious minorities	Boden maintains regular communication with its supply chain to ensure effective dissemination of our RSC which details regions that suppliers and factories should not be receiving products or obtaining services from. We actively engage with stakeholders to remain informed of potential risks on the ground.
Gender-Based Violence	Workers in the supply chain	Global events, including the COVID-19 pandemic, have been associated with increased risks of domestic abuse and workplace harassment across the countries we source from. Boden works with suppliers to ensure factories have effective internal reporting mechanisms in place and use our direct worker reporting programme to identify trends. We provide training through a 3rd party that promotes gender equality and addresses gender-based violence in the supply chain and where we can we collaborate with peers at shared sites.

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 and labour 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 \(ILO\)](#)
- [U.S. Department of Labor \(DOL\)](#)
- [Occupation Safety and Health Administration \(OSHA\)](#)
- [Fair Labor Standards Act \(FLSA\)](#)
- [BSR](#)

Where required, 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 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 a 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 risk and our level of activity within them: China, India, Türkiye, Sri Lanka, the US and the UK:

China	As a key sourcing country for Boden, allegations of state-imposed forced labour are a significant concern. We have conducted a thorough review of our supply chain and found no links to implicated entities. We continue to strengthen due diligence, including requiring suppliers to disclose the origin of their cotton. We remain committed to transparency and collaboration with industry peers to support meaningful improvement.
India	Historically, the Sumangali scheme in Tamil Nadu highlighted risks of exploitative labour practices in spinning mills, particularly for young women. While its prevalence has declined, related risks persist in lower tiers where visibility and leverage can be limited. We continue to monitor developments and engage with industry partners and stakeholders to address ongoing risks in the region.
Turkey	Türkiye continues to present heightened labour rights risks, particularly linked to the employment of Syrian refugees and the prevalence of informal work. Risks include low wages, excessive overtime, discrimination, and limited access to effective grievance mechanisms. Recent reporting also highlights ongoing risks of gender-based violence and harassment, both in society and within workplaces. As Türkiye remains a strategically important sourcing hub, we are committed to ongoing due diligence and collaborative action to address these risks.
Sri Lanka	We have identified Sri Lanka as a new risk because of the floods and subsequent landslides caused by cyclone Ditwah. The environmental disaster disrupted livelihoods across Sri Lanka, increasing labour rights risks within the garment sector, these included income insecurity, unsafe working conditions, worker displacement, and heightened risks of gender-based violence. We continue to engage with suppliers and are committed to ongoing due diligence and collaboration with stakeholders to respond to emerging risks in the region.
US	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.

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 [GI Group](#) to recruit these employees.

GI Group 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 GI Group'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.

Transparency & Traceability

We started making our first factory list publicly available on our website in May 2018, to show our commitment to transparency, this list is updated annually. The list includes product category and gender breakdown at factory level.

We also analyse audit data—such as gender and employment type —to better understand the composition of the workforce and identify potentially high-risk groups, recognising the increased vulnerability of women and migrant workers to labour rights risks and potential modern slavery.

The first tier of production represents only a small portion of the overall supply chain. To comprehensively understand the risks, we gather detailed information on factory operations as far down our supply chain

as possible. We gather this information during the supplier onboarding process and liaise with them for updates.

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

First-tier production sites are required to have an annual monitoring programme in place. Assessments/audits must cover all elements of the ETI base code and be conducted by an independent, third-party ethical audit firm.

Where possible, we share audits with other brands to reduce audit duplication. Our Sedex membership supports this approach by minimising audit frequency and enabling the sites to focus on improving working conditions.

Beyond Monitoring

Monitoring is a good first step, however there are known limitations on just this alone. As such to gather more touch points in the supply chain and to triangulate audit data we have partnered with a worker voice platform.

The worker insights from the platform support the identification of risks and inform our engagement with suppliers, where appropriate we provide worker based education and training.

Where serious issues are identified, we work with suppliers and local stakeholders, including NGOs, to ensure appropriate and effective remediation and drive continuous improvement in working conditions.

Assessing conditions further down the supply chain

Alongside desk or system-based monitoring we also visit suppliers and factories in country. While on these trips we take the opportunity to visit suppliers further down our supply chain to gather more information and to enable 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.

We also have our own internal training and awareness-raising programme that provides regular opportunities for learning for everyone in the 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

Building knowledge amongst our customers

This document has been translated into French and German and will be published across our websites. While not a legal requirement, we consider this best practice to support transparency, raise awareness of supply chain risks, and ensure accessibility for 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 bi-annual Baptist World Aid Australia survey which produces the Ethical Fashion Report
- The Ethical Trading Initiative's Corporate Transparency Framework (CTF), which assesses companies against 7 minimum requirements in relation to public reporting, along with further 'Good practice' and 'Better practice' requirements.

Next steps

In 2026, we aim to;

- Continue to roll out a training platform, to provide information on financial wellbeing, worker rights and emotional wellbeing to factory workers
- Understand the wage gap to living wages in our first tier supply chain
- Review how we assess risks in our supply chain