

# HUSH

Modern Slavery Act Transparency Statement  
1st April 2023 – 31st March 2024

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## INTRODUCTION

The business of Hush is fashion but Hush is not a fast fashion business; we are committed to producing high-quality, versatile, long lasting pieces that are designed with consideration for people, planet and animals. Every person involved in the manufacture of our products, from those in our UK office and warehouse to supply chain workers worldwide, play a crucial role in Hush's success. We advocate for a safe, fair, inclusive and respectful working environment for everyone.

Modern slavery is a severe violation of human rights, encompassing situations of exploitation such as forced, bonded and child labour and human trafficking. Victims of modern slavery are unable to refuse or leave their situations due to threats, violence, coercion, or deception. Despite international efforts, modern slavery is increasing. According to the International Labour Organization's latest research in 2021, the number of forced labourers has surged to 27.6 million. The textile and apparel industry is identified as the second most high-risk industry according to the Global Slavery Index, primarily due to the complex, multi-tiered and opaque nature of its supply chains and the presence of vulnerable workers within them.

Hush has zero tolerance for forced labour and human trafficking anywhere within our business or supply chains. In line with the UN Guiding Principles on Human Rights, we acknowledge that we have a clear responsibility as a business and collectively as an industry to protect and respect the rights of all people working within the fashion sector.

Hush's sixth Modern Slavery Statement, detailing our progress, challenges, and commitments for the financial year ending in March 2024, is prepared in accordance with the guidelines outlined in Section 54 of the UK Modern Slavery Act 2015. Presently, we are not obligated to report under any other modern slavery legislation and we support the global trend towards stronger legal structures for protecting human rights.

# STRUCTURE, BUSINESS AND SUPPLY CHAINS

## ABOUT HUSH

Established in 2003 by our Founder, Mandy Watkins, Hush is an online fashion and lifestyle brand that offers women's clothing, footwear and accessories. Our products are available for purchase through our website (hush-uk.com), Next online (next.co.uk), and John Lewis & Partners' website (johnlewis.com), as well as in 30 John Lewis concessions. Our team consists of 124 employees, with 118 based at our head office in Clapham, London, and six working across various John Lewis stores in the UK. We directly employ our staff and occasionally engage freelancers and contractors. Additionally, we utilise the services of a third-party managed warehouse based in the UK. Hush is a private limited company registered in England and Wales under registration number 3480753. True Capital holds a 51% stake in our business, making it the majority owner, while the remaining shares are held by founders Mandy Watkins and Rupert Youngman, along with other senior Hush executives, both current and former.

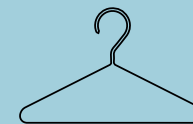
We are aiming to be a B Corp. With B Corporation certification, we aim to boost engagement in our sustainability programme and collaborate with others driving positive industry change.



## KEY BUSINESS FIGURES\*



Established 2003



98 countries sold into



1 UK based office



1 Third-party managed  
UK based warehouse



4114 different  
products available



124 employees with 118  
based in head office and  
6 across John Lewis  
concessions

\*All figures accurate as of 31st March 2024

# OUR STOCK SUPPLY CHAIN

We divide our suppliers into three categories: stock, non-stock and third-party branded suppliers.

## SUPPLY CHAIN TIERS

Tier	Process
Tier 1	Main Production Site
Tier 2	Primary Process Subcontractor E.g. stitching, cutting, packing
Tier 3	Secondary Process Subcontractor E.g. embroidery, embellishment, laundry
Tier 4	Fabric and Components E.g. fabric mills, trims
Tier 5	Raw materials
Non-Stock Suppliers	Goods and services that support our business operations

KEY SUPPLY CHAIN FIGURES\*



11

Tier 1 manufacturing countries



96.6%

of Hush production takes place in the following 5 countries China, India, Turkey, UK and Vietnam



106

Tier 1 manufacturing sites\*\*



21,576

workers in our Tier 1 manufacturing sites:



18

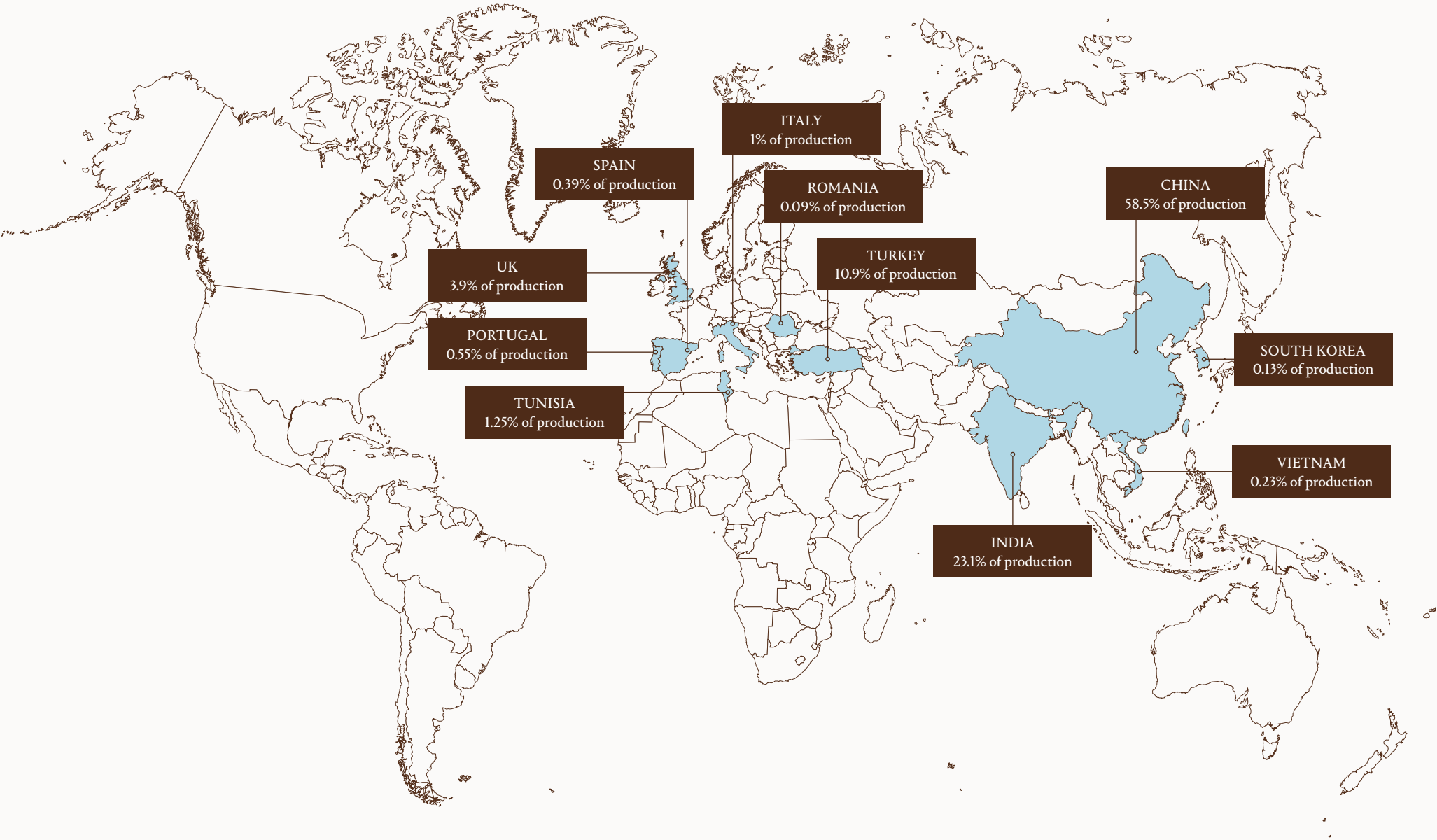
third-party brands sold through our website

\*All figures accurate as of 31st March 2024 except figure 3

\*\*Figure accurate as of end of December 2023



TIER ONE FACTORY LOCATIONS AND % OF HUSH PRODUCTION





## STOCK SUPPLIERS

We have 106 Tier 1 approved factories (defined as our main manufacturing sites) in China, India, Italy, Portugal, Romania, Spain, South Korea, Tunisia, Turkey, Vietnam and the UK.

We conduct regular checks to track the sites used for manufacturing our products, which include requiring new suppliers to identify all units involved in production before we place orders, mandating suppliers to provide Tier 1 factory information, confirming site usage with suppliers every six months, and asking for evidence of site production information during site assessments in our existing supplier programme.





## NON-STOCK SUPPLIERS

Through our non-stock suppliers, we source a range of goods not for resale (GNFR) and services which support our business operations, such as printing, packaging, labelling, office cleaning, recruitment, warehousing, transport and shipping. These non-stock suppliers are contractually required to comply with Hush's supply chain policies described below. We committed in our last Statement to map our non-stock suppliers. Unfortunately, due to company changes, we have not been able to complete this work during the last financial year. We have put this commitment on hold while we focus our resources on our product supply chain.



## THIRD-PARTY BRANDED SUPPLIERS

While a majority of our products are our own brand, we also carry a variety of smaller third-party brands – a total of 18 as of the end of the last financial year. These brands are contractually required to comply with all of our supply chain policies. Over the last year, we have designed a more in-depth third-party brand self-assessment questionnaire to help us understand their current sustainability performance and where they might need support. We will also update our third-party supplier contract to reinforce this obligation during 2024.



## OUR POLICIES



## MODERN SLAVERY GOVERNANCE

Hush's human rights, ethical trade and modern slavery prevention programmes are overseen at the highest level by our CEO, and are implemented by our legal, human resources (HR) and product teams. We also have a Sustainability Committee in place.

## MODERN SLAVERY GOVERNANCE STRUCTURE

CEO - overall responsibility for championing human rights and preventing modern slavery



Sustainability Committee - comprising representatives throughout the business who meet regularly to raise awareness of and act upon emerging sustainability issues and legislation.



Legal, human resources and product teams – responsible for developing and implementing modern slavery related policies and procedures, protecting employee and supply chain workers' rights and conducting supplier reviews.



## BUSINESS POLICIES

We have policies and procedures in place to protect our employees throughout the recruitment processes and during their time with us. Our Employee Handbook contains the following policies relevant to employee rights:

- Anti-Corruption & Bribery Policy
- Anti-Harassment and Bullying Policy
- Anti-Slavery & Human Trafficking Prevention Policy
- Code of Ethics Values Statement
- Corporate Social Responsibility Policy
- Disciplinary Procedure
- Equal Opportunities Policy
- Grievance Procedure
- Health & Safety Policy
- Whistleblowing Policy
- Human Rights Policy (to be introduced in 2024-2025)

All employees have access to the Employee Handbook on our internal HR portal.



# SUPPLY CHAIN POLICIES

Our supply chain policies are developed in collaboration with an external human rights expert and are reviewed regularly to ensure alignment with best practices. These policies apply to all stock, non-stock, and third-party brand suppliers, recruitment agents, labour providers, homeworkers, intermediaries, and subcontractors. The following table describes our supply chain policies, codes, and statements.

## SUPPLY CHAIN POLICIES

Policy, Code or Statement	Description
Supplier Code of Conduct	This code sets out our supplier expectations to ensure safe and fair working environments and practices within our supply chain. It is based on the ETI Base Code, an internationally recognised code of labour practice, founded on the conventions of the International Labour Organisation (ILO).
Child Labour & Young Worker Policy	This policy sets out our requirements for ensuring children are not working within our supply chains, that young workers are adequately protected at work and remediation guidelines if child labour or young worker hazardous work is identified.
Supply Chain Whistleblowing Policy	This policy supports suppliers to establish proper worker dialogue channels that are accessible, safe and understandable to enable workers to raise concerns or disclose information confidentially.
Cotton Sourcing Statement	This statement sets out our reasons for prohibiting cotton sourced from Uzbekistan, Turkmenistan and XUAR region in China owing to ongoing concerns about child and/or forced labour.
XUAR Statement	This statement sets out our requirements for our suppliers to ensure forced labour and human trafficking of Uyghur and other Turkic and Muslim-majority people is not taking place in our Chinese supply chain.
Supplier Terms	These terms set out a framework governing how business should be conducted between Hush and our suppliers. It contains contractually-binding agreements relating to production as well as our sustainability, anti-slavery & human trafficking and sub-contracting standards.
Migrant and Agency Worker Policy	DRAFT: This policy describes our requirements for suppliers and agencies to ensure migrant and agency workers are protected in the workplace, including a worker checklist for them to action prior to, during and after employment.
Supply Chain Homeworking Policy	DRAFT: This policy communicates our stance on homeworking in our supply chain and our commitment to work with suppliers to assess and improve conditions where homeworking occurs. It also contains our requirements for suppliers and intermediaries to put in place systems to protect homeworkers.
Responsible Exit Guidelines	DRAFT: These guidelines set out the steps our internal teams and suppliers can take to minimise the impact of exiting a site on workers.





## SUPPLY CHAIN POLICIES (Cont..)

Our new Migrant and Agency Worker and Supply Chain Homeworking policies are still in the draft phase. We hope to have these ready for deployment in the near future, along with internal guidelines, currently under development, on how to exit a supplier responsibly should the need arise.

Most of the documents above can be found in our Supplier Sustainability Standards. When suppliers begin the onboarding process, they are required to read and sign a declaration confirming their compliance with our Standards. We set out in the Due Diligence section below how we monitor compliance with our policies and what we do when suppliers cannot meet our standards.

## GRIEVANCE AND WHISTLEBLOWING MECHANISMS

Employees have two ways to report concerns:

- They can raise concerns through Hush's Grievance Procedure.
- They can report more serious issues using Hush's Whistleblowing Policy.

We encourage everyone within the business to raise concerns in good faith through this safe channel without fear of retribution. We will investigate all reports fairly and confidentially, and provide remediation when required. We will also provide feedback to whistleblowers on the progress and outcome of their concerns. We have a dedicated whistleblowing email address.

In addition, we have a Supply Chain Whistleblowing Policy to guide suppliers in establishing proper worker dialogue channels that are accessible, safe, and understandable, enabling workers to raise concerns or disclose information confidentially.



# DUE DILIGENCE





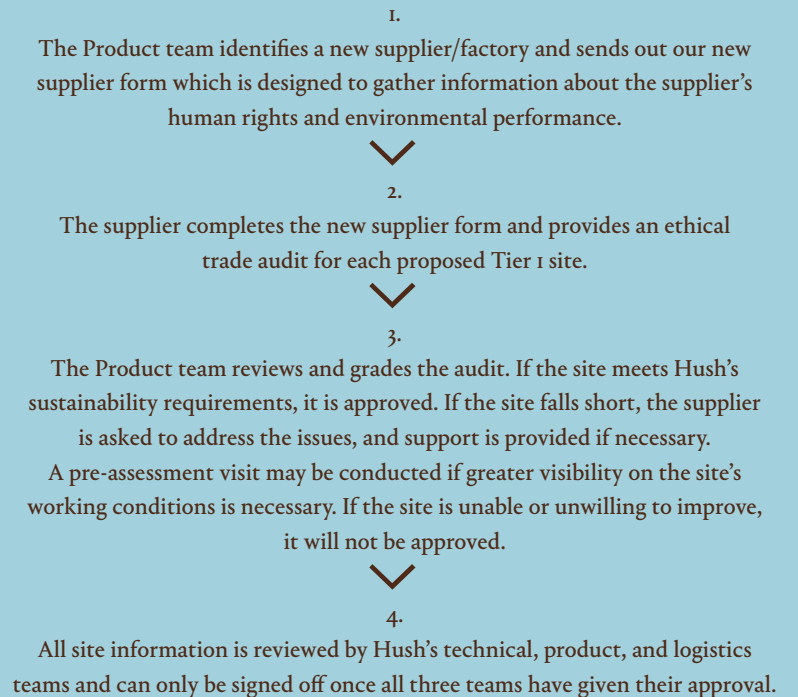
We aim to build stable, long-term relationships with suppliers who share our values, to influence and support them over time to improve our product and sustainability standards.

## NEW SUPPLIERS AND FACTORIES

In our stock new supplier and factory onboarding process, we assess new sites for their ability to meet Hush's sustainability and technical standards.

Here's an overview of our process:

### NEW SUPPLIERS/FACTORY ONBOARDING PROCESS





## EXISTING SUPPLIERS

Since 2019, an ethical assessment programme has been in place for our Tier 1 stock suppliers, who represent the majority of our stock spending. We support our suppliers by conducting site visits, factory assessments, remediation and personalised project work. We have partnered with a human rights consultancy called The Reassurance Network (TRN), which carries out this work on our behalf.

TRN performs an ethical assessment after a site has passed our onboarding process and begins producing Hush orders. The timing of this assessment depends on the grading the site received during the onboarding process. During site assessments, the assessor reviews the factory's ability to adhere to Hush's Supplier Code of Conduct. They also interview vulnerable worker groups, such as women, migrants, agency workers, refugees, and young workers, to gain further insight into their working conditions.

We monitor our supply chain assessment data and any non-compliances against our set of modern slavery indicators. These indicators signal possible instances of forced labour or human trafficking. When the assessor detects a modern slavery indicator during an assessment, they will provide their opinion on whether there is an elevated risk of modern slavery at the site based on their overall findings. If a higher risk is suspected, we conduct a more thorough investigation at the factory and within the local community to better understand the workers' circumstances. To date, we have not found any instances of modern slavery through our in-depth investigations. However, if such a situation were to arise, we would collaborate with TRN's regional experts and other local specialist organisations to understand the root causes and scope of the problem, ensure the protection of the workers' needs and rights, and implement a plan of action that serves the best interests of the workers.





## MODERN SLAVERY INDICATORS

- Presence of migrant workers
- Use of labour providers and recruitment agents
- Evidence of informal or indirect recruitment
- Child labour
- Accommodation tied to employment
- Abuse of vulnerability
- Deception during recruitment
- Restriction of movement
- Isolation from other workers or in remote locations
- Violence
- Intimidation or threats
- Retention of IDs
- Withholding of wages
- Debt bondage
- Abusive living or working conditions
- Excessive working hours

During the last 12 months, 93% of our Tier 1 factories were either audited by us or provided us with a third-party audit undertaken within the last 2 years. In the next FY we will be auditing 100% of our ongoing suppliers.



## REMEDIATION

Our approach to site assessments focuses on problem-solving rather than fault-finding. If we find any non-compliances during assessments, we will collaborate with the supplier, factory, TRN and potentially other brands working with the site to create a corrective action plan and address any issues. We will follow up with regular calls, visits, assessments and document reviews to ensure that any issues have been resolved. We expect the factory to continually improve over time with our support. If serious non-compliances are found or repeated violations occur, and the site is unwilling to make improvements, Hush reserves the right to terminate all business with the supplier. We have internal responsible disengagement guidelines in place to ensure that we exit sites in a way that minimises the negative consequences for workers.

TRN's assessors have the autonomy to address non-compliances with the factory directly to ensure timely resolution and support.

## NON-STOCK SUPPLIER ASSESSMENTS

We have identified warehousing as a priority category to continue to assess, given that our warehouse employs some of the more vulnerable types of workers, such as migrant and agency workers. We use the services of one UK based warehouse and undertook an initial assessment of this site in 2022. We conducted a follow up visit in February 2024 and were pleased to note the site had further strengthened its management and worker protection systems. Due to staff changes, we have been unable to progress with our goal of incorporating other high risk non-stock suppliers into our ethical assessment programme.





# RISK ASSESSMENT



## SUPPLY CHAIN

Our internal teams, with the support of TRN, carry out our risk assessments. These assessments include desk-based research, supply chain mapping, assessments and site visits and supplier and stakeholder engagement. We consider the following risk factors: product and service type, geographical location, worker type, including vulnerable worker groups, high-risk labour practices, such as excessive working hours, and the likelihood of involvement of recruitment and labour agencies and intermediaries. Our risk assessments have determined that our stock supply chain contains the greatest risk of modern slavery, so this is where we have been focusing our efforts through our ethical trade programme.

Our warehouse, logistics and cleaning companies occasionally use agency workers who, due to the nature of their employment, may be at greater risk of modern slavery. We will continue to assess the risks related to workers in these facilities and how best to protect them.

## VULNERABLE WORKERS

In order to protect vulnerable workers in our supply chain, such as Uyghur and other Turkic and Muslim-majority people, migrant and agency workers and homeworkers, we conduct worker mapping, ask questions about these worker groups during our assessments and have created policies aimed at enhancing protection for these workers.

- **UYGHUR AND OTHER TURKIC AND MUSLIM-MAJORITY PEOPLE**

In 2020, we became aware of reports of forced labour and trafficking of Uyghur and other Turkic and Muslim-majority people, particularly in China's Xinjiang Uyghur Autonomous Region (XUAR). At the time, we sent out a statement to all our suppliers setting out our position and asking them to sign a declaration of compliance. We continue to undertake due diligence through on-site visits and desk-based research on our stock suppliers to ensure we are not sourcing from factories located in XUAR or factories elsewhere in China where there have been allegations of forced labour conditions. We track legislation aimed at protecting Uyghur people and others trapped in forced labour to ensure our ongoing compliance.

- **MIGRANT AND AGENCY WORKERS**

We recognise that migrant and agency workers risk greater exploitation, inferior employment terms and working and living conditions, lack of access to health and welfare services, discrimination and human trafficking and forced labour. We continue to monitor and assess the exploitation risk to our Tier 1 migrant workers. We have drafted a Migrant and Agency Worker Policy, which contains a checklist for suppliers and agencies to review at each stage of the worker employment journey. We will be rolling this policy out to our suppliers in 2024.





- **HOMEWORKERS**

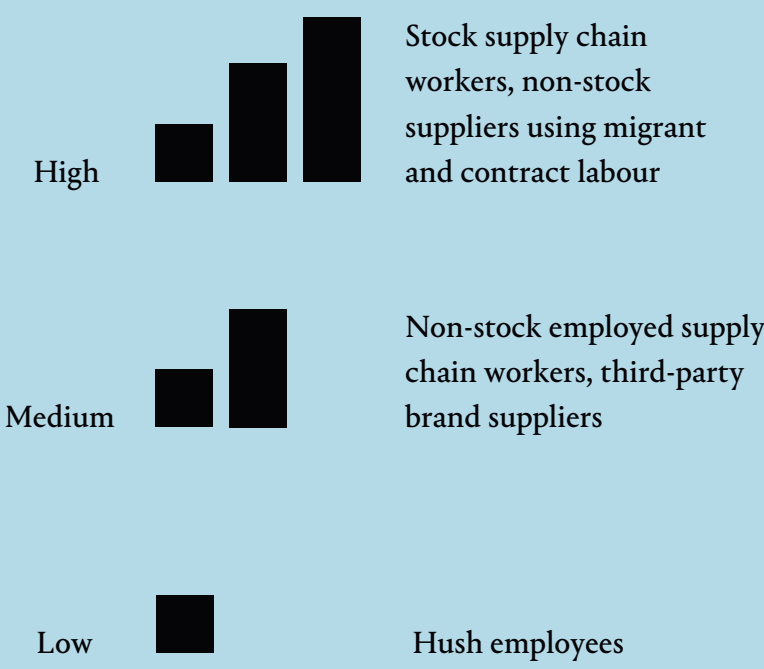
Due to the informal nature of their work, we are aware that homeworkers are vulnerable to wage exploitation and unsafe working spaces and may involve children in production processes. As we map further down our supply chain, we have identified sub-contractors using homeworkers, particularly in China. We have a clear position on homeworking described in our Homeworking Policy, currently still in draft format. It sets out our requirements for suppliers and intermediaries to protect the rights of homeworkers.



# OPERATIONS

Within our own business, we believe the risk of modern slavery is low; all of Hush’s employees are employed directly by us, with over 96.7% of our employees on permanent contracts.

# MODERN SLAVERY RISKS WITHIN OUR BUSINESS AND SUPPLY CHAIN



# TRAINING AND CAPACITY BUILDING



## EMPLOYEE TRAINING

We have historically run modern slavery induction sessions for all new employees. We are planning to introduce mandatory annual modern slavery training for all employees in 2024-2025.

New employees also receive more general training on Hush's sustainability programme as part of the induction process.

## SUPPLY CHAIN CAPACITY BUILDING

Given the size of our business and our relatively small order volumes, the best way to increase our influence with our suppliers and help them improve their capacity and knowledge is to collaborate with other brands, either on our own or as part of industry initiatives. In the next year, we plan to identify brand partnerships that will allow us to make a bigger impact on raising supply chain standards.



## EFFECTIVENESS OF OUR APPROACH

## EFFECTIVENESS OF OUR APPROACH

We have not found any instances of modern slavery in our business or supply chains during our due diligence and risk assessment procedures. Additionally, we have not received any reports of modern slavery through our grievance mechanisms.



## PROGRESS AND FUTURE COMMITMENTS

Below is an update on last year's progress and new commitments for the upcoming year. Unfortunately, due to staff changes, we have not been able to allocate resources to many of last year's activities. However, this year, we will prioritise a smaller number of key commitments to drive momentum within our programme.

## PROGRESS AND COMMITMENTS

Statement Section	2023-2024 Commitments	Progress	2024-2025 Commitments/Notes
Structure, business & supply chains – certification	Source 100% sustainable cotton by the end of 2023	Revised commitment	Source 50% organic cotton by the end of 2027
Structure, business & supply chains – transparency	Continue to map Tier 4 & 5 sites	On hold due to resource constraints	N/A
Structure, business & supply chains – transparency	Continue to map and risk assess non-stock suppliers	On hold due to resource constraints	N/A
Structure, business & supply chains – transparency	New	New	Update Hush's Third Party Brands Contract to require brands to comply with our Supplier Sustainability Standards
Structure, business & supply chains – certification	B Corp application to be submitted during the first half of 2023	Completed	N/A
Policies	Sign off and roll out Migrant and Contract Labour Policy, Homeworking Policy, Business Human Rights Policy. Continually review and improve policies	In progress – policies signed off	Roll out Migrant and Contract Labour Policy, Responsible Exit Guidelines, Business Human Rights Policy
Due diligence	Roll out Tier 2-3 SAQ	On hold due to resource constraints	N/A
Due diligence	Finalise third-party brands SAQ and roll out	In progress – SAQs finalised	Roll out third-party brands SAQ
Due diligence	Extend FORUM to suppliers who would benefit most from the programme	On hold due to resource constraints	N/A
Training & capacity building	Within 18 months run another supplier survey to establish supplier training needs	On hold due to resource constraints	N/A
Training & capacity building	Identify partners to help build supplier capacity and knowledge	In progress	Collaborate with other brands to address supply chain issues collectively

ONGOING COMMITMENTS

Statement Section	2023-2024 Commitments	2024-2025 Commitments/Notes
Due diligence	Ensure 100% of our tier 1 factories are assessed by us or another reputable third-party provider	Ongoing
Due diligence	Undertake assessment of warehouse at least every 2 years	Ongoing
Due diligence	Conduct further due diligence on Chinese factories to ensure there is not forced labour or human trafficking taking place.	Ongoing
Due diligence	Continue to map and risk assess vulnerable workers (migrant, homeworkers and women)	Ongoing
Training & capacity building	Continue to provide training on modern slavery prevention to all employees	Ongoing
Training & capacity building	Train all employees on sustainability standards as part of their induction process	Ongoing



Signed:

A handwritten signature in black ink, appearing to read 'S. Miles', enclosed within a dotted rectangular box.

Sarah Miles, Chief Executive Officer, on behalf of the board of directors,

Date 30.09.24

