

2025 Modern Slavery Statement

Introduction

At Nobody's Child, we are committed to taking action that prevents modern slavery and human trafficking across our operations and supply chain. As a purpose-led brand with a growing presence in the fashion industry, we recognise the responsibility we hold in addressing human rights risks across our supply chain and are committed to working with our supply partners and industry groups to raise standards. We adopt the Ethical Trading Initiative (ETI) Base Code, founded on the conventions of the International Labour Organisation (ILO) and the UN Guiding Principles on Business and Human Rights.

This statement has also been prepared in accordance with the Modern Slavery Act 2015. It outlines our approach to due diligence, demonstrates the work we are already undertaking with our supply partners and details our commitment to responsible sourcing. The reporting period for this statement is June 2024 - June 2025.

A Message from our CEO

"At Nobody's Child, we pride ourselves on doing things the right way and constantly striving for better. The last year has been one of real action for us. Since our last Modern Slavery Statement, we have doubled down on our Digital Product Passport initiative, deepened our supply chain traceability work, and released our first Impact Report - an honest take on our achievements, learnings, and goals across people, planet, product, and progress.

In partnership with our network of supplier partners around the world, we have elevated our engagement across traceability and human rights protection through supply chain risk mapping, targeted questionnaires, and ensuring learning and training resources are available on demand. As a team, we are proud of our strong supplier relations, the systems we have set up, and the next steps we have identified for continual improvement. We are excited about what lies ahead and look forward to bringing our supplier partners and our customers on the journey with us."

Jody Plows



Governance Structure

Nobody’s Child is a London based apparel retailer operating through our e-commerce site, retail shops, and international wholesale accounts. We are committed to upholding occupational health, safety, and welfare throughout our direct operations (head office and retail sites) and supply chain (distribution centres, wholesale partners, contracted manufacturing sites).

Responsibility for anti-slavery and human rights protection is embedded across all of our operations at NC, however, responsibility for the day-to-day operations of labour and workplace management in our supply chain sits with our Sustainability Lead.

OUR CEO

Strategic leadership and accountability, champions public policy and commitments, and oversees stakeholders influence.

SUSTAINABILITY TEAM

Oversees responsibility for ethical supply chain management; leading anti-slavery policies and human rights protection, managing risk assessment and due diligence programmes, ensuring this is embedded across our operations.

PRODUCT DEVELOPMENTTEAMS

Product teams hold close relationships with suppliers and oversee the end to end manufacturing process. They work closely with the sustainability team to screen prospective new suppliers across a range of social and environmental areas. They shape capacity planning and ensure critical paths allow sufficient time to fulfil orders responsibly.

Head Office & Retail Structure



1 HEAD OFFICE

Based in London, our head office is home to 103 employees.



6 UK STORES

We have 43 retail team members operating across all 6 of our retail stores in Covent Garden, Carnaby Street, Spitalfields, St Albans, Brighton and Leeds.



1 DISTRIBUTION CENTRE

Based in Milton Keynes.



22 WHOLESALE PARTNERS

We are stocked in 325 stores globally, including M&S, John Lewis Partners, ASOS, Fenwick, Next, Anthropologie, Nordstrom and Very.

Supply Chain Structure

The fashion supply chain is typically broken down from tier 0 to tier 4/5 as outlined below. At NC, all tier 1 finished goods factories are screened, assessed and onboarded to our supplier list by our buying, operations, and sustainability teams. We require all Tier 1 factories to sign our Supplier Sustainability Commitments before onboarding to ensure compliance with our standards.

SUPPLIER TIER	EXAMPLES	KEY RISKS
TIER 0 NC head office, stores and warehouses	Internal Operations	Low risk
TIER 1 Final product manufacturing and assembly	Factories cutting, sewing and finishing garments	Working conditions, wages, resource consumption
TIER 2 Fabric and materials production	Textile mills, dye houses	Working conditions, chemical safety
TIER 3 Raw material processing	Spinning, leather tanning	Working conditions, chemical use, resource consumption
TIER 4/5 Raw material production	Farms, forests, recycled polymers	Working conditions, traceability, resource, land consumption

We are currently mapping supply chain sites beyond tier one through chain of custody certifications and our Digital Product Passports. This supports our commitment to traceability and enables us to identify and address risks earlier in the supply chain.

Production Breakdown

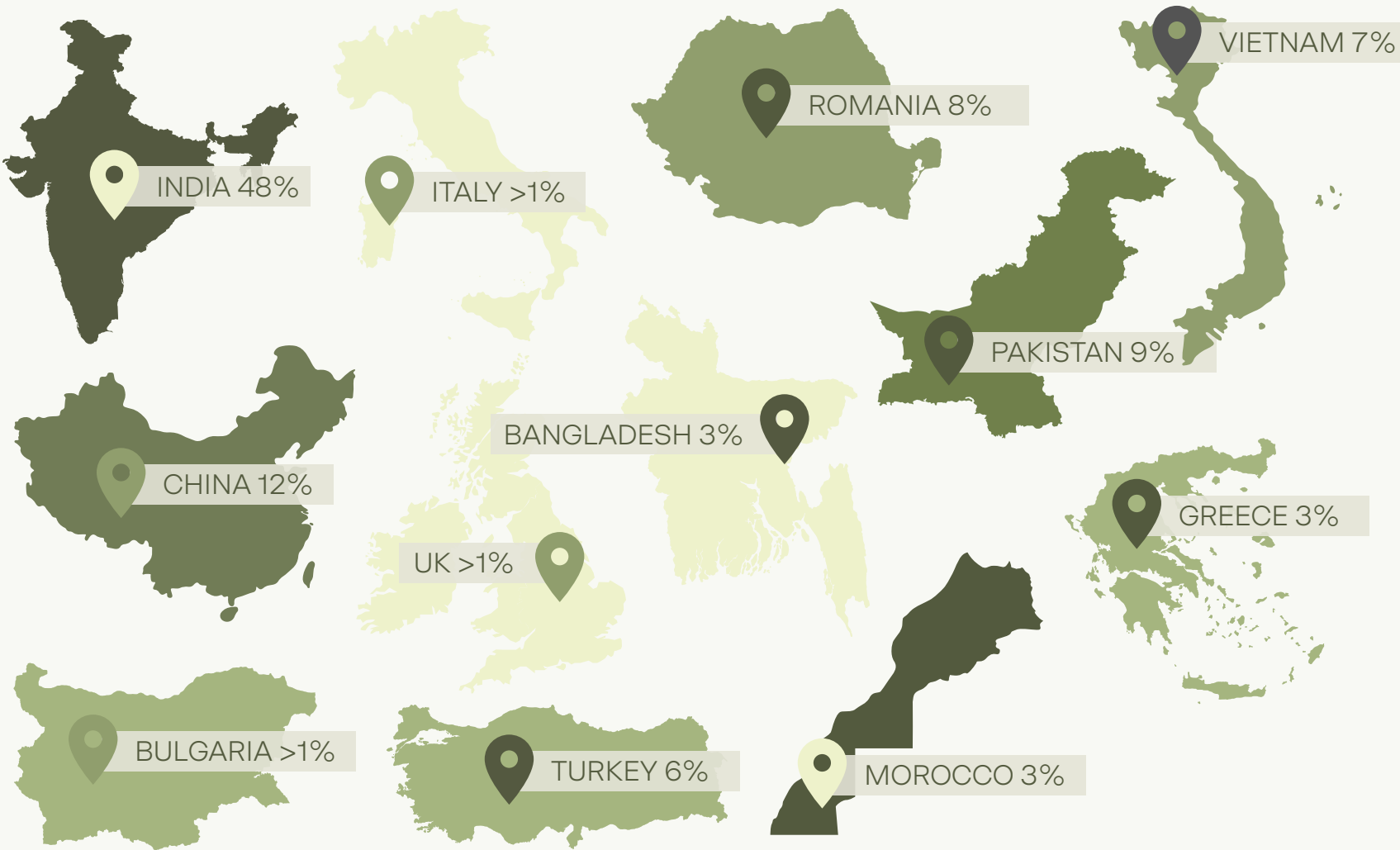
As of June 2025, our products are manufactured

in 12 countries

across 45 supply partners

in 84 tier 1 factories

made by 20,385 employees



Our tier 1 supplier list is published via Open Supply Hub bi-annually.

Assessing & Addressing Risks

DOUBLE MATERIALITY ASSESSMENT

At the end of 2024 we conducted a double materiality assessment to better understand the material risks across the business. This exercise is crucial in addressing industry challenges such as environmental impact, supply chain complexity, and social responsibility. By embedding this approach into our strategy, we have been able to identify where our business and stakeholders are most affected, helping us mitigate risks, foster innovation, and deliver long-term value.

The outcomes of this assessment found our key material social issues to be: fair work (including health and safety), ethical sourcing and traceability, and human rights.

MITIGATING KEY MATERIAL RISKS

Fair Work

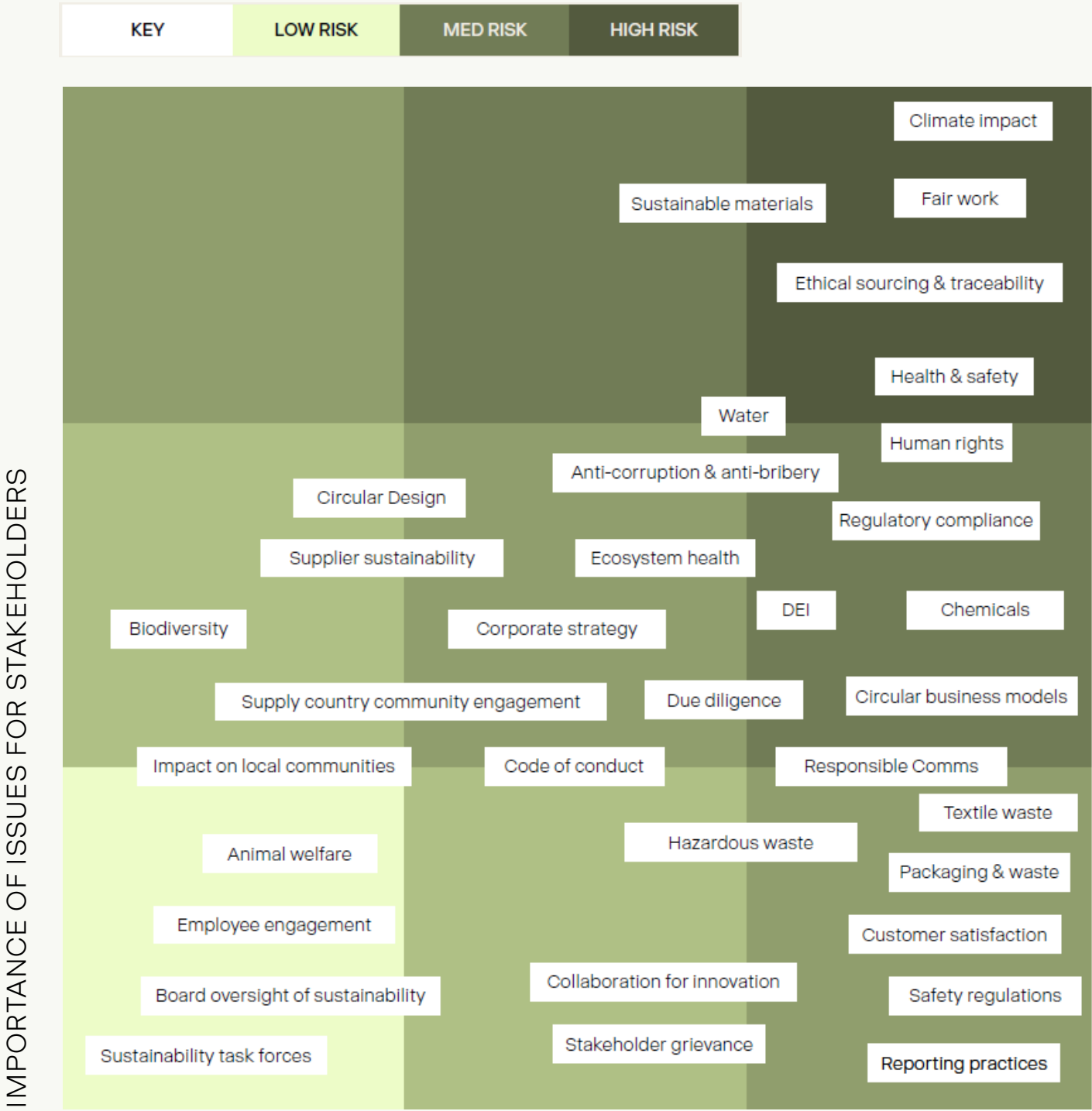
By the end of 2025 we are planning to update our current audit policy, with a revision of how non-compliances are graded. As part of this, we will be assessing our strategy surrounding a number of key factors including fair pay, secure employment, and health and safety.

Ethical Sourcing and Traceability

Full roll out of Digital Product Passports in the coming year will continue to allow us to map our supply chain beyond tier 1 suppliers, increasing visibility of our supply chain and enabling us to identify human rights risks.

Human Rights

We continue to factor human rights risks into our material sourcing decisions. Our anti-slavery and anti-trafficking policy was developed in 2024 to embed anti-slavery measures into our Code of Conduct and clearly communicate our expectations to live and prospective supplier partners.



IMPORTANCE OF ISSUES FOR NC

Assessing & Addressing Risks

It’s important for us to understand any potential risks throughout our supply chain. At Nobody’s Child, risk assessment and mitigation is an integral part of everyday decision-making and activities relating to suppliers, sourcing, and operations. It’s the first stage of due diligence and enables us to address and remedy issues found.

The table below outlines our human rights risk assessment findings in relation to worker groups, geographic location and industry specific risk indicators:

HUMAN RIGHTS RISK ASSESSMENT FINDINGS

 High Risk Worker Groups	Migrant Workers	Agency Workers
	Refugees	Temporary Staff
	Homeworkers	

 Key Risk Indicators	Forced and Child Labour
	Modern Slavery
	Discrimination and Gender Equity
	Freedom of Association and Collective Bargaining
	Occupational Health and Safety
	Wages and Working Hours
	Legal Protections and Enforcement Capacity
	Migrant and Informal Labour Risks

We conduct routine assessments for each supplier nation of operation to ensure we are aware of risks relating to human rights, modern slavery, the environment, labour and workplace management, social justice, human health, governance, and implementation of the UN’s Sustainable Development Goals (SDGs). Our findings can be found in the table below, and underpin our strategic direction moving forward:

RISK LEVEL	EXPLANATION	REGION
 High Risk Regions	These countries show multiple high-risk indicators (e.g., forced labour, child labour, weak legal enforcement, gender discrimination, etc.)	Pakistan
		Turkey
		China
		India
		Bangladesh
 Medium Risk Regions	Moderate risk across several indicators, with some protective frameworks, but challenges persist in enforcement, informality, or vulnerable labour groups	Vietnam
		Morocco
		Romania
		Bulgaria
 Low Risk Regions	These countries benefits from EU legal protections, but migrant labour and informal work raise targeted concerns:	Greece
		Italy
		United Kingdom

Our methodology combines observations and requirements specific to our operations, and external risk rating indices, including Walk Free index, ILO standards, SEDEX, the ITUC Global Rights Index, and the OECD.

Policies & Procedures

As part of our ethical trading standards, we have developed a number of policies and frameworks to ensure human rights are upheld in our direct and indirect operations and that the risk of modern slavery is monitored, managed, and mitigated.

STANDARDS AND EXPECTATIONS

Before our sustainability team review a factory’s audit, our buying team screen all suppliers based on social and environmental considerations. We also require all factories to sign our Supplier Sustainability Commitments before onboarding to ensure all supply partners are committed to complying with our sustainability standards.

SUPPLIER MANUALS

Our policies are collated in our Supplier Ethics and Environment Manual which details our Code of Conduct and requirements relating to labour/workplace management, anti-slavery and human trafficking, freedom of association, prohibited sourcing regions, and preferred and prohibited materials and chemicals. All suppliers are also provided with supplementary sustainability and chemical management guides which aim to breakdown this information into a more digestible format.

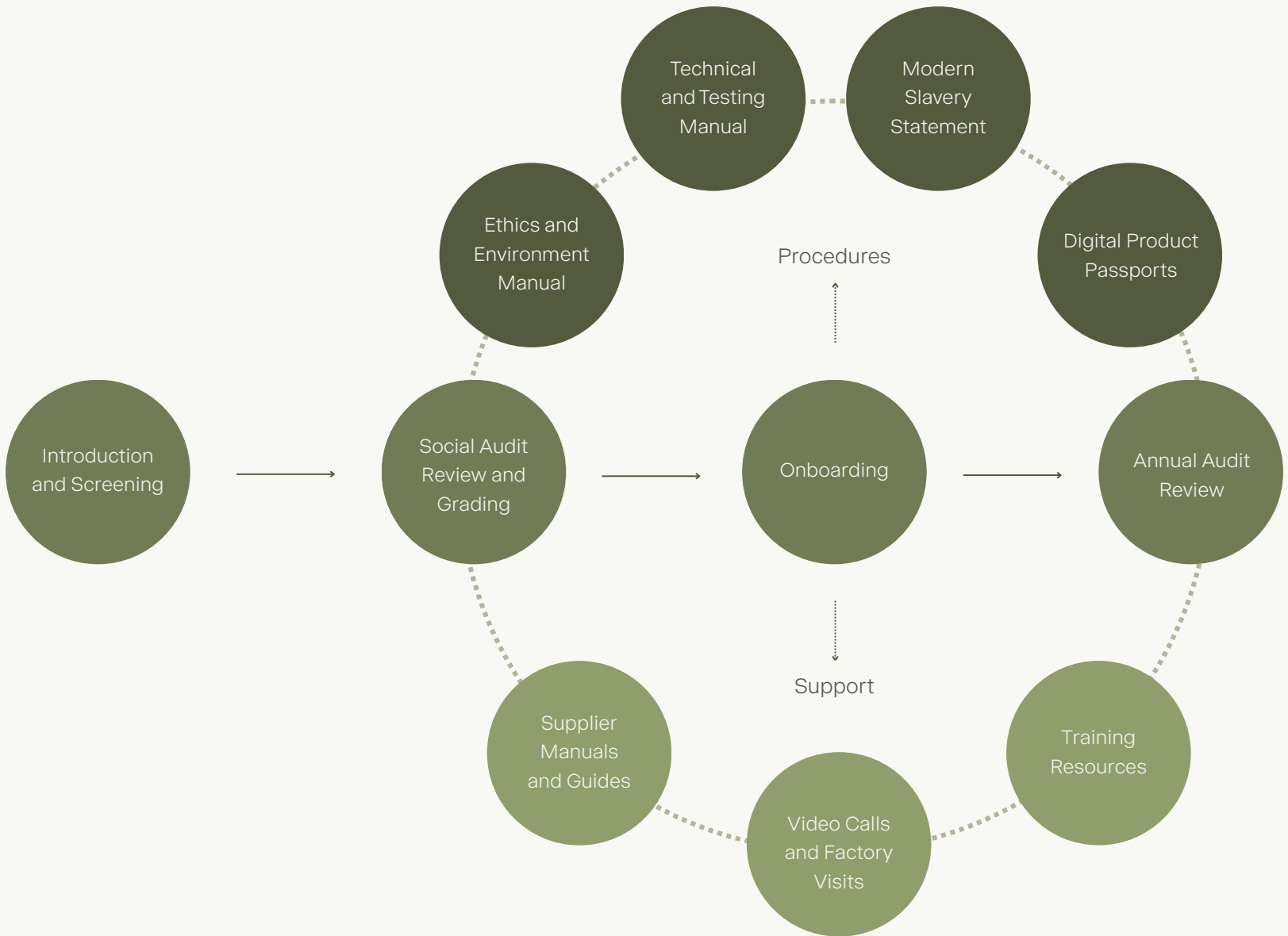
SUPPLIER ENGAGEMENT

We request all tier 1 suppliers complete our sustainability survey on an annual basis to help us better understand their social and environmental practices. This years survey has been distributed to 18 suppliers so far with a 94% response rate. Topics covered include living wage, good governance practices and employee benefits.

OPEN COMMUNICATION

Our teams maintain frequent and open communication channels with all suppliers to ensure issues and concerns can be raised. Core tier 1 suppliers are visited at least once a year by our CEO and product development and sustainability teams, providing better insight into operations and strengthening relationships with our supply partners.

Supplier Onboarding Process



Policies & Procedures

AUDITS

Our supply chain predominantly operates in regions with a higher risk of potential labour-related issues. Whilst we acknowledge the limitations of social audits, our audit policy is our primary tool in identifying, preventing and managing any human rights violations and modern slavery cases within our supply chain.

Before onboarding, we require all tier 1 factories including subcontracted sites, to be independently audited against the Nobody’s Child Code of Conduct. We use internationally recognised third-party audit frameworks, including Sedex’s SMETA and Amfori’s BSCI to independently assess and monitor supplier compliance.

All audit reports are reviewed and graded by our Sustainability team based on a traffic light system determined by the most serious non-compliance found in the report. We do not approve production in any red graded factories. An outline of our grading system can be found below.

As of June 2025:

GREEN	49%	AMBER	51%	RED	0%
No non compliances		Minor non compliances that require corrective action		Critical non compliances that demand immediate resolution	

TRAINING

It’s important our teams and suppliers have the information needed to comply with our commitment to mitigating modern slavery in our direct and indirect operations.

Training sessions are instrumental in equipping individuals across our supply chain with the tools they need to identify and manage human rights risks in their day-to-day roles and responsibilities.

In 2025:

- All supplier facing roles will have attended at least one ethical sourcing training session to build capacity for better understanding of human rights risks across our supply chain
- All tier 1 supply partners will have been provided with training resources on:
 - Human Rights and Environmental Due Diligence
 - Chemical Management

We are looking to increase awareness and training on these topics over the coming year, and plan to develop further training resources and host virtual training sessions for both our internal teams and supply partners on labour-related issues.

Traceability

OUR JOURNEY

As part of our Digital Product Passport (DPP), developed in collaboration with Fabacus, we’ve onboarded over 1000 options onto the Fairly Made platform. Since it’s pilot year in 2023 with 25 options, the initiative has steadily scaled to include all clothing in our AW25 collection, enabling us to trace our supply chain beyond tier 1 and gain a deeper look into the full journey of each garment.

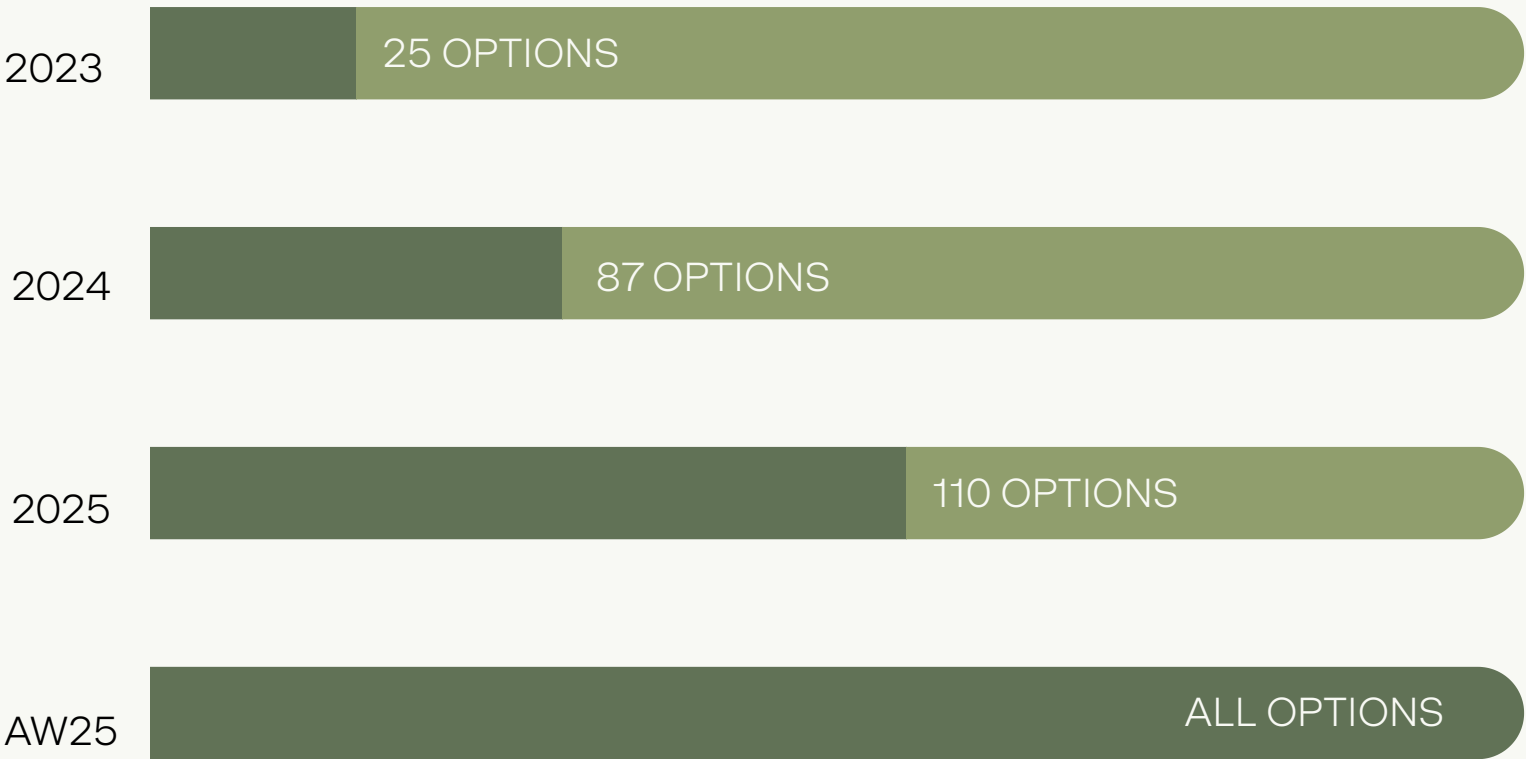
This roll out will significantly enhance our ability to identify, assess, and manage environmental and social risks associated with all stages of the supply chain. The table below outlines the ways in which DPP strengthens our risk identification, supplier engagement and improvement efforts:

AREA OF FOCUS	DPP OPPORTUNITY
Risk Identification	Allows us to trace products across multiple tiers, identifying any high-risk materials or regions, and responding appropriately where needed
Strengthening Due Diligence	Enables us to trace at a product-level, gaining visibility into garments’ origins, the people involved in their production, and the conditions under which they are made
Enabling Continual Improvement	Helps us track, review, and refine our progress with the aim of improving risk reduction across our fashion supply chain
Customer Engagement	Provides accessible product-level information that empowers informed choices and invites customers to join us on our traceability journey

Alongside enhancing supply chain oversight, customers can scan a unique QR code on each product to access real time insights and a digital record of the garment’s lifecycle - reinforcing our commitment to transparency and traceability.

Our DPP Progress

from 25 options in 2023 to over 1000 in 2025



Going Beyond Compliance

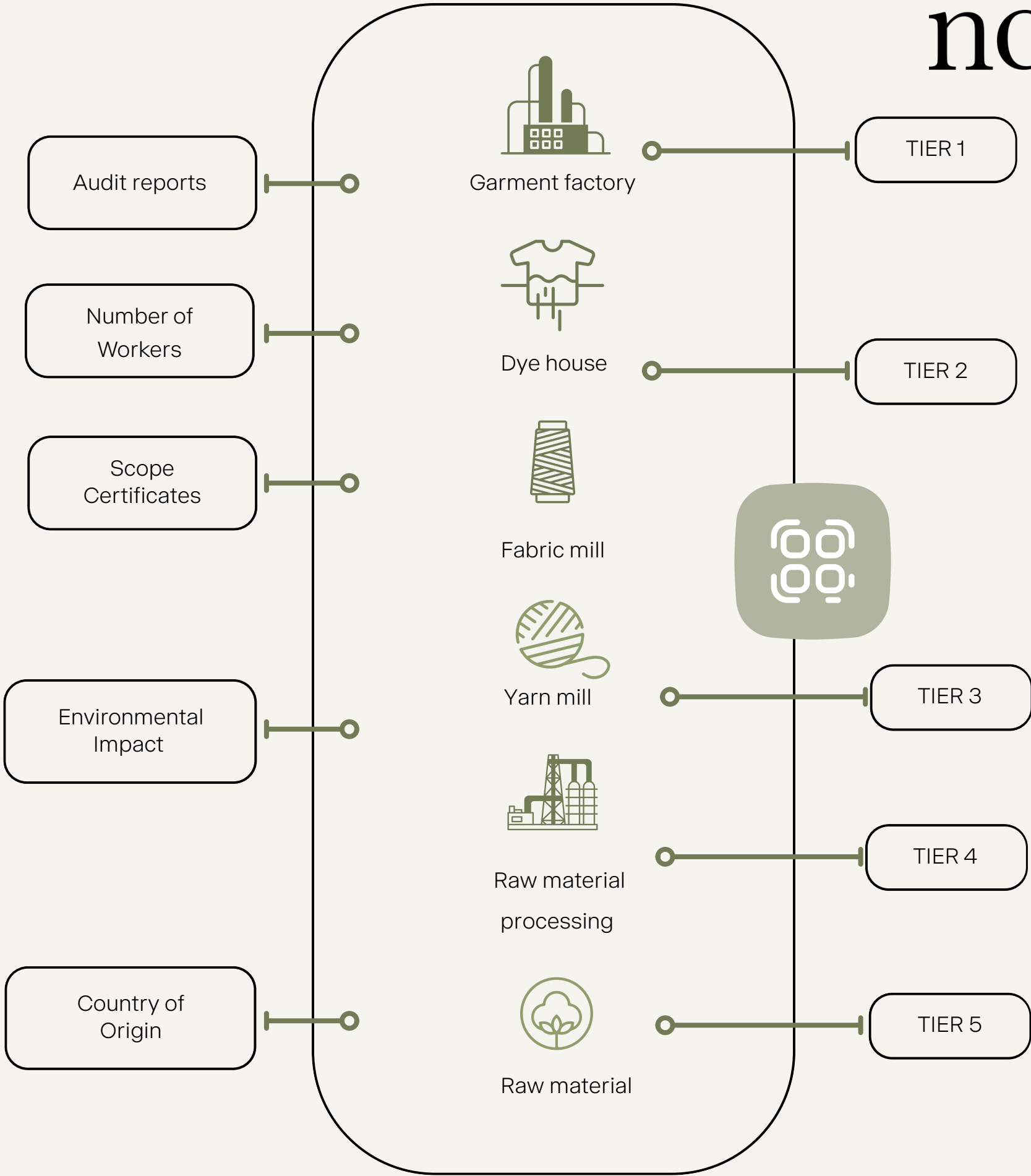
In line with the EU’s upcoming Ecodesign for Sustainable Products Regulations (ESPR), we’ve developed our own series of pioneering DPP pilots, that anticipate and help define the new standards for sustainability and circularity. That said, our DPP goes beyond compliance, offering a transparent, traceable view of each garment’s journey from fabric to factory and beyond.

As part of our DPP project with Fabacus, and in collaboration with our traceability partner, Fairly Made and our supplier network, we are gathering a range of dynamic data - from factory performance through to the product’s environmental impact.



By capturing detailed supply chain data across multiple tiers, we hold ourselves and our supply chain partners to high standards of transparency and accountability. This visibility enables early detection of risks, empowers consumers to make informed choices, and supports continual improvement across our sourcing and production operations.

This not only helps us meet evolving regulatory requirements, but also allows us to curate a unique database of supplier information that strengthens our preventative approach to human rights risks.



Risk Mapping

As part of our partnership with Fairly Made, we have access to its Global Risk Assessment Tool, which helps us identify potential risks in our supply chain, particularly around labour and deforestation.

The assessment draws on a curated database of publicly available sources, including NGO reports, compliance lists, and media investigations. Through this process, Fairly Made assesses our suppliers against this database, which means we can detect any supply chain tiers flagged to ethical or environmental risks and take early, informed action where needed.

Based on our previous 3 pilots, none of our suppliers have been flagged as high risk in relation to labour practices and deforestation.



NO LABOUR OR DEFORESTATION RISKS DETECTED BY TOOL

According to the platform, none of our suppliers are associated with serious ethical or environmental issues

Over the next year we plan to use this tool as an additional mechanism to our existing supplier screening process. By combining its capabilities with detailed insights from the DPP’s traceability analysis and our current knowledge of suppliers, we aim to enhance proactive risk management and uphold our commitment to working with suppliers to improve responsible sourcing and transparency.



Moving Forward

We are committed to working collaboratively with our supply partners to improve working conditions across our value chain and are dedicated to continuously reviewing and refining our monitoring and mitigation efforts to ensure their effectiveness. The projects outlined below align with our identified most salient risks and set clear objectives for teams throughout the business.

DIGITAL PRODUCT PASSPORTS

As part of our commitment to transparency and traceability across our supply chain, we aim to roll out DPPs across our collections by the end of 2025. In doing so, we are continuing to map our supply chain beyond tier 1 and gain greater visibility for risk identification and mitigation. Powered by Fabacus and traced by Fairly Made, our DPPs will help customers engage with and better understand our products, while providing us the tools and information to identify and proactively tackle risks early on.

PARTNERSHIPS

We are currently exploring additional mechanisms to supplement our due diligence procedures and are looking to work alongside a third party organisation to elevate engagement with our ethical labour and workplace management across our supply chain.

AUDIT PROCEDURES

Over the coming year we plan to update our current audit policy with a full revision of our audit grading procedure. As a result, we hope to tighten our processes with the aim of driving best practice in fashion supply chains.