

Nobody's Child Modern Slavery Statement

FY2026

A Note from Jody Plows

At Nobody's Child, we're committed to continually improving the way we operate and to ensuring that our approach to people, human rights and responsible business practices evolves alongside our business. The past year has been one of continued action and progress. Since publishing our last Modern Slavery Statement, we have solidified our commitment to our impact on our community through certifying as a B Corporation, strengthened our approach to supply chain traceability by rolling out our Digital Product Passport initiative across all clothing, and continued to provide a transparent overview of our progress, challenges and learnings through the publication of our second Impact Report.

We are proud of the relationships we hold with our supply partners and the systems and processes we have established to strengthen oversight across our supply chain. However, we recognise responsible sourcing and the prevention of modern slavery require ongoing commitment, collaboration and continuous improvement. As always, we will continue to build on the progress made this year and endeavour to work collaboratively with our supply partners and wider stakeholders to raise standards throughout our value chain and industry.





Introduction

As a fashion brand, we recognise our responsibility to identify and address human rights risks across our supply chain. Whilst we acknowledge the complexities of global fashion supply chains such as ours, we are dedicated to taking action that prevents modern slavery and human trafficking across our operations. 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 been prepared in accordance with the Modern Slavery Act 2015 by Nobody's Child's Sustainability Team and has been approved by our Board of Directors. Our previous Modern Slavery Statement can be found [here](#). This statement outlines our approach to mitigating modern slavery risks and our commitment to responsible sourcing. This statement covers the reporting period May 2025 – April 2026.

About Nobody's Child

OUR ORGANISATION

Nobody's Child is a London-based womenswear brand, founded in 2015 by retail entrepreneur Andrew Xeni and led by Chief Executive Officer Jody Plows. We design and sell womenswear focused on timeless style and fit across a broad range of ages and occasions. Our strategy is built around four pillars — People, Planet, Product and Progress — which guide our approach to responsible sourcing, impact reduction and materials.

OUR BUSINESS

We operate from our head office in Angel, London, and sell through our own ecommerce site, nine UK stores, and more than 25 wholesale partners, including M&S, ASOS, John Lewis, Next, Frasers and Nordstrom. Ecommerce accounts for 64% of revenue, retail stores for 8%, and wholesale for 28%. We serve a customer base of 1.2 million, up 36% year-on-year.

OUR SUPPLY CHAIN

We manufacture our products through a network of 58 supplier partners across 13 countries and distribute them via our Leicestershire distribution centre. Understanding and managing labour risk across this supplier base — and its extended tiers — is central to how we approach modern slavery mitigation, as set out in the sections below.

OUR GOVERNANCE

During FY26, Nobody's Child was overseen by a five-member Board of Directors, chaired by Founder Andrew Xeni and comprising CEO Jody Plows, CFO Andy Brown, and two Non-Executive Directors, Khurram Uqaili and Dr Alastair Alderton. Our Senior Leadership Team brings together finance, product, brand, operations, people and sustainability functions, and is responsible for the decisions that shape how Nobody's Child grows and operates responsibly.

Governance Structure

Responsibility for anti-slavery and human rights protection is embedded across all our operations at Nobody's Child. Day-to-day labour and workplace management in our supply chain sits with our Head of Sustainability, who leads this work on behalf of the Senior Leadership Team, reporting to CEO Jody Plows.

BOARD OF DIRECTORS

Provides oversight of modern slavery risk, sets the company's risk appetite, and approves and signs off the annual Modern Slavery Statement.

C-SUITE

Sets strategic direction and holds accountability for modern slavery mitigation, drives the company's external commitments and policy positions, and engages stakeholders on the company's approach.

SUSTAINABILITY TEAM

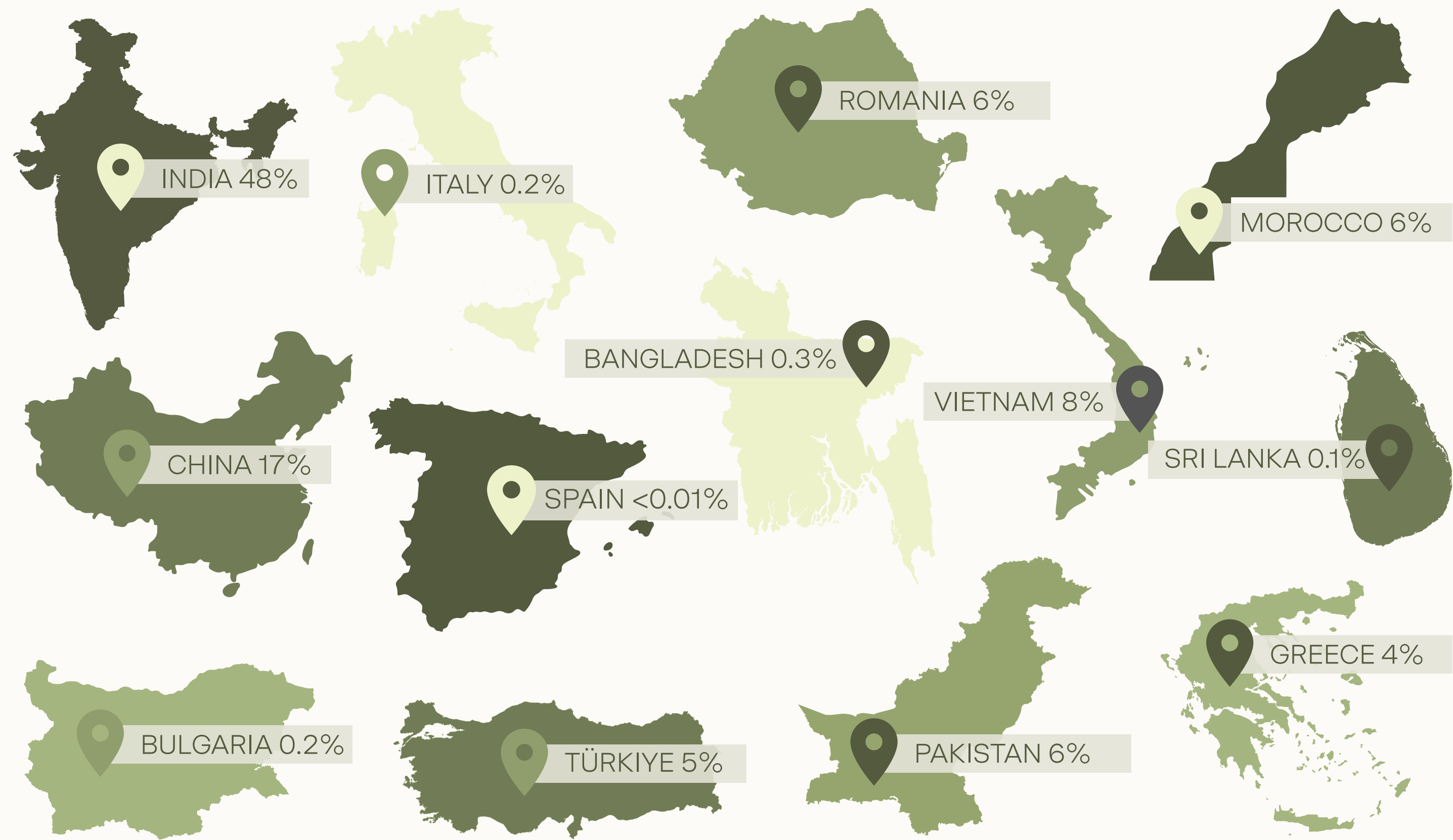
Leads anti-slavery policy and human rights protection across the business, manages supply chain risk assessment and due diligence, and ensures best practice is embedded across all operations — as set out in the roles opposite.

PRODUCT TEAMS

Maintain close relationships with suppliers and oversee the end-to-end manufacturing process, working closely with the Sustainability Team to screen prospective new suppliers across social and environmental criteria. They shape capacity planning and ensure critical paths allow sufficient time to fulfil orders responsibly.

Production Breakdown

In FY26, our products were manufactured in 13 countries across 58 supply partners in 86 Tier 1 factories made by 28,502 employees



Our Tier 1 supplier list is published via [Open Supply Hub](#) quarterly.

Figures reflect the end of the FY26 reporting period (April 30, 2026)

Supply Chain Traceability

SUPPLY CHAIN TRACEABILITY

As part of our Digital Product Passport (DPP) initiative developed in collaboration with Fabacus, we have been working closely with our supplier network to trace our supply chain beyond Tier 1. We rolled out DPPs across all clothing from AW25. In FY26, through our partnership with traceability software company, Fairly Made, we mapped our manufacturing, processing and sourcing activities across 31 countries and have increased our mapped supply chain sites from 39 to 777.

ENHANCED COMMITMENT TO TRACEABILITY

The roll out of our DPP initiative has significantly enhanced our ability to identify, assess, and manage social risks associated with each stage of the supply chain, strengthening our approach to modern slavery risks and mitigation.

We also believe that providing digital access to a garment’s lifecycle via our website’s product pages and wash care labels, empowers customers to make informed purchasing decisions. This transparency reinforces our commitment to long-term traceability.

We have 100% traceability across all Tier 1 finished goods factories. Over FY26, through DPP, we were able to increase country of origin (COO) visibility, contributing to enhanced risk identification sourcing risk identification beyond Tier 1 sourcing countries.

SUPPLIER TIER	EXAMPLES	KEY RISKS	COO TRACED
TIER 1			
Manufacturing & assembly	Factories cutting, sewing and finishing garments	Working conditions, wages, resource consumption	100%
TIER 2			
Fabric & materials production	Textile mills, dye houses	Working conditions, chemical safety	93%
TIER 3			
Raw material processing	Spinning, leather tanning	Working conditions, chemical use, resource consumption	63%
TIER 4			
Raw material procurement	Farms, forests, recycled polymers	Working conditions, traceability, resource, land consumption	73%



HARVESTING

India — Jalna
Matterra India Private Limited



FIBER PREPARATION

India — Jalna
Matterra India Private Limited



SPINNING

India
Salona Cotspin Limited



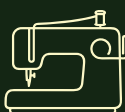
WEAVING

India
Tarak Textiles Private Limited



DYEING

India
R. S. Print Fab Pvt Ltd



MANUFACTURING

India — Haryana, Gurugram
Choice Clothing Limited

Farm-direct Cotton Sourcing

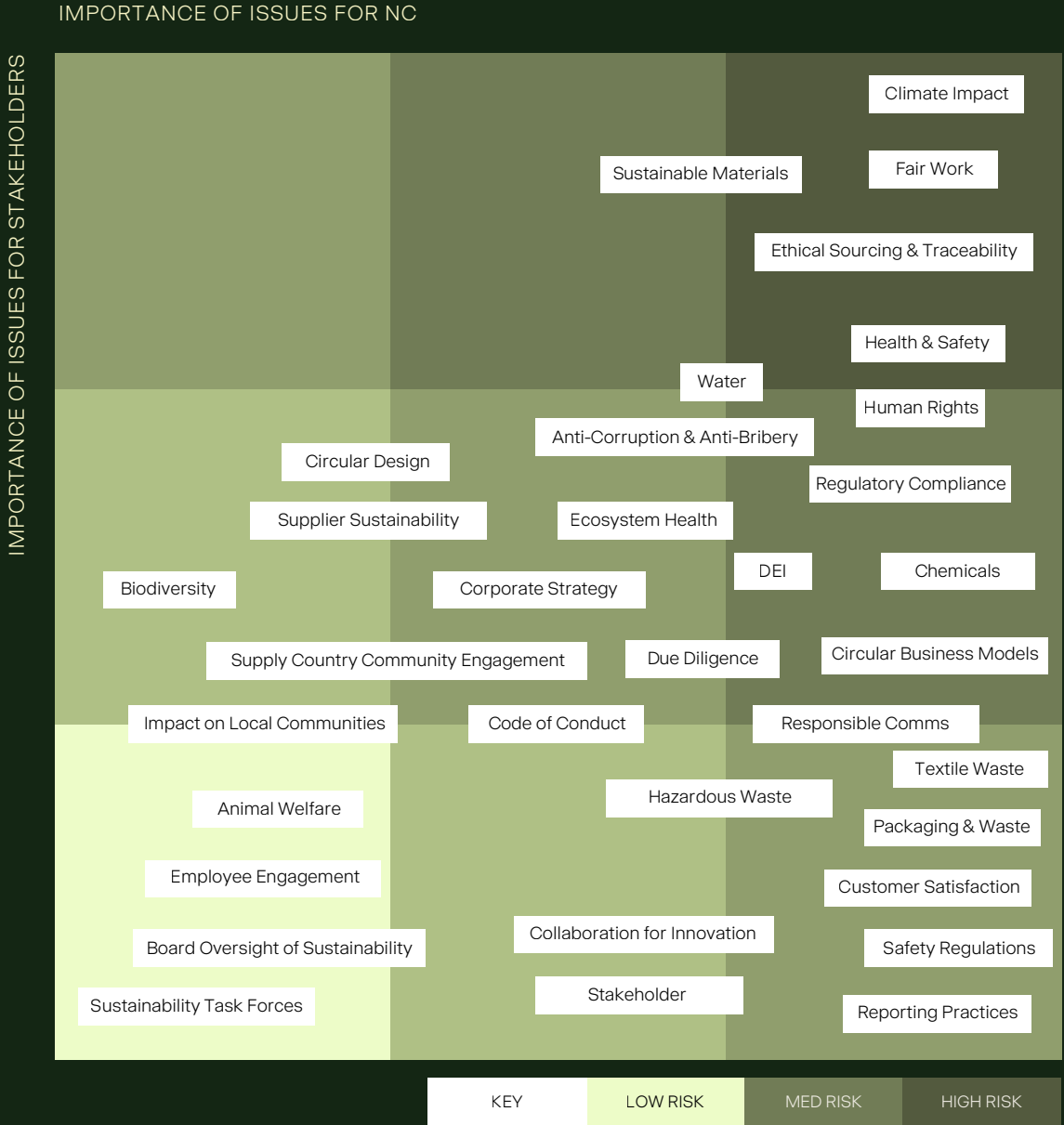
CHALLENGES WITH CONVENTIONAL COTTON

Conventional cotton farming carries significant modern slavery risk: farmers are especially vulnerable to debt bondage, child labour and unsafe working conditions, driven by fluctuating prices and unequal bargaining power within the supply chain. This makes visibility and transparency across raw material sourcing a persistent challenge - and one of the hardest tiers of our supply chain to monitor directly.

OUR COLLABORATION WITH MATERRA

Farm-direct sourcing models like our partnership with Matterra reduce our reliance on opaque, multi-layered trading structures, giving us more direct relationships with growers and greater visibility over labour and working conditions at farm level - precisely where risk is hardest to see. Regenerative farming practices also reduce reliance on chemical inputs, strengthening the long-term resilience of farms, farmers and their communities.

Through Matterra, we sourced 20 tonnes of cotton grown using regenerative farming practices over FY26 directly from farm level. In September 2025, our Head of Sustainability visited smallholder cotton farms in rural India, providing valuable insight into the people, places and practices behind the fibre. As our first collection made from farm-sourced cotton, this partnership strengthened traceability, created a more direct connection between our products, farms and farming communities and our material sourcing strategy.



Identifying, Assessing & Addressing Risks

DOUBLE MATERIALITY ASSESSMENT

To identify and understand the key material risks to our business, we conduct a comprehensive review of our Double Materiality Assessment (DMA) every two years. Embedding this approach into our strategy ensures we’re able to identify our most salient risks to both the business and stakeholders, helping us with mitigation and ensures we can continue to deliver long-term value.

Our 2025 assessment found our top 3 material social issues to be:

- Fair Work
- Ethical Sourcing and Traceability
- Human Rights

Since our last DMA was conducted in March 2025, the following actions have been taken to continue addressing these risks:

FAIR WORK

A revision of our auditing policy and procedures to include the monitoring of social issues including: living wages, secure employment, and facility operated living conditions.

ETHICAL SOURCING

The full roll-out of digital product passports has significantly increased visibility across our supply chain and assisted in identifying human rights risks across all tiers.

HUMAN RIGHTS

Human rights training has been conducted for all of our buyers. A full revision of our Supplier Ethics & Environment Manual, clearly and concisely communicating human rights expectations to all suppliers.

HUMAN RIGHTS RISK ASSESSMENT

Risk assessment and mitigation is an integral part of everyday decision-making and activities relating to suppliers, sourcing, and operations. We conduct annual risk assessments to help us identify, address and mitigate modern slavery issues across our supply chain.

The following worker groups are high risk according to the findings of our assessment. As a result, we take measures to monitor these groups as part of our auditing procedure.



High Risk
Worker Groups

International and Domestic Migrant Workers

Resident Workers

Refugees

Homeworkers

Agency and Subcontracted Workers

Our assessment also identified the following key risk indicators. All policies and remediation actions relating to these indicators can be found in our [Ethics and Environment Manual](#).



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

COUNTRY-LEVEL RISK ASSESSMENT

As part of our annual risk assessment, we conduct a country-level risk assessment for each supplier nation of operation to ensure we’re aware of key regional 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 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, Global Living Wage Index, Better Work, World Bank, World Economic Forum, and the OECD.

Production countries are categorised into 3 different areas: High Risk, Medium Risk and Low Risk.



Country Level
Risks

High Risk Regions show multiple high-risk indicators such as forced labour, child labour, weak legal enforcement, and gender discrimination.

Medium Risk Regions show a moderate risk across several indicators, with some protective frameworks, but challenges persist in enforcement, informality, or vulnerable labour groups

Low Risk Regions benefit from EU legal protections, but migrant labour and informal work raise targeted concerns:

GENDER RISK ASSESSMENT

This year we also introduced the addition of a gender risk assessment for each supplier nation of operation to ensure we’re aware of key regional risks relating to gender. The top three commonly identified risks were identified as:



Gender
Risks

Gender pay gap

Hiring discrimination

Harassment concerns

Policies and Procedures

We have developed a strong framework of policies and procedures to ensure human rights are upheld across our direct and indirect operations.

STANDARDS AND EXPECTATIONS

All prospective supply partners are screened by our buyers on social and environmental considerations prior to audit review.

During the onboarding process, we require all prospective factories to sign our Supplier Sustainability Commitments to ensure all expectations relating to our sustainability standards are clear and our supply partners are committed to meeting our standards before agreeing to produce Nobody’s Child goods.

SUPPLIER RESOURCES

All policies relating to human and labour rights and our code of conduct are collated in our Ethics and Environment Manual, and Sustainability and Chemical Management guides which are shared with all supply partners during the onboarding process.

SUSTAINABILITY SURVEY

All tier 1 suppliers are required to complete our annual sustainability survey to help us better understand their social and environmental impacts of our operations. Our 2026 survey was distributed to all supply partners with a 50% response rate. Topics covered include living wage, governance practices and employee benefits.

SUPPLIER VISITS

Our teams maintain frequent and open communication channels with all suppliers to ensure issues and concerns can be raised. We continue to visit core tier 1 suppliers at least once a year, providing better insight into operations and strengthening relationships with our supply partners.

GRIEVANCES

We are proud of the strong relationships we have built with our supply partners and are committed to maintaining honest and open communication across our value chain to ensure all individuals are able to raise concerns about breaches of our code of conduct. We encourage grievances to be reported at any time through our grievance form or emailed directly to our Head of Sustainability.

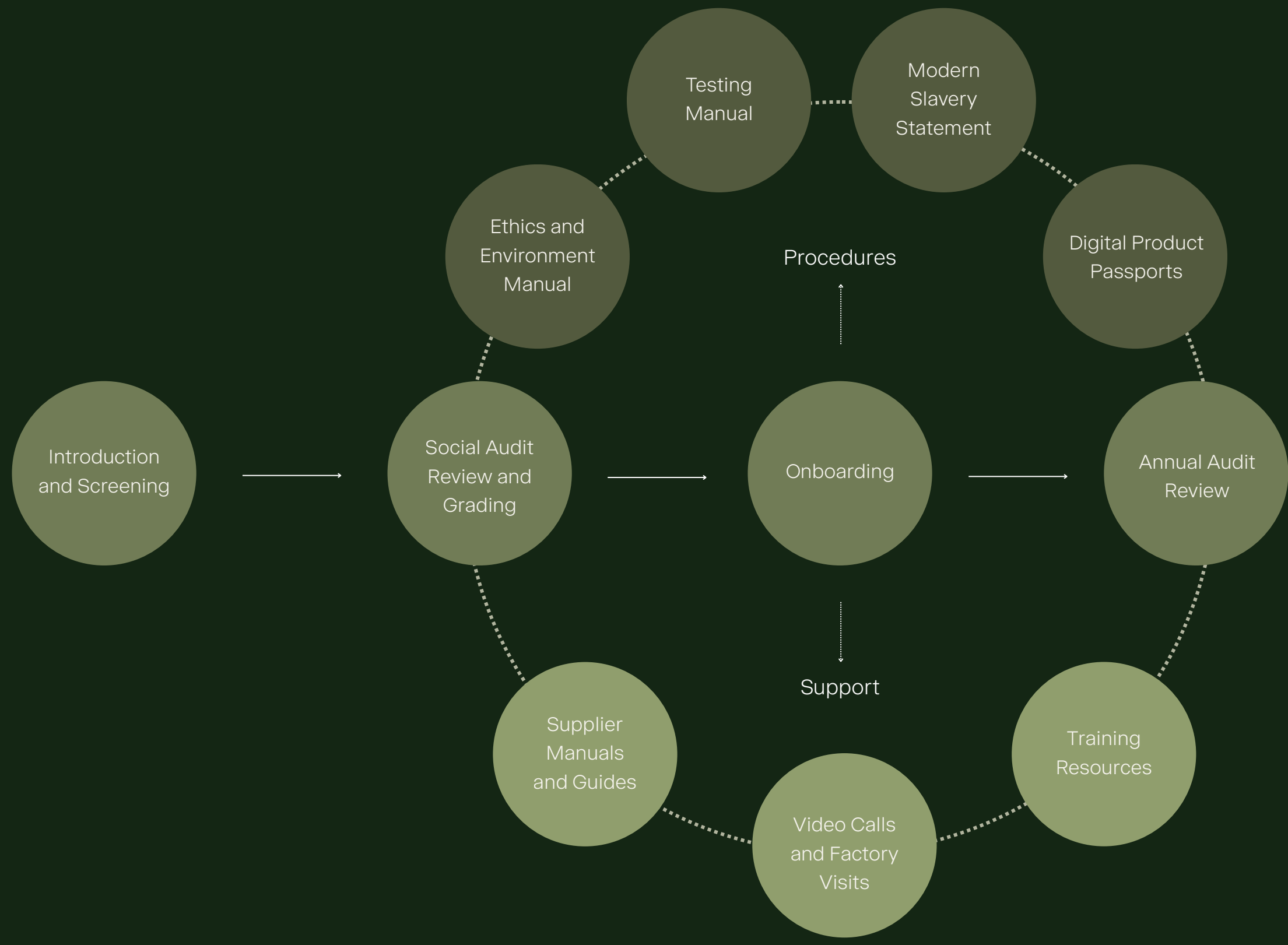
The results of our last supplier survey demonstrated 85% of our supply partners are aware of our grievance mechanism. As a result, we have committed to sending an annual reminder of our grievance procedure to all supply partners to ensure all individuals are aware of this process.

In the past year, one grievance was reported through this mechanism, allowing us to investigate and remediate concerns within our supply chain.

MODERN SLAVERY TRAINING

To build capacity for a better understanding of human rights risks across our supply chain, all of our buyers attended at least one ethical sourcing training session. In the coming months, we plan to roll out additional training to all supplier-facing roles, to ensure all individuals are equipped with the knowledge of how to identify and report human rights risks.

NOBODY'S CHILD ONBOARDING PROCESS



Auditing Procedure

Our supply chain operates in regions with a higher risk of potential labour-related issues. We require all supplier partners, including subcontractors, to meet strict social auditing standards, enabling us to gain an insight into manufacturing sites and their practices. We recognise social audits have limitations, however, our audit policy is currently our primary tool in identifying, preventing and managing human rights violations across our global supply chain.

All tier 1 factories including subcontracted sites, are 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 third-party audit reports are reviewed and graded by our Sustainability team using a traffic-light grading system. The overall grade assigned to an audit is determined by the most serious non-compliance identified in the audit report.

As of May 2026:

GREEN	56.3%	YELLOW	1.2%
No non compliances		Minor non compliances requiring low level corrective action	
AMBER	42.5%	RED	0%
Minor non compliances requiring corrective action		Critical non compliances that demand immediate resolution	

AUDIT PROCEDURE

To ensure our audit grading procedure accurately identifies and reflects key risks within our supply chain, last year we undertook a comprehensive review of this process. This included a detailed assessment of each non-compliance and its corresponding audit grade, with the aim of ensuring that our grading framework provides a consistent and proportionate assessment of risk to individuals’ safety.

As part of our review, we identified the previous distinction between Amber and Green non-compliances was too broad. As a result, we expanded our grading system from 3 categories: Red, Amber and Green, to 4 categories, with the introduction of a Yellow grade. We believe the additional grade provides greater distinction between lower-level non-compliances, enabling us to more accurately reflect the level of corrective action required. Whilst we currently have a small number of sites (1.2%) sitting in the Yellow category, we believe the Green, Yellow and Amber grades will eventually even out as our supply partners work towards remediating non-compliances. We still do not approve production at sites with red-graded audits.

EXPANSION OF CATEGORIES

As part of our ongoing efforts to strengthen our auditing procedure, we have also expanded the information we monitor for all supply partners and believe these categories provide greater insight into potential worker vulnerability and working conditions as identified in our risk assessment. These include the presence and management of worker dormitories, the use and proportion of agency and subcontracted workers, the percentage of women in management positions, and progress towards a living wage. Monitoring these categories enables our Sustainability Team to identify areas that may require further investigation, engagement or corrective action, and helps us to take a more proactive and risk-based approach to managing working conditions within our supply chain.

Subcontracted Sites

SUBCONTRACTED SITES

Subcontracting of labour and production processes is common within fashion supply chains, presenting challenges in maintaining visibility and effective due diligence beyond our direct tier 1 manufacturing partners.

Undeclared or unauthorised subcontracting increases the risk of reduced oversight of working conditions, limiting our ability to identify and address potential labour and human rights risks in our supply chain.

In FY26, we strengthened our processes to improve visibility and oversight of subcontracted sites. We now have visibility of 23 subcontracted sites. All tier 1 manufacturing sites are required to formally declare, in writing, all subcontractor sites involved in the production of Nobody’s Child goods prior to production approval. This has enabled us to maintain greater visibility of where our products are being manufactured, ensuring subcontracted facilities are subject to the same standards and due diligence requirements as our tier 1 manufacturers. Subcontracted sites have also been included under the scope of our traceability work with Fairly Made, ensuring that this information is captured in our Digital Product Passports.

All approved subcontracted sites are required to undergo our audit process, and are assessed using the same grading methodology and corrective action procedures outlined above. Where non-compliances are identified, these are managed through the same remediation and escalation processes applied to Tier 1 facilities, with the severity of the finding determining the required corrective action.





- Living wages paid (47%)
- Living wages not paid (52%)
- Unknown (1%)

Living Wage Analysis

LIVING WAGE

All supplier partners, including subcontractors, are required to pay employees at least the legal minimum wage. We also recognise that, in many regions, minimum wage does not always reflect the real cost of living for textile and garment workers.

Living wages are a core part of our supply chain strategy. We're developing a framework to better understand wage levels across our Tier 1 manufacturing sites and identify where further engagement and support may be needed.

As a first step, we benchmarked wage data from third-party social audits against living wage calculations based on the Anker Methodology. We found that 47 % of Tier 1 suppliers paid wages that met or exceeded applicable living wage benchmarks, while 52% did not and 1% had insufficient data available.

While this assessment provides a valuable baseline, we recognise that wage data from audits alone is not thorough enough to verify payment of a living wage throughout the supply chain. Achieving living wages is a complex issue that requires ongoing engagement and collaboration.

To strengthen our approach, we will be partnering with a specialist organisation to ensure our strategy is shaped by expert analysis.

Moving Forward

We are committed to working collaboratively with our supply partners to improve working conditions across our value chain and continuously strengthening our approach to monitoring and mitigating identified risks. The initiatives outlined below address our most salient risks and establish clear objectives and actions for teams across the business.

SUPPLY CHAIN TRACEABILITY

We’re continuing to work with Fabacus and Fairly Made on our DPP journey to map our supply chain beyond tier 1 and engage customers with the product journey. Our next step is to roll out DPPs to our footwear and accessories range, providing traceability insights and risk identification across all product categories.

SUPPLIER HUB

We are in the process of developing a Supplier Portal to house training resources and virtual training sessions for both our internal teams and supply partners on labour-related issues. This tool will be 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.

THIRD PARTY PARTNERSHIPS

We are currently exploring additional mechanisms to supplement our due diligence procedures such as the addition of online platforms. We are also looking to work alongside a third party organisation to elevate engagement with our ethical labour and workplace management across our supply chain as well as the implementation of our living wage strategy.