

Boden

MODERN
SLAVERY
STATEMENT



Modern Slavery Statement

Financial Year 3rd January 2021 – 1st January 2022 (FY2021)

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

This includes:

UK legislation: Transparency in Supply Chains Provision (Section 54) of the Modern Slavery Act (2015)
USA California legislation: The California Transparency in Supply Chains Act SB657
Australia legislation: The Modern Slavery Act 2018 (Federal Act)

What is modern slavery?

Modern slavery is when one person possesses or controls another person in such a way as to significantly deprive that person of their individual liberty, with the intention of exploiting that person through their 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

Our FY2021 statement sets out Boden's current activity and what plans we have in place to help tackle this issue both within our own supply chains and operations, and to support stakeholder and industry-level activity to eradicate modern slavery.

Modern slavery is a long-term issue with no quick solutions. We recognise that our customers expect us to get this right so that they are confident when choosing Boden. We are committed to continuously improving our practices to help support the eradication of modern slavery.

COVID-19

In 2021 we continued to still face the impacts of Covid 19 including national and international lockdowns, and bans on international travel. At the time of writing we have seen the reintroduction of travel and fewer lockdowns although travel to Asia remains challenging.

Boden and the suppliers we work with have adapted to new technologies and audit methodologies to ensure that we continue to monitor risks, but we also welcomed the return of site-based in-person audits.

The pandemic continues to highlight the importance of supplier relations and our need to work collaboratively to achieve shared goals.

We continue to maintain quick and effective open lines of communication with suppliers about the status of business operations and future planning, as well as talking through ongoing issues and how Boden could help resolve them.

In 2021, Baptist World Aid Australia reverted back to its usual survey covering topics as such as Policy and Governance, Tracing and Risk, Supplier Relationships and Human Rights Monitoring, Worker Empowerment and Environmental Sustainability. This year we gained an overall grade of a B - this was an improvement on our 2019 grade of a C+.

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

Signed by

Paul O'Leary,
Chief Operating Officer,
J. P. Boden & Co. Ltd
Date 4 July 2022

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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 2021, Boden celebrated its 30th birthday.

Our Locations:

- **London (UK)** - Head office
- **Leicester (UK)** - Warehouse and Contact Centre
- **Pennsylvania, PA (USA)** - Store and Pittston, Warehouse and Contact Centre
- **Boston MA (USA)** - Marketing office
- **Amsterdam (NL)** - EU Operations Team

Today the company employs approximately 1,000 people

Supply Chain:

- 81 Suppliers
- 140 first-tier factories
- 55,000 people

In total, we work with 81 apparel and footwear suppliers. Our suppliers work with 140 first-tier factories who employ over 55,000 people, producing diverse product lines from dresses to handbags to baby grows across 15 countries. Since May 2018, we have published our first-tier factory list on our website. Our latest factory list, published in August 2021, 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:



We have been working with 43% of our suppliers for over 5 years, and have been working with 22% of our suppliers for over 10 years.

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

Process, Policy and Due Diligence

Ethical Trading Initiative (ETI) and our Responsible Sourcing Commitment

We continue to be members of the ETI (having joined in 2008), in order to support the on-going development of our responsible sourcing programme and to have the opportunity to work collaboratively with external stakeholders with the intention of ensuring better working conditions for workers across international supply chains.

Modern slavery legislation takes the ETI base code provision on forced labour a step further to include the impacts of human trafficking. This base code is the foundation of our [Responsible Sourcing Commitment \("RSC"\)](#), which we have had in place since 2008. Suppliers must commit to "meet and strive to exceed" Boden's RSC and applicable policies as set out in the Terms and Conditions ("T&Cs") of our Supplier Manual. Our Supplier Manual gives guidance on Boden's policy towards areas including (but not limited to) the health, safety, hygiene, minimum working age, working hours and remuneration of workers.

Suppliers' obligation to comply with the T&Cs are two-pronged. Firstly, it is a Boden requirement that all suppliers sign our T&Cs as part of the on-boarding process. Secondly, the Purchase Order ("PO") raised with the supplier is a contract; by confirming the PO, the supplier thereby agrees to our contracted terms and conditions in supplying that order.

Boden has a requirement for all suppliers to provide full and open access to all facilities within the product supply chain. This must be granted for both Boden staff and any third-party representative that we have engaged to work on our behalf. Suppliers should also conduct and submit a semi-announced audit using the SMETA ethical auditing protocol. Other audit methodologies will be reviewed on a case-by-case basis to help reduce audit fatigue.

In addition to an annual ethical audit, suppliers must adhere to our current policies on homeworking and child labour which are set out in the appendix of our [RSC](#).

Collaborations

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



Ethical Trading Initiative (ETI)

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



Business for Social Responsibility (BSR)

[BSR](#) is a global non-profit organisation that works with its network of more than 250-member companies and other partners to build a just and sustainable world. BSR envisions a world in which everyone can lead a prosperous and dignified life within the boundaries of the Earth's natural resources.



&Wider

[Wider](#) is an anonymous direct worker feedback 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 online platforms for companies to manage and improve working conditions in global supply chains. They provide practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.



Better Cotton Initiative (BCI)

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

Together with their partners, BCI provide 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.



Open Apparel Registry (OAR)

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

Accountability and Governance

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

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

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

Implementation

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

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

Assessing Risks

Ongoing risk assessments

A number of factors heighten the risk of modern slavery occurring.

Modern slavery risk factor	Those at risk in Boden's supply chain	Boden's work to protect workers' rights
Migrant labour	Migrant workers who may face debt bondage for recruitment or travel costs.	Boden works with its suppliers and external stakeholders to tackle issues related to migrant labour. We constantly review independent third-party ethical audits where this information is recorded and monitored.
Significant presence of refugees	Undocumented refugee labour in Turkey, particularly relating to Syrian refugees	Boden continues to develop social dialogue in production sites; strengthening workers' access to effective worker representation. Boden employs a regional representative in Turkey who regularly visits the factories that Boden works with in order to drive improvement in working conditions.
Outsourced recruitment processes and the use of contract/agency/temporary employees	Workers in our UK Warehouse and US Warehouse	Boden works with trusted labour agencies in recruiting temporary workers. Boden drives awareness of modern slavery with induction training at our warehouses, and by displaying information posters in multiple languages detailing Boden's whistleblowing contact.
Presence of young workers in regions of increased likelihood of child labour	Mill workers in the Tamil Nadu region of India being subject to Sumangali schemes	Boden regularly engages with its supply chain to ensure that our RSC in particular our Young Workers and Child Labour policy, is being communicated to all tiers. We also remain actively engaged with stakeholders (on the ground).
State-imposed forced labour	Ethnic and religious minorities	Boden has reiterated its stance on forced labour and is engaging with its supply chain to map the risks. We are also seeking advice from experts on how to mitigate those risks if forced labour is identified.

COVID-19 Global pandemic	Workers in our value chain	<p>Boden maintained open communication with its suppliers during nation and international lockdowns. We ensured that we maintained orders and prompt payments to help suppliers.</p> <p>We have taken key learnings from COVID-19 to build back better as a business. This involves working with MSI's and factories to ensure that the factories have continuity plans in place so that they are prepared going forward. We are also working with our buying teams on our purchasing practices.</p>
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Gender Based Violence	Worker in our value chain	<p>The global COVID-19 pandemic has seen an increase in reports of domestic abuse and workplace harassment in all of our sourcing countries.</p> <p>We are working with suppliers to ensure that they have the correct internal reporting procedures in place and are continuing to roll out the direct worker survey programme, in order to assist us in spotting trends.</p>
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We regularly risk-assess our supply chain, whether through reviewing audits or researching emerging risks based on the known or potential presence of the above indicators in the countries we are sourcing production from.

Risk assessment is also incorporated into sourcing processes and purchasing decisions. The Responsible Sourcing Team provides the Buying Teams with information about the ethical risk rating on each of their factories. Modern slavery risk is an integral component of a site's risk rating. Where factories are rated as high risk, the reasons behind the issues are explained as well as an action plan to remediate the concerns. Active engagement from the Buyers drives the changes.

The Responsible Sourcing Team uses a variety of tools to gather risk data including internal knowledge and expertise, commissioned country risk reports, local expertise, NGO research from the region, the ETI community hub, informal industry-based peer groups, and our own research from credible and independent publicly-available tools. Suppliers and factories are then managed on a risk-basis, prioritising those at highest risk of human rights abuses including those related to modern slavery.

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

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

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

Human Rights risks

As part of our risk assessment on a global supply chain-level, we have prioritised the countries that we perceive to have a higher risk of human rights/modern slavery related issues occurring.

Amongst Boden's diverse product range, we have identified products that are at high risk of modern slavery which include those made using some elements of homeworking or hand embellishment. Homeworking can provide an essential lifeline to people where traditional job opportunities are inaccessible to them. Boden acknowledges the existence of homeworkers within the supply chain and is open and positive towards homeworking as part of the production process.

Boden have 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. In addition to the policy, the Responsible Sourcing Team remains in regular contact with the Buying Team and suppliers that employ homeworkers, in order to monitor the ongoing volume of homeworking in our range, and support wherever necessary.

Creating sustainable long-term improvement in working practices through collaboration is essential to addressing human rights issues and exploitative practices. Where there is opportunity, we collaborate with other brands and retailers either through the ETI or as separate partnerships to mitigate the risk in these areas.

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

China From our discussions with NGOs and collaboration with brands who also source from China, we understand the most common modern slavery risks in China to be: barriers to freely-chosen employments; excessive overtime; child labour; and the significant restrictions on workers' ability to bargain collectively and form trade unions.

We were concerned by the allegations of state-imposed forced labour being reported in the media. With China being a major sourcing country for Boden, we need to ensure that our products are free of any forced labour. To do this, we conducted a review of our supply chain in 2020, to identify any links to companies associated to the forced labour allegations. No links were found. However, we continue to carry out due diligence in this area and have asked all suppliers to provide details on the source of their cotton.

The sector-wide risks relating to forced labour in China are on-going and we recognise that the response to these risks requires a collaborative effort to gain meaningful leverage. We must remain open and committed to working with our peers in order to drive improvements in this space.

India In 2011, [Anti-Slavery International](#) identified issues of modern slavery concerning Sumangali schemes in Southern Indian state of Tamil Nadu. These illegal labour practices have been predominantly found at the raw-materials-processing-level of production where brand leverage can be limited and monitoring can be challenging.

To tackle these industry-level issues, a multi-stakeholder initiative called the [Tamil Nadu Multi-Stakeholder \(TNMS\) programme](#) was formed, which Boden supported. In 2020, this programme came to an end, but we remain engaged in the region, continuing to review government and NGO updates and seeking opportunities to collaborate.

Mauritius Mauritius poses a potential risk for bonded labour due to excessive recruitment fees that migrant workers (particularly workers from Bangladesh), may have had to pay.

Remediating the issues relating to recruitment practices is complex and is an ongoing piece of work with no quick solutions. Boden continues to collaborate with suppliers to drive greater transparency in recruitment practices.

We recognise that risk of modern slavery is an industry-level risk faced by thousands of migrant workers in Mauritius, and one we cannot tackle alone. Throughout 2021 we remained committed to multi-stakeholder collaboration.

Turkey As well as identifying Turkey as a high-risk country due to the Syrian refugee crisis, we have read reports of increased gender-based violence. In response to this, we have been working with a local NGO to devise an awareness programme aimed at providing women in our supply chain in Turkey with information on their rights and where they can go to get help.

As Turkey becomes an increasingly important production hub for Boden, we will continue to monitor the risks and work collaboratively, where possible, to address them as well as take action within our own supply chain to ensure decent working conditions for all workers employed.

UK We recognise that the modern slavery risk is not limited to our global operations and modern slavery is very much present in the UK. We take time to realistically understand our local risks and take necessary actions. An area of risk is our Leicester warehouse. At the warehouse, we employ temporary/agency workers to support during peaks in workload. We work with [Encore Personnel](#) to recruit these employees.

Encore Personnel are licensed labour providers under both the [Gangmaster Licensing Act \(2004\)](#) and the [Association of Labour Providers](#). They have also signed up to the principles of the multi-stakeholder initiative, [Stronger Together](#), with the aim to reduce modern slavery.

Information regarding Encore Personnel's modern slavery statement and reporting mechanism are available on their [website](#).

To further mitigate risks, we have put several measures in place to drive awareness of this issue within the workforce at Boden's Leicester site (which includes the warehouse and the contact centre). Modern slavery awareness is included in the induction training that all employees based at the site complete before starting work on the warehouse floor or in the contact centre. Employees also do annual refresher training. The site also has Stronger Together posters and materials posted in prominent places. These are displayed in multiple languages and give several options for workers to be able to communicate an issue, including Boden's own whistleblowing contact email.

US In Pittston (Pennsylvania) an area of risk is our warehouse, where we use a number of temporary employment agencies to help with employment needs.

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

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

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

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

Transparency & Traceability

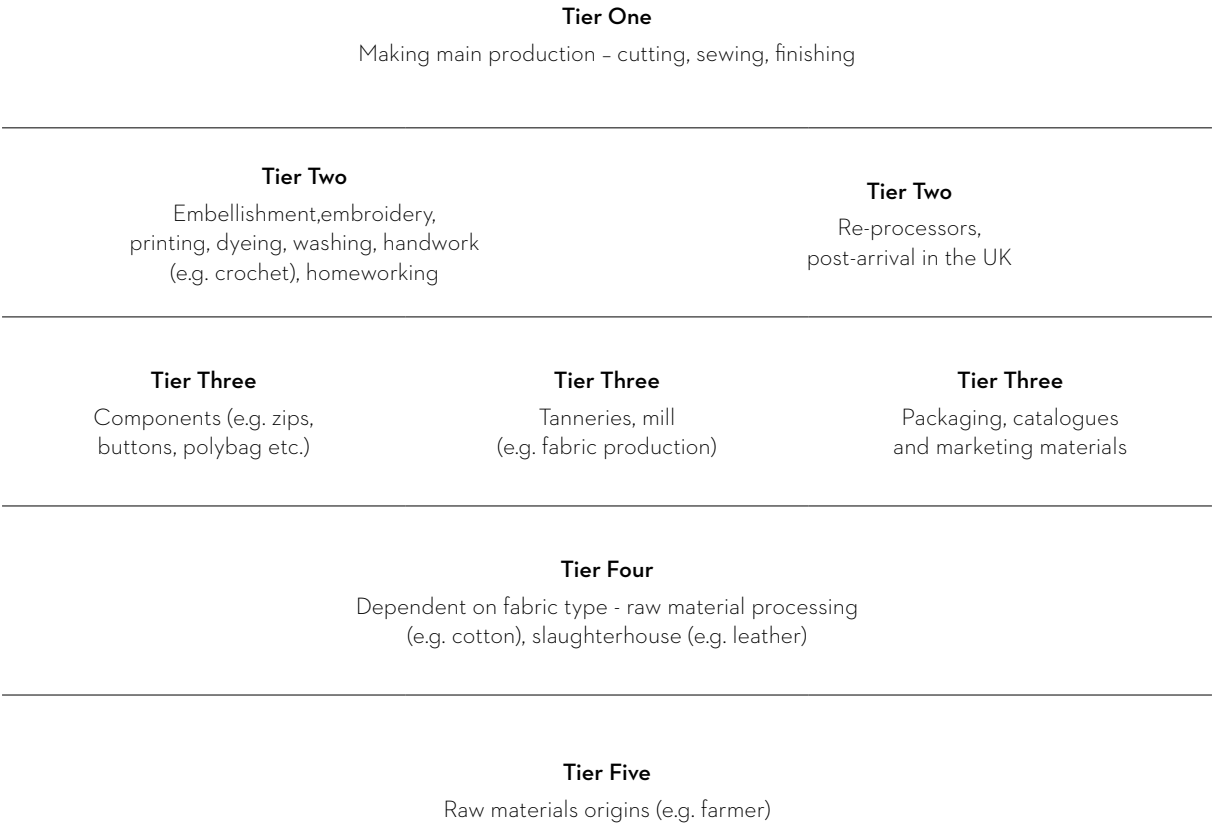
Since May 2018, we have published our first-tier factory list as part of our focus on transparency and we have made a commitment to update this list every 12 months. The list includes product category and gender breakdown at factory-level. Our audit demographic data is segregated and analysed by parameters including gender and ethnicity, as we know that women workers and migrant workers are rights-holder groups prone to vulnerability and discrimination, which heighten the risk of modern slavery.

The first tier of production (where the main processes for making the product happens) is only part of the story.

Understanding the extent of our supply chain risks means tracing the supply chain of our products as far as we can and understanding not only where risks of modern slavery and trafficking exist, but other potential salient human rights risks.

To support this, we gather as much detail about factory operations as we can. We are continuing to map and gather data on the second and third tiers and have a plan in place to map our wider supply chain. In 2021, our efforts were hampered by national and international lockdowns due to COVID-19.

We define our supply chain tiers as below:



Monitoring

First-Tier

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

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

Beyond Monitoring

Although monitoring is important, listening to and offering workers the opportunity to have their views heard is also very important. To this end, we have piloted different kinds of audits over the years to gather more information and feedback from workers.

In 2021, after a successful pilot through &Wider of the direct worker feedback programme, we began to roll this out to more sites with the ambition of have this running in all our first-tier factories by 2030.

The information gathered has provided opportunities for Boden to work collaboratively with the factories involved in order to resolve any arising priorities. If serious issues are identified, in regards to health and safety, physical abuse or confinement and labour rights, we take a comprehensive approach, working with local expertise and NGOs (on the ground) who support the factory and the workers through the remediation and improvement process.

Assessing conditions further down the supply chain

For many years, we have been informally visiting and assessing some of our second and third tier production units. Unfortunately, due to COVID-19 affecting our ability to travel internationally, this has temporarily paused. However, we continue to seek ways to formalise these assessments, and work collaboratively with suppliers and other brands on continuous improvement. As soon as we are able to, we will resume these visits.

Cascading Knowledge

Building knowledge in our business

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

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

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

Building knowledge amongst our customers

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

Building knowledge in our supply chain

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

Monitoring progress

We are tracking progress and reporting through the following mechanisms:

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

Next steps

Due to the impact of COVID-19, our next steps remain largely unchanged and we will continue to focus on the below activities:

- Planning travel to suppliers as and when circumstances allow.
- Increasing access channels for workers to feed-back views on working conditions. Using this information to build and revise our strategy, and to address and resolve differences between factory workers and factory owners
- Mapping tiers 2 and 3 of our supply chain
- Rolling out gender-based violence awareness programme in Turkey
- Expanding the workers' rights booklets produced in Turkey to more countries within our supply base
- Include a specific policy on forced labour in our RSC
- Include a specific policy on conflict minerals in our RSC
- Formalise Boden's responsible exit policy in our RSC
- Introduce a direct grievance mechanism for workers in our supply chain to report any issues directly to Boden

At the time of publishing this statement, things have improved since 2020, however we are still experiencing impacts on our business from the ongoing pandemic, with our supply chain experiencing national lockdowns and resource shortages. We will focus on the 'Next Steps' listed above but they may be subject to delay.