

RiverIsland

Modern Slavery Statement 2023

River Island's long-standing ethical programme continues to prioritise and promote the importance of trading ethically and sourcing responsibly. These are non-negotiable ways of working, embedded in our beliefs and our sustainability strategies.

Our work with our stakeholders is ongoing. As well as working continually with internal buying teams and valued suppliers, we continue to explore and develop key strategic partnerships. Our aim, as always, is to address and mitigate the increasing global risks of modern slavery and human trafficking. Our work is aligned to the United Nations Guiding Principles on Business and Human Rights, the ETI Base code and the OECD Due Diligence Guidance for Responsible Supply Chains.

Modern Slavery is a critical risk within all global supply chains, and ours is no different. We do not tolerate human rights abuses, either within our own organisation or in any part of our extended supply chain.

We understand that Modern Slavery can take many forms, and as such can be complicated and often difficult to uncover. We have established and embedded robust processes to identify and where possible eliminate potential areas of risk.

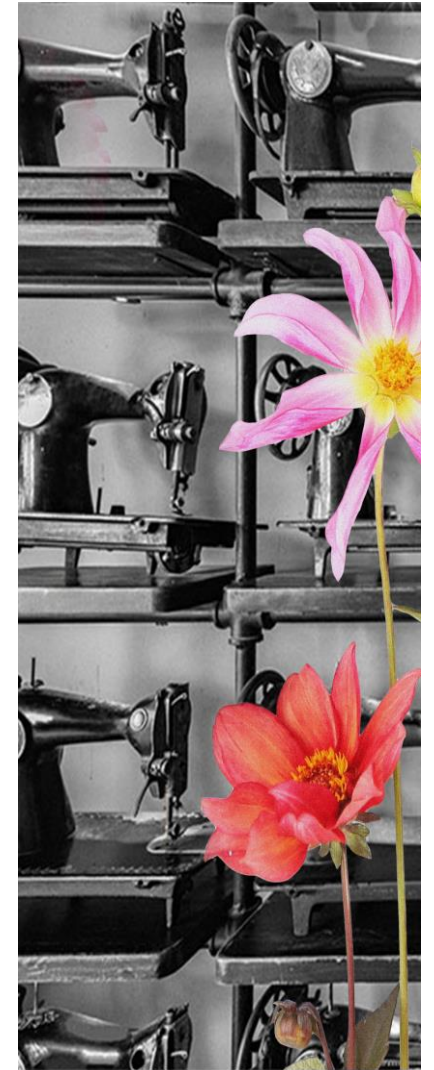
This Statement, written pursuant to the Modern Slavery Act 2015, covers the requirements of the Act for River Island Holdings Limited with regards to the 2023 financial year. This Statement has been written to highlight key activities that have been taken during this period and to provide full details of our commitment as a responsible retailer to fulfil the requirements of the legislation during the 2023 financial year. Furthermore, it provides useful information to enable an understanding of our commitment to reduce the Modern Slavery risks associated with our business.

The Statement has been approved by the River Island Board.

Warren Cohen

Chief Operating Officer
River Island Clothing Co. Limited

29th June 2024



During 2023 we continued to work on our Sustainability strategy and plan to update this further in 2024

(Please click on link [Sustainability - River Island](#))

Within this strategy there are key commitments around transparency and ethical ways of working.



3. ETHICAL WORKING

Continuously improve working standards for our own employees and for those in our supply chains underpinned by a commitment to modern slavery.

We continue to provide advice and training to our factories and supply chain partners where required, to ensure that all of our production units have the capacity to meet our ethical standards.

We uncovered 15 instances of unapproved subcontracting in 2023, which led to remediation work being carried out at 13 factories. We provided advice and training to address root cause and build internal capacity at the sites involved. We have a clear focus on the potential for unapproved subcontracting to be identified during our visits, by our own staff and our third-party partners. We see this as a key modern slavery risk. As most visits to key sites are carried out by our in-country team on an unannounced basis, they arrive on site with a full list of current and recent orders, enabling them to easily identify this issue.

We continued to build on our requirement for transparency and collaboration



10. TRANSPARENCY

Attain full transparency through the business and supply chain in order to measure and deliver our commitment to have clear visibility of our production sites.

During 2023 we continued our work with the Segura Team to build on our commitment to have full visibility of our own brand supply chain, down to yarn production as well as full visibility of all processes used to make our products <https://www.segura.co.uk/>.



We continued to increase awareness of modern slavery issues.



In late 2023, with the help of Slave Free Alliance, we carried out a full risk assessment at our Distribution Centre in Milton Keynes to identify any issues that may exist, or any checks or training that needed to be improved. We also wanted to ensure that there was a clear understanding of Modern Slavery Issues and awareness of what actions to follow should there be a suspected case of Modern slavery. We will be revisiting our DC in 2024 to hold a worker awareness day and also to follow-up on the previous risk assessment. We will continue to address any areas of risk as well as identifying and addressing new risks.

Help to give UK workers with a safe space to discuss workplace issues. [FAB-L - Highfields Centre](#)



We continue to partner with FAB-L to help give workers a voice in the Leicester textile industry. It allows workers in the area to have easy access to the experts and helps them address any work issues (as well as gaining access to other areas of help). Working with FAB-L has been invaluable in allowing the workers to understand their workplace rights.

Improving working conditions for Homeworkers



During late 2022 we partnered with Goodweave to map homeworkers who provide embellished product in our supply chain. This programme ensures that the homeworkers involved in the programme have decent working conditions and are not victims of modern slavery, as well as ensuring child labour is not present in this supply chain.

We have continued to increase Tier 2 Visibility on our publicly Available Factory List

We have continued to increase the amount of tier 2 sites declared on our factory list, This list is available on our website and on the Open Supply Hub. [Open Supply Hub – Home](#)

OUR BUSINESS

River Island is a leading multi-channel fashion brand based in the UK, selling womenswear, menswear and kidswear. River Island was established as a brand in 1988 and is a privately-owned business, owned by the Lewis family. The business, however, can be traced back to 1948 when it was first started by Bernard Lewis, and he and his family are still actively involved in running River Island today.

We have 244 stores globally, and we sell to over 120 countries online. River Island's annual turnover in 2022 was approx. £825.8m.

Our Head Office in West London is home to the Design and Development, Buying and Merchandising, Marketing, Technical, Ethical, Sourcing, Logistics, Legal and Finance teams. Our DC in Milton Keynes receives, holds, and distributes our products to stores, wholesale partners and online customers.

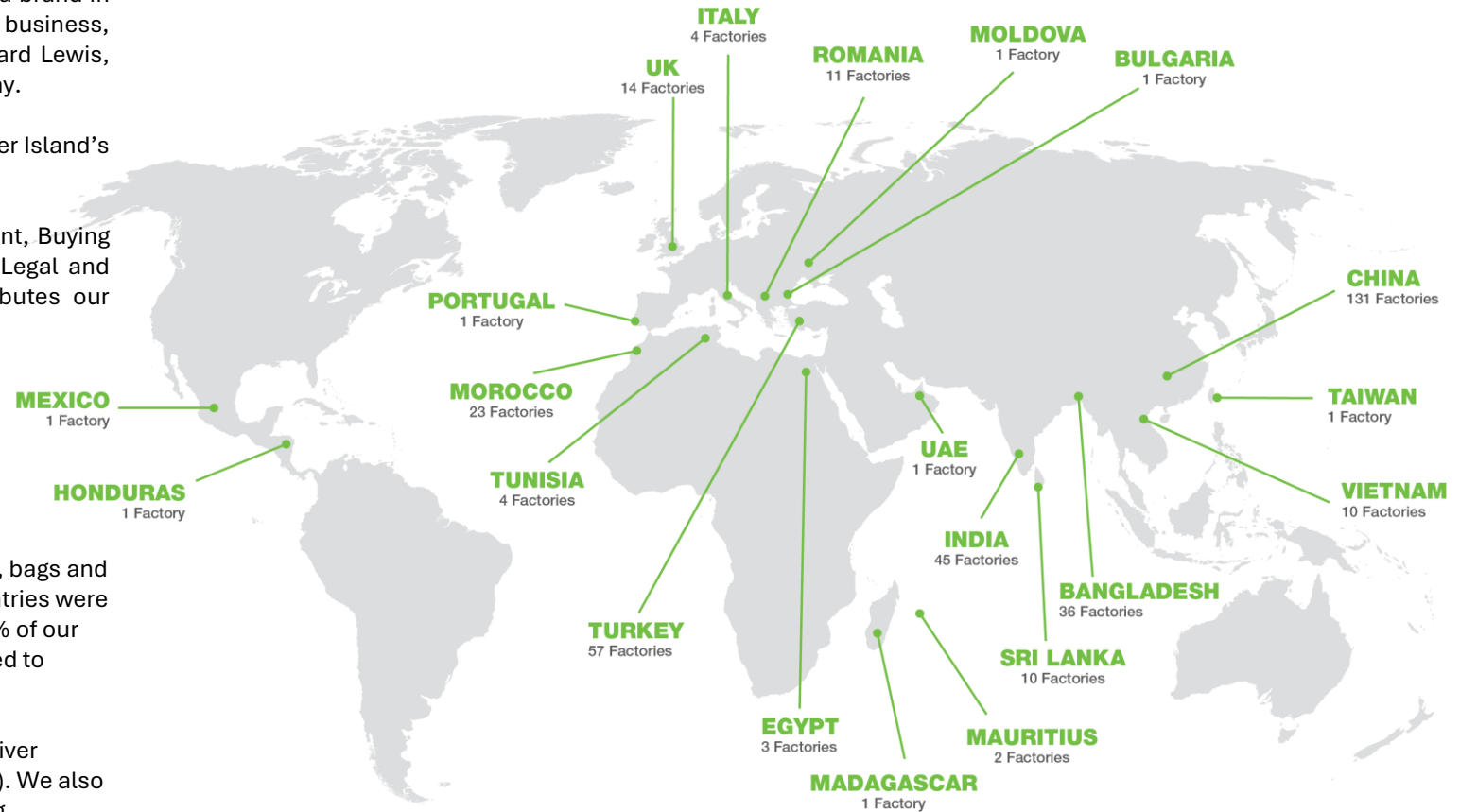
Total Number of Employees :

Head Office - 1087

Retail – 6106 (UK), 513 (ROI)

Our product is predominantly 'own label' and includes clothing, footwear, bags and accessories. In 2023, we sourced from 21 countries, and our 'Top-5' countries were China, Turkey, Bangladesh, India and Morocco which accounted for 76.2% of our range. In 2023, the Top 12 countries supplied 96.1% of our range compared to 95.8% in 2022.

In 2023, we worked with 177 product suppliers (358 factories). 87.4% of River Island products came from the 'Top-50' suppliers (the 'Top-20' are 63.9%). We also source a wide range of goods and services such as shop-fitting, packaging, cleaning, catering, logistics, security, IT, marketing, ecommerce, advisory and so forth (collectively referred to as 'goods not for re-sale' or 'GNFR') from third party suppliers, the vast majority of which are UK based.



OUR GOVERNANCE

All our human rights work streams sit with our Sustainability Board, which meets on a quarterly basis and includes members of our senior executive team, as well as all senior members of our Sustainability Team. This setup allows us to monitor our progress against targets set out in our current Sustainability Strategy and ensure we maintain our commitment to source our products responsibly, and protect the human rights of the workers in our supply chain.

OUR POLICIES

Human Rights are at the heart of our approach to modern slavery and follow international codes and standards as part of this process:

- The Base Code of the Ethical Trading Initiative (ETI) - [ETI Base Code \(English\).pdf \(ethicaltrade.org\)](#)
- The UN Guiding Principles on Business and Human Rights - [GuidingPrinciplesBusinessHR_EN.pdf \(ohchr.org\)](#)
- OECD Due Diligence Guidance for Responsible Supply Chains - [OECD Due Diligence Guidance for Responsible Supply Chains](#)

Supplier Agreement – River Island suppliers are contractually bound by the terms and conditions in our Supplier Agreement which include adherence to the following policies, for the protection and promotion of human rights:

- River Island Ethical Policy (based on the ETI base Code) - This Policy defines the shared ethical responsibilities between suppliers and River Island buyers. [POLICY-BOOKLET](#)
- River Island Anti-Slavery and Human Trafficking Policy (incorporated into our Contracts in 2016). [Anti-slavery and Human Trafficking Policy](#)

Employee Contracts – all River Island employment contracts directly incorporate a suite of policies designed to protect worker rights and promote a safe and fair supply chain. These include the River Island Ethical Policy referred to above, the River Island Anti-Slavery and Human Trafficking Policy referred to above, the Anti-Bribery and Corruption Policy, and the Speak-Up Policy.

GNFR Contracts – all require compliance with the Modern Slavery Act, and those relationships deemed to be operating in ‘higher-risk’ areas, according to the criteria set out below, specifically requiring adherence to our River Island Anti-Slavery and Human Trafficking Policy.

OUR COMMITMENT

River Island is committed to the identification and prevention of any type of slavery or human trafficking within the business and supply chain, and to clearly understand the risks that may be present in each. We ensure regular checks are carried out at all our production sites to ensure workers are treated fairly, and that their human rights are being respected. Through our policies we ensure that suppliers are aware of the requirements before working with River Island. Any updates are sent to all suppliers to ensure they comply with any changes in legislation.

We do this by working to continually increase the transparency of our supply chain. We ensure our policies and procedures are checked annually and that training is available to all internal staff members to give them the awareness required to understand the issues and their responsibilities.

MODERN SLAVERY RISK

River Island Code of Practice

Our Internal code of practice is used when assessing sites during our factory visits and audits as part of our ethical due diligence programme. This helps to ensure that our suppliers and their factories are given clear guidance and have a full understanding of our ethical standards. When working with suppliers and factories, we will always consider the root cause of any problem or risk. Where such risks are widespread across the supply chain, we understand there is often a need for more collaborative work to be carried out to address such endemic issues. We continue to invest significant resources and time to support collaboration and effective communication with all of our suppliers to reduce the risk of modern slavery occurring and help resolve any issues that may arise during the audit process.

How we Identify our Salient Risks

We conduct due diligence to identify risks with our business and supply chain. This is a continual process and collects on-going data from several sources.

- a. Factory visits and audits
- b. Supply chain mapping (Segura)
- c. Higg Data
- d. Factory / Supplier collaborations
- e. Information from our in-country teams
- f. Worker dialogue (during training, visits and audits)
- g. In-house research
- h. Stakeholder collaboration and information
- i. Third-party information and advice.

We continue to focus on our process of information gathering and have continued to increase our focus on Tier 2 of our supply chain. We aim to continue increasing visibility over the coming years to include lower tiers.

Prioritising Salient Risks

When prioritizing our salient Human Risks risk, we follow the UNGP guidance, looking at the scale and gravity of the risks and the potential number of individuals who could be affected along with looking at the remediability of the issue and the potential for them to reoccur. The

Potential impacts of any salient risks highlighted are focused directly on the individuals within our supply chain and the harm that could occur to these individuals due to such risks.

Current Key Modern Slavery Risks

In 2023 our current key areas of risk of modern slavery are:

- Suppliers who subcontract specific processes to lower tier manufacturing sites e.g., wet processing, embroidery etc..
- River Island own brand product supply chain
- Goods and services not for resale
- Key business service providers
- Countries with a high risk of modern slavery e.g., Mauritius, India, & China.

Salient Human Rights Risks

There continues to be no significant change to our overall set of salient issues during 2023:

i. Forced and Bonded labour - *Key Regions: China, India, UAE, Mauritius*

We continue to be aware that this issue has generally been pushed to lower reaches of the supply chain, or to regions of the globe that are difficult to access. As supply chain data increases through our work with Segura, we can use this information to identify key risk areas and carry out in-depth assessments.

During 2023, we have worked with Goodweave to look at the working conditions of Homeworkers in India to ensure that they have appropriate working conditions and are not held in any kind of forced or bonded labour, as well as ensuring there is no child labour present.

ii. Climate Change / Global Warming – *Key Region – Bangladesh*

We will be looking to increase our work on climate change and global warming in 2024 to examine how we can address risk as part of the ETI Just Transitions Working Group. As discussed in our last statement, we have identified certain regions at risk, but we are fully aware that this is a global issue requiring increased collaboration between Suppliers, Brands, Trade Unions, NGO's and Governments to make any work truly meaningful.

Salient Human Rights Risks (cont..)

iii. Regular Employment – *Key Regions – India, Turkey*

We continue to see the increased use of casual and agency workers across the globe with India and Turkey seeing an increase in the use of informal labour in recent years. We continue to work with our suppliers to try and reduce this reliance on the informal sector by explaining the risks involved when using this type of workforce. As part of our internal audit programme, we heavily focus on this area to ensure agency and casual workers are paid as per the law and have legal contracts in place.

iv. Working Hours – *Key Regions – China, Turkey, Sri Lanka*

High working hours continues to be a global issue. Specifically, China and Turkey have been found to have significant issues in this area. We strive to ensure our factories are constantly working to our code of practice. Where this is not occurring, we will set out remediation plans to tackle the issues. Any working hours issues found during our factory visits have full root cause analysis, from which a remediation programme is put in place. Working hours are then monitored monthly until we are confident that the issue has been resolved.

v. Wages / Social Security – *Key Regions – China, Turkey, UK*

The issue of payment of minimum and living wages continues to be an issue globally, along with social insurance payments. China and Turkey still have major problems with migrant workers and their wages and social payments. Whenever identified in our supply chain, we work with our factories to correct any issues found with immediate affect. In the UK this has been a key focus for River Island working alongside other UK Retailers as Suppliers since 2015 as part of the Fast Forward programme. Non-payment of minimum wage is seen as a high-risk issue in the UK and we work to ensure that all of our production sites meet both ethical and legal standards.

vi. Discrimination and Harassment – *Key Regions – Bangladesh, China*

Discrimination and harassment is probably one of the most difficult issues to find during factory visits, and relies on worker feedback to tackle the issue with any great success. As part of all our factory visits, we ensure we get good worker feedback and provide workers with details of how to contact us outside of work if this is preferable. We have also identified the exceptionally high risk of physical and verbal harassment to female workers in Bangladesh and in 2022 we partnered with ETI on their Gender Sensitive Workplace Programme to start to tackle this issue. (see page 11 of this Report).

vii. Freedom of Association & Collective Bargaining – *Key Regions – China, UAE*

We acknowledge and support the right of all of our workers to have access to freedom of association, so that workers can exercise their fundamental rights at work. We carry out checks during all visits to ensure that there are no restrictions on workers in this area. Our stance is clearly set out to our suppliers and we insist that our factories and suppliers should understand and respect the right for workers to organise or join associations of their choosing and be able to bargain collectively.

In countries where the law restricts freedom of association and collective bargaining, we also insist that our factories and suppliers must not obstruct or dissuade any parallel means of freedom of association or collective bargaining.

We heavily focus on this during worker interviews to ensure that workers understand their rights. Where this is not the case, we insist on training to be provided for all workers as part of our remediation process to ensure they understand their full rights in this area.

SUPPLIER SELECTION, SETUP PROCESS AND ON-GOING MONITORING

- Our supply chain stretches around the globe ([see page 4](#)) and to ensure we only work with decent suppliers we have a strict on-boarding process in place.
- Our suppliers are fully responsible for compliance with, and implementation of our Supplier Code of Conduct in their factories
- We approve all tier one factories before any orders are placed. Not all factories are approved if the audit reviewed does not meet with the River Island Code of Practice (C.O.P.),
- Once a factory is approved, we then audit them on a regular basis.
- All audits after setup that are carried out by our in-country teams are unannounced. All subcontracting by a tier 1 site must be pre-approved by River Island
- If an audit does not meet with our Code of Conduct, then a full remediation plan will be put in place in line with our COP and internal escalation process.
- We carry out full on-site worker interviews, and we also provide workers with an opportunity to have further contact with our teams if required – off-site interviews can be arranged as necessary. All audits include checks for forced and trafficked labour, we review all relevant documentation, hold confidential worker interviews and check worker accommodation if provided by the factory.

We use standard forced labour indicators set by the ILO as part of the overall risk analysis.

After each visit a site is issued with a Corrective Action Plan.


The corrective action plan is then monitored with strict time-lines, but also with the factory and/or supplier having the ability to contact us or our in-country teams directly to discuss the issues, request help and training as and when required. This process is seen as a partnership with our suppliers. This monitoring can include the need for follow-up visits, spot checks, further worker interviews, meetings, training etc.

If any critical issues are identified such as forced or child labour, we may involve experts to conduct further investigations on our behalf.

If there is ever a severe and imminent threat to workers lives or safety, then the remediation would be carried out immediately, and orders may be suspended.

In very rare cases where a supplier or factory are unable to work with us to make the necessary improvements, or there is a lack of commitment to the process, we would ultimately have to terminate our relationship with the supplier, but this would always been as a last resort.

Due Diligence (Cont..)

 SLAVE-FREE ALLIANCE Working Towards a Slave-free Supply Chain In 2022 we partnered with the Slave-Free Alliance to carry out a full Modern Slavery assessment across the whole business. This assessment helped us to understand where we could drive improvements and update processes to ensure we maintain a low risk of modern slavery occurring within our business and supply chain. The key findings were as follows:

- Need to increase visibility of Goods Not For Resale and Service supply chains and bring in line with current product supply chain checks and processes
- Review current internal modern slavery escalation process.
- Improve current internal training to build greater resilience to the risks of modern slavery.
- Increase effective communication both internally and externally

Following this process, we then carried out a full Risk Assessment of our DC in Milton Keynes in early 2023 (See page 3 for details)



We continue to be proud members of the UK Fast Forward programme, and have been since 2015. This membership enables us to ensure we work with ethical factories in the UK. These factories work directly with us, which provides their workers with a safe, secure and compliant workplace, and are paid a decent wage and are not mistreated or harassed at work.

We are currently also working with Fast Forward to ensure the integrity of the programme is maintained, by leading on the Brand Support Programme. This programme helps new and existing brands to understand the standards that should be upheld when auditing and following up on audits.

It also guides brands on the best ways to develop good relationships with workers, factory owners and suppliers. Through this, we have provided training and support for other brands on the programme, working alongside the Fast Forward team.

Gender Sensitive Workplace Programme. (Ethical Trade Initiative)

Having been members of the Bangladesh Accord for the past 10 years, we have seen the great improvements that have been made, although there has been little focus on the empowerment of women or addressing the issues of female worker harassment which have been heavily publicised in the media over recent years.

In 2022/23 we partnered with ETI who are running the Gender Sensitive Workplace Programme, selecting two key sites in the region. The project works to empower the female garment workers through multiple training sessions, giving them increased knowledge of their rights, to increase female representation in supervisor positions and to enable the factories to strengthen their grievance mechanisms against gender-based harassment through setting up a Sexual Harassment Complaints Committee.

Addressing Modern Slavery in the Bangladesh Ready-made Garment (RMG) Sector

During late 2023 we partnered with MSIF and Goodweave to carry out a deep dive into our Supplychain in Bangladesh at 2 suppliers. The goal of the project is to establish a comprehensive evidence base of risk, prevalence, and root causes of modern slavery in Bangladesh's ready-made garment (RMG) sector. Working with our selected suppliers the team aim to carry out supply chain mapping and assessment of high-risk suppliers and subcontractors in the lower tiers of the supply chain, with a view to analysing the risks to vulnerable workers focusing on the potential of forced and child labour, providing full remediation if and when issues are found. It is hoped that a preventative programme can be built from the work carried out. We hope to report more in our 2024 report.

Due Diligence (Cont..)

Worker Harassment – UK

In 2023 we had a case where a worker had been harrassed by colleagues at a packing unit in the UK, to the point where she had resigned with immediate affect. Working with partners on the ground in the region we worked quickly to investigate the issue and took evidence from several parties to ensure we had accurate information before proceeding.

We initially ensured that the worker received full pay during the investigation to alleviate any financial risk to the worker concerned, whilst also allowing time for us deal with the complaint.

It was soon found that a supervisor within the company was encouraging the harassment, in order to get the worker to resign due to a personal dislike for the worker on a non-work-related matter.

Once the investigation was complete it was realised that there needed to be harassment training for all workers and supervisors at the site. The supervisor in question was given a final warning for their actions, and the worker was given a position in another section of the business. This position was ultimately not taken up as the worker had found employment at another business locally, so it was ensured that the worker received full entitlement due at time of her resignation.

Due Diligence (Cont..)

Non-Payment of Minimum Wage - Morocco

In mid 2023 we had a whistleblowing call to our in-country team in Morocco. Allegations were made against a factory that 38 workers at a production site were not being paid full minimum wage, and that forged documents had been provided to our team. We were also informed that all workers had been coached and threatened both before and during visits by the factory manager. Workers were being questioned after interviews by the manager and also threatened before visits in case they shared the true information with our in-country team.

On contacting the owner of the factory who was unaware of the issues, it became clear that there was fraud being committed by staff in the factory, and after swift investigations three senior managers were dismissed. On working with the owners of the business the 38 workers received full back-pay for the period of the fraud. Although this was only a relatively small amount per worker per week it was significant amount when calculated for 38 workers and over several months.

After the incident the whole senior management team was replaced, and the owner of the business then took a much more active role, controlling wage payments directly. Workers were also key to the process and the relationship between management and workers has significantly improved due to everyone working together to fix the issue.

UK Apparel Industry

As part of River Islands commitment to the UK, we have helped to fund the Fashion workers Advice Bureau Leicester (FAB-L) which give advice and support for apparel workers in Leicester. Their support service include:

- Workers' Rights & Employment Law
- Health & Safety
- Benefits Advice & Welfare Advice
- Form Filling & Letter Writing
- Housing & Living Conditions
- Immigration & Legal Advice
- Financial Hardship Support
- Courses & Training
- Domestic Violence & Harassment

The advice provided to workers is free, and it is hoped that this will enable the more vulnerable workers to seek help when needed and help them to realise when they are being exploited.

Supplier Support

As mentioned in our case studies and in previous reports, we have a global team who regularly visit our key sites and check that the adhere to the River Island Code of Conduct.

Where required we can offer training to our suppliers and factories to ensure that they understand what needs to be in place to meet our standards, as well as giving them an understanding of their local laws and current issues that may affect their ability to meet our standards. We see internal capacity building as key to improving our supply chain, and providing our suppliers and factories with the necessary tools to build capacity being key to the process.

In 2023 we provided 11 suppliers and their factories with bespoke training to help them maintain the required standards to work with River Island. We also provided 3 Suppliers with training direct to their CSR managers. They had been newly appointed during late 2022 and early 2023 to ensure that they were fully aware of the requirements of our code of conduct when working with their factories.

Key Collaborative Partners:



During 2024 we are looking to:

- Carry out a follow-up Risk Assessment of the Distribution Centre to assess improvements made, including worker feedback
- Develop a focus on Gender Based Violence and Harassment through the work starting with the Ethical Trade Initiative
- Look at how Environment, Climate and Social issues are interlinked through our work with the Just Transitions Working Group
- Continue to increase transparency of Tier 2
- Update the Internal Modern slavery Training for all River Island Employees

Further information on our Social Impact and Sustainability Programme can be found in our 2022 Sustainability Update report at: <https://www.riverisland.com/sustainability>

