

# nobody's child

## **Modern Slavery Statement**

2024

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## Introduction

Nobody's Child is committed to preventing modern slavery and human trafficking in its operations and supply chains. We are pleased to be publishing our first Modern Slavery Statement as we continue to strive towards a greater understanding and transparency of our supply chain.

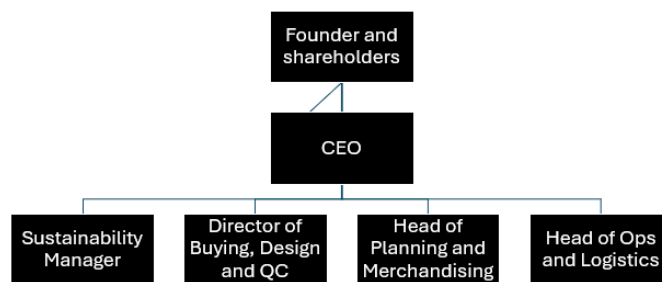
This document outlines the steps taken by our teams to ensure that modern slavery is not present in any part of our business or supply chains, in accordance with the Modern Slavery Act 2015.

As a purpose-led brand with growing presence in the fashion industry, we understand the risk of modern slavery. The risk of modern slavery is largely due to the complex, disconnected, and often opaque supply chains that make up the apparel industry.

## Business Structure

### Governance structure

Nobody's Child is committed to upholding occupational health, safety, and welfare throughout our operations pertaining direct employees corporate and retail employees and indirect employees in our supply chain. Anti-slavery and human right protection is led by our Sustainability Manager and is embedded into all our operations.



### Head office and retail structure

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**1 Head Office**  
90 employees

London

**3 Stores**  
24 employees

Carnaby St,  
Spitalfields,

**1 Distribution Centre**

Milton Keynes

**8 Wholesale Partners**

M&S, ASOS, JLP, N  
Brown, Very, Next,

**Supply chain structure**

As of May 2024, Nobody's Child's apparel and accessories are manufactured in 12 nations by 20 supplier partners in 39 contracted Tier 1 factories representing a total of 6293 workers. Our Tier 1 suppliers are published on Source Map.

All Tier 1 finished good factories are assessed and onboarded to our supplier list by our sustainability, buying, and technical teams. Full, independent unannounced/semi-announced audits of all Tier 1 factories are a prerequisite for partnering with Nobody's Child and are required every year with all cited non-compliances closed in a Corrective Action Plan report.

**Nobody's Child defines its supply chain tiers as follows:**

Tier 0	Owned Office, Manufacturing, Retail & Distribution Centres (plus contracted shipping and transportation, logistics and warehousing)
Tier 1	Contracted Manufacturing Sites & Subcontractors (finished production assembly – cutting, sewing, assembly, packing; and declared subcontracted processes such as embellishments, screenprinting and embroidery)
Tier 2	Materials Production (production and finishing of materials, trims, and packaging materials)
Tier 3	Raw Materials Processing (yarns spinning, dyeing, leather processing and tanning, resins production etc)
Tier 4	Raw Materials Extraction & Agriculture (extractives, plants or animal sources – including recycling plastic bottles to rPET)

## Due Diligence

Nobody's Child adopts a systematic due diligence approach to assess, identify, and address any potential risks relating to human rights protection. This approach is key for helping to ensure our Code of Conduct is correctly and completely implemented throughout our direct and indirect operations. We acknowledge that without appropriate measures, our sourcing and value chain is potentially vulnerable to risk of modern slavery. Our multistakeholder approach is founded on principles set out by trade unions, civil society organisations, and industry standard, combined with perspectives of our suppliers and factories. Human rights protection is a complex and evolving topic, and we therefore commit to continually reviewing our methodology to ensure alignment to all relevant expectations and regulations. Below are the levers to our current approach:

- Risk assessment
- Policies
- Procedures

### ***Risk Assessment***

Risk assessment and mitigation is an integral part of everyday decision-making and activities relating to suppliers, sourcing, and operations. Factors considered in evaluating these risks include geographic locations, types of suppliers, and industry-specific risks. Beyond this, 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 / 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, and the OECD.

Our most recent risk assessment identifies the most at-risk sourcing and supplier regions and the most at-risk worker groups, and these findings shape any required policy updates or developments and underpin our strategic direction moving forward with supplier engagement and due diligence.

Nobody's Child recognises the following groups as vulnerable to the risk of modern slavery:

- Migrant workers
- Minority groups, including refugees
- Homeworkers
- Contract and agency workers
- Temporary workers

Nobody's Child identifies potential indicators of modern slavery as the following:

- Recruitment fees and labour agents
- Cash-in-hand payments
- No union presence
- No access to grievance mechanisms
- Accommodation tied to employment

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- Poor working conditions
- Irregular work

## ***Policies***

Nobody's Child adopts a zero-tolerance policy towards modern slavery across all aspects of our operations. As part of our ethical trading standards, we have developed several 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. Our policies are collated in our Supplier Ethics and Sustainability Manual, a single document that details our Code of Conduct and our requirements relating to labour / workplace management, anti-slavery and human trafficking, freedom of association, prohibited sourcing regions, and preferred and prohibited materials and chemicals. Policy measures in place for managing the risk of modern slavery include:

- Code of Conduct (based on ILO standards and ETI base code)
- Sub-contracting Policy
- Anti-slavery and Human Trafficking Policy
- Freedom of Association and Right to Organise Guarantee
- Restricted Sourcing Countries and Prohibited Cotton Sourcing Regions
- Auditing and Corrective Action

Nobody's Child requires its partners to clearly communicate these policies to all full-time, part-time, and temporary employees. Communication and implementation requirements are stipulated in our Supplier Ethics and Sustainability Manual and are in place to ensure that all employees of all levels of seniority have unrestricted access to all policies and procedures in a language that is spoken and understood.

## ***Procedures***

Nobody's Child adopts the following mechanisms for assessing suppliers and factories within our supply chain for adherence to our Code of Conduct and policies relating to human rights and labour / workplace management.

## ***Audits***

Nobody's Child requires all factories (including sub-contractors) to be independently audited against the Nobody's Child Code of Conduct. Our audit programme is critical in the discovery and management of modern slavery cases throughout our supply chain. Whilst we acknowledge the limitations of audits, our programme is crucial in identifying risks at factory level and allows our head office team to take immediate action and mitigate risk across our supply chain.

Audit reports are reviewed by Nobody's Child and awarded one of the following grades.

- **Green grade.** Factories are graded 'Green' if the violations and/or conditions observed were deemed by us to be low or medium risk. A new audit must be conducted within one year from the last audit date if the factory is still producing goods for Nobody's Child.

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- **Amber grade.** Factories are graded 'Amber' if the violations and/or conditions observed were deemed by us to be high risk. A new audit must be conducted within six months from the last audit date.
- **Red grade.** Factories are graded 'Red' if the violations and/or conditions observed were deemed to be a critical risk. Suppliers will be required to address these issues with urgency and arrange for an immediate re-audit. We may stop production if there is an inadequate response from the supplier or factory management.

## **Training**

We recognise the importance of ensuring both our teams and suppliers have the information they need to comply with our commitments to mitigating modern slavery in our direct and indirect operations. Briefing and training sessions are instrumental for equipping teams with the tools they need to identify and manage risk in their day-to-day roles and responsibilities. Continuous training for employees is a mechanism to instil ethical trading standards into all our purchasing practices.

## **Traceability**

Following the successful launch of 3 pilot projects relating to product-level traceability, Nobody's Child continues to explore traceability throughout the value chain of its products. To date, we have traced 63 lines with a Digital Product Passport, in collaboration with 10 suppliers mapped across 13 countries. The next step on this journey is to refine the methodology, working with suppliers on data collection methods and third parties on independent verification. Through the DPP, Nobody's Child can elevate supply chain traceability beyond tiers 1 and 2, helping us to identify risk of modern slavery and human rights abuses.

## **Moving Forward**

We are proud to publish our first Modern Slavery Statement. To further strengthen our approach and ensure continual progress, we have identified the following mechanisms to combat modern slavery moving forward.

<b>Area</b>	<b>Action</b>
Supply chain mapping	Continue to map our supply chain beyond Tier 1 to gain greater visibility for risk identification and mitigation
Due Diligence	We are exploring additional mechanisms to supplement our due diligence procedures, including in-country reps to identify factory-level risk and provide another channel of communication between us, our suppliers, and their employees.
Training	Continue to train our direct teams on modern slavery mitigation and deepen and develop training mechanisms for supplier chain partners.

Collaboration	Partner with a specialist third-party organisation to shape procedure and join an industry-wide coalition to collectively drive best practice in fashion supply chains.
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### **A Note from our CEO**

As a fashion brand focused on responsibility, we pride ourselves on doing business the right way. We're proud to be built on a single premise: to deliver ethical product at an affordable price without compromising on the integrity of the garment. We take great care to make our products from lower impact fabrics for people and the planet, and this extends to those who work in our supply chain. We're proud to have very strong relationships with a small network of suppliers throughout the world.

In partnership with them, we take a zero-tolerance policy to modern slavery and I'm proud to be releasing our first statement, tracking our progress and actions we're taking moving forwards to continue to combat modern slavery in the future. We are proud of the progress we've made to date and acknowledge this is an ongoing journey. As we continue to move forward in this important area, we recognise traceability, due diligence, training and collaboration as levers for success. Over the coming year, we will continue to strengthen our approach for managing and mitigating the risks of human rights abuses, including modern slavery within our business and across our supply chain. We're excited about what lies ahead for our brand and look forward to bringing our suppliers and customers on the journey with us.



**Jody Plows, CEO**

*June 5<sup>th</sup> 2024*