

Boden

MODERN

SLAVERY

STATEMENT



Modern Slavery Statement

Financial Year 1st January – 31st December 2019 (FY2019)

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 FY2019 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.

This Modern Slavery Statement has full sign off by the Executive Board.

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.

This statement has been written using the Ethical Trading Initiative's (ETI) Modern Slavery Statement Framework for Evaluation, which is available [here](#). This statement has been reviewed by external stakeholders and their recommendations have been taken on board.

At the time of publishing this statement, we are experiencing unprecedented impacts on our supply chains from the ongoing coronavirus disease (COVID-19) pandemic. We have written to all of our suppliers advising them we will take responsibility for purchase orders and order commitments. All finished goods are still being shipped, all goods under production are continuing as normal, we have asked suppliers to complete them and ship to us. We are paying originally agreed prices in full and our payments terms have not changed. Our Sourcing Director has weekly contact with suppliers detailing Boden's COVID-19 updates.

We look forward to sharing our continued progress on this journey in our next statement.

Signed by

Paul O'Leary,
Chief Operating Officer,
J. P. Boden & Co. Ltd

Date: 05/05/2020

Contents

In accordance with The Home Office's statutory guidance, this Modern Slavery Statement covers the following six areas:

	Home Office Guidance	Boden Statement
04	Organisation structure and supply chains	<i>Our Company and Supply Chain</i>
06	Policies in relation to slavery and human trafficking	<i>Process, Policy And Due Diligence</i>
06	Due diligence processes	<i>Process, Policy And Due Diligence</i>
08	Risk assessment and management	<i>Assessing Risks</i>
14	Key performance indicators to measure effectiveness of steps being taken	<i>Monitoring</i>
15	Training on modern slavery and trafficking	<i>Cascading Knowledge</i>

Our company and supply chain

Company

Boden is a British brand founded in 1991 with eight pieces of menswear on a kitchen table. Today the company employs approximately 1,200 people across its London head office, London (UK) stores, Leicester (UK) warehouse and call centre, Pittston, PA (USA) warehouse and call centre and Boston, MA (USA) office. Boden began life as a mail-order business, and we are now a multi-channel brand, selling predominantly online as well as through catalogues, online, retail stores and several wholesale partners.

Supply chain

In total, we work with 92 suppliers, working with 151 first-tier factories who employ over 64,000 people, producing diverse product lines from dresses to handbags to baby sleepsuits. In May 2018, we published our first-tier factory list. The latest factory list, published in January 2020, includes product category and gender breakdown at factory-level.

Boden products are sourced from the following countries (the number of factories within each country is in brackets): Albania (1), Cambodia (1), China (68), India (24), Mauritius (2), Morocco (3), Philippines (2), Portugal (7), Republic of North Macedonia (3), Romania (2), Spain (1), Sri Lanka (2), Turkey (16), United Kingdom (8) and Vietnam (11).

The following table displays Boden's product mix in each country

Albania	Shoes
Cambodia	Swimwear
China	Accessories, Denim, Dresses, Jersey, Jumpsuits, Knitwear, Loungewear, Outerwear, Shirts, Shoes, Skirts, Swimwear, Tops, Trousers, Underwear
India	Accessories, Dresses, Jersey, Jewellery, Knitwear, Outerwear, Skirts, Shoes, Shorts, Tops, Trousers
Mauritius	Denim
Morocco	Accessories, Jersey
Philippines	Dresses, Jackets, Jumpsuits, Tops, Trousers
Portugal	Jersey, Underwear
Republic of North Macedonia	Coats, Jackets, Skirts, Trousers
Romania	Coats, Jackets, Skirts, Trousers
Spain	Shoes
Sri Lanka	Bottoms, Dresses, Nightwear, Tops
Turkey	Denim, Dresses, Jackets, Jumpsuits, Nightwear, Outerwear, Shorts, Socks, Tops, Trousers, Underwear
United Kingdom	Accessories, Shoes
Vietnam	Dresses, Shirts, Shoes, Tops



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 support our focus on traceability of production, working conditions and quality. Boden's sourcing strategy has always been to maintain long term relationships with suppliers, we have been working with 44% of our suppliers for over five years and 25% for over 10 years.

In April 2019 we held a Supplier Conference at Boden's head office in London, which was a huge success. The conference was attended by suppliers from around the world including merchandise suppliers and logistics providers. A leading academic in fashion, sustainability and retail presented to our suppliers on the Changing Face of UK Retail, including risks and legislation related to modern slavery. Content covered included the [UK Modern Slavery Act \(2015\)](#) as well as the [Australian Modern Slavery Act \(2018\)](#). Recommendations of the [sustainability of the fashion industry inquiry](#), chaired by the UK Government and Environmental Audit Committee, were also discussed. This included the social and environmental impact of disposable 'fast fashion' and the wider clothing industry. The conference also saw the relaunch of our supplier manual, our new sustainability strategy and emphasised the key messages of our Responsible Sourcing programme of traceability, transparency and collaboration.

Process, policy and due diligence

ETI and our Responsible Sourcing Commitment

In 2008, we joined the Ethical Trade Initiative (ETI), to support the development of our programme and have the opportunity to work collaboratively to ensure better working conditions for workers across international supply chains.

The ETI base code is the foundation of our [Responsible Sourcing Commitment \(RSC\)](#), which we have had in place since 2008. Suppliers must commit to our principles of Responsible Sourcing as part of signing our terms and conditions (T&Cs), agreeing to “meet and strive to exceed Boden’s Supplier Responsible Sourcing Commitment and applicable policies as contained in the Supplier Manual, which 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 our 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, and by confirming the PO the supplier thereby agrees to our contracted T&Cs in supplying that order.

Modern slavery legislation takes the ETI base code provision of forced labour a step further to include the impacts of human trafficking.

Boden is now public signatories of the Responsible Sourcing Network’s cotton pledge against forced labour in Uzbekistan and Turkmenistan. For more information about these pledges, please follow [this link](#). There is also a section in Boden’s supplier manual clarifying our position on forced labour and child labour issues in Uzbekistan and Turkmenistan cotton production. Suppliers agree to not knowingly source cotton from these locations.

Our current policy for young worker requirements, child labour prevention and remediation is set out in the appendix of our [RSC](#).

Ethical Trading Initiative



The [Ethical Trading Initiative \(ETI\)](#) is a leading alliance of companies, trade unions and 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



[Business for Social Responsibility \(BSR\)](#) 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 28 envisions a world in which everyone can lead a prosperous and dignified life within the boundaries of the Earth’s natural resources.

Better Cotton Initiative



The [Better Cotton Initiative \(BCI\)](#) – a global not-for-profit organisation – 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.

Fair Working Conditions



[Fair Working Conditions](#) partners with client CSR teams and key stakeholders around the world to promote compliance with international 17 labour standards, human rights best practices, employee welfare and environmental awareness.

Ethica



[Ethica CSR Ltd](#) is a social compliance and ethical trading consultancy company founded by Ebru Gökbulut in 2016 which consists of local CSR experts. The company is located in Istanbul, Turkey and operates mainly in Turkey and Bulgaria.

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 Director of Sourcing and Supply Chain, Head of Responsible Sourcing, 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 supply chain. The escalation includes a briefing to the Director of Sourcing and senior buying personnel 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. Any new concerns that have arisen from current risk assessments are addressed in this meeting and actions agreed. Modern slavery risks are one of the areas we update progress on during this meeting.

Implementation

Many teams 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 team.

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 in Mauritius (from Bangladesh, Madagascar and India) who may face debt bondage for recruitment or travel costs.	<p>Boden is an active member of ETI's Modern Slavery Working Group and take a multi-stakeholder approach to tackle these issues related to migrant labour. This includes joint collective action lobbying the Mauritian Labour Ministry.</p> <p>Commissioned tailored 'deep dive' assessments to understand and remediate recruitment practices at the factories we work with in Mauritius.</p>
Significant presence of refugees	Undocumented refugee labour in Turkey, particularly from Syrian refugees.	<p>Boden is active members of ETI's tripartite Turkey platform. A key element of this work is to put in place effective remediation where unregistered Syrian workers are employed.</p> <p>Developing social dialogue in production sites; strengthening workers' access to effective worker representation.</p> <p>Boden employs a regional representative in Turkey who regularly visits the factories Boden works with to drive improvement in working conditions.</p>
Outsourced recruitment processes and the use of contract/agency/temporary employees	<p>Migrant workers in Mauritius (from Bangladesh, Madagascar and India) who may face debt bondage for recruitment or travel costs.</p> <p>UK Warehouse and US.</p>	<p>Boden is an active member of ETI's Modern Slavery Working Group and takes a multi-stakeholder approach to tackle these issues. This includes joint collective action lobbying the Mauritian Labour Ministry.</p> <p>Commissioned tailored 'deep dive' assessments to understand and remediate recruitment practices at the factories we work with in Mauritius.</p> <p>Work with trusted labour agencies in recruiting temporary workers. Drive awareness of modern slavery with induction training at our warehouses and displaying information posters in multiple languages with Boden's whistleblowing contact.</p>

Presence of young workers and regions of increased likelihood of child labour.

Mill workers in the Tamil Nadu region of India being subject to Sumangali schemes.

Boden is proud to be a member of the multi-stakeholder initiative Tamil Nadu Multistakeholder programme since 2012, which has so far reached 25,191 female workers at risk.

We regularly risk assess our supply chain 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 a monthly summary of 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 Head of Responsible Sourcing attends all supply base sourcing strategy meetings with the product teams and buying and sourcing directors to discuss supplier and factory risk. This discussion will include country and industry risk factors, including modern slavery risk factors, updates on factory programmes and activities where improvements or best practice have been implemented.

These meetings help to inform actions and decision making for sourcing in future seasons, and is conducted in addition to our existing critical escalation policy and process.

The Responsible Sourcing Team use a variety of tools to gather risk data including internal knowledge and expertise, commissioned country risk reports, local expertise and NGO research from the region 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 we use to help us below:

- NGO Reports from [Oxfam](#) and [Anti-Slavery International](#)
- [Trafficking in Persons report \(TIP report\) US State Dept. 2019](#)
- [List of Goods produced by Forced and Child Labor US State Dept.2018](#)
- [Walkfree Foundation](#)
- [Verité](#)
- [UN Universal Human Rights Index \(UHRI\)](#)
- [ILO \(International Labour Organisation\)](#)
- [Anti-Slavery International](#)
- [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 \(FLSA\)](#)

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

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

Amongst Boden's diverse product range, we have identified products that are at high risk of modern slavery to 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's long-established work in implementing homeworker guidelines has been recognised by ETI, who [published a case-study of our work](#) in this space in 2010. Boden has 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 remain in regular contact with buying team and suppliers that employ homeworkers to monitor ongoing volume of homeworking in our range, and support wherever necessary.

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

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.

China is our biggest sourcing country, and a large producer of cotton fibre. Cotton is Boden's most important raw material, making up more than 80% of our range.

As a member of the Better Cotton Initiative (BCI), we closely follow the guidance and updates of BCI.

The majority of Chinese cotton fibre is grown in Western China. Workers in this region are known to face barriers to freely chosen employment. However, these issues are not geographically confined to Western China or limited to cotton farming, which make them even harder to identify. Compounding this, barriers to decent work of this nature are difficult to identify through ethical auditing, making detection even more challenging.

In 2020, we planned to pilot a 'beyond audit' approach with our top suppliers. This type of supply chain monitoring will increase access channels for workers to feed back their views on working conditions, and amplify worker voice. Due diligence in this way will leave us better equipped to measure indicators of forced labour, and workers will have a direct feedback channel to report human rights abuses of this nature. At the time of writing this statement, China is facing an ongoing outbreak of the novel coronavirus disease (COVID-19). We will review the timing of rolling this programme out in China, in line with Foreign and Commonwealth Office travel advice.

These sector-wide risks of forced labour in China are not going away. We recognise that this requires collaborative effort to gain meaningful leverage, and remain open and committed to collaboration in order to drive improvements in this space.

India

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

To tackle these industry-level issues, a multi-stakeholder initiative called the [Tamil Nadu Multi-Stakeholder \(TNMS\) programme](#) was formed. It has three work streams: community engagement and awareness; legislative lobbying and reform; and training at the mill-level to empower the young female workers affected by these schemes.

Boden is proud to have supported the work of the TNMS programme since 2012, which has so far reached 25,191 female workers. The key achievements of the programme in 2019 include:

- 2,211 new female workers included to receive training, with 13,145 previously recruited female workers continuing to receive ongoing support
- 25,191 female workers reached so far in total through the programme
- 1,103 peer educators empowered through training
- 367 middle management teams in 16 mills and factories trained
- 48 spinning mills and garment factories from 11 districts have been included in the programme
- Half a day training focusing on building self-esteem conducted for spinning mill workers in March 2019

Mauritius

Mauritius is a potential risk for issues relating to bonded labour due to excessive recruitment fees that migrant workers, particularly from Bangladesh, Mauritius is at risk for issues relating to bonded labour. This is due to excessive recruitment fees that migrant workers (particularly from Bangladesh) have had to pay.

Recognising this as an issue affecting several of its members across apparel and other industries sourcing there, the ETI set up the Migrant Labour Working Group. We joined this group so we could work with others to address and tackle these issues collectively and come up with joint plans of action that take a multi-stakeholder approach. This group has recently restructured to become the Modern Slavery Working Group, and Boden remains an active member.

Since joining, we have:

- 1 - Signed a joint letter to the Labour Minister of Mauritius in 2018, which was a memorandum of understanding for joint action in remediating these challenges within this supply chain. In February 2018, we attended the multi-stakeholder event in Mauritius to further these discussions. In January 2019, we have reaffirmed our commitment as a signatory to the ETI's follow-up letter to the Mauritian Labour Ministry.
- 2 - Commissioned Fair Working Conditions (FWC) to deliver a tailored assessment in January 2019 focusing on worker interviews on and offsite, in order to gain an understanding of both their recruitment experience and whether their work and conditions were as expected. We have also advised FWC to review the Freedom of Association mechanisms currently available to workers and to include worker representatives (currently in place) throughout the process.

The update and actions of this assessment are as follows:

The FWC tailored assessment brought to our attention concerns about worker living conditions and recruitment practices. Boden and the factory management agreed a corrective action plan, which included deadlines.

A follow-up visit made by a consultant to Boden verified the following:

- Significant improvements have been made to living conditions
- Improvements to Freedom of Association mechanisms, including strengthened worker-elected committees
- Dissemination of information to other workers via translation of committee meeting notes into local languages of migrant workers

Remediating the issues relating to recruitment practices is more complex. This is an ongoing piece of work with no quick solutions. Boden continues to collaborate with the supplier jointly to drive greater transparency in recruitment practices. Throughout 2019, we engaged with other ETI Migrant Labour Working Group members who have similar experience sourcing from Mauritius, to share learnings and best practice.

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 2020 we remain committed to multi-stakeholder collaboration including through ETI's Modern Slavery Working Group.

Turkey

We identified Turkey as a high-risk country due to the Syrian refugee crisis, where millions of Syrians have fled Syria into Turkey. Although an increasing number of Syrian workers are officially registered to work in the apparel industry, there are a significant number of undocumented workers who are at risk of potential exploitation. This is particularly the case for young workers and female workers. This is an industry-level risk across Turkey and so we wanted to work collaboratively, where possible, to address this as well as take action within our own supply chains to ensure decent working conditions for all workers employed.

We were the first brand to sign up and commit funding to the ETI tripartite Turkey platform, jointly funded by the UK Foreign and Commonwealth Office. Representatives from our suppliers and factories in Turkey took part in a tripartite working forum in Istanbul to raise suppliers' awareness, and gain their support in tackling these industry-level issues. It is essential that all stakeholders are part of the process and remediation work. Our suppliers also participated in the [Verité](#) research conducted as part of the initial development of the programme.

The key focus of this work is developing social dialogue in production sites; ensuring all workers have access to effective worker representation, whether that is through worker representative committees or trade union representatives.

We have one site currently working through the programme, with their approach commended by the project team on the level of commitment demonstrated and the transformative impact that the worker representatives have had. The programme is now being streamlined based on results of the participating factories so far, and Boden remains committed to supporting the ETI Turkey working group in the future.

In 2019 Boden also employed a regional representative in Turkey who has extensive local expertise in working conditions and is a fluent Turkish speaker. As Turkey becomes a more important sourcing hub for Boden, this resource will prove invaluable in helping us to implement projects on the ground and on-board new suppliers.

We also engaged in a collaboration with a fellow ETI apparel brand member on a Better Workplaces programme, focused on improving communication between management and workers, building capacity of the management and human resources teams, developing management capabilities in tackling workplace issues, and worker rights awareness training.

We were able to work with the factory management directly to make considerable changes to improve the daily experience of workers. Throughout 2019, we supported the factory's continued progress and work to sustain this new approach to worker management in the long term. The project formally finished in summer 2019, with multiple encouraging key outcomes of the project as captured by worker surveys. These include: measurable improvement in supervisor behaviour; reduction in excessive and involuntary overtime; greater awareness of worker representatives; and strengthened worker understanding of grievance procedures. In autumn 2019, Boden's Turkish representative completed a follow-up visit to the factory on behalf of both brands. The outcomes were really encouraging, verifying significant improvements that the factory has been able to make since the initial worker survey at the beginning of the project in 2018. The strengthened worker representation and election processes have had a positive impact on employee retention, which reinforces the value of addressing worker feedback in the factory.

Outside of these collaborations, our Turkish representative provides further on-the-ground support in a range of worker rights topics, especially worker representation in our Turkish supply chain. We use our Turkish representative to implement and monitor projects on worker representation in Turkey, promoting worker-management dialogue and an increase in worker awareness of rights and entitlements.

UK

We recognise that risk is not limited to our global operations and modern slavery is very much present in the UK. We therefore take time to realistically understand our local risks and take necessary actions. An area of risk is our Leicester warehouse. There, 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](#), aiming 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. 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 the call centre. 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.

USA

In the Pittston warehouse and call centre 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 Labor Provisions that protect minors and ensure that working conditions are safe and not detrimental to their health, well-being or educational opportunities.

We are looking to increase our efforts around modern slavery training in both our Pittston and Boston operations so that these meet the measures in place in our UK sites. We are aware that there is more to be done on this front and recognise the importance of modern slavery awareness in our US workforce.

Transparency & Traceability

During 2019 we updated the [sustainability section of our website](#) in order to better engage our customers on our Responsible Sourcing journey including transparency and traceability.

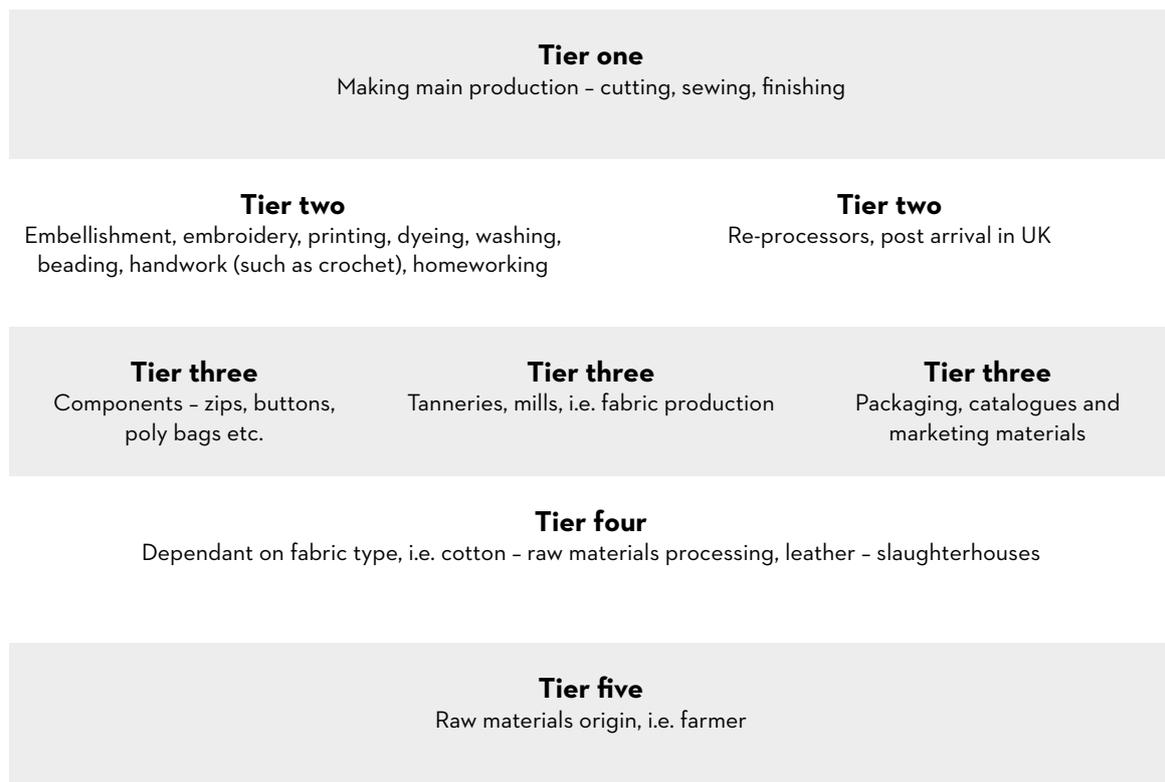
In May 2018, we published our first-tier factory list as part of our focus on transparency and we have made a commitment to update this list every six months. The latest list, published in January 2020, includes product category and gender breakdown at factory-level. Our audit demographic data is segregated and analysed by parameters including gender and ethnicity, as we know that women workers and migrant workers are rightsholder groups prone to vulnerability and discrimination, which heighten 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.

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 to reduce audit duplication. Membership of 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 most important. To this end, we have piloted different kinds of audits over the years to gather more information and feedback from workers - including FWC audits that were used to benchmark conditions in factories in key sourcing countries. FWC audits include an opportunity for workers to vote on how they feel about conditions and provides an anonymous hotline to report anything of concern confidentially.

More information about FWC and their approach is available on their [website](#).

When serious issues are found 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.

In Turkey, we ran several training and engagement programmes tackling worker survey feedback received relating to overtime issues. Initially we engaged local ethical trade expertise, [Ethica](#), to work with the factory to understand the root cause of the issues and agree to collective solutions for workers. Ethica supported the factory through an improvement programme that included training and development of a worker committee that now also includes an elected female representative. We have seen steady improvements in overall working conditions onsite. To build on this work, Boden's Turkish representative is conducting periodic follow-up visits to ensure learnings are embedded into factory operations in the long-term, and a worker committee with equal representation is upheld.

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. We continue to seek ways to formalise these assessments, work collaboratively with suppliers and other brands on continuous improvement.

CASCADING KNOWLEDGE

Building knowledge in our business

Our Responsible Sourcing Team builds its 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.

- Introduction to Responsible Sourcing – a monthly two hour internal training session compulsory for all new employees joining the company which covers Boden's Responsible Sourcing programme
- A dedicated Intranet page with information about Boden's Responsible Sourcing strategy, including our RSC as well as online training on modern slavery, which is compulsory for all new starters to complete
- A weekly newsletter distributed to the head office population about ethical and sustainability headlines from the fashion and textile industry, including emerging and current risks in Responsible Sourcing

Topics delivered as part of the training that all employees receive include: the role of the ETI; ETI base code clauses and related working conditions; understanding a supply chain and the impacts business decisions can have; modern slavery and human trafficking. We also run regular training sessions for our employees.

Building knowledge amongst our customers

This Modern Slavery Statement has been translated into French and German and will be published on our French and German 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 France and Germany which are important markets 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 put in place where needed
- ETI annual reporting – every year we provide the ETI with a report detailing all of our responsible sourcing activities for the year. Our progress is assessed and benchmarked against the ETI's principles of implementation by a joint ETI review team, which includes an NGO representative. In 2019, the NGO reviewer was Partner Africa. Prior to submission, the report is reviewed and signed off internally by both the department director and the CFO

NEXT STEPS:

Over the coming year we will be focusing on the below activity:

- Pilot a 'beyond audit' due diligence methodology with our top suppliers
- Increase access channels for workers to feed back views on working conditions. Use this information to build and revise strategy, address and resolve differences
- Map the supply chain of our top suppliers
- Establish transparency of our tier two sites
- Investigate mapping the supply chains of goods not for resale (GNFR)
- Use Boden's Turkish representative to implement and monitor projects on worker representation in Turkey; promoting worker-management dialogue and an increase in worker awareness of rights and entitlements

Please note - at the time of publishing this statement, we are experiencing unprecedented impacts on our supply chains from the ongoing coronavirus disease (COVID-19) pandemic. We endeavour to focus on the 'Next Steps' listed above - but they are subject to change.