



Boden Modern Slavery Statement

January 2016 - December 2016

As part of our continued commitment to ensuring ethical working conditions in our supply chain and operations, we fully support the transparency in supply chains provision (Section 54) of the Modern Slavery Act focusing on the prevention of modern slavery and human trafficking.

What is modern slavery?

Modern slavery is when one person possesses or controls another person in such a way as to deprive that person significantly 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.

The following statement sets out what Boden is currently doing 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 and human trafficking.

This is a long-term issue with no quick solutions, but we recognise that our customers expect us to get this right so that they are confident when choosing Boden. We are prepared for the hard work and patience involved, building on the knowledge we have, assessing current processes and focusing on improving our procedures to build a sustainable long-term approach.

We look forward to sharing our progress on this journey in 2018.

Signed by

Paul O'Leary
Executive Finance Director, Boden

Date: 22.05.2017

Who we are...

Boden is a British brand, founded at a kitchen table in 1991 with eight pieces of menswear and today employing 1,136 people across its London (UK) head offices, London store and centres in Leicester (UK), Pittston, PA (USA) and Boston, MA (USA). It began life as a mail-order business but is now a multi-channel brand, selling predominantly online as well as through catalogues, retail stores (one location, with new stores opening in 2017/18) and several wholesale partners.

Boden's ethical trade story so far

We have a dedicated ethical trade team based at our London head office. Since 2008, when we joined the Ethical Trade Initiative (ETI), we have been developing our programme and working with both the ETI and other members to make improvements in the supply chains we are working with. Our responsible sourcing commitment, which incorporates the ETI base code, is available [here](#). We report our ethical-trade-related activities to the ETI so that they can be measured against their principles of implementation, and our progress is reviewed by ETI staff and an NGO member: in 2016 the NGO reviewer was Anti-Slavery International. Our report is reviewed internally by both the department Director and the Board Finance Director.

Accountability and governance

We have a formal escalation process in place for when serious/high-risk issues affecting working conditions are found in our supply chain. The escalation includes a briefing to the Sourcing Director and senior buying personnel, with a proposed action plan for remediation with agreed timescales.

In the latter half of 2017 we will be setting up a Modern Slavery Committee that will work with the ethical trade team to tackle modern slavery risks across the business.

Policies, process and due diligence

The Ethical Trading Initiative 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 when signing our terms and conditions.

The Modern Slavery Act takes the ETI base code provision of Forced Labour a step further to include the impacts of human trafficking.

Our supplier manual has a section on Modern Slavery - 'The UK Modern Slavery Act, a definition' - which includes links to Anti-Slavery International website resources and steps suppliers should take to prevent these issues at factory level. There is also a section clarifying our position on well-known issues related to both forced-labour and child-labour issues in Uzbekistan and Turkmenistan cotton production. Suppliers must not knowingly source cotton from these locations.

In 2017, as part of an update of our Responsible Sourcing Commitment, we will be developing a more detailed approach on forced labour and human trafficking as part of a dedicated Human Rights Policy.

All suppliers and the factories they work with will be expected to sign up to the new version of Boden's Responsible Sourcing Commitment.

Our supply chain

Product

The garment and accessories supply chain is complex. To help us manage this complexity we work closely with suppliers and, where we can, ensure that we maintain long-term relationships with both the suppliers and the factories to ensure traceability of production, working conditions and quality.

We source Boden-designed product from the following countries (number of factories in brackets): China (69), India (23), Indonesia (1), Macedonia (2), Morocco (2), Philippines (2), Portugal (11), Romania (4), Spain (3), Sri Lanka (5), Taiwan (1), Thailand (2), Tunisia (2), Turkey (10), United Kingdom (5) and Vietnam (5).

Our three core sourcing countries are China, India and Portugal, which account for two-thirds of our production.

We have 77 suppliers working with 147 first-tier factories, which employ 61,000 people and produce diverse product lines from dresses to handbags to candles.

The first tier of production – where the main processes for creating the product happen – 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 where the risks of modern slavery and trafficking – and other potential salient human-rights risks – could exist.

Traceability

As part of working with suppliers, we gather as much detail about factory operations as we can. This includes understanding where all parts of the production process are happening. 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.

Second tier processes include garment-dyeing, washing, printing, sewing, packing, embroidery and embellishment, beading, crochet and hand-knitting. Third-tier processes include spinning, tanning, jewellery-plating and component-making.

As we have discovered so far, this mapping work is quite an undertaking. We sell over 3,500 styles each year, so it certainly won't be easy – the important challenges never are. It will require engaging with suppliers in a new way, helping them delve deeper with their own suppliers along the chain. It will require trust and patience at each level but we understand that quality for our customers includes transparency, knowing where and who is involved in making their Boden favourites.

Non-product merchandise

In 2018, we will be extending our focus into product not for resale. This will include mapping the supply chains for areas including catalogues, labelling and packaging, and taking the next steps of risk-mapping and action-planning.

Monitoring

All factories producing Boden products are subject to working-conditions monitoring through semi-announced independent ethical audits. Audits must cover the ETI base code principles and local law requirements. Where possible we share audits so that the factory management can focus on improving conditions for workers rather than duplicating auditing procedures. The key element of monitoring is to ensure workers have the opportunity to be heard.

To gather more information and feedback from workers, we have piloted different kinds of audit over the years, including FWC (Fair Working Conditions) audits that were used to benchmark conditions in factories in key source countries.

FWC assessments include an opportunity for workers to vote on how they feel about conditions and provide an anonymous hotline so that they can report anything of concern confidentially.

Where issues were identified through an FWC audit in a site in Morocco, we worked with NGO Partner Africa on training for the management team and the workforce, including the introduction of a workers' committee to improve communications between all levels at the factory and for the workers to enable change in their working conditions. We continue to work with Partner Africa on measuring improvements at the site.

We have also worked with two different organisations on anonymous worker surveys in different regions: in China and India we partnered with Good World Solutions and in Turkey we are working with Labor Voices. Topics covered in these anonymous questionnaires include wellbeing, awareness of their factory-worker representation options and their effectiveness, general concerns, impact of training they or the factory management have received, relationships with their supervisors/management, and health and safety.

In Turkey, we are tackling the worker survey feedback that has been received relating to issues on overtime. We have engaged local ethical trade expertise to work with the factory on understanding root causes of the issues and agreeing to collective solutions to improve the situation for workers.

For more details of how these survey programmes work, visit:

www.laborvoices.com

www.goodworldsolutions.org

Assessing conditions further down the supply chain

We have been informally visiting and assessing some of our second and third-tier production units. We will be looking at ways we can formalise these assessments and work collaboratively with suppliers and other brands on assessments and improvement actions for workers at these next levels.

Risk assessing the supply chain

There is a higher risk of modern slavery in conditions where there is: migrant labour, significant presence of refugees, contract/agency/temporary staff, outsourced recruitment processes, young workers and/or risk of child labour.

We have risk-assessed our supply chain based on the known or potential presence of the above indicators in the countries we are sourcing production from, using several different tools: our internal knowledge and expertise, as well as independent, publicly available tools that include but are not limited to:

- Trafficking in Persons Report (TIP)
US State Dept. 2016
- List of Goods produced by Forced
and Child labour US State Dept.2016
- Verité
- Walkfree.org

We have reviewed risk in relation to priorities and our initial focus will be on Boden product manufacturing, labelling and packaging, and operations at our offices and warehouses.

In countries where we are producing and have identified a higher risk of modern-slavery-related issues occurring, we are working in several ways:

1. Engaging in collaborative opportunities, either directly through ETI in country working programmes or as smaller groups.

Turkey

We were the first brand to sign up and commit funding to the ETI tripartite Turkey programme that is being jointly funded by the UK Foreign and Commonwealth office. Collaborating with other brands, NGOs and trade unions is essential to addressing human rights issues and exploitative practices, and creating sustainable long-term improvement in working practices.

Representatives from our suppliers and factories in Turkey took part in a tripartite working forum in Istanbul, to raise suppliers' awareness of issues and gain their support in tackling these industry level issues. It's important that all stakeholders are brought into the process and that solutions are worked on together. We also volunteered our suppliers to participate in the Verité (<http://www.verite.org/About-Us>) research that is being conducted as part of the programme.

India

In 2011, Anti-Slavery International identified issues of modern slavery concerning the Sumangali scheme in Tamil Nadu in Southern India. Such schemes have been predominantly found at the raw-materials-processing level of production, where leverage can be limited and monitoring challenging.

http://www.antislavery.org/wp-content/uploads/2017/01/1_slavery_on_the_high_street_june_2012_final.pdf

To tackle these industry-level issues we have been part of a multi-stakeholder initiative through ETI – the Tamil Nadu Multi-Stakeholder (TNMS) Nalam programme – which comprises three work streams: community engagement and awareness, legislative reform and training at mill level to empower the young female workers affected by this scheme. As of 2017 we have one mill in the training scheme.

2. Engaging specialist expertise on the ground to support more in-depth assessments where country/sector risk factors demonstrate a higher potential risk of modern slavery, such as the presence of migrant labour, refugee labour or contract/agency workers. When considering a supplier in a new sourcing country, we will conduct enhanced due diligence assessments as part of the induction process.

We are currently considering a new source country. During geographical risk assessment we identified a significant percentage of migrant labour from several regions, and in pre-assessment we found the production factory to have significant migrant labour present in the factory. We are engaging Verité to conduct a migrant worker conditions assessment so we can fully understand conditions for these workers and put together an action plan.

Building knowledge internally

Our ethical trade team continue to build their knowledge in this area through training, conferences and events including ETI modern slavery training sessions. We have run monthly internal ethical trade training for product teams since 2008, and since 2015 our Ethical Trade Training ‘masterclass’ has been compulsory for all new starters joining Boden head office.

Topics include the role of the Ethical Trading Initiative, ETI base code clauses and related working conditions, understanding a supply chain and the impacts business decisions can have, specific country risks and their root causes, modern slavery and human trafficking, stakeholders and their role in progress and the move towards a human rights impact based approach. We also run regular training sessions covering the same curriculum for our staff in our warehouses in both the UK and USA.

We have been tackling suppliers individually to raise awareness on modern slavery, as well as planning tailored sessions for larger groups. We are working on collaborative opportunities to run practical in-country training.

Key performance indicators and tracking progress

The next steps after publishing this statement will be forming the committee and setting KPIs for the next year in regards to our identified priorities. The committee will then track progress against these every quarter with the Sourcing Director and key stakeholders within the business.

UK operations and understanding risk

Each year we run an anonymous employee-feedback survey. This was provided in multiple languages in 2016 to ensure that we could get comprehensive feedback from all areas of our business, including where English might not have been an employee’s first language.

Due to the nature of warehouse operations, we employ temporary staff to support peaks in workload. We work with one agency – Encore Personnel – to provide us with extra staff at these times. They are licensed labour providers under the Gangmaster Licensing Act 2004, are members of the Association of Labour Providers and have signed up to the principles of Stronger Together, a multi-stakeholder initiative that is aiming to reduce modern slavery:

<http://stronger2gether.org/>

Encore Personnel’s modern slavery statement is available here:

<https://www.encorepersonnel.co.uk/wp-content/uploads/2017/01/slavery-and-human-trafficking-statement.pdf>