

TFG Brands (London) Ltd

Modern Slavery Transparency Statement

Financial Year 2024 - 2025

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A Message From Our CEO and Head Of CSR & Sustainability

At TFG, we continue to uphold our unwavering commitment to address the root causes of modern slavery, eliminate the conditions in which exploitation can thrive, and safeguard the rights and dignity of everyone working for and with us.

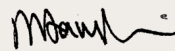
Our approach continues to evolve each year, driven not only by the increasing expectations of government and our stakeholders but by our own determination to lead by example. We recognise that our responsibility extends beyond our own operations. The complexities of our industry mean that the risks associated with modern slavery are often most acute within the tiers of our supply chain.

This is why we invest considerable effort in building and strengthening partnerships with our supply chain, carrying through the principles of responsible purchasing practices, and helping them develop the capabilities to meet both legal and ethical standards.

Where we have continued to develop frameworks to assess, monitor and mitigate the systemic risks in our business, we are extending this support to our supply chain partners in maturing their practices, enhancing understanding, building resilience, and ensuring that meaningful, long-term improvements are made. Our aim is not merely to achieve compliance but to drive lasting change that eliminates exploitation and ensures that every worker is treated with the fairness and dignity they deserve.

This is not a challenge with a clear end point, but we know that lasting progress will only be achieved through collaboration – across our industry, with regulators, and with all those who share our commitment to protecting people and upholding their rights. Tackling exploitation in our sector demands continuous focus, ongoing improvement, and an unswerving commitment to vigilance.

This statement demonstrates the steps we have taken in evolving our intentions into actions, and whilst we are proud of all that we have achieved, we are focused on the opportunities that will present to ensure that resources mobilised go further and have lasting impact on the world's most vulnerable people. Many thanks again to our teams for their ongoing dedication and focus.



Justin Hampshire
Group Chief Executive Officer
TFG Brands



We remain steadfast in our commitment to working to address forced labour as part of our wider human rights strategy

This sentiment is further validated by the 2024 International Labour Organization (ILO) reports that illegal profits from forced labour have risen by a staggering 37% over the past decade, reaching US\$236 billion per year. Approximately 86% of forced labour cases occur in the private sector, with the majority concentrated in three areas that are relevant to our business: industry (including manufacturing), services (including transport and storage), and agriculture (for the farming and harvesting of raw materials). These shocking figures demonstrate how important it is for our business to continue to work to identify, prevent, and mitigate this pervasive issue.

Recognising the importance of strong internal processes to address modern slavery risks, we have further strengthened our human rights due diligence (HRDD) approach, developing a more gender responsive human rights due diligence that supports our efforts in protecting women.

Responsible purchasing practices align our business needs with a human centric approach to due diligence, driven by a fundamental belief in governance with purpose, and where we get it right, we are leading by example.

We have seen changes and progress driven by the power of advocacy. Our first of a kind legally binding agreement with ITF, is driving a positive shift in other businesses following our example, by putting transport and logistics workers firmly on their due diligence map.

We believe that at the heart of an effecting HRDD lies meaningful stakeholder engagement and collective action, centred on the inclusion of rightsholders and their legitimate representatives, as well as government bodies.

This year we actively contributed to the update of the Home Office Transparency in Supply Chains (TISC) Guidance, which widens and strengthens the level of influence that individually and collectively we can have and should exercise and explains how businesses should comply with the letter and spirit of section 54 of the Modern Slavery Act 2015.

I am hugely proud of the work that we do, and this report shows how we continue to support those within our supply chains, and the communities around them, to realise their human rights.



Francesca Mangano
Head of CSR and Sustainability
TFG Brands



Respecting Human Rights and Labour Standards in our Supply Chain

Alongside setting out a clear commitment on human rights and labour standards, we recognise it is only through meaningful relationships with our supplier partners that we can begin to better understand what is required to improve working conditions and environmental practices in our supply chains. As such, we seek to uphold the following responsibilities to them:

Open Communication:

We are committed to continually evolve and improve our ways of working, and will always ensure our relationship with our supplier partners is based on open dialogue, gaining feedback so we can reflect and adjust our own standards and behaviours where needed.

Responsible Purchasing Practices:

Our principles of responsible purchasing practices are modelled on the Common Framework for Responsible Purchasing Practices, in partnership with our suppliers and with the guidance of the Ethical Trading Initiative. We are formalising equal partnerships with our suppliers, with a two-way code of conduct that ensures both parties comply with a set of agreed requirements, with the overarching aim to improve working conditions for workers in our supply chains.

Clear Expectations:

Before establishing a relationship, we set out our commitment to ethical trade, as well as the requirements our suppliers must meet to support this aim. As our journey towards responsible purchasing practices evolves, we are committed to collaborate with our suppliers, ensuring our actions enable them to meet our requirements and expectations, achieving mutual business success, with the aim to raise standards and improve working conditions as our relationship develops.

Support and Guidance:

We provide support and guidance to our supplier partners to help them understand and meet our requirements. This includes putting in place the policies and procedures to ensure our supply chains are equipped to protect and respect human rights and labour standards, as well as being environmentally responsible. This is supported by regular site visits, as well as the principle of continual improvement.

Policies

As part of our ever-evolving ethical trading strategy, which is based on the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [ETI Human Rights Due Diligence Framework](#), we have developed our operational policies with the view of respecting, protecting and remedying the human rights and labour standards of all who work on our behalf.

TFG Brands core policies relate to our commitment to adopt the UNGPs, and include our Human Rights Policy, Supplier Code of Conduct, Migrant Workers Employment Policy and Implementation Guidelines, [Guideline for employment and integration of people displaced from Ukraine](#), Cotton Procurement Policy, Homeworkers Policy, Neptune Declaration, Maritime Labour Convention 2006 and the Young Worker and Child Labour Policy.

Our Human Rights Policy sets out our responsibility to respect international human rights globally. It provides a basis for embedding this responsibility through all business functions, responding to stakeholder expectations where needed, identifying and plugging any policy gaps. It elaborates our commitment to developing in-house learning, management capacity and leadership.

Our Supplier Code of Conduct ('Code of Conduct') is aligned with the Ethical Trading Initiative ('ETI') base code, with elements of the SAI SA8000 Standard:2014. It outlines the minimum social and environmental standards we expect each factory – and its sub-suppliers – to meet and or exceed our expectations regarding the conditions in which our products should be manufactured.

Our Migrant Workers Employment Policy and Implementation Guidelines set out the supplier requirement to protect, respect and remedy the rights and welfare of migrant and contract workers, some of the most vulnerable to exploitation and modern slavery. Within this policy, TFG Brands endorses the [Employer Pays Principle](#), which reflects the [Dhaka Principles](#) for Migration with Dignity.

Established in response to the Russian invasion and ongoing conflict in Ukraine, TFG Brands played a key role to develop the **ETI guidelines for employment and integration of people displaced from Ukraine**. This policy provides guidance on how to support the employment of refugees and displaced people, with secure, decent, safe and fair work with mainstreaming of gender considerations in mind.

Our cotton procurement policy outlines TFG Brands position on human rights and labour standards in the sector, focused on the cultivation and processing of cotton fibre, including on cotton farms as well as ginning and spinning facilities. It does not however, address the environmental impacts of cotton production in either the fibre, yarn, fabric or garment processes.

Our Homeworkers Policy communicates our position towards homeworking in our supply chains, providing support to our supply chain partners. Homeworkers exist in our supply chains, and we are supportive of this. The majority of homeworkers are women who are balancing paid work with domestic and family responsibilities with few practical alternatives to provide income. We are committed to working alongside our suppliers to sustain homeworkers' employment and making their work as regular as possible, while contributing through our purchasing practices to improved rights, income, and working conditions.

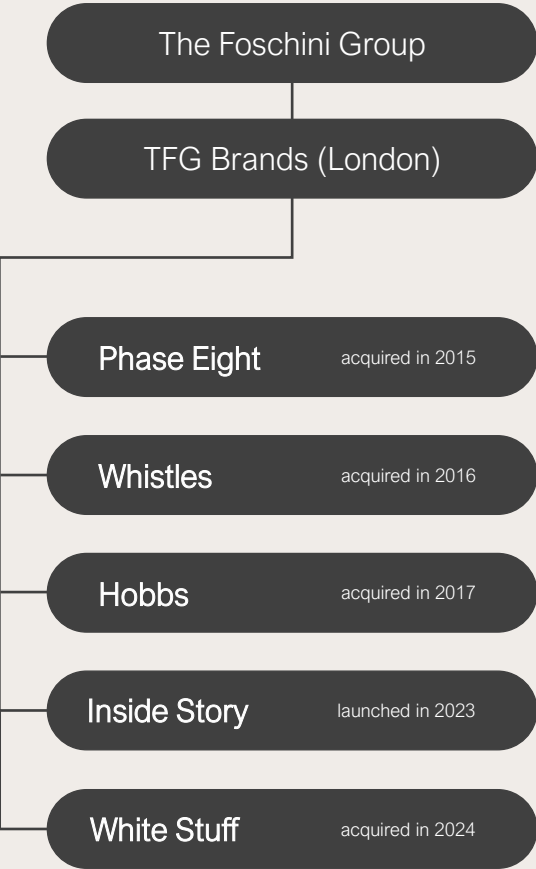
[The Neptune Declaration on Seafarers Wellbeing and Crew Change](#) aims to promote and protect the welfare of seafarers. It was launched in response to the crew change crisis, which resulted in around 400,000 seafarers stranded on ships because of coronavirus-related travel bans.

[The Maritime Labour Convention 2006](#) aims to establish minimum working and living standards for all seafarers working on ships flying the flags of ratifying countries.

Our Young Workers and Child Labour Policy prohibits the recruitment of child workers in our supply chains and outlines remediation guidelines.

Finally, other policies that relate to the prevention of modern slavery are our **Anti-Bribery Policy**, **Whistleblowing Policy** and **Equal Opportunity Policy**.

Our Business



Headquartered in London, TFG Brands is owned by The Foschini Group Limited (“TFG”) a leading publicly listed South African retail group.

TFG first entered the UK market (forming TFG Brands) through the acquisition of the premium womenswear brand Phase Eight in January 2015. Since then, the premium womenswear brands Whistles and Hobbs, and more recently the homeware brand, Inside Story and lifestyle brand White Stuff have been added to the group’s portfolio. Each brand focuses on a different customer and style, from the contemporary designs at Whistles to understated British elegance at Hobbs, exclusive occasion and daywear collections at Phase Eight, thoughtfully created designs at White Stuff and modern homeware at Inside Story.

TFG Brands is headquartered in London, sharing offices with Phase Eight and Inside Story. TFG Brands is establishing a retail presence, operating in 1 territory with 2 solus stores and employs 471 people across both central teams and retail roles. As of 31st March 2025, TFG Brands employs 3,567 people – directly for either TFG Brands, Hobbs, Inside Story, Phase Eight, Whistles or White Stuff – working in central teams, and throughout our retail locations, in both part-time and full-time roles.

The DC for Phase Eight, Hobbs, Whistles and Inside story is operated by a third-party logistics company who employ 120 people across the TFG contract. White Stuff’s DC is operated directly by the brand



Phase Eight

Phase Eight is a premium, British brand; the go-to destination for empowering, feminine style that inspires. Founded in 1979, Phase Eight designs clothing and accessories for all areas of her life - from special occasions to weekend looks.

Acquired by TFG Brands in 2015, Phase Eight is headquartered in London with its Customer Care operations and Distribution Centre (DC) based in Medway, Kent. Phase Eight has a strong international retail and online presence, operating in 15 territories across 257 solus stores and concessions. Phase Eight employs 678 people.



WHISTLES

Whistles is a multi-channel contemporary fashion brand, selling apparel, footwear, and accessories in timeless, intelligent designs for modern women.

Acquired by TFG Brands in 2016, Whistles is headquartered in London, with a DC and Customer Care team in Medway, Kent. Whistles has a strong retail and online presence, operating in 7 territories across 133 solus stores and concessions. Whistles employs 403 people.



HOBBS

LONDON

Founded in 1981, Hobbs is a premium British womenswear brand offering clothing, footwear, and accessories.

Acquired by TFG Brands in 2017, Hobbs has a headquartered in London, with a DC and Customer Care team in Medway, Kent. With a strong retail and online presence, Hobbs operates in 10 territories across 189 solus stores and concessions. Hobbs employs 646 people.



Inside Story

Inside Story is an exciting, contemporary, homeware brand with an emphasis on style and quality.

Launched online in February 2023, the collection is beautifully curated, from our handcrafted, exquisite cushions and throws sourced in India; indulgent scents and elegant soy wax candles hand poured in the UK; to our bedding and towel ranges favouring luxurious, hotel-quality thread counts and super soft cottons.

With a growing presence online, Inside Story operates in the United Kingdom, with its headquarters in London and with a DC and Customer Service in Kent. Inside Story employ 12 people and it's DC is operated by a third-party logistics company, who employ 6 people on the Inside Story contract.



WHITE STUFF

Established in 1985, White Stuff is a multi-channel lifestyle brand known for its unique, thoughtfully created designs for women and men, and use of certified materials.

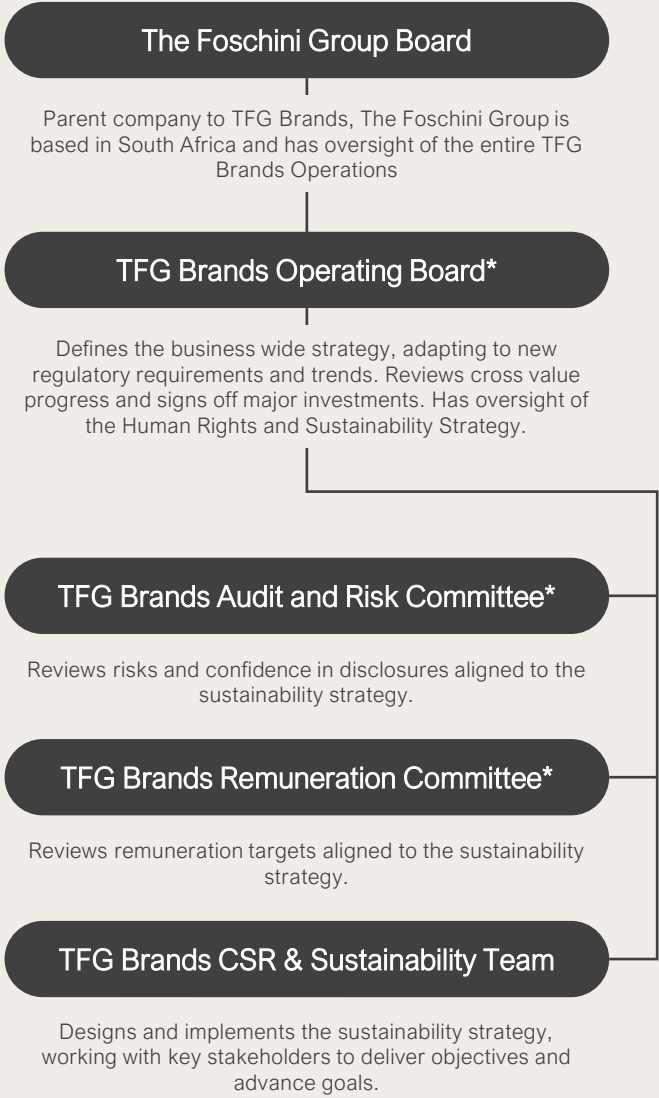
Acquired by TFG Brands in 2024, White Stuff has is headquartered in London. White Stuff operates in 3 territories across 186 solus stores and concessions. White Stuff employs 1207 people in head office and retail. The DC and customer services is located in Leicester with 127 people employed.

Our Governance

Upholding our commitment to respect the human rights of everyone in our operations remains our priority in our business.

The CSR and Sustainability Committee sits within the TFG Brands Operating Board, which oversees the governance of responsible business practice. The CSR and Sustainability Committee’s principal role is to establish, implement and evolve the sustainability strategy, aimed at reducing the company’s impact on people and the planet, while reflecting the company’s purpose, vision and values. It upholds and oversees TFGL policies and takes appropriate actions on areas of concern.

The Committee also play a part in monitoring the business’s engagement with its community of stakeholders including customers, suppliers and colleagues, as well as government on sustainability and corporate responsibility matters.



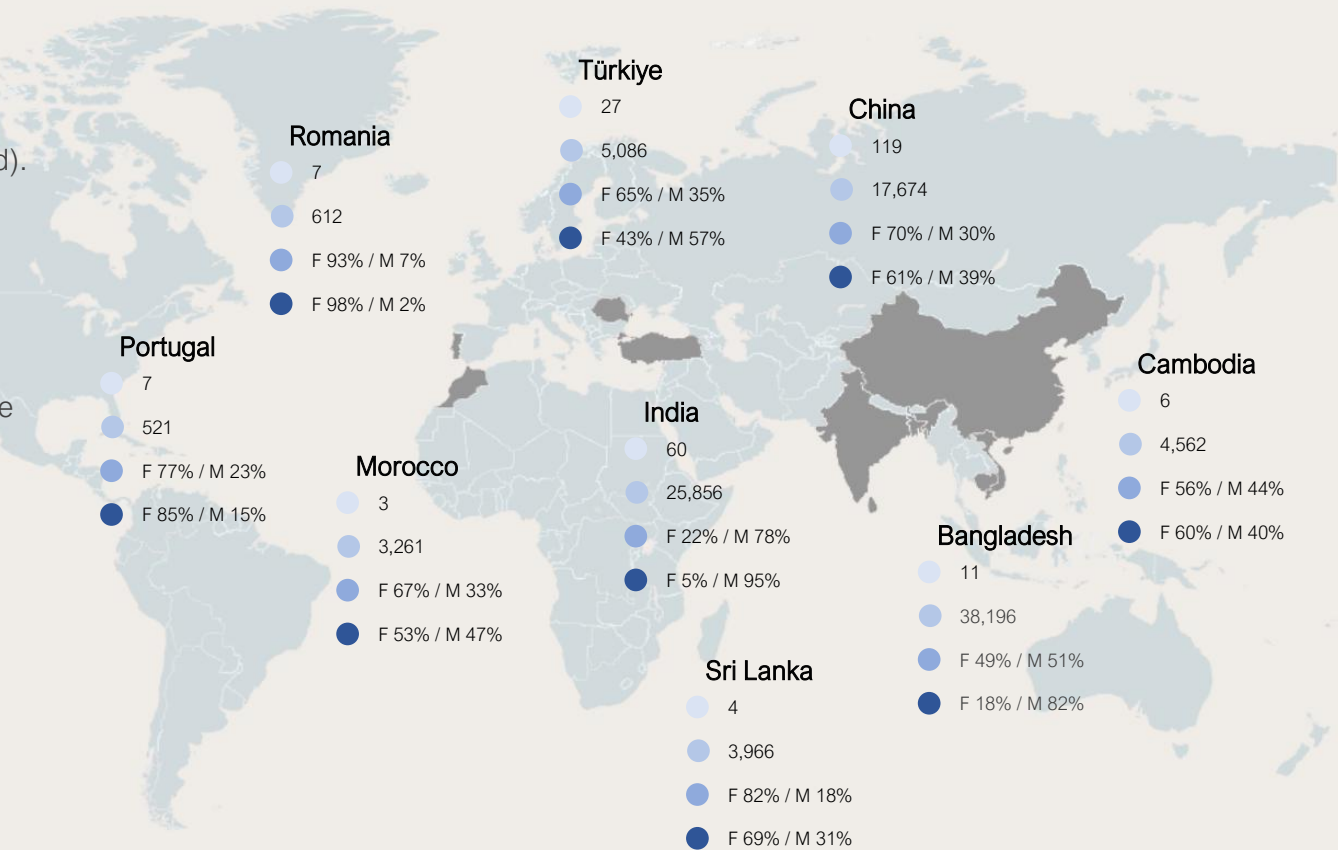
11 *The Operating Board, Remuneration Committee and Audit and Risk Committee have additional functions, but this description outlines their function related to their CSR and Sustainability focus.

Our Sourcing Landscape

Collectively, TFG Brands manufactures products through a global network of 168 external suppliers (of which 36 are shared) across 21 countries and in 279 tier-one production sites (of which 32 are shared).

Further to its tier-one suppliers, TFG Brands continues to map its subsequent supply chain tiers which provide subcontracted and homeworking processes as well as fabrics, trims, yarns and raw materials. Each brand does not have direct relationships with these suppliers and are managed via their tier-one suppliers. All brands source their fabrics, components, and raw materials through the same network and in-house.

Representing 98% of purchased volumes during the 2024-2025 financial year for its tier-one suppliers, TFG Brands collective top 10 sourcing countries are China, India, Bangladesh, Türkiye, Cambodia, Vietnam, Sri Lanka, Morocco, Romania and Portugal.



- Number of factories
- Number of workers
- Percentage of workers identifying as female or male
- Percentage of workers identifying as female or male in management roles

Our Sourcing Landscape

Phase Eight

Phase Eight manufactures its products in 71 first tier factory sites across 13 countries. Phase Eight's factory relationships are managed through an external network of 51 suppliers, of which 43% are direct and 57% are agents. Phase Eight's top 10 sourcing countries are China, India, Türkiye, Romania, Morocco, Greece, Vietnam, Sri Lanka, Indonesia, Portugal representing 99.5% of purchased volumes this year. The Phase Eight first-tier supplier list can be found [here](#).

Whistles

Whistles manufactures its products in 74 first tier factory sites across 14 countries. Whistles' factory relationships are managed through an external network of 56 suppliers, of which 45% are direct and 55% are agents. Whistles top 10 sourcing countries are China, India, Türkiye, Vietnam, Portugal, Sri Lanka, Mauritius, Tunisia, Spain and the United Kingdom representing 98% of purchased volumes this year. The Whistles first-tier supplier list can be found [here](#).

Hobbs

Hobbs manufactures its products in 76 first tier factory sites across 13 countries. Hobbs' factory relationships are managed through an external network of 54 suppliers, of which 59% are direct and 41% are agents. Hobbs' top 10 sourcing countries are China, India, Sri Lanka, Morocco, Türkiye, Vietnam, Romania, Indonesia, Cambodia and Portugal representing 99.5% of purchased volumes this year. The Hobbs first-tier supplier list can be found [here](#).

Inside Story

Inside Story manufactures its products in 14 first tier factory sites across 4 countries. Inside Story's factory relationships are managed through an external network of 4 suppliers, of which 100% are direct. Inside Story's sourcing countries are India, United Kingdom, South Africa, Portugal and the United Kingdom representing 100% of purchased volumes this year. The Inside Story first-tier supplier list can be found [here](#).

White Stuff

White Stuff manufactures its products in 85 first tier factory sites across 10 countries. White Stuff's relationships are managed through an external network of 47 suppliers of which 40% are direct and 60% are agents. White Stuff's sourcing countries are Bangladesh, India, China, Cambodia, Türkiye, Vietnam, Portugal, Nepal, Spain and Sri Lanka representing 100% of purchased volumes this year. The White Stuff first-tier supplier can be found [here](#).

Country	Est. Prevalence of Modern Slavery (Victims per 1,000 population)	TFG Brands Purchased Volumes 2024-25
TÜRKIYE	15.6	5%
NORTH MACEDONIA	12.6	<0.1%
INDIA	8	19%
ROMANIA	7.5	2%
BANGLADESH	7.1	16%
INDONESIA	6.7	1%
SRI LANKA	6.5	2%
GREECE	6.4	<1%
CAMBODIA	5	4%
CZECHIA	4.2	<0.1%
VIETNAM	4.1	2%
CHINA	4	46%
PORTUGAL	3.8	1%
NEPAL	3.3	<1%
ITALY	3.3	<0.1%
SOUTH AFRICA	2.7	<0.1%
MOROCCO	2.3	1%
TUNISIA	2.3	<1%
SPAIN	2.3	<1%
UNITED KINGDOM	1.8	<0.1%

TFG Brands collective top 10 sourcing countries are China, India, Bangladesh, Türkiye, Cambodia, Vietnam, Sri Lanka, Morocco, Romania and Portugal.

The table above illustrates our first-tier sourcing landscape ordered by prevalence of modern slavery according to the [Global Slavery Index Map](#) and purchased volumes during the 2024-2025 financial year.

We recognise that certain countries within our own operations may have one or more of these modern slavery risks and as such, we have divided them into three different categories of high, medium and low risk and allocated appropriate priorities. This differentiation was based upon assessing causes and contribution, direct and indirect impacts as well as level and influence, according to the prevalence of modern slavery as highlighted in the Global Slavery Index map.

Our Supply Chain

Our supply chain is divided into two channels:





- Products for re-sale online and in stores, including the brands' branded products and other third-party brand product.
- Non-stock items and services, including outsourced customer deliveries, logistics, IT, cleaning, customer care and catering.

Each brand under the TFG Brands group designs and develops their own branded products from offices in London, while finished goods are manufactured by an established network of third-party factories.

At brand-level, the sourcing team is comprised of the design, fabric sourcing, buying, merchandising and technical departments, who take ownership of their sourcing landscape and supply chains. At Group-level, the CSR and Sustainability team work alongside the sourcing teams to ensure that direct and indirect suppliers are assessed and selected based on ethical and sustainable credentials, together with commercial criteria as outlined in the due diligence section below.

Non-stock items and services are managed by the procurement team and – where applicable -supported by the CSR and Sustainability team, as well as the legal team.

Each brand's supply chain is defined as illustrated in the table opposite.

Tier	Definition	Example	Hobbs	Phase Eight	Whistles	White Stuff
1 	Primary production site	Assembly of finished goods before being shipped to brand. Processes such as cutting, stitching, QC, packing are conducted.	Fully Mapped	Fully Mapped	Fully Mapped	Fully Mapped
2 	Dye-houses, Fabric mills, trims & Subcontractors or homeworking	<p><u>Dye-houses</u>: fabric dyed and finished if not at fabric mill</p> <p><u>Fabric Mill</u>: yarn woven/ knitted into fabric</p> <p><u>Trims</u>: Buttons, zips and labels</p> <p><u>Subcontractors & homeworking</u>: secondary processes conducted outside of the primary production site such as embroidery, embellishment, printing and in some cases, stitching</p>	Partially Mapped	Partially Mapped	Partially Mapped	Partially Mapped
3 	Yarns	Spinning of raw material into yarns	Partially Mapped	Partially Mapped	Partially Mapped	Not Mapped
4 	Raw Material	Cultivation or extraction of raw material, such as farm, forest, ranch	Not Mapped	Not Mapped	Partially Mapped	Not Mapped

How we identify salient risks

The identification of our salient human rights risks is part of a wider enhanced due diligence process to manage and respect human rights. Our approach goes beyond compliance and builds on years of effort to better understand where there is most risk of human rights abuses occurring and their impacts.

On an annual basis, we conduct a human rights risk assessment to help us better understand, manage and respond to the risks in our supply chains.

Directed at group level, TFG Brands follows the [ETI Human Rights Due Diligence \(HRDD\) framework](#) and [UN Guiding Principles for Business and Human Rights](#) which is used to assess, identify, monitor and mitigate all human rights risks. Through this due diligence process - which in some cases will be enhanced - we carry out a risk assessment across our manufacturers and non-stock suppliers, as well as collaborating with our strategic partners, including the [Ethical Trading Initiative](#), [Homeworkers Worldwide](#), [Anti-Slavery International](#) and the [International Workers' Transport Federation](#) to gain external expert guidance and advice.

Due to the complexity of global supply chains and in order to prioritise our resources, it is important that we are able to understand the wide range of human rights impacts we may be connected to. This includes examining risks related to our business model, the products we make and our sourcing and purchasing practices, as well as our global sourcing landscape.

Our footprint is linked to an extensive range of supply chain stakeholders, from farmers and producers, to traders and manufacturers. For many of them, we hold indirect relationships due to the complex nature of supply chains, however our future sourcing ambitions extend across the entirety of our supply chains, encompassing both direct and indirect relationships.

We also recognise that increasing supply chain transparency and traceability continues to play a pivotal role in driving change, as well as responding to salient risks. As we progress on this journey, TFG Brands partners with Segura Systems to enhance transparency in our supply chains, adding additional assurance on our mapping efforts beyond tier 1. Working in collaboration with our first-tier supplier partners, TFG Brands is now mapping its second-tier production sites, components, packaging and services used across all products via a multi-tier declaration function, that is confirmed with the second-tier supplier in real time, adding greater assurance to our efforts.

We welcome the creation of [Supply Trace](#), an open platform that exposes potential risks in global supply chains, currently focusing on the apparel sector and links between forced labour in the Uyghur Region of China and shipments to the US. In addition, by contributing to the [Open Supply Hub](#), we are joining our industry peers to resolve an important challenge that the industry has been struggling with for several years – the lack of single facility identifier for garment factories in apparel supply chains. We believe this development is key in our industry and will support current and future brand and stakeholder collaborations on an array of activities at factory level, ranging from joint remediation to collaborative capacity building activities.

In the spirit of continuous improvement and recognising that the risks people in our supply chains are exposed to are changing, we are working to develop a more sophisticated and systematic assessment, as well as prioritising the potential human rights impacts that we could cause, contribute to, or be connected to across our supply chains.

The direct and indirect effects of climate change will have significant implications for the people and communities in our supply chains. Our enhanced saliency assessment will also seek to identify and prioritise the evolving issues that have the potential to cause the greatest harm to people connected to our business, now and increasingly in the future.

As we progressively work towards identifying our salient issues, we will evolve our existing human rights commitments and advance targets which will challenge our business to drive meaningful progress on human rights.

The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
How grave or serious the adverse human rights impact would be, considering both the potential direct impact, for example on the right to life, and the indirect knock-on impact on other rights.	How many people are or could be affected by the adverse human right impact	How hard or possible it would be to put the human rights violation right, once it has occurred.	The likelihood of the risk occurring based on prevalence, country and industry context and audit data.	How are rights affected affected by physical and transitional climate change.

Our Partners

We value our partnerships with NGOs, Trade Unions and Academia, as well as other brands and multi stakeholder platforms such as the Ethical Trading Initiative and the British Retail Consortium, working together to find a common solution to salient issues.



The Ethical Trading Initiative is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Their vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.



Anti-Slavery International first identified slavery in supply chains as a key issue in the fight against slavery over two decades ago. They tackle modern slavery in supply chains through research, advocacy and engagement with business.



The Multi-Stakeholder Initiative Working Group on Responsible Purchasing Practices has collaborated to develop the Common Framework for Responsible Purchasing Practices and works on promoting the uptake and implementation of the Framework, and on influencing relevant policy.

End Uyghur Forced Labour

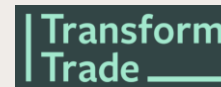
The Coalition to End Forced Labour in the Uyghur Region is a coalition of civil society organisations and trade unions united to end state-sponsored forced labour and other egregious human rights abuses against people from the Uyghur Region in China, known to local people as East Turkistan.



British Retail Consortium is the trade association for UK retail businesses, whose purpose is to make a positive difference to the retail industry and the customers it serves, today and in the future.



Organic Cotton Accelerator (OCA) unites the sector to unlock the Organic Cotton Effect – driving positive impact from field to fashion for both people and the planet. Building a transparent, responsible and resilient organic cotton supply chain that fosters prosperity and wellbeing for farming communities.



Transform Trade works for trade and climate justice. In South Asia and East Africa, they partner with farmers, workers and artisans to help them benefit from more sustainable and equitable trade. In the UK they advocate and campaign for changes to business practices and government policy.



The International Transport Workers' Federation is a democratic, affiliate-led federation recognised as the world's leading transport authority. They fight to improve working lives and help their members to secure rights, equality and justice.



Sedex is one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains.



HomeWorkers Worldwide works to support homeworkers and their organisations in their struggle for rights and respect.



Fairtrade is the most recognised and trusted sustainability label working to make trade fairer for the people who grow our food. Through the global fair trade movement businesses, NGOs, and shoppers alike are rebalancing trade – one product at a time.



The Open Supply Hub is an open-source map and database of global apparel facilities, their affiliations and unique OSH IDs assigned to each facility.

Training

We recognise the importance training plays in tackling modern slavery and other forms of human rights abuses. As such, we provide updates and raise awareness of salient modern slavery risks internally to both our procurement and operations teams, as well as our operating board and external partners and work collaboratively to find solutions to mitigate these issues.

Reflected in our actions taken, this year we have increased awareness within our teams and beyond on the subjects listed opposite.

Responsible Logistics

In partnership with the [International Transport Workers' Federation](#), we raised awareness of the human rights risks affecting transport workers in our supply chain, among our logistics and procurement team, and we will extend this training to our third-party logistics partners on an ongoing basis.

Responsible Warehousing

In partnership with [Anti-Slavery International](#) and our third-party logistics partners, we have raised awareness of the risks related to responsible recruitment in our distribution centres in the UK. This work continued over the course of 2025. In addition, Anti Slavery International developed bespoke training on how to prevent and detect modern slavery in our operations and warehousing and these are rolled out on an ongoing basis across the business.

Academic Research Projects

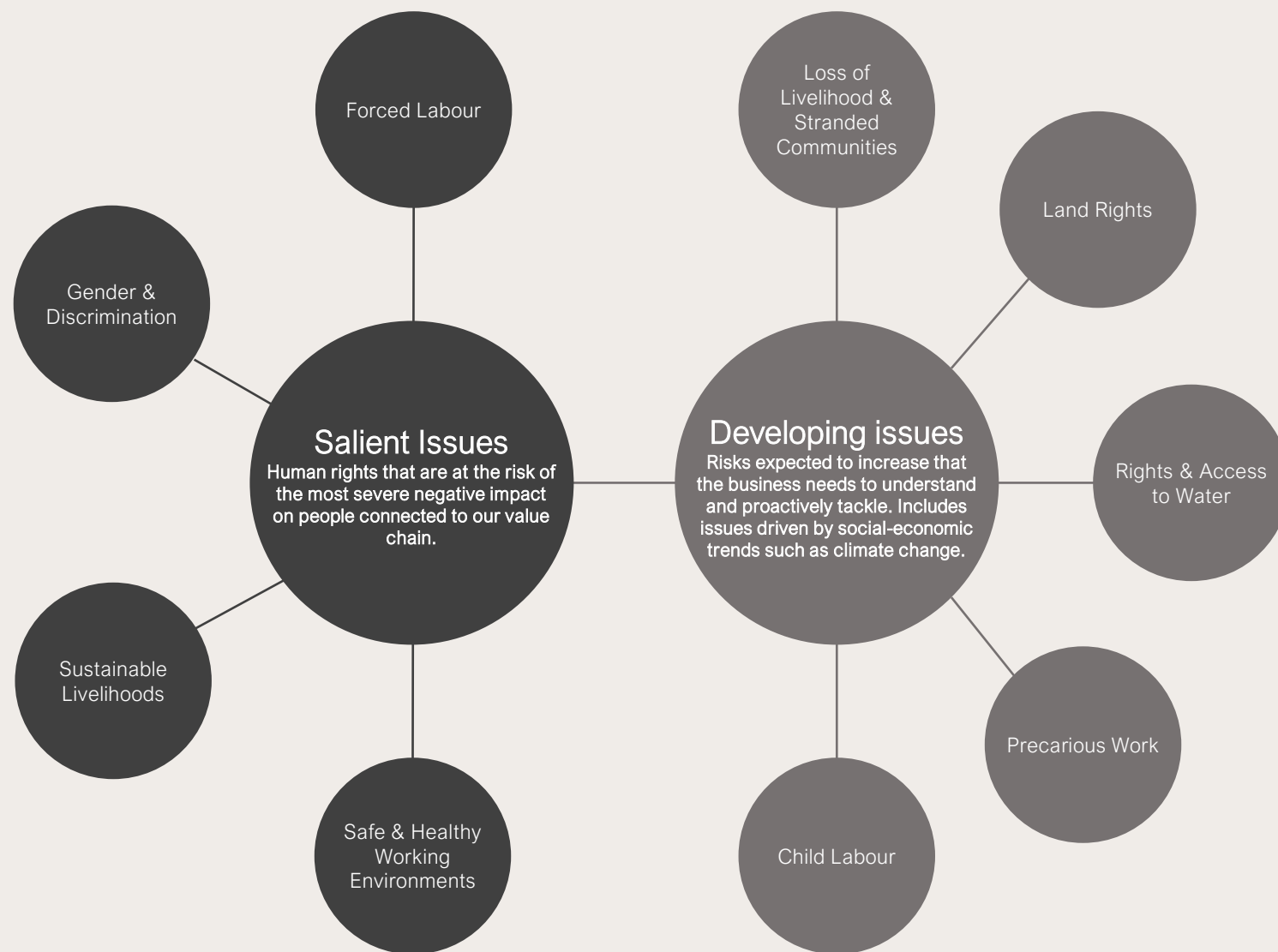
Over the past year we continued to contribute to modern slavery related research projects led by distinguished Universities, sharing our case studies and experience in responding to and mitigating risks, as well as outlining ongoing challenges and existing limitations.

Salient Issues

At TFG Brands, we source a wide range of raw materials across different countries, from multiple suppliers. Each of these routes and commodities presents unique challenges and requires specific commitments and targeted action.

As part of our annual risk assessment and due diligence process, we conduct assessments of our supply chains and sourcing practices to identify our salient environmental and human rights risks.

These risks represent the most severe potential negative impacts on people and the planet that could arise as a result of our business' operations and supply chains. By prioritising our salient environmental and human rights risks, we can better understand, manage, and respond to these risks and build on our long-standing commitments to address them.



Salient Issues

Salient Issues

Developing Issues



Loss of Livelihood

Land Rights

Rights and Access to Water

Precarious Work

Child Labour



The prioritisation of our salient risks also takes into account our effort in supporting the United Nations Sustainable Development Goals as illustrated above.



Salient and Developing Issues by Geography

Salient Issues			Developing Issues		
Issue	SDGs	Region	Issue	SDGs	Region
Forced Labour		China	Loss of Livelihood and Stranded Communities		Regions with prevalence of climate change and conflict risks
Gender and Discrimination		India, Bangladesh, Turkey, Tunisia, Morocco	Land Rights		India
Sustainable Livelihood		India, Bangladesh, Vietnam, Cambodia	Rights and Access to Water		India, South Africa, Bangladesh
Safe and Healthy Working Conditions		Globally	Precarious Work		Globally
			Child Labour		India

Actions Taken

At TFG Brands, we have a long track record of respecting and championing human rights, as well as responding to issues in our supply chains.

Recognising the importance of strong internal processes to address modern slavery risks, this year we have focused on further strengthening our human rights due diligence (HRDD), implementing a gender responsive approach to human rights, and developed stronger requirements and guidance for suppliers specifically linked to identified high-risk sourcing areas.

Over the past year we have continued to embed measures to assess, identify, monitor and mitigate the risk of modern slavery in our business and supply chains. From proactively investigating potential risks and strengthening our due diligence to raising more awareness on the topic.

The outcome of our enhanced human rights due diligence identified key areas with high risks of modern slavery, including state imposed forced labour, the presence of third-party labour recruitment agencies and a high level of contract and agency workers, as well as a predominantly female workforce, low-level awareness of workers' rights, low pay, and irregular work due to lack of legitimate workers representation.

We recognise that crises heighten the risk of all forms of modern slavery. Structural inequalities like poverty, gender discrimination, and the absence of legal migration pathways, create conditions of extreme vulnerability. "Push" factors such as economic instability, conflict, and climate crises drive people into desperate situations, while "pull" factors – often the false promise of opportunity in wealthier nations – lure them into exploitation. Understanding these dynamics is essential to tackling modern slavery at its roots.

While in recent years there has been increased action by some countries to address forced labour risks within business and government supply chains, more needs to be done towards mandatory Human Rights & Environmental Due Diligence (mHREDD).

Over the course of the financial year 2025, we have focused on some of the salient risks we identified, whilst making progress on others that we previously reported on. What follows is a summary of this past year's efforts.

Gender Responsive Human Rights Due Diligence

All Sourcing Regions

Reaffirming our commitment to enhance our gender responsive approach to human rights due diligence, we joined the ETI community of practice to tackle gender-based violence and harassment (GBVH) in our supply chain, with the aim to work towards gender responsive human rights due diligence.

We recognise that there is a strong business case for advancing gender equality and preventing GBVH by securing commitment at the top.

Through this workstream we have refined our supply chain mapping and analysis of gender disaggregated data, with the aim to include wage data in the near future.

We will use gender-disaggregated supply chain data to help identify a wide range of risks that disproportionately affect women in the workplace as a result of their gender. This exercise could shed a light on:

- Why women might be found in more vulnerable contract types, such as fixed term, temporary or seasonal contracts, and in general more informal working conditions, compared to men;
- Why women are not in leadership positions e.g. because they may not have the same access to training or networking opportunities, or they may be time constrained due to unpaid care responsibilities;
- How health and safety procedures or infrastructure that are not fit for women, given biological differences or types of activities done in the workplace;
- Uncover root causes of complex workplace issues such as gender-based violence and harassment, which predominantly affects women workers.



Gender Responsive Human Rights Due Diligence

All Sourcing Regions

We are looking at realigning our internal policies with those that are shared with our supply chain, to ensure that our commitment towards tackling GBVH is firmly embedded.

We started gathering a sense of the level at which our suppliers are aware of GBVH and have already put measures in place to address this by collating Self Assessment Questionnaires. This is because we feel that:

Suppliers play a key role as critical stakeholders in the development and implementation of GBVH policies and processes as well as the practical implementation of GBVH prevention and remediation measures.

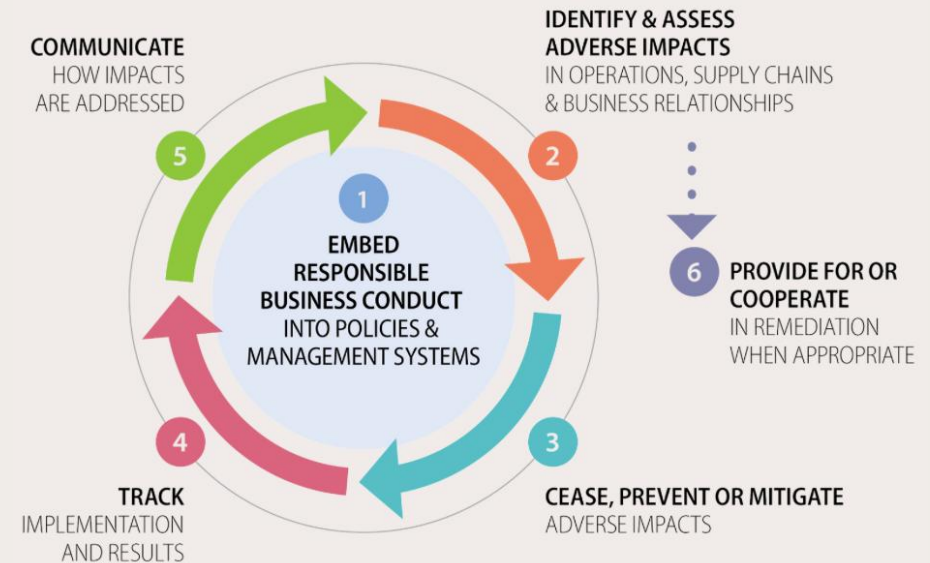
By integrating suppliers' perspectives, we want to understand the effectiveness of responsible purchasing practices current approaches, the challenges suppliers face in addressing GBVH and the ability to think forward to identify solutions; This will enable us to create a space to discuss collaboration and shared responsibilities in tackling GBVH risks.

We plan targeted supply base training as part of a collective approach and are exploring opportunities for peer-to-peer learning.

Salient issues relate to Gender & Discrimination, Healthy & Safe Working Environment and Sustainable Livelihood.



DUE DILIGENCE PROCESS & SUPPORTING MEASURES



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
High	High	High	High	Medium

Responsible Logistics

Global



TFG Brands London is committed to respecting the human rights of seafarers in our global supply chains.

To uphold this commitment TFG Brands London became the first fashion retailer to partner with the International Transport Workers Federation (ITF) to cooperate on preventing, mitigating, and addressing human rights risks for transport workers in its supply chain.

An MOU signed on 29 March 2023 sets out ways of working together to eradicate labour rights abuses from the company's entire supply chain, including shipping, freight, and warehouse workers.

We continue to uphold these commitments and have designed clear requirements and guidelines for all our **charterers and combined logistics providers** to implement business practices which underpin maritime human rights due diligence.

Finally, following on the thread of our efforts towards Gender Responsive Human Rights Due Diligence, we will work towards extending this to the (Goods Not For Resale) GNFR supply chain and mirror our gender responsive work to logistics and warehousing.

Traditionally, maritime has been a male dominated sector, and women make up only an estimated two percent of the world's maritime workforce, significantly underrepresented on cargo ships. The risk of discrimination, bullying and harassment, including sexual harassment, are strong barriers to women going to sea. A male-centred culture and lack of provisions for women onboard also put a stop to many women making seafaring their career.

Responsible Logistics

Global

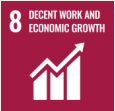


Through our legally binding agreement with the ITF, we will support their tireless efforts to advocate for changing the culture, priorities and practices on board so that more women are attracted to, and stay longer in safe and nurturing maritime jobs.

"ITF has been an invaluable partner of TFG Brands since the start of the Covid-19 pandemic, initially collaborating to address the seafarers' humanitarian crisis and helping to shine a light on an area of our supply chain where we had limited visibility."
Justin Hampshire, Chief Executive, TFG Brands London

"TFG London has taken the bold and necessary steps to address the human rights issues that occur from factory to customer. We commend their leadership and encourage all brands to work with unions to expose the unseen human and labour rights abuses in their supply chains."
Steve Cotton, General Secretary, International Transport Workers' Federation

Salient issues relate to
Healthy & Safe Working
Environment and
Sustainable Livelihood.



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
Critical	High	High	High	High

Responsible Warehousing

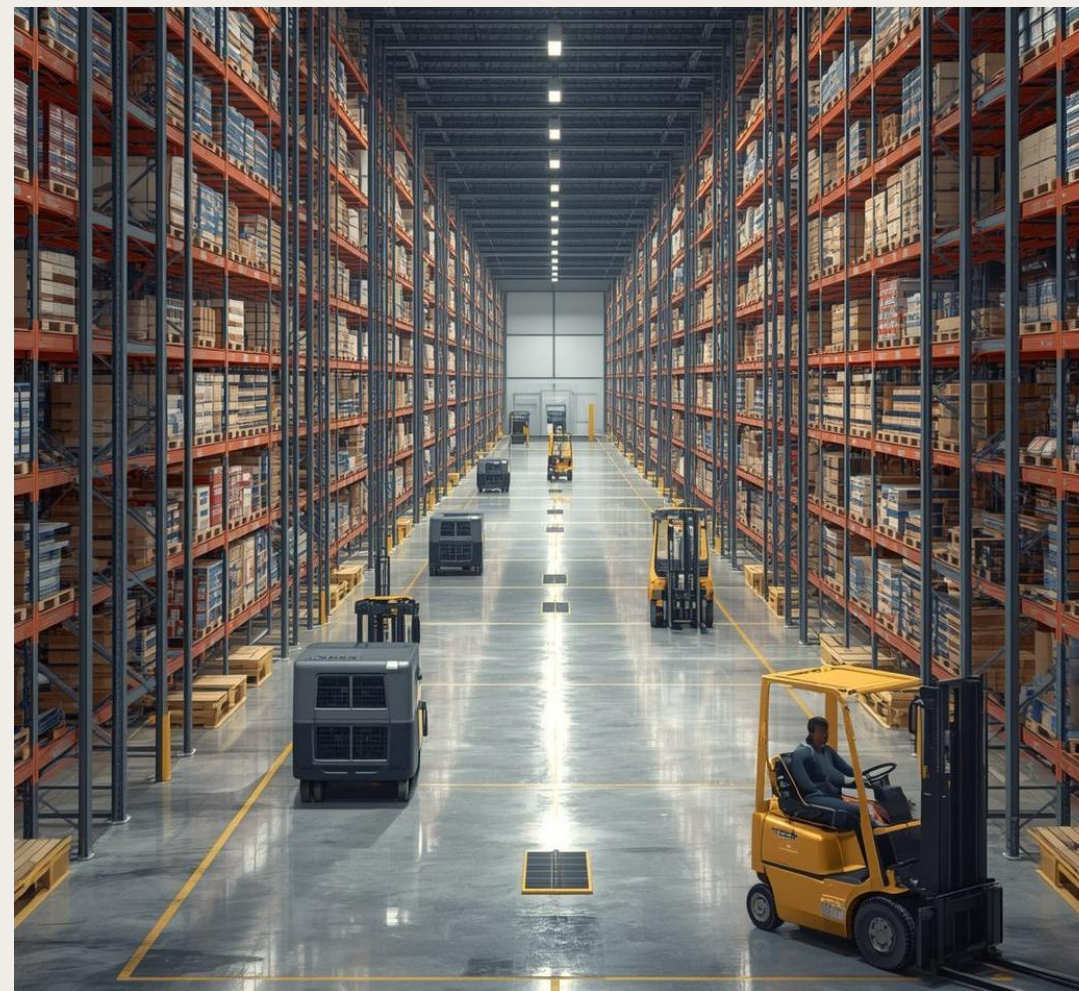
United Kingdom

We continue our strategic partnership with Anti Slavery International by extending our previous warehouse and distribution work with a collaborative project to identify any potential human rights or labour rights risks for workers and other people in UK warehouses, in order to mitigate these risks and prevent workers from harm.

This project is ongoing and will allow us to develop and deliver training to address any risks identified and provide recommendations to strengthen policies and procedures. This will also provide a greater understanding of the experiences of workers during recruitment and operations, and any internal challenges, in order to improve practices and procedures. This is in line with new laws which are being introduced that require businesses to conduct human rights due diligence across their supply chain.

The Anti-Slavery International approach combines:

- Desk research to identify relevant sectoral risks
- Policy and procedure review
- Consultation with stakeholders to gain insights into issues and risks materially relevant for workers – both on site with warehouse operatives, suppliers and management, and virtually with HR
- A salience assessment of the identified human rights risks and recommendations on next steps to address identified risk areas



Responsible Warehousing

United Kingdom

The assessment is qualitative social research, carried out in line with the UN Guiding Principles on Business and Human Rights and with the OECD Guidelines for Multinational Enterprises. Stakeholder Engagement is a core element in the effective assessment and understanding of the human rights risks in any business or supply chain.

Alongside this, we will work collaboratively with our partners to apply and maintain The ITF Principles for Decent Work in Warehousing, Distribution and Logistics:

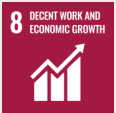
- 01. Fundamental Principles And Rights At Work
- 02. Safe Jobs
- 03. Secure And Decent Jobs
- 04. Harassment And Violence-Free World Of Work
- 05. Deployment And Use Of Technology
- 06. Just Transition Towards Decarbonised And Climate-Fit Warehousing Operations
- 07. Freedom Of Association And Collective Bargaining
- 08. Effective Grievance Mechanisms

“Anti-Slavery International has been working with TFG to assess the salience of human rights risks in their UK Distribution Centres. We took a worker-centred approach, with on-site stakeholder engagement, to develop appropriate and effective actions informed by workers’ experiences. We will continue to focus on distribution centres through our valued partnership with TFG over the next year, working in collaboration to drive systemic change within the sector.”

Eloise Savill, Private Sector Adviser, Anti-Slavery International



Salient issues relate to Healthy & Safe Working Environment and Sustainable Livelihood.



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
High	High	Medium	Medium	Low



This year we remain focused on championing Freedom of Association in existing and emerging sourcing countries, by adopting an HRDD approach to FOA/Collective Bargaining and Workers Representation.

We continue to work on enhancing our understanding of FOA and workers representation in our existing and new sourcing countries, strengthening our policy and working towards its successful implementation.

We started gathering data on the level of understanding and implementation of FOA among our suppliers, what is already there in terms of policy and where are the gaps that need to be plugged, through a workers representation mapping exercise, and the application of a risk mapping tool.

In addition, we are creating a standalone policy on FOA which will be implemented with our supply chain partners towards the end of the year.

Salient issues relate to Forced Labour, Gender & Discrimination, Healthy & Safe Working Environment and Sustainable Livelihood.



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
High	High	High	High	High

State Imposed Forced Labour

A paradigm shift in global sourcing practices led by concerns over tainted human rights supply chains and a resulting wave of regulatory interventions has increased businesses’ efforts to combat the risk of exposure to state-imposed forced labour (SIFL). In the Chinese context, a robust body of evidence has demonstrated presence of the direct and indirect links between global supply chains and the use of a workforce forced to work by the State under repressive policies.

These assertions have mainly been associated to the closed context of the Xinjiang Uyghur Autonomous Region (XUAR), but it has become increasingly clear the need to identify how supply chains across China are affected, following findings that repressive labour policies such as labour transfers to manufacturing hubs are as much of a reality in XUAR as it is in other parts of China.

This is why State-imposed forced labour has become one of our areas of concern, and whilst we lack business leverage to change forced labour practices, and the inability to conduct safe and credible due diligence on the ground, there are steps we will take to mitigate this.

As such we are planning on applying the Global Rights Compliance’s Risk Identification Toolkit that will support us with strategies to identify risks of SIFL across their business operations in China. This work will help TFGL – from procurement officers to human rights specialists – assess potential exposure to forced labour programmes.

The methodology looks beyond the XUAR, recognising that SIFL risks may exist elsewhere in China.

China

Salient issues relate to Forced Labour.



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
High	High	Low	High	Low



Responsible Purchasing Practices

All Sourcing Regions

In October 2022 we began our participation in the Common Framework for Responsible Purchasing Practices (CFRPP), alongside the Ethical Trading Initiative and other multi-stakeholder initiatives.

Through the 'Learning and Implementation Community' and across five key principles (including integration and reporting, equal partnership, collaborative production planning, fair payment terms and sustainable costings) we take new steps towards advancing our purchasing practices, developing collaborative solutions, as well as sharing learnings with peers, experts and supply chain partners.

The overall desired outcome of the community is improved purchasing practices, with the overarching aim to improve supply chain working conditions for garment workers.

Our key focus includes:

- Equal partnership: we have taken steps to translate the framework principles into business practices, with the involvement of our suppliers to improve our ways of working in a way that benefits both us and our suppliers.
- Two-way code of conduct: supporting our work to translate the framework principles into business practices, we recognise the importance to hold both parties accountable, agreeing on key commitments designed to enable improved working conditions for garment workers.



Responsible Purchasing Practices

All Sourcing Regions

Over the last two years, we have taken a number of practical steps to improve purchasing practices, which are outlined below.

Enhanced internal, cross-department communication and collaboration, with regular meetings between buyers across different product categories, to table production progress, commitments and how decisions could impact suppliers and workers. The CSR team attends supplier calls regularly, to ensure communication is aligned.

Stronger relationship with suppliers, where we identified production planning as an area where we could make the most positive impact with suppliers and give opportunity for improved outcomes for workers.

More efficient production planning, where suppliers have clearer visibility, timelines that are genuinely collaboratively developed, and changes can be tracked more efficiently.

Through this work we support the Common Framework for Responsible Purchasing Practices (CFRPP) and have contributed to several educational pieces, including a brand case study on RPP, interviews and webinars, and we hope to collaborate and share insights with brands and organisations to drive action toward more responsible business practices throughout the industry.

Upholding a responsible purchasing practices discipline is continuous work, which extends beyond a single department. It's a company-wide initiative that requires commitment from the CEO, executives and teams across the organisation including: forecasting, planning, design, product development, sourcing, production, materials, finance, and social and environmental impact, among others and we will continue to ensure this work is central in conversations across all areas of our business.

“There is increasing recognition of the impacts purchasing practices can have on supply chain working conditions. To address these potential impacts, brands need to assess their own commercial practices and consider whether these are empowering their suppliers to achieve the labour standards expected of them. The work of the LIC provides a great opportunity to build trust and communication with suppliers, develop the rapport between internal teams, and find creative ways to improve systems and integrate sustainability into the brands’ day-to-day operations.”

Elisa Shepherd, Senior Advisor Business Practices, Ethical Trading Initiative

Salient issues relate to Gender & Discrimination, Healthy & Safe Working Environment and Sustainable Livelihood.



The United Nations Guiding Principles on Business and Human Rights				
Severity			Likelihood	Transition
Scale	Scope	Remediability		
High	High	Low	Medium	Low

Modern Slavery Statement Guidance Contribution

Over the course of last year, we are proud to have contributed to the development of the updated Home Office Transparency in Supply Chains (TISC) Statutory Guidance.

This updated guidance explains how businesses should comply with the letter and spirit of section 54 of the Modern Slavery Act 2015. The Act requires large businesses to produce an annual statement setting out the steps they have taken to prevent modern slavery in their business and supply chains.

This guidance lays out The Home Office expectations for these statements and provides practical advice to support businesses to undertake meaningful action to tackle modern slavery, incorporating the learnings from the past 10 years since the Act was introduced.

The Home Office has developed this guidance in consultation with businesses including TFG, public bodies, civil society organisations, trade unions and academics.



Transparency in Supply Chains (TISC) Statutory guidance

Next Steps

We stand committed to tackling modern slavery by continuing to enhance measures to assess, identify, monitor and mitigate risks in our business and supply chains and to working towards eradicating this abhorrent crime.

By putting human rights and labour standards at the centre of our sustainability strategy, our focus areas for the forthcoming year will advance our goals to respect human rights and improve working conditions throughout our supply chain, from farmer to seafarer.

Continue to monitor and mitigate key areas with high risks of modern slavery

Our logistics supply chain, warehousing operations, gender-based violence and harassment (GBVH), as well as purchasing practices remain areas that carry high risks of modern slavery.

We have outlined the steps taken to address these risk and we will continue to take this work forward, providing updates to each in our subsequent statement.

Continue to develop our gender responsive HRDD

We remain committed to enhancing our gender responsive approach to human rights due diligence, and as our work with the gender responsive HRDD workstream progresses, we will continue to scale up data and improve workers representation and social dialogue. We will focus on plugging the gaps in policies related to addressing GBVH and work collaboratively to find solutions to the issue.

Evolving how we identify salient risks, with a focus on SILF

We will continue our work to focus on more sophisticated and systematic saliency assessment to include materiality, enabling better identification and prioritisation of the potential human rights impacts that we could cause, contribute to, or be connected to across our supply chains. This will include furthering our work to address state imposed forced labour. We will continue to evolve our existing human rights commitments and advance targets which will challenge our business to drive meaningful progress on human rights, transparently reporting on our assessment and most salient risks in our next statement.

Continue to address freedom of association and workers representation

We are developing short- and long-term objectives to address FOA and workers representation in our supply chain. Our focus will work towards enhancing our understanding of FOA and workers representation in our existing and new sourcing countries, strengthen our policy and work towards its successful implementation.

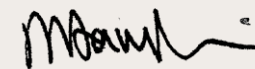
Continue to foster our partnerships

We value our partnerships with NGOs, Trade Unions and Academia, as well as other brands and multi stakeholder platforms. We believe that meaningful stakeholder engagements are at the basis of enhanced EHRDD strategies and we will continue to develop new and foster existing relationships in the year ahead, working together to find a common solution to salient issues.

Progress our training programme

We recognise the importance training plays in tackling modern slavery and other forms of human rights abuses. As such, we will continue to provide updates and raise awareness of salient modern slavery risks across our business working collaboratively to find solutions to mitigate these issues.

This Modern Slavery Statement was prepared by the TFG Brands CSR and Sustainability team and approved by TFG Brands London Operational Board of Directors in September 2025.



Justin Hampshire, Group Chief Executive Officer, on behalf of TFG Brands (London)

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It sets out the steps TFG London has taken during the 2024/2025 financial year (the "Year") to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business, and the additional steps we plan to take in 2025 and 2026.

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