

RiverIsland

Modern Slavery Statement 2024

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Introduction

Modern Slavery continues to be one of the most prominent risks within supply chains globally, and River Island’s long-standing ethical programme continues to prioritise and promote the importance of trading ethically and sourcing responsibly with an aim to help mitigate this risk.

Our ways of working are non-negotiable and embedded in our beliefs and our sustainability strategies along with our commitment to our customers and stakeholders. We do not allow the use of forced or child labour within our supply chains and this is backed up by our policies and procedures, along with training given to our employees, partners and suppliers. This stipulates that we do not tolerate human rights abuses of any kind, either within our own organisation or in any part of our extended supply chain.

As well as working continually with internal buying teams and all our suppliers, we continue to explore and develop key strategic partnerships. Our aim, as always, is to address and mitigate the increasing global risks of modern slavery and human trafficking.

Our work is aligned to the United Nations Guiding Principles on Business and Human Rights, the ETI Base code and the OECD Due Diligence Guidance for Responsible Supply Chains.

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

This Statement, written pursuant to the Modern Slavery Act 2015, covers the requirements of the Act for River Island Holdings Limited with regards to the 2024 financial year. This Statement has been written to highlight key activities that have been taken during this period and to provide full details of our commitment as a responsible retailer to fulfil the requirements of the legislation during the 2024 financial year. Furthermore, it provides useful information to enable an understanding of our commitment to reduce the Modern Slavery risks associated with our business.

The Statement has been approved by the River Island Board.

Antony Smith
Chief Financial Officer, River Island

June 2025

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Key Highlights and Activities

Modern Slavery Awareness Day River Island Distribution Centre



In early 2024 with the help of Slave Free Alliance we held a worker awareness day at our Distribution Centre in Milton Keynes. This followed on from the modern slavery risk assessment that was carried out in 2023. This had highlighted a need for us to give greater knowledge to our workforce in the DC who were seen as at a higher risk of being involved in modern slavery compared to our head office and store staff. This gave the opportunity for all workers to receive training and advice on the issue from a modern slavery expert as well as being able to give feedback on their experiences and share any concerns that they may have.

Help to give UK workers remediation and a safe discuss workplace issues.

[FAB-L - Highfields Centre](#)



During 2024 we continued our partnership with FAB-L to help give workers a voice in the Leicester textile industry. It allows workers in the area to have easy access to the experts and helps them address any work issues (as well as gaining access to other areas of help such as). Working with FAB-L has been invaluable in allowing the workers to understand their workplace rights.

Collaboration



Working with The Reassurance Network we continued to ensure that our suppliers and factories had a clear understanding of the River Island code of practice visiting our key sites in all of our major regions including China, India, Turkey, Egypt, Sri Lanka, Vietnam, Morocco and the UK. (See commitments section for more details)

Training and Risk Awareness

We continued our Modern Slavery Training Programme for stores and head office. This explains the issues around modern slavery in detail along with how to spot the signs of Modern slavery and how to report the issue should anyone be concerned that there may be signs that it may exist within the business and or supply chain.

Monitoring and Remediation

Our monitoring and remediation programme covers all our tier 1 factories with all key sites having regular visits to ensure that they meet with the River Island code of practice. Any issue found during factory visits by our teams, in-country partners or highlighted through 30 party audits are monitored and corrected with a full remediation plan put in place, regular follow-ups are actioned and a root cause analysis is carried out to ensure we reduce the risk of the issues arising again. We carried out over 150 visits to our key sites in all key regions during this period.

Our Business and Supplychain

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

We have 230 stores globally, and we sell to over 120 countries online. River Island’s annual turnover in 2023 was approx. £700M.

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

Total Number of Employees :

Head Office - 947

Retail – 5307 (UK), 497 (ROI)

Our product is predominantly ‘own label’ and includes clothing, footwear, bags and accessories. In 2024, we sourced from 25 countries, and our ‘Top-5’ countries were China, Turkey, Bangladesh, India and Morocco which accounted for 78.6% of our range. In 2024, the Top 12 countries supplied 95.1% of our range compared to 96.1% in 2023.



In 2024, we worked with 215 product suppliers (395 factories). 79.4% of River Island products came from the ‘Top-50’ suppliers (the ‘Top-20’ are 57.67%). We also source a wide range of goods and services such as shop-fitting, packaging, cleaning, catering, logistics, security, IT, marketing, ecommerce, advisory and so forth (collectively referred to as ‘goods not for re-sale’ or ‘GNFR’) from third party suppliers, the vast majority of which are UK based.

River Island

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Our Business & Supplychain

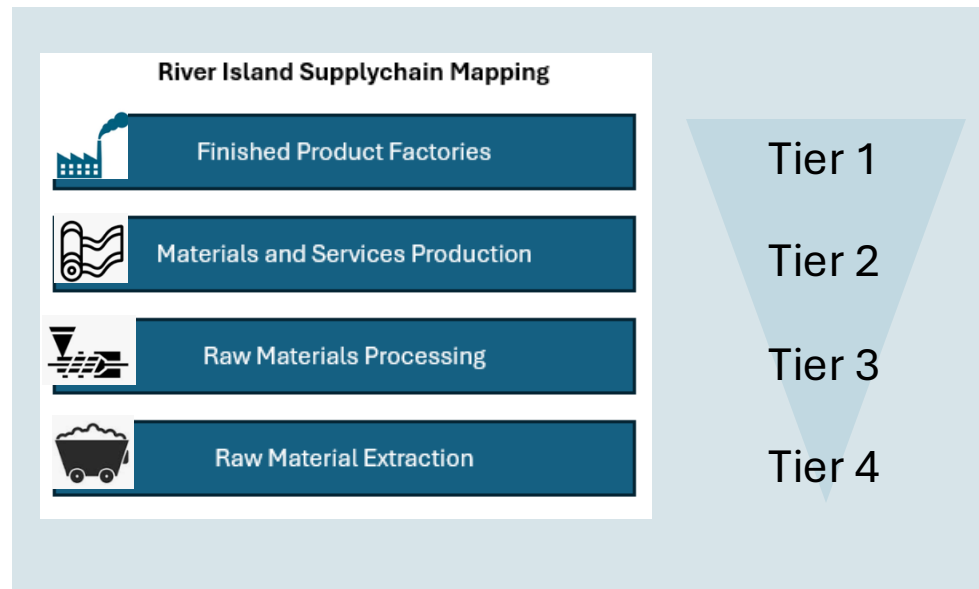
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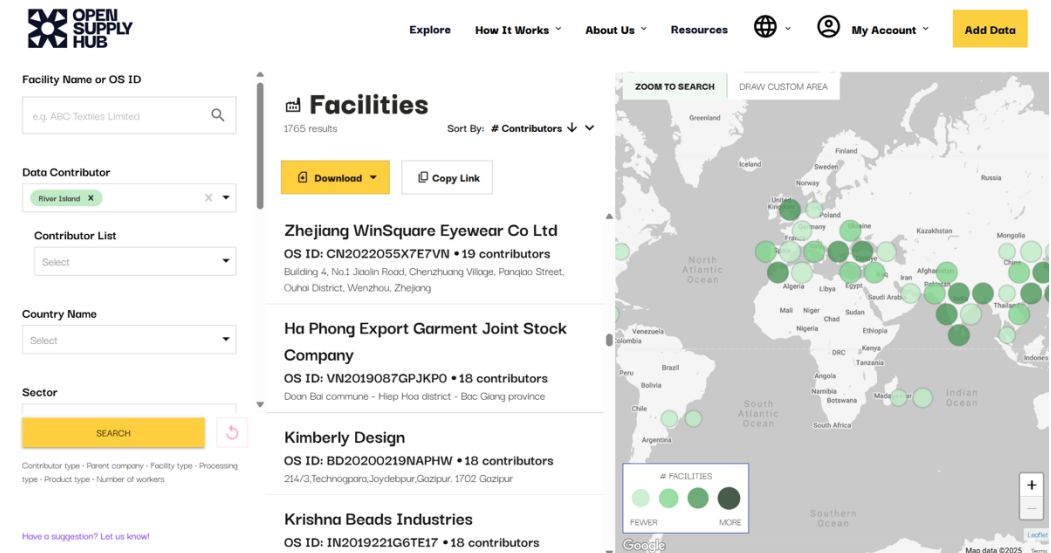
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Our Business and Supplychain...cont.



At River Island we sell mainly own brand products and work with our Supplychain partners to ensure that they meet River Island standards. Our partnerships are built on suppliers having similar aims and working with us to build trust and allow us to work with them to deal with any issues that may arise during the course of our partnership.

We have been publishing our Tier 1 factory list both on our company website and with the open supply hub for several years. <https://opensupplyhub.org/>. As part of our commitment on transparency we update this information twice a year. On our website we provide this information in both PDF and Excel Formats. See section 10a & 10b on page 24 of attached link for latest list. [River Island Factory List](#)



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Our Commitment

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

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

Fast Forward Programme Membership

River Island has been a member of the UK Fast Forward programme since 2015. This initiative supports the use of ethical factories in the UK, ensuring safe, secure, and compliant workplaces. The process includes methodologies to carry out a forensic audit at production sites where there is a clear risk of unethical or criminal practices being used. ([Fast Forward](#)) (See *Due Diligence Section* for further details of work carried out)



Reassurance Network



We have continued our long-term partnership with The Reassurance Network to give us support in our work with our suppliers. The Reassurance Network is an international network of over 40 experts who work to create positive change. They are known for their work in improving human rights through audit, training and bespoke solutions. They are located in China, South and Southeast Asia, India, Turkey, MENA, Europe and the UK. Collectively speaking over 20 languages, we travel and operate globally. They have helped us in our efforts with capacity building work with our suppliers as well as a key partner in our remediation work to ensure our standards are met by all of our supply chain partners ([The Reassurance Network](#))

Ethical Trade Initiative



We have been active members of the Ethical Trade Initiative (ETI) since 2008. The ETI is a UK-based alliance founded in 1998 that brings together companies, trade unions, and NGOs to promote respect for workers' rights around the world. Its mission is to improve working conditions in global supply chains by ensuring that businesses uphold international labour standards. At the heart of ETI's work is the ETI Base Code, a set of internationally recognized labour standards based on the conventions of the International Labour Organization (ILO). We see this as a key partner with which we can work to help improve global supply chains and address issues that need improvement at an industry level. ([ethicaltrade.org/](#))

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Our Business & Supplychain	<h3>OUR GOVERNANCE</h3> <p>All our human rights work streams sit with our Sustainability Committee, and includes members of our senior executive team, as well as all senior members of our Sustainability Team.</p> <p>This setup allows us to monitor our progress against targets set out in our current Sustainability Strategy and ensure we maintain our commitment to source our products responsibly and protect the human rights of the workers in our supply chain.</p>
Our Commitment	<h3>OUR POLICIES</h3> <p>Human Rights are at the heart of our approach to modern slavery and follow international codes and standards as part of this process:</p> <ul style="list-style-type: none">• The Base Code of the Ethical Trading Initiative (ETI) - ETI Base Code (English).pdf (ethicaltrade.org)• The UN Guiding Principles on Business and Human Rights - GuidingPrinciplesBusinessHR_EN.pdf (ohchr.org)• OECD Due Diligence Guidance for Responsible Supply Chains - OECD Due Diligence Guidance for Responsible Supply Chains
Governance & Policies	<p>Our Supplier Agreement – River Island suppliers are contractually bound by the terms and conditions in our Supplier Agreement which include adherence to the following policies, for the protection and promotion of human rights:</p> <ul style="list-style-type: none">• River Island Ethical Policy (based on the ETI base Code) - This Policy defines the shared ethical responsibilities between suppliers and River Island buyers. POLICY-BOOKLET• River Island Anti-Slavery and Human Trafficking Policy (incorporated into our Contracts in 2016). Anti-slavery and Human Trafficking Policy• For a more detailed list of policies please refer to page 24 of our Annual Sustainability Report - River island Sustainability Report
Risk & Due Diligence	<p>Employee Contracts – all River Island employment contracts directly incorporate a suite of policies designed to protect worker rights and promote a safe and fair supply chain. These include the River Island Ethical Policy referred to above, the River Island Anti-Slavery and Human Trafficking Policy referred to above, the Anti-Bribery and Corruption Policy, and the Speak-Up Policy.</p>
Training & Partnerships	<p>GNFR Contracts – all require compliance with the Modern Slavery Act, and the River Island Anti-Slavery and Human Trafficking Policy.</p>

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Our Business & Supplychain	<div><div>River Island Code of Practice</div><div><p>Our Internal code of practice is used when assessing sites during our factory visits and audits as part of our ethical due diligence programme. This helps to ensure that our suppliers and their factories are given clear guidance and have a full understanding of our ethical standards.</p></div></div>
Our Commitment	<div><p>When working with suppliers and factories, we will always consider the root cause of any problem or risk. Where such risks are widespread across the supply chain, we understand there is often a need for more collaborative work to be carried out to address such endemic issues.</p></div>
Governance & Policies	<div><p>We continue to invest significant resources and time to support collaboration and effective communication with all of our suppliers to reduce the risk of modern slavery occurring and help resolve any issues that may arise during the audit process.</p></div>
Risk & Due Diligence	<div><div><div>How we Identify our Salient Risks</div><div><p>We conduct due diligence to identify risks with our business and supply chain. This is a continual process and collects on-going data from several sources.</p><div><div>a. Factory visits and audits</div><div>b. Supply chain mapping (Segura)</div></div></div></div><div><div><div>c. Higg Data</div><div>d. Factory / Supplier collaborations</div><div>e. Information from our in-country teams</div><div>f. Worker dialogue (during training, visits and audits)</div><div>g. In-house research</div><div>h. Stakeholder collaboration and information</div><div>i. Third-party information and advice.</div></div><div><p>We continue to focus on our process of information gathering and have continued to increase our focus on Tier 2 of our supply chain. We aim to continue increasing visibility over the coming years to include lower tiers.</p></div></div></div>
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Introduction	<div>Risk & Due Diligence...cont.</div> <div><div>Current Key Modern Slavery Risks</div><div>In 2024 our current key areas of risk of modern slavery were:<ul style="list-style-type: none">Suppliers who subcontract specific processes to lower tier manufacturing sites e.g., wet processing, embroidery etc..River Island own brand product supply chainGoods and services not for resaleKey business service providersCountries with a high risk of modern slavery e.g., Mauritius, India, & China.</div><div>These are the same to our previous assessment as we have not seen any major change in our risk map.</div><div><div>Salient Human Rights Risks</div><div>There continues to be no significant change to our overall set of salient issues during 2024:<div><div>i. Forced and Bonded labour - Key Regions: China, India, UAE, Mauritius</div><div>We continue to be aware that this issue has generally been pushed to lower reaches of the supply chain, or to regions of the globe that are difficult to</div></div></div></div></div>
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Risk & Due Diligence	<div>access. As we gain greater transparency of our tier 2 supply chain, we can use this information to identify key risk areas and carry out in-depth assessments. During 2024 we continued our work with Goodweave focusing on the potential of forced or child labour within our tier 2 Supplychain in Bangladesh (<i>see page 12 for more information</i>).</div> <div><div>ii. Climate Change / Global Warming – Key Region – Bangladesh</div><div>We will be looking to continue with our work on climate change and global warming in 2024 to examine how we can address risk as part of the ETI Just Transitions Working Group. As discussed in previous statements, we have identified certain regions at risk, but we are fully aware that this is a global issue requiring increased collaboration between Suppliers, Brands, Trade Unions, NGO’s and Governments to make any work truly meaningful.</div></div> <div><div>iii. Regular Employment – Key Regions – India, Turkey</div><div>We continue to see the increased use of casual and agency workers across the globe with India and Turkey seeing an increase in the use of informal labour in recent years. We continue to work with our suppliers to try and reduce this reliance on the informal sector by explaining the risks involved when using this type of workforce. As part of our internal audit programme, we heavily focus on this area to ensure agency and casual workers are paid as per the law and have legal contracts in place.</div></div>
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Risk & Due Diligence	<div><div>Risk & Due Diligence...cont.</div><div><div><div><div>iv. Working Hours – Key Regions – China, Turkey, Sri Lanka</div><div>High working hours continues to be a global issue. Specifically, China and Turkey have been found to have significant issues in this area. We strive to ensure our factories are constantly working to our code of practice. Where this is not occurring, we will set out remediation plans to tackle the issues. Any working hours issues found during our factory visits have full root cause analysis, from which a remediation programme is put in place. Working hours are then monitored monthly until we are confident that the issue has been resolved.</div></div><div><div>v. Wages / Social Security – Key Regions – China, Turkey, UK</div><div>The issue of payment of minimum and living wages continues to be an issue globally, along with social insurance payments. China and Turkey still have major problems with migrant workers and their wages and social payments. Whenever identified in our supply chain, we work with our factories to correct any issues found with immediate effect. In the UK this has been a key focus for River Island working alongside other UK Retailers as Suppliers since 2015 as part of the Fast Forward programme. Non-payment of minimum wage is seen as a high-risk issue in the UK, and we work to ensure that all of our production sites meet both ethical and legal standards.</div></div><div><div>vi. Discrimination and Harassment – Key Regions – Bangladesh, China</div><div>Discrimination and harassment is one of the most difficult issues to find during factory visits, and relies on worker feedback to tackle the issue with any great success. As part of all our factory visits, we ensure we get</div></div><div><div>worker feedback and provide workers with details of how to contact us outside of work if this is preferable. We have also identified the high risk of physical and verbal harassment to female workers in Bangladesh and in 2024 we joined the ETI Grace Programme looking at ways to improve our policies and increase our ‘gender lens’ during factory visits and examining ways to spot issues through interaction with workers and management.</div><div><div>vii. Freedom of Association & Collective Bargaining – Key Regions – China, UAE</div><div>We acknowledge and support the right of all of our workers to have access to freedom of association, so that workers can exercise their fundamental rights at work. We carry out checks during all visits to ensure that there are no restrictions on workers in this area. Our stance is clearly set out to our suppliers, and we insist that our factories and suppliers should understand and respect the right for workers to organise or join associations of their choosing and be able to bargain collectively.</div><div>In countries where the law restricts freedom of association and collective bargaining, we also insist that our factories and suppliers must not obstruct or dissuade any parallel means of freedom of association or collective bargaining.</div><div>We heavily focus on this during worker interviews to ensure that workers understand their rights. Where this is not the case, we insist on training to be provided for all workers as part of our remediation process to ensure they understand their full rights in this area.</div></div></div></div></div></div>
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Risk & Due Diligence	<div><div>Risk & Due Diligence...cont.</div><div><div>SUPPLIER SELECTION, SETUP PROCESS AND ON-GOING MONITORING</div><div><ul style="list-style-type: none">• Our supply chain stretches around the globe (<i>see page 4 for full details</i>) and to ensure we only work with decent suppliers we have a strict on-boarding process in place.• Our suppliers are fully responsible for compliance with, and implementation of our Supplier Code of Conduct in their factories• We approve all tier one factories before any orders are placed. Not all factories are approved if the audit reviewed does not meet with the River Island Code of Practice (C.O.P.),• Once a factory is approved, we then audit them on a regular basis.• All audits after setup that are carried out by our in-country teams are unannounced. All subcontracting by a tier 1 site must be pre-approved by River Island• If an audit does not meet with our Code of Conduct, then a full remediation plan will be put in place in line with our COP and internal escalation process.• We carry out full on-site worker interviews, and we also provide workers with an opportunity to have further contact with our teams if required – off-site interviews can be arranged as necessary. All audits include checks for forced and trafficked labour, we review all relevant documentation, hold confidential worker interviews and check worker accommodation if provided by the factory.</div><div><p>We use standard forced labour indicators set by the ILO as part of the overall risk analysis.</p><p>After each visit a site is issued with a Corrective Action Plan.</p><p>The corrective action plan is then monitored with strict time-lines, but also with the factory and/or supplier having the ability to contact us or our in-country teams directly to discuss the issues, request help and training as and when required. This process is seen as a partnership with our suppliers. This monitoring can include the need for follow-up visits, spot checks, further worker interviews, meetings, training etc.</p><p>If any critical issues are identified such as forced or child labour, we may involve experts to conduct further investigations on our behalf.</p><p>If there is ever a severe and imminent threat to workers lives or safety, then the remediation would be carried out immediately, and orders may be suspended.</p><p>In very rare cases where a supplier or factory are unable to work with us to make the necessary improvements, or there is a lack of commitment to the process, we would ultimately have to terminate our relationship with the supplier, but this would always been as a last resort.</p></div></div></div>
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Risk & Due Diligence	<div><div>Risk & Due Diligence...cont.</div><div><div>Addressing Modern Slavery in the Bangladesh Ready-made Garment (RMG) Sector</div><div><p>During 2024 we continued our work through our partnership with MSIF and Goodweave to carry out a deep dive into our Supplychain in Bangladesh at 2 suppliers.</p><p>The goal of the project is to establish a comprehensive evidence base of risk, prevalence, and root causes of modern slavery in Bangladesh’s ready-made garment (RMG) sector. Working with our selected suppliers the team aim to carry out supply chain mapping and assessment of high-risk suppliers and subcontractors in the lower tiers of the supply chain, with a view to analysing the risks to vulnerable workers focusing on the potential of forced and child labour, providing full remediation if and when issues are found. It is hoped that a preventative programme can be built from the work carried out. Through this work we did not find any major issues of forced labour at any of the tier 2 sites highlighted, but several ethical issues were found, and remediation plans were put in place. We are continuing this work into 2025 and will be selecting more of our tier 1 factories to help us with this programme.</p><div><div>Fast Forward - Monitoring our Suppliers in the UK</div><div><p>We have been members of the UK Fast Forward programme since 2015. This is due to the high-risk nature of manufacturing in the UK due to the high price of goods made in the UK and the use of skilled workers from</p><p>mainly ethnic backgrounds which are at a higher risk of mistreatment and modern slavery.</p><p>This membership enables us to ensure we work with ethical factories in the UK. These factories work directly with us on this programme to ensure their workers are provided with a safe, secure and compliant workplace, and are paid a decent wage and are not mistreated or harassed at work.</p><p>We have also continued our work with Fast Forward to ensure the integrity of the programme is maintained, by leading on the Brand Support Programme. This programme helps new and existing brands to understand the standards that should be upheld when auditing and following up on audits.</p><p>It also guides brands on the best ways to develop good relationships with workers, factory owners and suppliers. Through this, we have provided training and support for other brands on the programme, working alongside the Fast Forward team.</p><p>We are pleased to report that we have not had any major issues in our UK Supplychain for several years and we are confident that the process we have put in place with the help of Fast Forward and The Reassurance Network has helped to maintain a high standard of partner factory through the hard work of all parties involved.</p></div></div></div></div></div>
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Child Worker – China

In the summer of 2024, our in-country team entered a factory and found a 15-year-old child worker in the site. On further investigation it was found to be the son of one of the factory managers who was doing office work during his summer holiday. A remediation plan was immediately put in place and the child was stopped from working at the factory with immediate effect.

The factory agreed to place the boy in summer school and one of our representatives attended the enrolment session to ensure this had been actioned correctly. As the individual was due to start high school in the September the remediation was only fixed for a short period of time.

The factory also paid an allowance to the student to cover expenses, and our in-country rep then followed up with the student in September to ensure they were in High School for the new semester.

Subcontracting – Sri Lanka













In early 2024 during the annual visit to a key site in Sri Lanka our in-country team carried out Random order checks and found that several orders had been made at a second undeclared site. We worked quickly

with the Factory to understand how this issue had arisen and arranged a visit to the second site. It soon became clear that the factory had capacity issues, and we worked with them to get the second site approved and setup for use.

Training was given to supplier management to ensure they fully understood our transparency requirements and the need for all production sites to be declared in advance of use to ensure we would not find a similar situation going forward.

Minimum Wage – China

During a visit by our in-country team during late 2024, it was found that a small number of piece workers had not received minimum wage due to management not carrying out the correct calculations to ensure that minimum wage was achieved. Working with our team, the management team quickly identified the short fall over the previous months and workers were repaid the amount owed. The management team were also shown how simple checks can be put in place to ensure this situation would not occur going forward.

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Key Workstreams	<h3>UK Apparel Industry</h3> <p>As part of River Islands commitment to the UK, we have continued to contribute towards the funding of the Fashion workers Advice Bureau Leicester (FAB-L) which give advice and support for apparel workers in Leicester. Their support service include:</p> <ul style="list-style-type: none">• Workers’ Rights & Employment Law• Health & Safety• Benefits Advice & Welfare Advice• Form Filling & Letter Writing• Housing & Living Conditions• Immigration & Legal Advice• Financial Hardship Support• Courses & Training• Domestic Violence & Harassment <p>The advice provided to workers is free, and it is hoped that this will enable the more vulnerable workers to seek help when needed and help them to realise when they are being exploited. FAB-L - Highfields Centre</p>
Our Business & Supplychain	<p>Where required we can offer training to our suppliers and factories to ensure that they understand what needs to be in place to meet our standards, as well as giving them an understanding of their local laws and current issues that may affect their ability to meet our standards. We see internal capacity building as key to improving our supply chain and providing our suppliers and factories with the necessary tools to build capacity being key to the process.</p>
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