

**MODERN
SLAVERY
STATEMENT
2025**

RiverIsland

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1. Introduction

MODERN SLAVERY STATEMENT 2025

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 sustainability strategies, alongside 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, as well as 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 2025 financial year. This Statement has been written to highlight key activities that have taken place during this period and to provide full details of our commitment as a responsible retailer to fulfil the requirements of the legislation during the 2025 financial year ending 31st December 2025. 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.

Kirsty Homer
Chief People Officer, River Island

June 2026

2. Key Workstreams

Modern Slavery Assessment River Island Distribution Centre Audit

In early 2025, with the help of Slave Free Alliance, we carried out a second modern slavery risk assessment at our Distribution Centre in Milton Keynes. This followed on from the worker awareness day that was held in 2024. We see workers at the DC as being at greatest risk of all our UK workforce especially when compared to our head office and store staff. The key takeaways from the day were that no signs or evidence came to light that would suggest any of the workforce were currently at immediate risk from Modern Slavery although, due to the number of staff at the site, awareness was still a key area to address with new starter training as well as refresher sessions for existing workers.

Fashion-Workers Advice Bureau Leicester (Fab-I) FAB-L - HIGHFIELDS CENTRE

In 2025 we continued our partnership with FAB-L, which supports workers in the Leicester textile industry, providing advice and helping to address workplace concerns. The collaboration helps to ensure workers understand their workplace rights and available protections.

Audit Collaboration

We continue to work closely with The Reassurance Network to support our engagement with suppliers. The Reassurance Network is an international group of more than 40 experts who specialise in improving human rights through audits and training programmes. With teams based across China, South and Southeast Asia, India, Turkey, the MENA region, Europe and the UK, the network operates globally and collectively speaks more than 20 languages. Through this partnership, they support our supplier audit programmes and play an important role in remediation, helping to ensure our standards are understood and met by our supply chain partners. This support is incredibly valuable in our key sourcing regions, including China, India, Turkey, Bangladesh, Sri Lanka, Vietnam and Morocco.

Social Initiatives

We continued to work collaboratively with industry partners to address labour risks in our supply chain. During the year, we partnered with Goodweave on a project focusing on modern slavery risks in our Tier 2 factories in Bangladesh.

In addition, we engaged in several initiatives through the Ethical Trading Initiative (ETI), including workshops on Freedom of Association and the GRACE (Gender Responsive Action Community) initiative.

2. Key Workstreams

Monitoring & Remediation

Our monitoring and remediation programme covers all Tier 1 factories, with regular audits at key sites to assess progress and social compliance. Any issues highlighted by our teams, in-country partners or through 3rd party audits are managed through a remediation process – including corrective action plans, follow-up visits and root cause analysis to reduce risk of reoccurrence. During 2025, we carried out over 100 visits to key sites in our main sourcing regions.

Supply Chain Transparency

We are committed to transparency within our supply chain and publicly disclose our Tier 1 factory list through Open Supply Hub, biannually. <https://opensupplyhub.org/>. This helps support the shift towards industry transparency, enabling collaboration with other brands to help improve labour standards.

SGS Partnership

We are also partnered with SGS through its RI Interactive platform, to strengthen transparency and improve visibility beyond Tier 1. We see this as a key partnership going forward as we look to increase visibility of the lower tiers of our supply chain to ensure we continue to meet key legislation and both internal and industry transparency requirements.

3. Our Business Supply Chain

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River Island is a leading UK-based, multi-channel fashion brand based in the UK, offering womenswear, menswear and kidswear. Established in 1988, the brand is privately owned by the Lewis family. The company's roots trace back to 1948 when it was founded by Bernard Lewis under the name Lewis Separates. The family remain actively involved in running River Island today, with Ben Lewis acting as CEO.

We have 178 stores globally, and we sell to more than 120 countries online. River Island's annual turnover in 2024 was approx. £690M.

Our Head Office in west London is home to our Design and Development, Buying and Merchandising, Marketing, Technical, Sustainability, Sourcing, Logistics, Legal and Finance teams. Meanwhile our Distribution Centre in Milton Keynes receives, holds, and distributes our products to stores, wholesale partners and online customers.

Total Number of Employees :

Head Office – 882

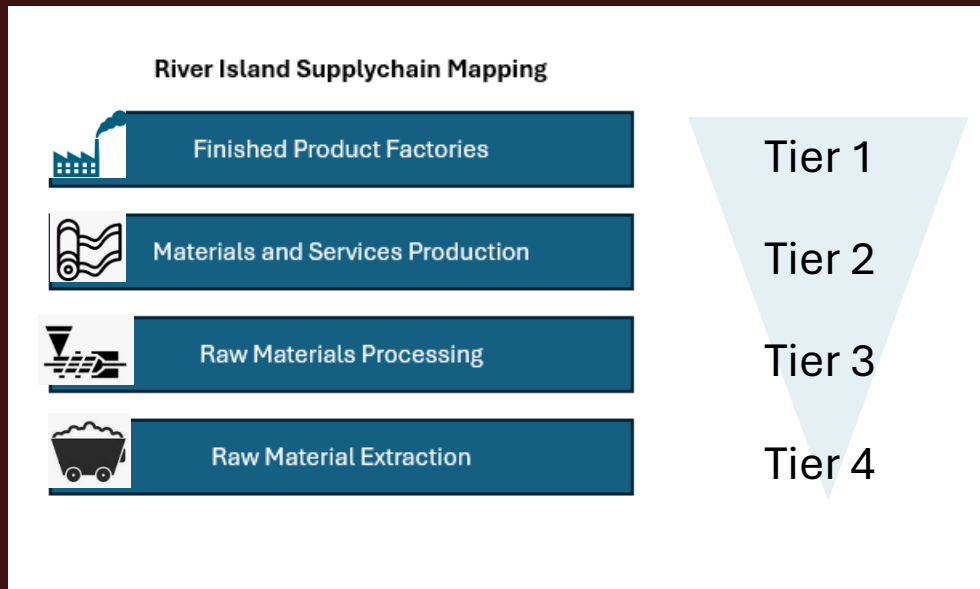
Retail – 5733

Our product is predominantly 'own label' and includes clothing, footwear, bags and accessories. In 2025, we sourced from 455 factories in 20 countries, and our 'Top-5' countries were China, Turkey, Bangladesh, India and Morocco which accounted for 77.8% of our range.

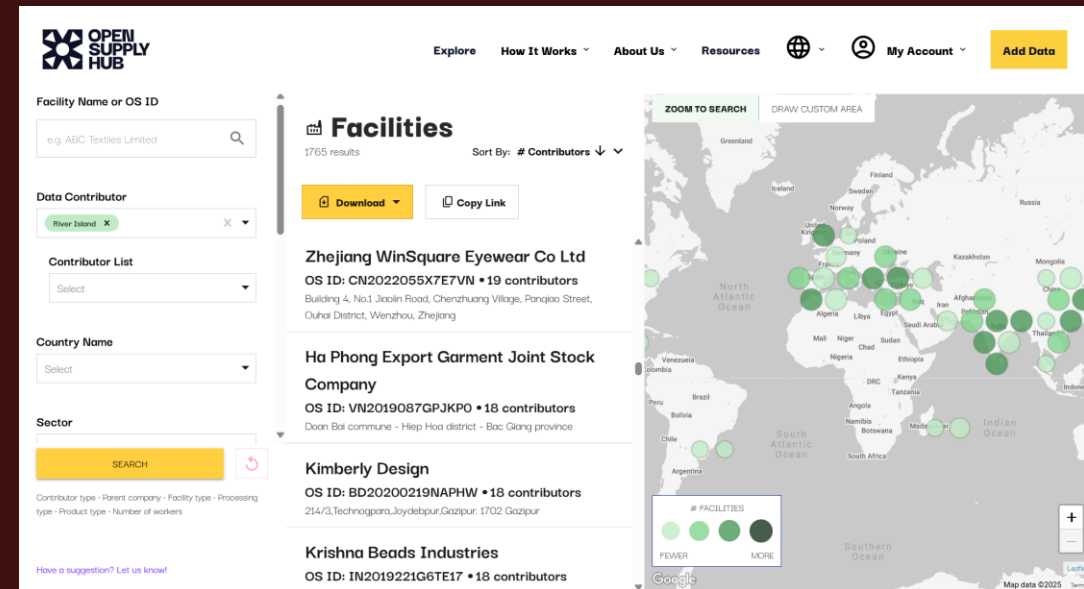


In 2025, the Top 12 countries supplied 96.9% of our range compared to 95.1% in 2024. In 2025, we worked with 225 product suppliers and 79.4% of River Island products came from the 'Top-50' suppliers (the 'Top-20' are 57.67%). We also source a wide range of goods and services such as shop-fitting, packaging, 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.

3. Our Business Supply Chain



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.



At River Island we sell mainly own-brand products and work with our supply chain 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 to allow us to work with them to deal with any issues that may arise during the course of our partnership.

4. Our Commitment

MODERN SLAVERY STATEMENT 2025

River Island is committed to preventing all forms of modern slavery and human trafficking in our business and supply chain. We take a risk-based approach to identify potential areas of concern and carry out regular site visits and audits, to ensure workers are treated fairly and their human rights are respected.

Our supplier policies clearly set out the standards expected of all partners before they begin working with us, with updates communicated promptly to reflect changes in legislation or best practice. To support this, we maintain ongoing transparency within our supply chain, regularly review our policies and procedures, and provide training for internal teams so they understand the risks, their responsibilities and our standards.

Fast Forward Programme Membership

River Island has been a member of the Stronger Together Fast Forward (now, Fair Work) audit programme since 2015. This initiative supports the use of ethical manufacturing in the UK, helping to ensure safe, secure, and compliant workplaces. The programme includes methodologies to carry out a forensic-style audit at production sites, where there might be a risk of unethical or illegal practices.

(See Due Diligence Section for further details of work carried out)

In 2026 the Fast Forward programme is evolving into the new Stronger Together UK Apparel and General Merchandise programme. The basic audit programme will not be changed and standards within the programme will not be affected.

Reassurance Network

Following many years of partnership with The Reassurance Network on our audit programme, in 2025 we introduced a new “Tailored Audit” approach. This was designed for selected factories that have consistently demonstrated only low-risk, minor inherent non-compliances.

Rather than repeating a full audit, these visits focus on deeper worker engagement. Using existing audit data as a baseline, the tailored audits include brief checks across health & safety and record reviews, with the majority of time taken dedicated to worker interviews.

This approach allows us to build trust with workers and create a bigger confidential space for them to share concerns. We believe this will provide greater visibility of potential risks that may not be identified through traditional audit methodologies, and early feedback from both factories and workers has been positive.

4. Our Commitment

Ethical Trade Initiative

River Island has been a member of the Ethical Trading Initiative (ETI) since 2008. The ETI is a UK-based alliance of companies, trade unions and NGOs working together to improve respect for workers' rights in global supply chains. The core of its work is the ETI Base Code, a set of internationally recognised labour standards based on conventions of the International Labour Organization (ILO). Through our membership, we collaborate with other organisations to address systemic labour risks, including those linked to modern slavery and to support improvements in working conditions across the apparel industry. (ethicaltrade.org/)



5. Governance & Policy

MODERN SLAVERY STATEMENT 2025

Our Governance

River Island's human rights work streams sit with our Sustainability Working Group, which includes members of our senior executive team, as well as all senior members of our Sustainability Team. Progress is mapped and monitored against our current Sustainability Strategy Targets and maintains our commitment to source our products responsibly, protecting the human rights of the workers in our supply chain.

Our Policies

Human rights are at the heart of our approach to modern slavery, and our policies follow and reflect the following international codes and standards:

- 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](#).

Supplier Agreement - River Island suppliers are contractually bound by

the terms and conditions in our Supplier Agreement, which includes adherence to the following policies, for the protection and promotion of human rights:

- 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 the full list of policies, including our Anti-Bribery and Corruption Policy, Speak-Up Policy and many more, please refer to page 24 of our Annual Sustainability Report - [River Island Sustainability Report](#)

Employee Contracts – All River Island employment contracts directly incorporate our policies (above) designed to protect worker rights and promote a safe and fair supply chain.

GNFR Contracts – All GNFR Contracts require compliance with the Modern Slavery Act, and the River Island Anti-Slavery and Human Trafficking Policy.

6. Risk & Due Diligence

River Island Code of Practice

River Island has established an internal Code of Practice as a part of our ethical due diligence programme. The Code sets out the standards expected of our factories and is used to assess their audit outcomes, supported by a traffic light grading system that helps identify areas of risk and prioritise corrective action.

Where issues are identified, suppliers are required to remediate these through Corrective Action Plans. A key focus of this process is identifying the root causes of non-compliance, to ensure that improvements are sustainable and that similar issues do not recur. In cases where risks reflect inherent supply chain challenges, we recognise that collaborative industry action may be required to address these systemic issues.

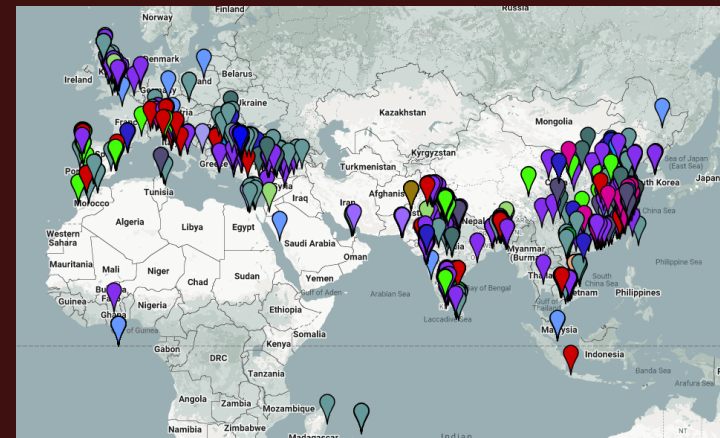
We continue to invest significant time and resources in working closely with our suppliers, supporting open communication to reduce the risk of modern slavery and strengthen social compliance standards across our supply chain.

Salient Risks

River Island continues to strengthen its due diligence processes to identify and assess risks within our business and supply chain. This is an ongoing process that incorporates data from multiple sources:

- Factory visits and audits
- Supply chain mapping (Valid8, RI Interactive)
- Higg Data
- Factory / Supplier collaborations
- Information from our in-country teams
- Worker dialogue (during training, visits and audits)
- In-house research
- Stakeholder collaboration and information
- Third-party information and advice

We continue to focus on data collection and have increased our focus onto Tier 2 visibility within our supply chain. We aim to continue increasing visibility over the coming years to include lower tiers down to Mills.



6. Risk & Due Diligence

Current Key Modern Slavery Risks

In 2025, River Island identified the following key modern slavery risks within our operations and supply chain, based on ongoing due diligence, audit findings and stakeholder engagement:

- The use of subcontracting within our supply chain, particularly where specific processes (such as wet processing or embroidery) are outsourced to lower-tier manufacturing sites with reduced visibility.
- Risks associated with our own-brand manufacturing supply chain.
- Goods not for resale (GNFR) and business service providers, where there are lower levels of transparency compared to product supply chains.
- Sourcing from regions with a heightened risk of modern slavery, including Bangladesh, India and China.

Salient Human Rights Risks

There has been no significant change to our identified salient human rights risks during 2025.

I. Forced & Bonded Labour - Certain regions, including South Asia and China, are recognised as heightened risk of forced and bonded labour due to the scale of manufacturing, the use of migrant labour, and the prevalence of informal employment structures.

These risks are often found in the lower tiers of the supply chain or in regions that are difficult to access. We use this insight to prioritise key risk areas and carry out risk assessments.

II. Climate Change / Global Warming – Key sourcing regions, particularly South and Southeast Asia, are increasingly exposed to the impacts of climate change, including extreme heat, flooding and water stress. These risks can affect both production facilities and worker wellbeing. In 2025, we continued to examine how to address these risks as part of our work with the ETI Just Transitions Working Group. However, addressing climate-related risks in global supply chains requires collaboration between suppliers, brands, trade unions, NGOs, and governments to achieve meaningful and sustainable change.

III. Regular Employment – In key sourcing countries, including India, Bangladesh, and Turkey, risks relating to regular employment remain, particularly the use of temporary or informal labour, limited job security and the absence of formal contracts in parts of the supply chain. We work closely with our suppliers to reduce reliance on the informal sector. As part of our internal audit programme, we place particular focus on this area, ensuring that agency and casual workers are paid in accordance with the law and provided with legal contracts.

6. Risk & Due Diligence

IV. Working Hours – Key sourcing countries, particularly Bangladesh, India, and China, continue to present heightened risks of excessive working hours, especially in lower-tier suppliers and subcontracted facilities. We address these risks through our audit programmes, corrective action plans and worker engagement initiatives. Where excessive working hours are identified during audits, we work with the factory to determine the root cause, implement a remediation plan and monitor progress over the following months, concluding with a follow-up audit to ensure compliance.

V. Wages / Social Security – Key Regions – China, Turkey, UK

Key sourcing countries, especially China, Turkey and the UK, continue to present risks relating to wages and social security, including underpayment, delayed payment and limited access to statutory benefits, particularly for temporary, migrant, or subcontracted workers. These risks are addressed through audits, corrective action plans, and worker engagement initiatives.

Whenever non-payment of minimum wages is identified within our supply chain, we work with factories to correct these issues immediately. In the UK, this has been a key focus for River Island, where we have been working with the Fair Work (formerly Fast Forward) audit programme since 2015.

VI. Discrimination & Harassment – There are heightened risks of discrimination and harassment, particularly in Bangladesh and India, and especially for women, migrant workers, and other vulnerable groups. We address these risks through audits, worker engagement, grievance mechanisms and supplier training. Discrimination and harassment are among the most difficult issues to identify during factory visits, as they rely heavily on worker feedback. As part of all our factory visits, we actively seek worker input and provide information on how to contact us confidentially if preferred.

We previously identified the high risk of physical and verbal harassment of female workers in Bangladesh so, in 2025, we continued our work with the ETI GRACE Programme. A Gender policy has been created and signed off, as well as learning to apply a stronger gender lens during factory visits and exploring ways to detect and address issues through interactions with both workers and management.

VII. Freedom of Association & Collective Bargaining - Sourcing countries such as Bangladesh, India and Turkey continue to present challenges to freedom of association and collective bargaining, with workers sometimes facing barriers to joining unions or participating in union activities. We address these risks through audits, supplier engagement, worker training and our participation in the ETI FOA Working Group throughout 2025.

6. Risk & Due Diligence

Insights from the Working Group have informed the creation of a River Island Freedom of Association policy, which has been signed off and will be issued to suppliers in 2026, alongside a FOA “Your Rights at Work” poster for factory notice boards and a supplier memo, reinforcing our stance on FOA across our supply chain.

In countries where legislation restricts freedom of association and collective bargaining, we require factories and suppliers not to obstruct any alternative means for workers to exercise these rights.

We place particular focus on FOA during worker interviews to ensure that workers understand their rights. Where gaps are identified, training is provided to all workers as part of our remediation process, ensuring they are fully informed about their rights in this area.

Supplier Selection, Setup Process & On-Going Monitoring

Our supply chain spans the globe, and to ensure we work only with ethical suppliers, we maintain a strict onboarding process.

Suppliers are fully responsible for compliance with, and implementation of, our Supplier Code of Conduct in their factories. All Tier 1 factories are approved during the onboarding and factory approval process.

If a factory does not meet River Island’s requirements, we work with them to achieve suitable compliance before onboarding.

Where a factory is unwilling or unable to reach the required standards, we will not manufacture with them.

Following setup, all audits carried out by our in-country teams are unannounced. Any Tier 1 subcontracting must be pre-approved by River Island. Audits are accompanied by a full remediation plan aligned with our Code of Practice.

We continue to support suppliers with required improvements and monitor progress over time. Strong supplier relationships are important to us, and we prioritise remediation over disengagement to ensure the welfare of workers is protected. In rare cases where a supplier or factory demonstrates a lack of commitment to improvements, we may terminate the relationship, but this is always a last resort and carried out responsibly.

6. Risk & Due Diligence

As part of all audits, we carry out full on-site worker interviews and provide opportunities for off-site or confidential follow-up interviews if required. Audits include checks for forced and trafficked labour, review of all relevant documentation, confidential worker interviews, and where applicable, inspection of worker accommodation. We use standard forced labour indicators set by the ILO as part of our overall risk analysis.

Where critical issues are identified, such as forced or child labour, we will engage external experts to carry out further investigations. In cases of severe or imminent threats to worker safety, remediation is implemented immediately, and orders may be suspended to protect workers.

Addressing Modern Slavery In The Bangladesh Ready-Made Garment (RMG) Sector

In 2025, we continued our partnership with [GoodWeave](#) participating on their project ***Forced Labor in Supply Chains: Piloting Innovations and Building Capacity***, implemented by GoodWeave International and funded by The Walt Disney Company. This project involved a deep dive into our supply chain in Bangladesh, focusing on three of our suppliers' tier 2 supply chains.

The initiative worked on GoodWeave International's forced labour tool and risk assessment methodology in Bangladesh, increasing the garment industry's understanding of forced labour risks and improving approaches to risk identification.

Working with our selected suppliers, Impact conducted assessments of their high-risk subcontractors in the lower tiers of the supply chain. These assessments focused on vulnerable workers and the potential for forced or child labour, with the intention of informing preventative programmes. While no cases of forced labour were identified at the Tier 2 sites assessed, several minor ethical issues were discovered, and remediation plans were put in place.

Fast Forward - Monitoring Our Suppliers In The UK

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 mainly ethnic backgrounds who are at a higher risk of mistreatment and modern slavery.

6. Risk & Due Diligence

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.

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.

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.

We are pleased to report that we have not had any major issues in our UK supply chain 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.

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 he 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 set up 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.

6. Risk & Due Diligence

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 shortfall 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.

Workers Family Living In The Factory – India

In 2024, during an audit by our in-country team, we identified a situation presenting high risk, where a security guard and his family, including children, were living on the roof of the factory in unsafe conditions and without adequate fire safety measures. Several critical issues were found in the audit, but rather than disengaging, we worked closely with the factory to address these risks through training and capacity building. The factory lacked knowledge but demonstrated a willingness to improve and as a result, has now strengthened its understanding of worker safety and social compliance requirements, which was reflected in their 2025 re-audit. The family have now been safely rehoused in suitable accommodation, and we will continue to support the factory to ensure improvements are sustained.

7. Partnerships & Training

UK Apparel Industry

As part of River Island's commitment to the UK, we have continued to contribute towards the funding of the Fashion-workers Advice Bureau Leicester (FAB-L) which gives advice and support for apparel workers in Leicester. Their support service includes:

- 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
- Support For Victims Of Domestic Violence & Harassment

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](#)

As mentioned in our case studies and in previous reports, we have a global team who regularly visit our key sites and check that they adhere to the River Island Code of Conduct. 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; providing our suppliers and factories with the necessary tools is central to this process.

Key Collaborative Partners:

