

UK MODERN SLAVERY ACT 2015 AND CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT 2010 STATEMENT 2021

This Statement has been published in accordance with the Modern Slavery Act 2015 and California Transparency in Supply Chains Act 2010. It sets out the steps taken by REISS LIMITED (“REISS”) during financial year ending 30 January 2021 to prevent modern slavery and human trafficking in its business and supply chain. Reiss Limited is a subsidiary of Reiss Holdings Ltd. We have continued to identify and assess the risks of modern slavery and human trafficking during the COVID-19 pandemic. This has been a challenge with Reiss staff and external auditors not being able to travel but we have kept in touch with suppliers throughout the pandemic.

The 2021 Statement is written by the group CSR representative, approved by Reiss board members and signed by Jonathan Blanchard, Chief Financial & Operating Officer.

Reiss initiated the process to become foundation members of the Ethical Trading Initiative in early 2017 and its application was successfully accepted in May that year. Reiss has become a full member in 2019 after publishing its first annual report to ETI. ETI is a leading alliance of companies, trade unions and NGOs that promote respect for workers’ rights around the globe and strengthen Reiss’ commitment to ethical trade and the eradication of modern slavery with expert guidance and support. www.ethicaltrade.org

Reiss is an active and vocal foundation member, involved in many country-specific working groups which adds value to its risk management. Reiss has contributed to the Turkey, China, India and Modern Slavery working groups, engaging with other members and increasing best practices. The outcome of the 2019 ETI annual report has been used as a tool for the improvement of our strategy for ethical trade in the coming years. This 3-year strategy has been signed off by the board in 2020.

In 2020 Reiss joined the Better Cotton Initiative to improve on its Social and Sustainable Strategy. <https://bettercotton.org/> The Better Cotton Initiative (BCI) is a global not-for-profit organisation and the largest cotton sustainability programme in the world. BCI exists to make global cotton production better for the people who produce it, better for the environment where it grows and better for the sector’s future.

Structure, business and supply chains

Since its creation by David Reiss in 1971, Reiss has established a design philosophy centred on creating design-led menswear, womenswear and accessories.

Today Reiss is a highly respected, prominent business in the global fashion arena with products developed at its headquarters in central London, employing 1274 employees across its headquarters and retail locations.

Reiss operates in United Kingdom, Australia, Canada, Germany, South Korea, Netherlands, Spain, Switzerland, and the United States, across 257 stores and online channels (including wholesale, concessions, franchise shops and internet sites). Reiss manufactures its finished goods through a global network of external suppliers and sources its raw materials through the same network as well as in-house.

Reiss remains committed to ensuring that its operations and supply chains promote safe, fair, legal and humane working conditions. This means we expect the business and our suppliers to abide by local laws, international labour and human rights standards in all countries in which we or they operate.

Our commitment to the eradication of slavery, servitude, forced labour and human trafficking (collectively referred to as modern slavery) in the business and our supply chain is closely aligned with the Modern Slavery Act 2015. We recognise the reality of these issues for all concerned and we have established measures to identify the risks to our business that modern slavery presents. These measures are reviewed annually to ensure best practice.

This statement provides an overview of our work to implement an effective governance framework and our enhanced due diligence process which includes a close review of modern slavery risks and indicative factors in the way we operate and how we source. Responsibility for the Modern Slavery Statement sits with the board and is executed by the CSR representative. Year on year the Modern Slavery Act Statement is reviewed and updated according to agreed improvements for the year to come.

In 2020, Reiss manufactured garments in 15 different territories in the Far East and Europe. The top 4 production countries have been China (57%), Turkey (22%), India (5%) and Vietnam (2%). These 4 sourcing countries accounted for 86% of our purchasing volumes in 2020 which saw Reiss consolidate its supply base and focus on strengthening long term supplier partnerships. Other production countries include the Philippines, Bangladesh, Sri

Lanka, Mauritius, Scotland, Portugal, Albania, Italy and Spain. Production has increased in China (+2%) and Vietnam (+2%). We have seen a decline in production in Ukraine as well as in India.

Prior to placing any orders and as an integrated business practice, Reiss followed its Ethical Compliance and Due-Diligence programme to adeptly identify challenges and sourcing risks.

All sourcing countries face their own geopolitical, cultural and legal differences and is partly the reason that Reiss continues to evaluate and monitor supplier compliance through supplier self-assessment forms and third-party audits. Due to Covid none of the Reiss staff have been travelling to production countries. Please find more in the chapter policies in relation to slavery and human trafficking. All information is recorded and monitored in a central database and is used to map Reiss' supply chain.

In 2019 Reiss successfully mapped its tier one and two suppliers.

- In 2020 we have mapped subcontractors.
- Reiss has onboarded 25 new garment and accessory suppliers in the Far East and Europe.
- In 2020 Reiss started the first phase of mapping fabric mills which had been postponed in 2019.

84 mills have completed the first stage of onboarding.

25 mills need to complete a part of the onboarding documents.

Policies in relation to slavery and human trafficking

The Reiss Ethical Compliance and Due-Diligence programme (Governance Framework) is an integrated business practice and is a vital foundation for all supplier partnerships. This framework is also applied to Reiss' own business operations.

Reiss is committed to its Supplier Code of Conduct which is based on the ETI Base Code and covers Worker and Human Rights (This includes Modern Slavery as well as Environmental Protection and Animal Welfare) Supplier Code of Conduct

<https://www.reiss.com/corporate-responsibility/code-of-conduct/>

Our Modern Slavery Act and Code of Conduct can be found on the above-mentioned website as well as our Gender Pay Gap statement and Diversity & Inclusion Statement.

The programme sets out our requirements, expectations and guidance, outlining the minimum social standards that must be met. The programme consists of the Reiss Supplier Manual, Self-Assessment Form, Code of Conduct and Supplier Engagement – Terms of business together with supplier audits and its corrective action plans.

Core policies in the Code of Conduct for suppliers and sub-contractors are:

- Modern Slavery is prohibited, and employment freely chosen
- Child Labour will not be used
- Freedom of Association
- Working conditions should be safe and hygienic
- Living wages should be paid
- Working hours should not be excessive
- No discrimination on the work floor
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- Migrants should be employed legally

Together, these documents collect key information on labour practices, working environments, health and safety as well as general ethical trade awareness. Modern Slavery is mentioned directly in our Supplier engagement form and Code of Conduct confirmation. Country region, product category and partnership type are also considered, and combined with an existing factory audit verifies the data provided. These policies are monitored in our database on a regular basis, conversations with suppliers on corrective action plans and 3rd party auditing. Current global issues such as Syrian refugees working in Turkey, homeworkers in India and Uyghurs being exploited in China have our daily attention. We strive to get a better understanding on these subjects and how they affect our day-to-day business with our supplier base. These subjects are part of our risk assessment and are

Identification of risks together with steps taken to prevent and manage that risk

The Reiss Ethical Compliance and Due-Diligence programme (Governance Framework) is an integrated business practice and is a vital foundation for all supplier partnerships. This framework is also applied to Reiss' own business operations. The framework elevates Reiss' efforts to better detail its sourcing landscape and ability to align itself to the Modern Slavery Act.

Reiss continues to risk assess all suppliers and production sites using information obtained from the Ethical Compliance and Due-Diligence programme. This, in conjunction with business KPI's and country risk insight from public sources such as the World Bank, United Nations, the Global Slavery Index and ETI membership support Reiss' approach to risk prioritisation and audit selection.

Reiss applies the same approach when assessing risks in its own operations, such as collecting key information about labour practices of its contracted partners. To further promote greater transparency and traceability, Reiss has initiated the use of Segura systems in our business operations, allowing Reiss to track and trace the orders of lower tiered trim suppliers. It provides an insight into which suppliers order trims and Reiss can follow up non-nominated suppliers.

Due diligence processes in relation to slavery and human trafficking in business and supply chains

To support Reiss' due-diligence efforts, all suppliers are required to submit an existing factory audit and based on the supplier's risk assessment, an ethical audit (with focus on social aspects) may be conducted. These audits assess compliance with our Supplier Code of Conduct and are, amongst other things, intended to identify any modern slavery practices. If issues are identified, appropriate investigative and remedial actions are taken. Reiss supported all factories in ensuring Corrective Action Plans were monitored and completed with appropriate evidence recorded. Reiss audits are conducted in collaboration with Intertek and auditing tool is SMETA (pillar 4) This auditing type is assessed against the Reiss code of conduct and local labour laws by experienced country local auditors. The structure of each assessment is adjusted to meet Reiss' objectives, country challenges and supplier history.

Reiss recognises audits are a useful tool as part of a wider due diligence programme,

however, does not solely depend on them, instead endorses a holistic approach including production site visits and collaborative supplier partnerships. See also chapter 'further steps'.

Training and capacity building

Reiss annually updates the business on its commitment to the Modern Slavery Act and developments to the Ethical Compliance and Due-Diligence Programme. Attended by key departments including Sourcing, Technical, Buying, Design, Fabric, and Brand Communications; the business update outlines the requirements of the Modern Slavery Act and Reiss' commitment. It also encourages each department to assess and improve their own practice and influence. Social Compliance and Modern Slavery is part of the daily business at Reiss. It is discussed during the onboarding process. Currently there are no measures of the effectiveness of these trainings. The Reiss CSR representative and ETI have organised training sessions for Product Development teams on womenswear, menswear and accessories to get a better understanding of supplier relationships, responsible buying and capacity building. For the future we are looking to continue this training in more depth and roll out to other departments. (See further steps)

Supplier Self-Assessment

Suppliers are required to complete a self-assessment form for each factory location that produces Reiss products. The Self-Assessment is an integrated exercise providing insight into a factory's workplace, environmental protection and health & safety policies in addition to subcontracted processes, if any. Suppliers are also asked to submit the most recent factory social audit. Combined, Reiss can detail and approve factories and sub-contractors before an order is placed, which continues to influence our overall decision making on further compliance assessments and sourcing adjustments. A bespoke self-assessment form is also shared and recorded for all contracted partners used in Reiss' own operations.

Supplier Code of Conduct

Updated in 2020 with language on child labour, human trafficking, slavery and anti-corruption the Reiss Supplier Code of Conduct is aligned with the intent of the

Modern Slavery Act, reflecting best practice and stakeholder expectations. The code of conduct is core to the Ethical Compliance and Due-Diligence programme and has been shared with all suppliers and contracted partners in Reiss' own operations. As standard, the code requires access to both Reiss and third-party auditors to perform unannounced audits that check compliance with all core labour rights.

Reiss also updated its code to include language on responsible recruitment, reaffirming its commitment that no worker should pay for a job and the costs of recruitment should be borne not by the worker but by the employer. All suppliers are required to share their recruitment policies as part of the ethical and compliance programme.

The Reiss supplier code of conduct builds on the Ethical Trading Initiative (ETI) base code and International Labour Organisation principles, standards and guidelines.

<https://www.ethicaltrade.org/eti-base-code>

Supplier Engagement – Terms of Business

Reiss' Supplier Engagement – Terms of Business is a principal tool used to communicate the obligations on suppliers to comply with the Modern Slavery Act. The Terms of Business also supports Reiss' efforts of greater transparency by requiring suppliers to declare all production sites and sub-contractors. Reiss monitors suppliers' audits and Corrective Action Plans (CAP's) and we ask ETI base code related questions in a survey each supplier must complete before they receive a first order.

Further Steps

Building on the work conducted over the last 12 months, Reiss will now focus on further mapping of fabric mills sourced in-house. Reiss will continue to build transparent supplier relationships which will support its mapping efforts with suppliers who source raw materials on our behalf. It is our aim to have full transparency on our 10 main fabric mills and their subcontractors.

Reiss will encourage suppliers with audits older than 2019 to do a periodic audit. Our aim for the future is to have no audits older than 2 years. Auditing has been difficult during Covid when factories have been closed or there was no access for auditors.

After successful training for Product Developers in 2020 Reiss looks to extend its training programme to include department specific programmes that will provide a wider business understanding of Modern Slavery Risks.

Reiss has concerns on the situation for Uyghurs in the Xinjian region in China. Reiss will take all necessary steps in 2021.

Reiss will further implement it chosen strategy in 2021 with a focus on staff training, risk assessment, Human Rights Due Diligence, Recruitment Policies, Worker Awareness, Grievance mechanisms and Remedies.

This statement was approved by the Board and executive team of REISS limited.

Signed,



Jonathan Blanchard, Chief Financial & Operating Officer

Date: 30/04/2021



**Ethical
Trading
Initiative**

Member