# Modern Slavery Statement

2024/2025



### Our commitment

At FatFace Limited, we uphold the highest standards to ensure modern slavery and human trafficking have no place in our business or supply chains

I remain incredibly proud of the firm position FatFace continues to take in tackling human rights risks across our global supply chain. Through proactive due diligence and a commitment to transparency, we are determined to identify and address the challenges that persist in complex supply chains.

The Modern Slavery Act 2015 highlights the importance of understanding the salient risks we face and serves as a critical framework, encouraging businesses to examine and act on the most pressing risks. At FatFace, we are committed to putting the rights of workers and other stakeholders in our operations at the core of our programme and strive to embed responsible business practices at every level.

Responsible sourcing remains a cornerstone of our ESG strategy. We are focused on ethical trade, and we work closely with suppliers, partners, and stakeholders to address the growing global risks of modern slavery and human trafficking. Our approach is grounded in international frameworks, including the Ethical Trade Initiative (ETI) Base Code and the UN Guiding Principles on Business and Human Rights.

While global supply chains remain complex and evolving, we believe transparency and collaboration are essential to progress. This report outlines our actions over the past year and the steps we continue to take to strengthen our safeguards and improve outcomes for workers.

As a certified B Corp, we believe in using business as a force for good. We are committed to ongoing improvement and accountability, and we support the legislation that underpins efforts to eliminate modern slavery and human trafficking. Our annual Modern Slavery Statement outlines the progress made by FatFace during the financial year ended January 2025.

Due to our acquisition by NEXT our factory audit processes changed midway through last year. Processes moved from third-party SMETA (Sedex Members Ethical Trade Audit) and verification audits up to June 2024, to audits after this date conducted by NEXT's on the ground Code of Practice (COP) team. It was a transitional year, and this report reflects the changes as we began the process of aligning some of our operational procedures with our new ownership.

This is our 7th statement made under the Modern Slavery Act 2015 and constitutes our Group modern slavery statement for the 2024/25 financial year. It highlights the key activities we have undertaken during the year and aims to provide useful information to understand our commitment as a responsible retailer to reduce those modern slavery risks that could be connected to our business.

We recognise the gravity of modern slavery and understand that it is a deeply rooted, complex issue that no organisation can address in isolation. There are no quick fixes, and it requires sustained commitment and collaboration. At FatFace we are dedicated to ensuring that every part of our business plays a role in upholding our responsibilities and protecting the rights of both our own teams and those working across our global supply chain. We remain committed to transparency and look forward to continuing to share our progress.



WCml

Will Crumbie – CEO June 2025

### Key achievements 2024/2025

Seamlessly transitioned from SMETA 3rd party and The Reassurance Network (TRN) verification audits to adopting the NEXT COP Principle and Auditing Standards. Updated all documentation to incorporate COP Principle Standards into our audit framework.

11 multilingual conferences held in country and online.

Enhanced supplier onboarding process.

Ensured all our teams were trained on the new audit standards.

Strengthened cotton sourcing policy.

### **About FatFace**

Founded in 1988, FatFace is a British lifestyle clothing brand that is Made for Life. With a unique heritage, FatFace creates product ranges across women's, men's, footwear and accessories for the family to live life in. Our products are purposefully designed using lower impact materials and thoughtful construction techniques. Devoted to style, Proudly B Corp.

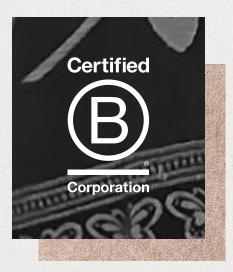
FatFace is a multichannel retailer, with a thriving international digital business with over 213 stores in the UK, Ireland, USA and Canada, and a highly engaged social community. Our head office is in Havant and we employ 2,003 staff across our UK and Ireland operations, in the USA and Canada stores we have 141 employees. FatFace became a certified B Corporation™ in 2003 and we are dedicated to doing things better and reducing our impact where we can. We do this with a clear strategy around three key pillars – product, planet, and community.

We maintain a strong focus on our ESG commitments, which is a key part of our ESG agenda and is regularly reported to both the Operational and Group Boards. Our Modern Slavery Act 2015 responsibilities are managed by our Responsible Sourcing team, led by our Trading Director, Nick Stevenson, who is part of our executive Operational Board.

Modern slavery risks are closely monitored and reported as part of our sustainability KPI's. Progress is reviewed bi-monthly by senior management and annually by the group board, ensuring consistent accountability at the highest levels.

### Over 213 stores in the UK, Ireland, USA and Canada

In addition, regular updates are shared with FatFace teams and Product leads to track performance, address issues promptly, and stay aligned with our targets. Our KPI's include supply chain due diligence, a critical tool in identifying, assessing and escalating potential modern slavery risks. The FatFace Board plays a key role in providing a strong oversight of our approach.





## FatFace governance structure and key changes

In October 2023, we were acquired by NEXT plc. Despite this change, our reporting structure remains unchanged, with our Operational Board still accountable.

Our FatFace Board (FFB) oversees the day-to-day operational running of the business. They ensure smooth and efficient management of strategy and policies and set long term targets while maintaining the ethos that makes us FatFace.

This change of ownership offers new opportunities that align with our commitment to responsible growth and the prevention of modern slavery and human trafficking in our supply chain, along with collaboration with NEXT and other Total Platform brands.

FatFace incorporated the NEXT Code of Practice (COP) Principle Standards into its own supply chain operations in October 2024 and this now forms the main body of work in this statement as we adapt our targets, processes and policies and training to be in line with the change.

Main changes in our governance since our last statement are described as below:

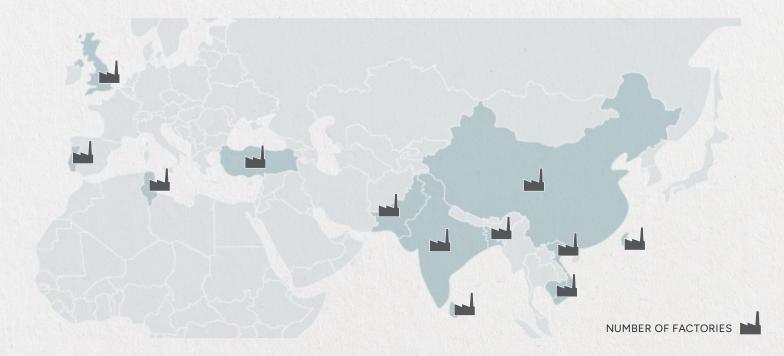


### Our product supply chain

Based on the reporting year 2024/25, FatFace worked with 111 garment, shoe and accessory factories across 12 countries and 14 third-party branded suppliers. We continue to nurture long term relationships with our suppliers, placing great emphasis on partners who share our values and responsible approach to business. We have been working with our top 20 manufacturing partners for a combined period of 303 years, with the average relationship length being 15 years. Our top 20 suppliers make up 74% of our buy value. Whilst we cherish longterm supplier relationships, we will continue to seek out partners who strive to meet our high quality and ethical requirements and recognise our shared duty to promote positive social and environmental standards.

We know that our product mix

and ability to ensure continued high quality is dependent on our working relationships with our suppliers, who fully understand our business values and expectations. The strength of our supplier relationships provides us with excellent visibility of our firsttier factories and an effective platform for understanding and addressing Modern Slavery & Human Trafficking concerns within the supply chain.



- Bangladesh 4
- Cambodia
- China 60

5

2

- India 20
- Pakistan 3
- Portugal 2
- Sri Lanka

- Taiwan 1
- Tunisia 2
  - Turkey 8
  - UK 2
  - Vietnam 2
- Total 🖬 111



**12** Sourcing countries

+65,000 Over 65,000 workers in our Tier 1 product supply chain **64** We work with 64 suppliers

relationship with our top

15 years

20 suppliers

Average supplier

**111** Active Tier 1 factories

#### 100%

Suppliers agree to adhere to FatFace Ethical Policies

Based on the reporting year 2024/25, FatFace worked with 111 garment, shoe and accessory factories across 12 countries and 14 third-party branded suppliers

We have a clear supplier strategy which supports our commitment to responsible sourcing:

- We carefully select business partners who share our values and commitment to uphold and continuously improve labour and environmental standards.
- We seek to build long term stable relationships and use our buying power to influence improvements in workplace supply chain standards.
- We set clear expectations for supplier standards and provide guidance and support to help our supplier partners to achieve these standards.



### Policies in relation to slavery and human trafficking

## What is modern slavery?

Modern Slavery involves one person depriving another of their liberty in order to exploit them for personal or commercial gain (UN Guiding Principles on Human Rights).

The Ethical Trading Initiative (ETI) notes that Modern Slavery is an overarching term used to describe its various forms, being:

- Human trafficking: a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.
- Forced labour: any work or service which people are not doing voluntarily, and which is exacted under a threat of some form of punishment.
- Bonded labour: demanding as a means of repayment of a debt or a loan.
- Slavery: a situation where a person exercises (perceived) power of ownership over another person.

We adopted our definition of modern slavery from the UN Guiding Principles on Business and Human Rights, which state that 'modern slavery involves one person depriving another of their liberty in order to exploit them for personal or commercial gain'.

#### A Global Concern

Modern slavery is a widespread issue that affects every region of the world and intersects all industries. Today, approximately 50 million people find themselves in a situation where they face modern slavery.

Of these people, 28 million were in forced labour and 22 million were trapped in forced marriage. Unfortunately, the number of people in modern slavery has risen significantly in the last five years\*

Apparel, footwear, accessories and home supply chains are complex and far-reaching making it easier to hide the exploitation of workers. Workers can be exploited through forced labour, long working hours and lack of worker rights. Vulnerable groups such as migrant workers, temporary workers and women and children are more at risk of modern slavery.

\*2022 Global estimates of Modern Slavery from ILO.

As a responsible retailer, we are committed to identifying and addressing these issues in our own supply chain. To improve working conditions and reduce the risk of modern slavery, in the past we have collaborated with our trusted partner TRN who has supported us with Verification Audits. This work stopped as of July 2024 as we began our transition to the NEXT COP audit approach.

Our long-standing membership with the Ethical Trading Initiative (ETI), since 2008, allows us to work alongside other brands and retailers, including those that may be our direct competitors. We understand that improving working conditions is not a commercial or competitive issue but about ethical responsibility. We engage monthly with similar sized brands, using this platform to share information and collaborate on critical issues.

We believe Modern Slavery is unacceptable and strive to build a fair, ethical and transparent supply chain, that respects and protects workers' rights and improve working conditions. We work to tackle exploitative practices through robust policies and governance processes, risk assessments and audits, collaboration with other retailers and transparent supplier relationships.



### **Ethical trading policies**

We are committed to working in accordance with the UN Guiding Principles on Business and Human Rights. We believe companies have the responsibility to respect human rights through policies and by working with robust standards and processes that will identify, prevent and manage the remediation of any human rights risks. FatFace is committed to upholding these human rights standards and processes in its business operations and supply chain.

Our code of conduct, the "FatFace Way of Life" was previously the cornerstone of the principles of how we worked with our supply chain and set out the ethical standards that we expected. We continued with this approach until July 2024, when we adopted the NEXT COP Principle Standards which are based on universally recognised labour standards, including those outlined in the Ethical Trading Initiative (ETI) Base Code and the UN Guiding Principles on Business and Human Rights, both of which cover Modern Slavery issues.

FatFace has robust processes in place to ensure all Tier 1 factories are audited periodically against



the ETI Base Code, national and other applicable laws. These audits are conducted by the NEXT COP team, the initial audit is conducted on an announced basis, with this approach applying to first time audits through to October 2025. All audits after this will be conducted on an unannounced basis. Factories must ensure that any non-compliances identified are corrected within the timeframe detailed in the Corrective Action Plan (CAP).

We continue to actively support the factories we work with to resolve non-compliances that have been raised. We work in concert with our own Responsible Sourcing team, the factory and supplier, and our auditing Code Of Practice team, to resolve the issue. Our focus in the past has been in conducting verification assessments on our higher risk factories, but since moving to the COP team we are able to get deeper insights into all of our factory base as the audit team are placed in country and can visit our sites at any time.

FatFace has robust processes in place to ensure all Tier 1 factories are audited periodically against the ETI Base Code, national and other applicable laws





### **Code of conduct**

Our Code of Conduct is drawn from core International Labour Organisation (ILO) conventions and accompanying recommendations and are aligned to the Ethical Trading Initiative (ETI) Base Code and the Next Code of Practice.

We expect our suppliers to understand, take responsibility for and ownership of implementing the COP Principle Standards throughout their supply chains and business operations. FatFace takes a longterm view of what is right and will remain committed to the continuous improvement of delivering high standards to meet the expectations of our customers, stakeholders and to protect the human rights of those engaged within, and supplying to, our business.

We recognise that human rights abuses can also exist within our own business (non-product operations). Areas such as recruitment and the utilisation of contract labour present potential risks, so we have policies in place to mitigate these risks as well as a robust recruitment process. This process includes our own due diligence, such as checking original documents such as passports and right to work documents. Where we work with recruitment agencies, we also ask for their modern slavery policy.

All our employment contracts incorporate policies designed to protect worker rights and promote a safe and fair environment to work in. These policies include our Antibribery and Corruption, Health & Safety, Data Protection and Privacy, and Whistleblowing Policy.

### FatFace code of conduct



#### No Forced Labour or Modern Slavery -Employment is Freely Chosen

There must be no form of modern slavery or forced labour, whether it be human trafficking, involuntary prison labour, indentured labour, bonded labour or otherwise. No employee should be obliged to work through force, financial pressure, intimidation or by any other means.



#### Lawful Working Hours

The normal working hours should not exceed 48 hours per week and must comply with national laws or the benchmark industry standards, whichever offers greater protection. Overtime working shall be voluntary, should not exceed 12 hours per week and will not be demanded on a regular basis. Employees must be compensated for overtime at the rate legally required in the country of manufacture or, in those countries where such laws do not exist, at a rate exceeding the regular hourly compensation rate.



### Freedom of Association and the Right to Collective Bargaining

The supplier and its factories must recognise and respect the right of the employee to join and organise associations of their own choosing and to bargain collectively. Where law restricts the right to freedom of association and collective bargaining, suppliers must not obstruct parallel means for free association and collective bargaining.



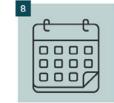
#### Safe and Healthy Working Conditions

Suppliers and their factories must provide their employees with a safe and healthy working environment and continue to work towards preventing work-related accidents and maintaining the welfare and safety of their employees.



#### No Discrimination is Practiced

All employees shall be afforded equality of treatment. FatFace recognises and respects cultural differences, it will seek and identify suppliers who employ individuals based on their ability to do the job, irrespective of their gender, race, colour, language, nationality, ethnic or social origin, religious beliefs, political opinion, marital status, disability, property, age, sexual orientation or union membership. Health screening for the purposes of recruitment shall not be undertaken, unless otherwise required by law.



#### Employment Security

Wherever reasonably practicable, all workers should enjoy security and stability of employment and regularity of income. Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided.



#### No Child Labour

Suppliers must not employ children who are less than 15 years old or less than the legal minimum age in the country of manufacture. Where local law sets the minimum age at 14 years, under ILO convention 138 in accordance with developing country exceptions, the lower will apply.



#### **Respectful Treatment of Employees**

Employees must be treated with respect, dignity and be employed in a workplace free of harassment, abuse, and degrading treatment. No employee will be subject to physical, sexual, mental or any other form of abuse or harassment or corporal punishment.



#### Fair Wages and Benefits

Employees' wages should be enough to meet the basic needs of employees and provide for some discretionary expenditure. In all cases, wages must equal or exceed the minimum wage required by law or the industry benchmark standard, whichever is higher and include all legal benefit entitlements.



#### Management Systems

The FatFace Code of Conduct must be underpinned by robust management systems to ensure compliance with local legislation and the Code of Practice auditing standards.

FatFace is committed to working in accordance with the UN Guiding Principles on Business and Human Rights. Companies have the responsibility to respect human rights through policies and by working with robust standards and processes that will identify, prevent and manage the remediation of any human rights. FatFace is committed to upholding these human rights standards and processes in its business operations and supply chain.



Our expectations listed below are based on universally recognised standards such as the relevant ILO conventions, the ETI Base Code and UN sustainable development goals.

FatFace is a full member of ETI

We also have additional policies available for our suppliers covering specific supply chain issues and can be found here: <u>Next Code of Practice</u>

### **Risk assessment and due diligence**

We recognise that the highest potential for human rights abuses lies within our core product supply chain. To address this, we conduct an annual global risk assessment to pinpoint significant high-risk issues that may be present within our supply chains. We are committed to performing due diligence investigations in collaboration with our suppliers and manufacturing partners.

This year, we re-evaluated our core product supply chain against country-specific risks using a variety of indices and data sources, including the Global Slavery Index, the Sedex RADAR risk assessment tool, factory audit reports, NEXT risk assessment and the Transparency Corruption Index.

From this analysis, the highest risk of modern slavery in our supply chain still remains in the same six countries - China, India, Cambodia, Pakistan, Bangladesh, and Turkey.

Through our social responsibility initiatives and modern slavery risk assessment, we have six key salient risks. We have prioritised them where we believe we can have the most substantial impact. As this is a hybrid report, the key activities undertaken to 25th January 2025 to address these risks are outlined below.



### 1.

Salient Risks High working Hours.

#### **High Risk Countries**

China, India, Cambodia, Pakistan, Bangladesh, Turkey.

#### Explanation

Risk of high or involuntary overtime.

#### **Action Taken**

- All new suppliers have signed up to our new code of conduct.

- New suppliers have to undergo onboarding training which outlines the COP Principle standards, policies and high risk areas.

- We continued to raise awareness of excessive working hours and worked closely with select factories to develop long-term action plans.

- During the audit process we have spoken to suppliers directly to understand the root cause and supported them with solutions.

- We have continued with in country and online training through supplier conferences and regular contact which has allowed transparency and open dialogue.

#### **Next Steps**

- We have been in a transition period and with a move to unannounced audits. We plan to analyse working hour trends across a select number of factories within our top 20 suppliers, where our influence is strongest. This analysis will help identify priority areas and inform the development of targeted training to address excessive working hours. - Once we have done this work, we need to revisit our purchasing practices to ensure we are not putting unnecessary pressure on suppliers.

### 2.

#### Salient Risks

Forced labour (includes wage retention).

#### **High Risk Countries**

China, India garment factories, Bangladesh.

#### Explanation

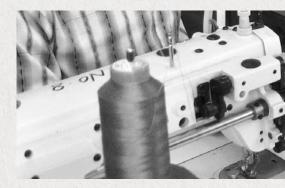
Workers are coerced to work through threats, violence and other forms of pressure including withholding wages to restrict a workers freedom.

#### **Action Taken**

- We have strengthened our programme by implementing a wage retention policy and continue to reinforce the importance of addressing modern slavery across our supply base.

#### **Next Steps**

- We will continue to enforce the wage retention policy and engage with our supply base to raise awareness and drive action on modern slavery risks.



### 3.

#### Salient Risks

Temporary Workers and the use of recruitment agencies.

#### **High Risk Countries**

China, Taiwan, India, Turkey.

#### Explanation

Temporary workers may be hired in an informal way, without contracts or paid through an intermediary. This leaves them more exposed to exploitation than being directly employed. Using recruitment agencies may leave workers vulnerable to unethical recruitment practices.

#### **Action Taken**

- We have adopted migrant and agency labour policies which our suppliers must follow.

- All Tier 1 factories have to fill out a pre-audit questionnaire which has a specific focus on regular employment and migrant labour, no critical factories have been flagged to date.

- We have mapped our cotton supply chain up to Tier 5 to ascertain where there are contract/temporary workers. Through this process we have identified Tier 3 suppliers in China, India and Pakistan have emerged as the highest risk areas.

#### **Next Steps**

- We plan to explore grievance platform TIMBY to support worker voice, labour right violations and ethical issues in our Tier 1 factories. Timeline to be reviewed and roll out plan to be established, reviewing how best we support our Tier 3 in addressing the risks identified. This includes exploring potential partnerships and collaboration opportunities.

### 4.

#### Salient Risks

Working conditions - risk of earthquakes, building collapse & fire.

#### **High Risk Countries**

Bangladesh, Pakistan, India, Turkey.

#### Explanation

Countries that are more prone to earthquakes, building collapse and fire.

#### **Action Taken**

- We have been a member of the RMG Sustainability council RSC (formerly Bangladesh Accord) since 2013. All Bangladesh Factories have a RSC safety inspection with a progress rate of at least 90%.

- In 2024 we joined the Pakistan Accord to strengthen our programme.

- Turkey - introduced an Earthquake performance analysis report if the building license and safety documentation is not sufficient.

#### **Next Steps**

- We will maintain our commitment to the Accord and support the work in ensuring safe and healthy working conditions at our factories in Bangladesh and Pakistan and maintain the same level of work in Turkey.

### 5.

Salient Risks Raw Materials.

High Risk Countries China, India.

#### Explanation

Risk of forced labour and child labour connected to specific raw materials.

#### **Action Taken**

- We have strengthened our cotton policy to ensure no cotton yarn is sourced from China and confirm there is no sourcing from prohibited countries.

- We have mapped our suppliers to Tier 5.

Completed Oritane Isotope testing on two of our high-volume lines to test the yarn origin.
Internal training conducted regularly so the buying and design teams are aware of the sourcing risks.

- No identified cotton mills in Xinjiang region (70 mills declared from 34 suppliers/47 factories covering India, China, Bangladesh, Taiwan, Pakistan, Turkey and Vietnam).

- We have signed up to the Better Cotton traceability solution.



#### **Next Steps**

- Annually we will re-map our factories and cotton mills to ensure there is no sourcing from this region.

- Cotton used in the manufacturing of our products is either Better Cotton, Organic or Recycled Cotton. We work with Textile Exchange who incorporate human rights into the assessments for organic and recycled cotton.

- We will be trialling styles containing traceable better cotton this year and will update on our progress.



#### Salient Risks

Freedom of association.

#### High Risk Countries

India, Cambodia, Bangladesh.

#### Explanation

Some workers in factories lack proper representation and awareness of their right to freely associate (FOA), limiting their ability to voice concerns or advocate for fair working conditions.

#### **Action Taken**

- During the initial audit period, we identified 9 instances related to FOA across our supply chain. The primary concern was the lack of effective worker representation and limited awareness, specifically in India.

#### **Next Steps**

- We plan to explore grievance platform TIMBY to support worker voice, labour right violations and



ethical issues. Timeline to be reviewed and roll out plan to be established.

- We will look to increase awareness in our supply base through training on our COP standards.

- We will actively seek opportunities to partner with peer brands on stakeholder engagement activities such as shared factory assessments or in country programme, with the aim of tackling complex supply chain issues including Freedom of Association.



### Key activities timeline 2024/2025

#### FEB 24:

We temporarily paused our Tier 2 due diligence audits and engagement with factories during our transition to new ownership. Given the evolving nature of our policies, we felt it would be unfair and potentially confusing for our suppliers to undergo assessments amidst the change. As a result, this work has been postponed until 2025 to ensure clarity, consistency and a more effective implementation.

#### JAN – JULY 24:

In preparation for the transition, we reviewed audit outcomes against our business levels to ensure that all factories where we hold the most influence were aligned with our code of conduct. Where gaps were identified, we dedicated additional time and resource to support those factories in meeting the updated audit requirements.

#### **JUNE 24**:

We updated our supplier documents to include the NEXT COP Principle standards and updated policies where relevant. We reviewed and enhanced our supplier onboarding process to capture more comprehensive information upfront. This improvement has enabled us to make more informed decisions and better assess if a supplier is the right fit for our business.

#### JUNE – JULY 24:

Updated and trained our product teams to ensure they were fully informed and aligned with the new audit standards.

#### JULY – AUG 24:

In July and August 2024, we partnered with the NEXT COP country teams to host multilingual conferences in China and India, with virtual sessions held via Zoom™ for suppliers in ten countries. The aim was to support all Tier 1 factories and suppliers in preparing for the transition to COP policies and procedures. These sessions provided an opportunity to update our partners on our new ownership structure, reassure them that no drastic changes were being made, and introduce the COP Principle standards. We also used this platform to discuss Responsible Material certifications, Green Claims, and the need for transparency across entire supply chains. By opening up clear communication channels, these conferences enabled honest, two-way dialogue and helped strengthen our supplier relationships.

**SEPT 24:** 

Pre-audit meetings started in September 24.

#### <u>OCT 24 – JAN 25:</u>

36 announced audits commenced, we are now working closely with the in-country COP teams and suppliers to remediate any non-compliances.

### Supply chain transparency

During this reporting period, we continued to audit all of our factories through a combination of SMETA 3rd party audits and Verification audits, with a transition to COP audits beginning in October 2024. The following progress was made:

The following progress was made:

- 47 SMETA audits were completed.
- 7 Verification Audits were conducted.
- From October 2024 to January 2025, a total of 36 COP audits were carried out.

This hybrid approach has allowed us to maintain a comprehensive oversight while gradually shifting toward our COP audit framework.

In our supply base, despite dedicated time and investment to support remediation efforts, we had to disengage with one supplier as they were unable to meet our minimum standards. In these instances, we always investigate deeply to understand the specific issue and work with the supplier and factory to remediate as quickly as possible to address both the symptom and the root cause. If remediation is unsuccessful then we will exit the factory, from our verification assessment work this has occurred on one occasion.

Our verification assessments identified instances of non-compliance related to human rights, including risks associated with modern slavery, in a small portion of the factories assessed. The following case study provides an example of the types of issues observed and the actions being taken in response.







### FATFACE

### Case study – Managing recruitment fees

On the SMETA report, we identified recruitment fees were not being reimbursed, so we appointed our trusted partner TRN to conduct a more in depth audit and to understand the scale of the issue. Through interviews they concluded this had affected 1 worker, the recruitment fee issue was incurred during the hiring process with the worker's previous employer.

While the recruitment fee was the responsibility of the worker's



previous employer, the new factory took corrective action by reimbursing the worker and submitting evidence of payment.

As part of our supply chain transparency project, this year we focused on mapping our cotton supply chain as this is our most used material. We managed to map down to our Tier 5 which is equivalent to the farm level.

#### What we identified:

- No cotton farms in China, which is in line with our Responsible Sourcing policy.
- No identified cotton mills in Xinjiang region.
- We are working with a total of 70 mills from India, China, Bangladesh, Taiwan, Pakistan, Turkey and Vietnam.
- Identified 14 spinning mills and 8 fabric mills in Tamil Nadu, India which is a higher risk area.

#### What we actioned:

- We strengthened our cotton policy to ensure no cotton yarn is sourced from China.
- Checked all of our suppliers against the Uyghur Forced Labor Prevention Act (UFLPA) banned list and confirmed none matched.
- Committed to explore Traceable Better Cotton which will help us improve the traceability of our cotton back to the country of origin. We will begin by trialling a small collection of products and will update more on this in our next report.





### How we report on modern slavery risks

We continue to analyse human rights abuses and non-compliance against our code of conduct through the implementation of FatFace's Responsible Sourcing programme. We report to our Trading and Buying Directors every 2 months, as well as reporting to the Group Board through the Audit Committee.

The Responsible Sourcing Team also provide the buying teams with a regular summary of the ethical risk rating on each of their factories. Modern slavery risk is an integral component of a site's risk rating. Where factories are rated as high risk, the reasons behind the issues are explained as well as an action plan to remediate the concerns. Active engagement and support from the buying team is essential in driving the required improvements with the supplier.

As members of the Ethical Trading Initiative (ETI) we have a commitment to report publicly on our activity. We have committed to Group progression and adhere to the ETI's Corporate Transparency Framework, which requires an annual submission. This process provides us with valuable external oversight and guidance, helping to strengthen and improve our ethical trade programme.

In our commitment to improve transparency, we've made the choice to publicly disclose information about all of our first-tier factories on our website. This disclosure encompasses factory addresses, product categories, and worker numbers. Additionally, we've shared our data on the Open Supply Hub, a collaborative supply chain mapping platform utilised by multiple retailers. We remain dedicated to maintaining this information, updating it every six months in alignment with our ongoing commitment to increased transparency.

### **Training and development**

We ensure that all members of our Design, Buying, Merchandising and Quality teams receive training on the COP Principle and Auditing Standards. This training emphasises the importance of understanding and addressing potential human rights abuses and their impact on both our supply chain and the people involved.

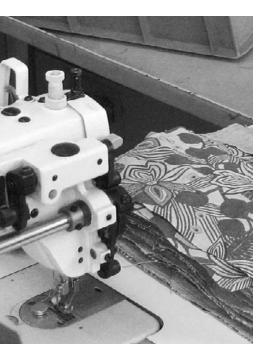
We have strengthened our collaboration with other brand members by actively increasing our participation in the Ethical Trading Initiative (ETI), including attending webinars and member events. In addition, we take part in quarterly sessions with NEXT Total Platform brands, where we share best practices, explore challenges and discuss future opportunities. We also maintain ongoing engagement through bi-monthly participation in our ETI small brands network, fostering continuous dialogue and collaboration.

As part of our broader commitment to combating modern slavery, we have enhanced our efforts company-wide. We have introduced mandatory training, delivered through our Thrive portal, during employee inductions and as part of our annual compliance week in January 2025. This training module, which was completed by over 2,000 employees, equips them with the skills to recognise signs of modern slavery within both our supply chain and internal operations.

In July and August 2024, we held in-country conferences in China and India and 9 online conferences to help our suppliers with the transition process and understanding of the COP standards. These conferences were an excellent opportunity to update our suppliers on our business and emphasised the importance of transparency, fostering ongoing two-way partnerships, ensuring better collaboration and shared responsibility moving forward. It also gave us an opportunity to train our suppliers on Green Claims and the importance of raw material certification and its role in transparency.

#### 2025 focuses and beyond

- Audit all active Tier 1 factories.
- Plan to map our supply chain to Tier 5. As part of the process, we will pay particular focus on Tier 2 suppliers such as our printers, embroiderers, trim, labelling and packaging suppliers and begin auditing them against our COP Principle and Auditing standards.
- Continue to focus on working through our salient risks and actions, building on what we've learnt in the previous year.
- Hold online supplier conferences reminding suppliers and factories of COP requirements and standards.
- Target all existing factories to achieve NEXT COP audit standard Category 3 or better.
- Strengthen our non-stock Modern Slavery checks.
- Enhance buyer tool kit to support teams when engaging a new supplier or factory.





# FATFACE

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