

River Island Modern Slavery Statement 2017

River Island is a family business, and we have a steadfast commitment to protecting the human rights and the dignity of all persons within our global supply chain. Furthermore, we have an underlying and long-standing commitment to ethical trading based upon the firm belief that business can be both profitable and responsible. We take the elimination of modern slavery very seriously and we have incorporated this objective into our ethical trade policy and programme. We are committed to working collaboratively with key stakeholders such as the ETI and its members, government bodies, NGOs, local authorities and other partners, in order to tackle this global challenge. In 2017, River Island's main (Tier 1) factories employed 330,000 workers of which 180,000 were women.

The following statement has been published in accordance with the Modern Slavery Act (2015) and outlines the steps River Island has taken during the financial year ending 31 December 2017 to identify and prevent modern slavery and human trafficking from taking place within our business and supply chains.

(A) About River Island

River Island is a leading multi-channel fashion brand based in the UK, selling women's wear, menswear, and kids' wear. River Island was established in 1988 and is part of the Lewis Trust Group, which is a privately owned business. The Group was started in 1948 by Bernard Lewis, and he and his family are still actively involved in running River Island today.

We have over 330 stores in 16 countries on 4 continents, and we sell to over 120 countries online. River Island's annual turnover in 2017 was £1bn.

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. Our IT teams are based at both our Head Office and our Tech-Hub in East London.

Total Number of Employees in 2017:

Head Office 1306

Distribution Centre 686

Retail 6992

Our product is almost 100% "own label" and includes clothing, footwear, bags and accessories. In 2017, we sourced from 29 countries, but the "Top-5" countries – China, Turkey, Romania, India and Bangladesh – accounted for 75% of our range. The Top 12 countries supplied 93% of our range.

We work closely with our suppliers and aim to build long-term sustainable business relationships. In 2017, we worked with 285 product suppliers (574 factories). Seventy-five per cent of River Island products came from the "Top-50" suppliers (the "Top-20" are 55%).

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 267 third party suppliers, the vast majority of which are UK based.

(B) RIVER ISLAND POLICIES – relating to slavery and human trafficking

Supplier Manual – River Island Suppliers are contractually bound by the terms and conditions in our Supplier Manual which include adherence to the following policies, for the protection and promotion of human rights:

River Island Ethical Policy (based on the ETI base Code)

Download our booklet.

This Policy defines the shared ethical responsibilities between suppliers and River Island buyers.

River Island Anti-Slavery and Human Trafficking Policy (incorporated into our Contracts in 2016)

Download policy.

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 Whistleblowing Policy.

GNFR Contracts – all require compliance with the Modern Slavery Act, and those relationships deemed to be operating in "higher-risk" areas, according to the criteria set out below, specifically require adherence to our River Island Anti-Slavery and Human Trafficking Policy.

(C) DUE DILIGENCE and assessment of Modern Slavery risk in 2017

River Island has been a member of the ETI since 2008 and we adopted the ETI base code as the minimum standards against which our product suppliers and factories are consistently measured. Since 2016 this has included an ongoing assessment of Modern Slavery risk. Whilst our ethical approach continues to be based on building trust and transparency with our suppliers and factories (in order to fully understand the conditions, risks, and challenges that exist), we now realise that the potentially deep-rooted and systemic practices associated with Modern Slavery may not be identified through pre-arranged visits.

Since 2017 we have conducted 90% of our Ethical Audit visits on an unannounced basis, and this will increase in 2018. We aim to collaborate with suppliers and factories to make improvements as required, but we will discontinue business with any supplier or factory who persistently fails to do any of the following: be open and honest; take responsibility for meeting our ethical standards; and make required improvements to rectify serious non-compliances within an agreed time frame. Our focus to date has been on the "First-Tier" suppliers, factories and sub-contractors who directly manufacture our products.

During 2017, and ongoing, our due diligence covers the following key areas:

New supplier/factory set up process: Orders cannot be placed with any supplier/factory until it has completed pre-assessment and approval by the River Island Ethical team (as well as Technical and Commercial). This includes all First Tier sub-contractors. We review independent 3rd-party audits (SMETA) and corrective action plans, and we may also conduct River Island validation audits according to risk.

Visibility of production location: Suppliers are contractually obliged to manufacture River Island products at the factory named on the Purchase Order (PO). Only pre-

approved sites may be used, and written approval is required in the event that the location needs to change. This allows us to report, measure and risk assess our product supply base according to location and business levels. Ethical audits and resources are prioritised and managed accordingly.

Unannounced/illegal sub-contracting: Our Ethical Policy dictates that only audited, approved factories and sub-contractors are used. However, we recognise that we cannot be complacent to the risk of illegal sub-contracting to units with ethical failings (including potential for Modern Slavery conditions and practices).

Early in 2017 we found a UK factory had sub-contracted work to a second site without the knowledge of the brand. The factory and supplier refused to accept that either was at fault for the situation and were not willing to engage to ensure that the situation would not occur again and we subsequently de-listed both from our approved supply base. Despite all the work we have carried out with our suppliers and factories in recent years, including our collaboration with the Fast Forward programme since 2015, this incidence of unauthorised sub-contracting highlighted the extent of the challenge.

Since then, we have increased our focus on identifying and preventing First Tier sub-contracting. In 2017, over 90% of the ethical team factory visits were unannounced and now include extra processes to spot check that individual products are in production at the agreed location and date, and to highlight any missing products. Records are investigated to identify any undeclared production units, which are then visited in order to assess working conditions. We consider the circumstances and underlying causes of each issue found before taking the appropriate remediation and corrective actions with the Supplier/factory.

For example, the unit completes the "New Factory Set Up" assessment and approval process and we implement a continuous monitoring programme with the supplier/factory. As a result of our increased efforts, in 2017 we uncovered 16 instances of unapproved sub-contracting which led to remediation with 15 suppliers (29 production sites).

Case studies:

(a) Our auditor in Turkey visited a factory and found no River Island production on site shown on the PO. The supplier claimed to be unaware of the situation, but collaborated with us and the factory to ensure that all orders were produced in the approved sites

going forward. We now receive a monthly report from this supplier to ensure that when we carry out unannounced visits we can quickly check that the correct orders are in the site.

(b) We also visited a factory in China and found no evidence of our orders in the approved site but, after working with the factory and the UK supplier we approved a second linked factory as this helped both to better meet our production needs. The second site was setup after being visited and approved by our in-country team

We also updated our Supplier Manual to clarify and re-emphasise the Supplier's responsibility to implement and conduct specific processes to prevent unauthorised sub-contracting. We are aware that buying practices can also have an impact on sub-contracting and have implemented tools to improve visibility of production capacity, versus River Island order volumes, at factory level. This will continue to be rolled out in high-risk areas in 2018.

Serious and repeated breaches of our Ethical Policy, and repeated lack of openness and co-operation, can lead to the supplier or factory being removed from our approved list. (This applied to one Supplier in 2017).

Supply base risk assessment: We are aware that some production locations carry a higher potential risk of Modern Slavery and Trafficking. Key risk factors include: migrant labour (within a country or between countries), a high presence of refugees, young workers (risk of child labour), contract and agency workers, outsourced HR functions and female workers. In addition, the security situation and increasing threat of terrorism in some countries makes it more difficult to travel safely in order to conduct visits.

We assessed Turkey, China, India, UK and Mauritius as the highest risk areas for modern slavery risk.

River Island ethical audits and visits: We have Ethical Teams based in five key manufacturing countries who travel regionally to conduct regular audit/visits to factories. They follow-up on 3rd-Party audits, monitor corrective action plans and support with issue resolution. Since 2017 these visits have been unannounced to uncover real ethical conditions and validate that products are being manufactured in the agreed factory. We aim to work pro-actively when issues are found, and we ask that

suppliers and factories work with us based on a continual improvement programme methodology to correct issues and improve transparency.

During 2017, our Ethical Team assessed 442 factory audits and conducted 174 audit visits, including 43 in Turkey, 38 in China, 24 in India, 34 in UK and 25 in Romania.

Supplier Performance Review: Compliance with River Island Ethical Policy is a contractual responsibility for suppliers. River Island Buying Teams review "end-to-end" supplier performance at least twice a year. The Ethical Team provide an ethical score/summary for each supplier to ensure that the Buying Teams are aware of and consider ethical performance and risk when compiling their sourcing plan. Buyers review the plan with their Divisional Director and the Head of Sourcing and Ethical, prior to each new buying season, and this includes a discussion of any ethical risks and required actions. During 2017, we strategically reduced the business levels with three key suppliers (pending corrective/improvement programmes) and suspended business with one supplier following ongoing ethical issues.

ETI working Groups and Collaboration: In order to address significant and widespread ethical challenges, we are collaborating with other brands, industry experts, NGO's and other stakeholders in the following areas:

UK Fast Forward Programme: We continue to be a member of the UK Fast Forward Improvement Programme, working with other brands under the guidance of David Camp. [Download leaflet](#). David was the founder of an initiative known as 'Stronger Together,' created specifically to tackle the issue of modern slavery in the agricultural and food industry. He adapted the same robust audit methodology and approach to apply to all UK-manufacturing factories.

During 2017 we completed Fast Forward factory training, including initial audits and unannounced validation audits, on all River Island UK factories (including First Tier sub-contractors). We have now consolidated our UK business into factories that can clearly demonstrate compliance and ongoing improvements. During 2017 we conducted 38 UK Fast Forward visits, including all Tier 1 factories; as well as 15 2nd-Tier units (printers/Laundries and Packing Units); and 8 warehousing units. We will extend the Warehousing audits further in 2018.

ETI Turkey Working Group (Syrian Refugee Crisis): In 2017 we conducted unannounced audits and published guidance/training to suppliers to help ensure that Syrian workers can be employed ethically, safely, and are paid no less than the legal minimum wage.

Migrant Labour Model: The risk of Modern Slavery is increased in all countries where migrant labour is relied upon. In 2017, we collaborated with other brands in targeting countries to visit, assessing and monitoring our shared key factories, and in recruitment practices, in order to ensure that migrant workers are employed legally and ethically. Of our 330,000 tier 1 workers, 20,000 workers were reported to be migrant workers.

Business wide operational due diligence: We continue to carry out due diligence and risk assessments across the rest of the business in respect of Goods Not For Resale (GNFR). Every GNFR relationship has also been assessed and graded according to risk. Any supplier of GNFR rated as medium or high risk for the purposes of modern slavery now has our Anti-Slavery and Human Trafficking Policy incorporated into their contract, including an express commitment to comply.

(A) MODERN SLAVERY GOVERNANCE

Sourcing, Ethical and Supply chain Steering Group: Held quarterly and chaired by our CEO. Also in attendance are our COO, our FD, the Buying Directors and the Supply Chain Director. We review the current supply base and sourcing strategy, as well as highlight any key risks and actions which may be required to comply with River Island's Ethical Policy and Anti-Slavery and Human Trafficking Policy.

Modern Slavery Working Group: Reporting to the Chief Counsel, and with input and guidance from the Ethical Sourcing Manager, this cross-functional group of senior managers from all River Island operations (DC, stores, HR, GNFR procurement and UK Facilities) focuses on the supply of non-branded products, as well as River Island operations and services.

(B) MODERN SLAVERY AWARENESS AND TRAINING

Ethical Sourcing induction: All River Island Buying Teams and new joiners attend mandatory Ethical Sourcing induction sessions which give a detailed introduction to the ETI base code. In 2017 we also launched an online Modern Slavery training module. Completion of this interactive module is now mandatory for all Head Office functions, and shall ultimately be extended to all River Island UK sites. We monitor completion

rates and scores to ensure awareness and understanding of Modern Slavery in all relevant areas of the business. So far, we have trained 95% of our Head Office team.

Industry training and participation: As an active member of the ETI we regularly participate in briefing meetings, Working Group meetings and the Medium Sized Companies' Roundtable, providing valuable opportunities to raise awareness, share experiences/learnings and collaborate on resolution of key issues including modern slavery.

In 2017 we also participated in joint meetings between Fast Forward Members and government bodies, including HMRC and the Director of Labour Market Enforcement, Sir David Metcalf, to discuss reporting and enforcement of UK modern-slavery issues.

(C) NEXT YEAR

We are only at the beginning of a long journey towards the eradication of modern slavery on a global scale. We need to stay aware of the ever-changing trends and risks caused by political, environmental as well as economic factors, such as wars, migration, labour shortages and rising costs.

Our suppliers are our partners, and we stand a much better chance of successfully tackling modern slavery if we have a shared understanding and a shared accountability for the outcome. In 2018, we will continue to focus our work in our product supply chain. We will increase audits of factories, and we will continue to educate our suppliers (e.g. by extending our Interactive Modern Slavery Training Module to suppliers).

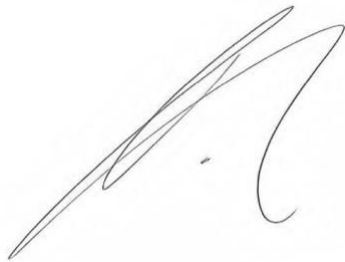
Our in-country teams are building greater awareness and experience of modern slavery, and the use of agents and trafficking, and we will continue to collaborate and share experiences and information with NGO's, other ETI brands, suppliers and local agents to build effective solutions (including worker remediation, detection and prevention).

We are investigating UK Fast Forward audit methodology for other high-risk areas. We are collaborating with suppliers in Southern China to raise awareness and mitigate modern slavery and trafficking risk due to the growing trend for migrant Burmese labour provided by agents.

We will also continue to add Tier 1 processors (printers and laundries) to our audit and risk assessment process. We will also build reporting and visibility of our key fabric mills (prioritised according to River Island business level and leverage) as a first step to enabling "Tier 2" visibility and risk assessment at a future stage.

In 2018 we will also continue to further map the GNFR supply chain and expand our risk assessment exercise. We will be exploring initiatives within each department to further reduce the risk of modern slavery subsisting, and we will carry out audits where necessary.

We will be looking at ways of measuring the performance of actions we take to combat modern slavery and human trafficking, to help us monitor how effective our practices have been.

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BEN LEWIS, CEO

RIVER ISLAND

**ETHICAL
POLICY**

FOR BUYERS & SUPPLIERS



INTRODUCTION

River Island is a family business with a strong fashion heritage and a brand reputation that is growing worldwide.

Our business culture is based on building long-term, meaningful and mutually beneficial relationships, with both employees and suppliers.

We have an underlying and long standing commitment to ethical trading, based upon the firm belief that business can be both profitable and responsible.

It is more important than ever that we communicate our brand values, ways of working, and expectations, clearly and consistently to all our partners.

We must also strive to comply with the most up to date legislation and regulations in every country we trade in.

This document outlines the River Island Ethical Policy which is at the heart of how we do business.

BEN LEWIS, CEO





ETHICAL POLICY

- Compliance with the River Island Ethical Policy is considered a key requirement of everyone working with our brand, and is included in the end-to-end assessment of both supplier, and buying team performance.
- Employees and suppliers who understand how we work, share our values, and work proactively to achieve and improve standards are an asset to our business.
- We do not want to work with those who are not willing to be open and honest, fail to take responsibility for meeting our Ethical Standards, or fail to make improvements towards meeting these standards.



THERE ARE 5 SECTIONS TO THIS POLICY

1. ETHICAL STANDARDS

2. RIVER ISLAND RESPONSIBILITY

3. SUPPLIER RESPONSIBILITY

4. SHARED VALUES AND RESPONSIBILITY

5. ETHICAL CHALLENGES, COLLABORATION AND BENEFITS



1

ETHICAL STANDARDS

We have adopted the ETI Base Code as the *minimum* standards that should apply to workers in our supply chain, as set out below. If local law sets higher standards than the base code then these legislative requirements should be met.

- Employment is freely chosen (not forced or enslaved);
- Freedom of association (freedom of speech; the right of workers to negotiate with employers);
- Working conditions are safe and hygienic;
- Child labour shall not be used;
- Living wages are paid;
- Working hours are not excessive;
- No discrimination is practised;
- Regular employment is provided; and
- No harsh or inhumane treatment is allowed.



2

RIVER ISLAND RESPONSIBILITY

- Be aware how sourcing, design, buying and trading decisions and actions can influence the supplier's ability to comply with the ETI Base Code.
- Seek the views of our suppliers and encourage feedback.
- Undertake activities (such as visits, audits and reviews) to be aware of the working conditions and labour practices in our supplychain.
- Proactively work with our suppliers to make any improvements required to meet our Ethical Standards.



3

SUPPLIER RESPONSIBILITY

- Actively manage and monitor working conditions in every factory that they use to manufacture River Island products, so as to achieve our Ethical Standards.
- Ensure that all sub-contractors or other third parties engaged in the supply of River Island products are aware of, and conform to our Ethical Standards.
- Alert us to any issues where they are unable to achieve our Ethical Standards.
- Proactively work with us to make any improvements required to meet our Ethical Standards.
- Use only pre-approved sites for River Island production.
- Manufacture products only at the approved site specified on the purchase order.
- Share ethical information with us openly and honestly, disclosing all details concerning production including: raw materials; place and method of manufacture; use of all sub-contractors or other third parties involved in the process.
- Permit River Island employees, or our appointed agents, access to all production facilities for the purpose of ensuring compliance with the River Island Ethical Policy (by appointment or on an unannounced basis).



4

SHARED VALUES & RESPONSIBILITY

To follow purchasing practices which are consistent with the delivery of our Ethical Standards:

- Understand production lead-times.
- Negotiate a fair price for the goods that we buy (benchmarking, market rate, open costings, garment engineering).
- Negotiate any changes to orders giving reasonable notice.
- Pay on time, and according to agreed terms.
- Communicate in a clear, accurate and timely way.
- Work together to improve the efficiency in the supply chain relationship.

THE MUTUAL BENEFITS OF ACHIEVING OUR ETHICAL STANDARDS ARE SHOWN BELOW...

FOR WORKERS



Fair and safe conditions

Job security

Motivation and skills

Improved standard of living

FOR SUPPLIER/FACILITY OWNERS



Stable and skilled workforce

Better productivity/ profitability

Increased competitiveness

Enhanced reputation & customer trust

FOR RIVER ISLAND



Better product and quality

Reliability and security of supply

Protect brand reputation

Meet & exceed customer expectations

5

ETHICAL CHALLENGES, COLLABORATION & BENEFITS

River Island recognises that many ethical and trading issues cannot be solved overnight. However, we strongly believe that gradual, sustainable and significant change is an achievable goal.

We can influence greater change with a wider collaboration of efforts (across manufacturing partners, other stakeholders, and brands), than through individual initiatives.





FIND OUT MORE...

If you have any queries about the River Island Ethical Policy – how it applies to you, and how to ensure that you can follow it in your daily role – please contact: **CSR@River-island.com**

RIVER ISLAND

RIVERISLAND.COM

RIVER ISLAND

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

1. POLICY STATEMENT

- 1.1 River Island's commitment to respect human rights is guided by:
 - 1.1.1 The United Nations ("UN") Universal Declaration of Human Rights;
 - 1.1.2 The International Labour Organisation's ("ILO") Core Labour Standards and its Tripartite Declaration of Principles;
 - 1.1.3 The UN Global Compact principles on Human Rights and Labour Standards;
 - 1.1.4 The UN Convention on the Rights of the Child;
 - 1.1.5 The UN Guiding Principles on Business and Human Rights, which detail the "Protect, Respect and Remedy" framework;
 - 1.1.6 The OECD Guidance for Multi-National Enterprises on responsible business conduct;
 - 1.1.7 The Ethical Trading Initiative Base Code; and
 - 1.2 River Island has fostered and continues to foster an organisational culture that respects dignity and human rights. This culture, both within River Island's operations and in our external business dealings, is implemented through our:
 - 1.2.1 Ethical Code of Conduct Practice (the Ethical Trading Initiative Base Code);
 - 1.2.2 Ethical Policy;
 - 1.2.3 Whistleblowing Policy;
 - 1.2.4 Supplier Agreement and River Island manuals (Factory Standards manual, Health and Safety Guidelines and Worker Employment Guidelines); and
 - 1.2.5 Anti-bribery Policy

together the "River Island Compliance Policies".
 - 1.3 River Island is committed to ethical trading, sourcing and procurement. Ethical sourcing and procurement refers to processes which respect fundamental international standards against criminal conduct and human rights abuse and respond immediately to such matters where they are identified with the aim of resulting in progressive improvements to the lives of people who contribute to supply chains and are impacted by supply chain decisions.
 - 1.4 Modern slavery and human trafficking are gross violations of fundamental human rights. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
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2. WHAT IS MODERN SLAVERY?

- 2.1 Slavery, in accordance with the UK's 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Modern slavery takes various forms all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain including:
- 2.1.1 **Forced labour** - is defined in international law by the ILO's Forced Labour Convention 29 and 2014 Protocol. It involves coercion, whether by direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/herself voluntarily;
 - 2.1.2 **Debt bondage** - victims are forced to work to pay off debts that realistically they will never be able to fulfill. Low wages and increased debts mean not only that they cannot ever hope to pay off the loan, but the debt may be passed down to their children;
 - 2.1.3 **Sexual exploitation** - Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution, escort work and pornography. Whilst women and children make up the majority of victims, men can also be affected. Adults are coerced often under the threat of force, or another penalty.
 - 2.1.4 **Criminal exploitation** - Victims are forced into crimes such as cannabis cultivation or pick pocketing against their will;
 - 2.1.5 **Domestic servitude** - Victims are forced to carry out housework and domestic chores in private households with little or no pay, restricted movement, very limited or no free time and minimal privacy often sleeping where they work.
 - 2.1.6 **Human trafficking** is the arrangement or facilitation of the travel of another person, either across borders or within a single country, with a view to that person's sexual or non-sexual exploitation.

3. SCOPE OF POLICY

- 3.1 This policy sets out River Island's commitment to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligations under the Modern Slavery Act 2015. It applies to all of our business units, operations, functions, and staff, including but not limited to legal entities, acquisitions, disposals, outsourcing arrangements, new products, new asset classes and strategic projects. These may be referred to generally as "the business" or "businesses".
 - 3.2 We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we expect our suppliers to comply with all of River Island's Compliance Policies and we expect that our suppliers and subcontractors will hold their own suppliers to the same high standards.
 - 3.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
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4. TRANSPARENCY IN OUR GLOBAL SUPPLY CHAIN

- 4.1 River Island is committed to ensuring that we adequately report our progress in eradicating ~~anti~~-slavery and human trafficking according to suitable benchmarks and frameworks, which we will continue to keep under review.
- 4.2 As a supplier of goods in the UK, River Island has an obligation under the Modern Slavery Act 2015 to publish an annual statement setting out the steps which we have taken during the financial year to ensure that slavery or human trafficking is not taking place in any of our supply chains or in any part of our business, or a statement that we have taken no such steps.
- 4.3 This is a developing area and River Island's approach will evolve over time. However, we envisage that some of the steps which we will be taking to ensure that our global supply chain is free from slavery and human trafficking will include:
 - 4.3.1 Mapping and creating a risk based assessment of our global supply chain;
 - 4.3.2 Monitoring and reviewing procurement processes and supplier contracts to ensure that suppliers are required to comply with appropriate standards relating to the use of labour in accordance with this policy;
 - 4.3.3 Proactive supplier risk management, including regular audit and verification of supplier contracts through its own personnel or through a third party independent auditor, on an announced or unannounced basis;
 - 4.3.4 Training of employees and management who have direct responsibility for supply chain management, particularly with respect to mitigating risks within the supply chain, and extending our training processes to those within our supply chain where reasonably possible and appropriate to do so; and
 - 4.3.5 Identification of key performance indicators allowing progress to be benchmarked and monitored.
- 4.4 The annual statement will be approved by the Board of Directors and signed by a director authorised by the Board of Directors and published on River Island's website.

5. REPORTING OBLIGATIONS

- 5.1 We are committed to investigating and addressing concerns relating to modern slavery and human trafficking which are raised over and above our own due diligence and anti-slavery risk assessments.
 - 5.2 Staff are expected to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred, or that it may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.
 - 5.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or Contact our Ethical Trade Department on csr@river-island.com
 - 5.4 Modern slavery concerns or grievances should in the first instance be communicated to our Ethical Trade Department by email on csr@river-island.com. If the matter concerns River
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Island employees, the complaint may then be passed internally to our Human Resources team. River Island recognises that an individual may not wish to be identified during the course of raising a concern. In such circumstances, River Island will do everything possible to protect the person's identity and will not disclose it without their consent. If it proves impossible to resolve the matter without revealing the individual's identity, the member of management dealing with the matter will discuss with them whether and how to proceed. In some cases, however, confidentiality cannot be absolutely guaranteed as the very fact of the investigation may serve to reveal the source of the information, the statement of the person raising the concern may be needed as part of evidence against the perpetrator, or legal proceedings at a later stage may require the individual to appear as a witness.

- 5.5 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery or human trafficking of whatever form is, or may be, taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Ethical Trade Department immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

6. WHAT ACTION WILL RIVER ISLAND TAKE IF A VIOLATION OF THIS POLICY IS IDENTIFIED?

- 6.1 The action which the River Island will take will vary, depending on the nature and severity of the impact which has been identified either through our own due diligence, or due to a complaint, campaign or protest action. Verification of the allegations or human rights issue, and the given facts in the case, are a critical starting point and may require independent investigation and, where the issues and claims are complex, access to expert advice.
- 6.2 If a direct cause or connection to the River Island's business can be shown, then any follow-up remedial action will depend on the degree of influence that River Island has over the situation and its relationship to the affected parties. Some situations may require co-operation or engagement with government agencies, judicial authorities or non-government bodies. In some cases existing operational-level grievance mechanisms will be sufficient to resolve an issue.
- 6.3 If, following support and guidance to remediate any issue which is identified, any contractor, subcontractor, supplier, or vendor violates this policy, or wilfully, knowingly or negligently allows subordinates to do the same, River Island will reconsider that commercial relationship with that organisation, which may lead to the termination of contracts or other sanctions. Violations, or suspected violations, will be reported to law enforcement agencies where appropriate.
- 6.4 Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. Any employee who breaches this policy will face disciplinary action which could result in dismissal for misconduct or gross misconduct.

7. GOVERNANCE AND RESPONSIBILITY

- 7.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You must ensure that you read, understand and comply with this policy.
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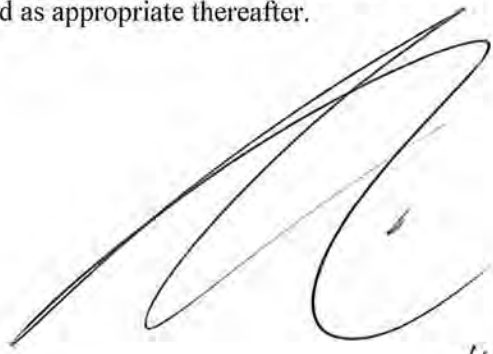
- 7.2 The River Island Compliance Policies support delivery of our commitment to eradicate modern slavery and human trafficking in our business and supply chain. Our Ethical Trade Department monitors compliance with these Policies.
- 7.3 We recognise that senior-level participation is paramount. As such, our CEO, the Board of Directors and a cross-functional team of specialists in procurement and outsourcing, risk and human resources are involved in our group-wide due diligence and compliance processes.
- 7.4 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 7.5 The Ethical Trade Manager has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery and human trafficking.
- 7.6 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 7.7 Where a business enters into internal or external outsourcing arrangements, it may delegate operations but cannot delegate responsibility or accountability for human rights and anti-slavery and must ensure appropriate contracts, monitoring frameworks and reporting procedures are in place in accordance with this policy.

8. COMMUNICATION AND AWARENESS OF THIS POLICY

- 8.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 8.2 Our approach to modern slavery and human trafficking shall be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Signed

Date in force



11/4/2018

fast forward

Building sustainability in UK supply

Fast Forward is a collaborative initiative to build legal and ethical labour standards compliance within the UK garment and general merchandise retail supply base.

The Fast Forward programme objectives are to:

- » Measurably improve labour standards compliance within the UK supply base.
- » Prevent exploitation of and provide access to remedy for vulnerable workers.
- » Improve honesty, openness and trust between retailers and the UK supply base.
- » Engender an ownership and aspiration in the UK supply base to operate clean, safe, ethical and efficient production units.
- » Facilitate a more level playing field for competition amongst suppliers.

The Fast Forward programme features:

- » A consistent straightforward ethical compliance standards regime
- » Interactive, regional training workshops to the full UK supply base.
- » A point based, consistent, concise base line audit process which strands factories into one of four categories: Under Review; Developing; Performing; Leading.
- » Access to remedy for workers through a multi-language whistleblowing hotline.
- » A rigorous corrective action plan regime with expert support mechanisms.
- » Creation of a supplier community focused on continuous improvement.

The Fast Forward programme requires the UK supply base to evidence that:

1. Workers are eligible to work in the UK.
2. Workers are paid at least national minimum wage.
3. Workers are treated fairly in accordance with employment law.
4. Workers are provided with a safe and hygienic working environment.
5. Workers are not subject to mistreatment and have access to remedy.
6. Taxes are accurately calculated and paid in accordance with UK law.

For further details, please contact Fast Forward at enquiries@fastforwarduk.org or 01276 919090

