



# ALLSAINTS

MODERN SLAVERY STATEMENT FY 22/23

# INTRODUCTION

Under the Modern Slavery Act 2015, companies carrying on business or part of a business in the UK and which provide goods or services with a turnover of £36 million or more are obliged to publish an annual Slavery and Human Trafficking Statement setting out the steps the company has taken to ensure slavery and human trafficking is not taking place in its supply chain or its own business.

This statement relates to the financial year 2022/23. It is made by All Saints Retail Limited (“AllSaints”, “we” or “our”) and sets out the steps that AllSaints has taken to ensure that modern slavery is not taking place in its supply chains or in any part of its business. This statement has been approved by AllSaints’ board of directors.

Established in London in 1994, AllSaints is a global brand with an independent spirit. We are a community that starts with our worldwide customer base, spread over 50 countries worldwide, across all ages and demographics. Headquartered in East London with studios in LA, Taipei, Seoul and Tokyo, our more than 2,000 global team members work hand-in-hand with our 56 manufacturing partners (and 149 Tier 1 manufacturing sites as of November 2023) to create full collections of womenswear, menswear, footwear and accessories. We also proudly deliver every aspect of the brand experience in-house, from store design and construction to our online platforms. Our customers can find AllSaints in international stores, concessions and franchises across 34 countries as well as our online platforms and our partnerships with other global online marketplaces.





## WE ARE RESPONSIBLE

One of our core values as a business is “We are responsible”, pushing us to look after each other, our customers, our suppliers, our communities and our planet. Throughout the design and manufacturing of all our collections, AllSaints has a deep commitment to responsible practice – from sourcing raw materials to reducing water usage, to being a member of AMFORI, a leading business association for sustainable trade, supporting companies across the globe to operate successful and responsible businesses, by improving the Environmental, Social and Governance performance of their supply chains. AllSaints is certified to sell products to a number of industry standards that put human rights as central tenets of their frameworks including Global Organic Standard (GOTS), Organic Content Standard (OCS) and Leather Working Group (LWG)

This commitment extends to our company culture and operations. From the recruitment process to training all employees on diversity, equality and inclusion, AllSaints strives to be an amazing place to work. We're proud to be a winner of a number of awards in 2023 for our culture, diversity and CSR, including being listed in the top 100 Inspiring Workplaces, and winning a charity partnership award for our circularity-based partnership with UK homeless charity Shelter.



AllSaints anti-trafficking partnership with NotForSale

## RESPONSIBLE SOURCING

AllSaints does not own the companies or factories that produce our goods, but we recognise our responsibility for the workers in those factories to ensure that they are able to make our products freely and in good working conditions. We source the majority of our products from 149 direct first-tier product suppliers based overseas in Cambodia, China, India, Mexico, Peru, Philippines, Portugal, Romania, Spain, Thailand, Turkey, UK and Vietnam (as of November 2023), many of which work with other retailers. We believe that it is important to engage with product suppliers who are reputable and considered to be ethical suppliers globally.

AllSaints is serious about tackling the problems and risks of modern slavery and human trafficking beyond its supply chain and has been a partner of Not For Sale, a charitable organisation which protects people and communities from modern slavery and human trafficking, for over 13 years. Their work provides survivors and at-risk communities with safety, stability, education and economic opportunities. AllSaints' partnership with this organisation goes beyond monetary value with employees of AllSaints taking part in Not For Sale projects in Thailand in 2022, 2019 and 2016, in Peru in 2022, and Romania in 2014, as well as sending a global team of eight to volunteer in summer of 2023 with displaced children or those at risk of trafficking supported by NotForSale's project across Myanmar, Thailand and Laos.



## DUE DILIGENCE & REMEDIATION

AllSaints commits to act diligently in (a) assessing actual and potential adverse impacts of our business against the values and principles of the Ethical Trade Initiative (ETI) Base Code, as laid out by the International Labour Organisation (ILO) identifying in our business and our supply chains where the most significant risks for these adverse impacts may occur and (c) acting upon them with the aim of preventing and/or addressing them in line with the requirements of the ETI and ILO. In this context, we have undertaken the following due diligence steps.

# ASSESSMENT OF MODERN SLAVERY RISK

Although the risk of modern slavery in our business is low, we assess the following areas for risk:

Use of recruitment agents	General recruitment practices
Young and vulnerable workers (including foreign migrant workers)	Management systems and processes
Dormitories	Wages and Benefits



# MAPPING & MONITORING OUR SUPPLY CHAIN

<p>We use our internal ESG and Supply Chain Management tool 'Origin' to manage and map our supply chain so we have a clear understanding of our sourcing locations and where the highest risk of Modern slavery may occur.</p>	<p>We continuously gather and assess information about working conditions in our 149 Tier 1 production sites by collecting accepted independent third party audits (criteria for accepted audits and audit frequency are outlined in our <a href="#">Social Audit Requirements</a>)</p>	<p>We monitor the risk of regions we operate in using the Amfori ESG Risk Compass.</p>
<p>Using our internal ESG and Supply Chain Management tool 'Origin' we monitor and drive continuous improvement of any problems identified through the audits that are conducted by working with Amfori and our Suppliers directly to work together to find acceptable solutions and timelines for realistic and effective positive change.</p>	<p>Every Supplier and tier 1 manufacturing process is required to onboard on 'Origin', During this process it is a mandatory requirement that they complete a 'Social Compliance Self Assessment Questionnaire'. The results of which we will cross check with audit reports to add another layer to our due diligence process.</p>	

## RESPONSIBLE SOURCING POLICIES

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business and that our products are ethically sourced. Our commitment to ethical sourcing and zero tolerance approach to modern slavery and human trafficking is written into the following policies:

## ALLSAINTS' ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

This policy was incorporated into our business in January 2017 and was added to our Supplier Manual, which is distributed to all our direct first-tier product suppliers to review, adhere to and sign. The policy also forms part of our employee policies and outlines the requirements of employees at AllSaints and other organisations that work on our behalf to ensure the prevention, detection and reporting of any modern slavery in any part of the business or supply chains. Any breach of this policy may result in disciplinary action for employees and can otherwise result in the termination of any business relationship.

## ALLSAINTS' CODE OF CONDUCT

We use this code to outline the minimum requirements that all direct first-tier product suppliers must uphold in relation to their workers such as employment being freely chosen, no harsh or inhumane treatment of workers, and ensuring that child labour is not used. This code is based on the Ethical Trading Initiative (ETI) Base Code, which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice. The code is contained in our Supplier Manual.



## ALLSAINTS' COTTON SOURCING POLICY

This is also contained in our Supplier Manual. It specifically prohibits any direct first-tier supplier of AllSaints' products from sourcing its cotton from regions where there is a significant risk of modern slavery. AllSaints is committed to not knowingly sourcing cotton for the manufacture of any of our products where we believe there is a high risk of exploitation or the use of forced labour.

## AUDITING OUR SUPPLY CHAIN

As part of our initiative to identify and mitigate risk within our product supply chain, we undertake the following activities:



Inspecting, undertaking a compliance review, and auditing new sites of direct first-tier product suppliers prior to production and sourcing. Both unannounced and semi-announced on-site audits are conducted on an ongoing basis by 3rd party auditing bodies to observe compliance with industry standards and AllSaints' ethical sourcing policies. Our ESG team review any non-compliances with suppliers and work with them to ensure timely resolutions of any issues



Continuing to require all direct first-tier product suppliers to complete and sign a supplier profile questionnaire and setup form. This confirms that the supplier has, among other things, a human rights compliance programme in place and complies with employment laws in that jurisdiction.



Continuing to require all direct first-tier product suppliers to agree to and comply with AllSaints' Anti-Slavery and Human Trafficking Policy, Code of Conduct and Ethical Trading Initiative, Policy on Cotton Fiber Sourcing and anti-bribery and corruption terms and conditions contained in the AllSaints Supplier Manual.



Ensuring that our employees, contractors and anyone else acting on AllSaints' behalf are aware of our whistleblowing telephone line and the accompanying whistleblowing procedure/policy so that risks such as modern slavery in our business dealings can be reported in confidence for subsequent investigation. We want to make sure that there are no barriers in reporting any non-compliance with our ethical sourcing policies.

# KEY PERFORMANCE INDICATORS

*(Previous years - before 2022)*

*In our previous statements, AllSaints chose to focus on the below actions in order to: (i) ensure compliance; and (ii) raise awareness of the importance of protecting against modern slavery and preventing it from contaminating our business in any way:*

1

**Ensure that all current and new direct first-tier product suppliers sign up to our revised Supplier Manual, which includes the Anti-Slavery and Human Trafficking Policy and amended terms and conditions of supply to include modern slavery and anti-bribery provisions.**

All relevant first-tier product suppliers have signed up to the revised Supplier Manual and any new suppliers are required to sign up to the revised Supplier Manual as part of AllSaints' supplier onboarding procedure.

Update: In addition to achieving this objective, we have now moved the onboarding process to our supplier management tool, Origin, launched in early 2023. This allows us to have all documents in one place, easily accessible to both us and the supplier.

We continue to ensure buying, design and production teams are aware of and abide by the onboarding procedure.



AllSaints anti-trafficking partnership with NotForSale

# KEY PERFORMANCE INDICATORS

## 2

**Incorporate our Anti-Slavery and Human Trafficking Policy into our standard form employee contract and into our induction process for all individuals who work for us and provide training when considered necessary for existing employees.**

This Policy is widely available and accessible by all colleagues across the business as part of AllSaints' internal policy system.

AllSaints has trained its internal teams deemed to have a higher risk of exposure to issues arising from modern slavery and human trafficking. We are committed to ensuring that these individuals are adequately informed about modern slavery and equipped to raise any concerns they might have.

The Policy also forms part of AllSaints' new starter onboarding process to ensure that all new employees are trained and aware of AllSaints' stance on the issue from the outset.

Update: All employees will be trained on compliance with our anti-slavery and trafficking policy this year.



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# KEY PERFORMANCE INDICATORS

3

**Instigate a formal training programme to teach relevant staff, including Buying, Merchandising and Sourcing teams about the risks of modern slavery and how to effectively monitor and prevent it. We will also ask our direct first-tier product suppliers to provide training to their staff, suppliers and providers.**

As above, training has been rolled out to all relevant AllSaints teams. AllSaints has also requested that our first tier product suppliers provide relevant training to their staff, suppliers and providers.

Update: Through the Origin platform, we have been able to create and then upload training related to Modern Slavery that we will begin to push out to our suppliers.



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# KEY PERFORMANCE INDICATORS

4

## **Become a member of Sedex.**

AllSaints became a member of Sedex, a global organisation which allows its members to manage performance around labour rights, health and safety and business ethics through the sharing of data.

Update: In early 2023, we made the decision to become members of AMFORI, an NGO with extensive experience and knowledge of supporting businesses to develop. As a result we are no longer members of SEDEX. We will however continue to accept SMETA audits so our suppliers aren't burdened by multiple audits but believe AMFORI will strengthen our overall social

5

## **Continue to work with Not For Sale to support their efforts to protect people and communities from human trafficking.**

AllSaints continues to support Not for Sale, with employees volunteering their time to take part in the Not For Sale project in Thailand this year. AllSaints are also continuing to encourage vendors to commit funds and make pledges to Not for Sale in the future.

Update: as stated above, in September 2022, we sent a team of AllSaints volunteers from across the organisation to Thailand for a week to help Not For Sale's activities on the ground.



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# FY 2022/23 SUMMARY

FEB 2022 - FEB 2023

In addition to the above, we have in the last twelve months :

1

**Embarked on a long-term sustainability journey**, putting human rights and due diligence at the core of our strategy. We continue to celebrate artisanship in our supply chain and ensure that our social, human and environmental impacts are continually monitored and reduced over time.

This year we have strengthened our Conscious Commitment by renewing our certifications of the Better Cotton Initiative, GOTS, LWG and adding OCS to our mix of more sustainable cotton.

We have also committed to a number of industry-wide sustainability initiatives, such as signing up to The BRC's "Road to Net Zero", committing to be Net Zero by 2040. In addition to this we have signed up to WRAP's Textiles 2030, focusing on reducing the environmental impacts from the UK's textile industry.

2

**Brought our key suppliers from around the globe together** in the UK in summer 2022 to talk about our overall business and ESG strategy, core business values and how we can collaborate to ensure every worker in our supply chain feels valued, and is treated with respect and dignity.

3

**Regularly review our policies** to ensure they remain fit for purpose. An annual review process involves team members from ESG, Technical, Design, Distribution centre and legal.

4

**Built up a new ESG team and function**, reporting to our Global Production Director. This team will have responsibility for AllSaints' sustainability reporting, due diligence processes including Modern Slavery, working with suppliers to drive uptake of more sustainable materials, and supporting the wider business with transformation to a Net Zero future.



## COMING 12 MONTHS

February 2023 - February 2024  
In the coming financial year we will focus on....

### ONBOARDING OF ORIGIN PLATFORM

Over the last year we have been working to develop Origin. Origin is a new, tailor-made responsible sourcing and supply chain management platform to improve the transparency and traceability of our product supply chains to aid our monitoring and remediation of social, environmental and governance challenges. It has been designed to allow for better transparency and the ability to access data further upstream in our supply chain in a much cleaner and more organised way which will allow for more effective and targeted risk-based due diligence by the relevant teams in our business.

Being inclusive and having our whole supply chain on board with us was very important and in February 2023 we began rolling it out to our suppliers, giving them no-fee access to the platform meaning there will be no financial pressure added to our suppliers and their production facilities.

This means that every facility that has contact with our product, from our Tier 1 garment manufacturers to the farms where the fibres are grown, will be able to access this platform. Once the facility is registered by the 'parent facility' (ie. the preceding organisation in the supply chain) they will be given access to Origin where they will be able to load information about themselves; including their location, production processes, employee information, and other relevant information and evidence to demonstrate their compliance to national and international laws, as well as to the standards and certifications that we require them to adhere to. Origin will enable us to simplify our due diligence efforts, helping ensure suppliers are on board with us and our sustainable and ethical commitments. It will also allow for better transparency for our suppliers too, who will have a clearer view of our relationship and their own supply chains.



## COMING 12 MONTHS

### **SUPPLY CHAIN MAP OF TIER 1 - PUBLIC DISCLOSURE**

Using the data we are collecting through Origin, we will disclose our tier 1 suppliers and the locations of our key production sites on our website. We are volunteering this information to show our commitment to responsible production and traceability, and to bring our customers and team members on our sustainability journey

We hope to grow and add to the information displayed, and improve the functionality over the coming years.

### **BECOME ACTIVE MEMBERS OF AMFORI**

We intend to build on our membership of AMFORI, utilising their platform to look at any key trends coming through the audits of our suppliers, attending both UK and international meetings of the organisation and its membership base. We look forward to contributing to the AMFORI network, working to improve global supply chain practices.

### **REVISE AND PLAN NEW COMPANY-WIDE TRAINING FOR MODERN SLAVERY**

Working with our People and Culture colleagues, we will develop a high-level training programme on ESG covering key topics such as Modern Slavery and our Ethical Policies.





## COMING 12 MONTHS

### **REVIEW OUR CONTRACTS WITH KEY GOODS NOT FOR RESALE SUPPLIERS**

Working with legal, store design and distribution centre team members, we will review our contracts across the organisation, to ensure we are strengthening and tightening our due diligence procedures.

### **TRAINING OF OUR SUPPLIERS**

Through Origin, we are able to provide quick, digestible and free training resources for our suppliers on topics such as working hours, health & safety and modern slavery. This training will be mandatory for all suppliers onboarding with us. We also require facilities with relevant non compliances found to retake the training and pass a test to prove that the materials have been understood and can be used to help plan the remediation of the non compliance(s) found.

### **CONTINUING TO ENGAGE OUR SUPPLIERS**

We will host our largest strategic suppliers (those we have longest relationships with and spend the largest volumes with) on an off-site day in the UK, discussing our business strategy for the coming year. A significant portion of the day will be spent discussing our sustainability journey, including key expectations around social audits, transparency and working conditions.

## SUMMARY

ALLSAINTS IS ALWAYS LOOKING TO DEEPEN OUR INSIGHT INTO HOW OUR SUPPLY CHAINS FUNCTION AND WHAT THEIR WORKING PRACTICES ARE, AND CONTINUOUSLY STRIVE TO STRENGTHEN OUR OWN INTERNAL APPROACH TOWARDS ADDRESSING MODERN SLAVERY AND HUMAN TRAFFICKING.

ALLSAINTS REMAINS COMMITTED TO TACKLING THE PROBLEM OF MODERN SLAVERY, HUMAN TRAFFICKING AND SERVITUDE IN OUR GLOBAL SOCIETY, AND WE WILL CONTINUE TO TAKE STEPS TO MITIGATE THE RISK AND PREVENT THE OCCURRENCE OF THE SAME IN ANY PART OF OUR BUSINESS. WE HOPE TO BUILD UPON THE PROGRESS WE HAVE ALREADY MADE IN CONNECTION WITH THIS AIM.

Peter Wood - Chief Executive Office & Director  
AllSaints Retail Limited

