

HUSH

Modern Slavery Act Statement 2024-2025

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INTRODUCTION

Hush's seventh Modern Slavery Statement for the financial year ending in March 2025 complies with Section 54 of the UK Modern Slavery Act 2015 and summarises our modern slavery prevention activities and commitments. We currently do not have any additional modern slavery reporting obligations.

We aim to create high-quality, long-lasting products while ensuring a safe and respectful working environment for everyone in our business and supply chain.

Modern slavery, encompassing forced and child labour and human trafficking, remains a critical issue, with the International Labour Organization reporting 27.6 million people trapped in forced labour in 2021. We do not tolerate modern slavery in any part of our business or supply chain. In accordance with the UN Guiding Principles on Human Rights, we recognise our duty as a business and as part of the broader industry to uphold and remedy the rights of all individuals working on behalf of Hush.

STRUCTURE, BUSINESS AND SUPPLY CHAINS

ABOUT HUSH

Established in 2003 by our Founder, Mandy Watkins, Hush is an online fashion and lifestyle brand that offers women’s clothing, footwear and accessories. Our products are available for purchase through our website (hush-uk.com) and through Next online, M&S, Morleys, Fenwick and John Lewis & Partners’ websites, as well as in 31 John Lewis concessions, 2 Fenwick stores and 2 Morley’s stores. Our team consists of 135 employees, with 100 based at our head office in Clapham, London, and 35 working across various John Lewis, Fenwick and Morley’s stores in the UK. We directly employ our staff and occasionally engage freelancers and contractors. Additionally, we utilise the services of a third-party managed warehouse based in the UK.

Hush is a private limited company registered in England and Wales under registration number 3480753. True Capital holds a 72% stake in our business, making it the majority owner, while the remaining shares are held by founders Mandy Watkins and Rupert Youngman, along with other senior Hush executives, both current and former.

We are delighted to announce we became a B Corp company in 2024, connecting us with a global community of businesses working to elevate social and environmental standards.



KEY BUSINESS FIGURES*



Established 2003



84 countries sold into



1 UK based office



1 Third-party managed
UK based warehouse



135 employees with 100 based in
head office and 35 across John Lewis,
Morley’s and Fenwick concessions

*All figures accurate as of 31st March 2025

OUR STOCK SUPPLY CHAIN

We divide our suppliers into three categories: stock, non-stock and third-party branded suppliers.

SUPPLY CHAIN TIERS

Tier	Process
Tier 1	Main Production Site
Tier 2	Primary Process Subcontractor E.g. stitching, cutting, packing
Tier 3	Secondary Process Subcontractor E.g. embroidery, embellishment, laundry
Tier 4	Fabric and Components E.g. fabric mills, trims
Tier 5	Raw materials
Non-Stock Suppliers	Goods and services that support our business operations
Third-Party Branded Suppliers	Other third-party branded products sold through our website

KEY SUPPLY CHAIN FIGURES*



10

Tier I manufacturing countries



96%

of Hush production takes place in
the following 4 countries China,
India, Tunisia and Turkey



39

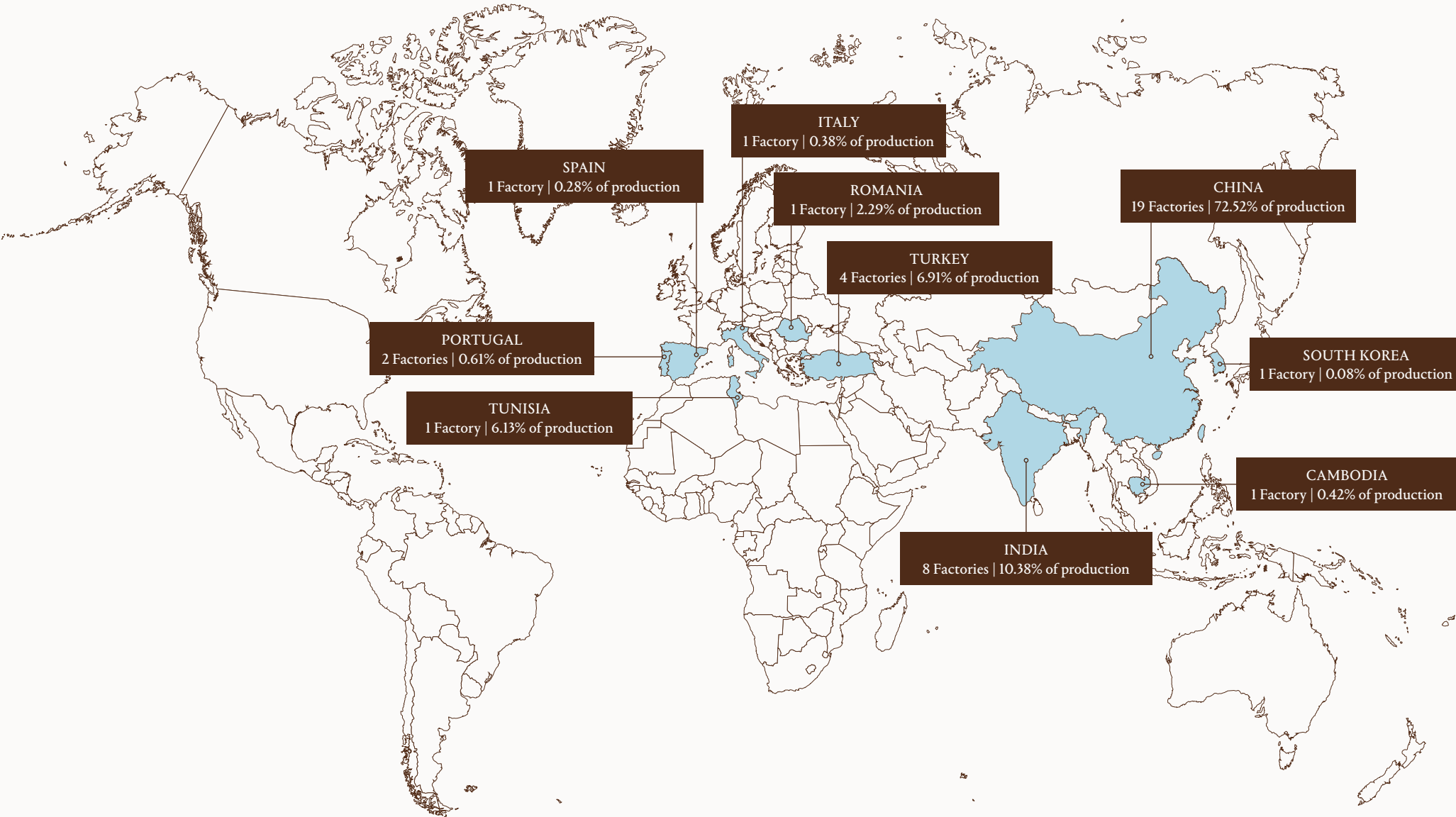
Tier I manufacturing sites



6

third-party brands sold through
our website

TIER ONE FACTORY LOCATIONS AND % OF HUSH PRODUCTION



STOCK SUPPLIERS

In 2024, we undertook a supply chain consolidation exercise to refocus on strengthening relationships with key suppliers and reducing the number of third-party brands we sell.

We have 39 Tier 1 approved factories (defined as our main manufacturing sites) in Cambodia, China, India, Italy, Korea, Portugal, Romania, Spain, Tunisia and Turkey. We are in the process of mapping Tier 2 suppliers and commit to completing this process by the end of the year.

We conduct regular checks to track the sites used for manufacturing our products, which include requiring new suppliers to identify all units involved in production before we place orders, mandating suppliers to provide Tier 1 factory information, confirming site usage with suppliers every six months and asking for evidence of site production information during site assessments in our existing supplier programme.





NON-STOCK SUPPLIERS

We source a range of goods not for resale (GNFR) and services to support our business operations. These include printing, packaging, labelling, office cleaning, recruitment, warehousing, transport and shipping. Our non-stock suppliers are contractually required to comply with Hush's supply chain policies described below. However, they are considered lower risk than our stock suppliers and are therefore not currently part of our wider due diligence programme.

THIRD-PARTY BRANDED SUPPLIERS

Most of our products are sold under our own brand, but we also offer a small number of third-party brands on our website – a total of six as of the end of the last financial year. These brands are also contractually required to comply with our supply chain policies. We have developed a self-assessment questionnaire to help us understand third-party brands' current sustainability performance and where they might need support.



OUR POLICIES



MODERN SLAVERY GOVERNANCE

Hush’s human rights and modern slavery prevention programmes are overseen at the highest level by our CEO, and are implemented by our legal, technical, human resources (HR) and product teams. We also have a Sustainability Committee in place.

MODERN SLAVERY GOVERNANCE STRUCTURE

CEO - overall responsibility for championing human rights and preventing modern slavery



Sustainability Committee - comprising representatives throughout the business who meet regularly to raise awareness of and act upon emerging sustainability issues and legislation.



Legal, human resources and product teams – responsible for developing and implementing modern slavery related policies and procedures, protecting employee and supply chain workers’ rights and conducting supplier reviews.

BUSINESS POLICIES

We have policies and procedures in place to protect our employees throughout the recruitment process and during their time with us. Our Employee Handbook contains the following policies relevant to employee rights:

- Anti-Corruption & Bribery Policy
- Anti-Harassment and Bullying Policy
- Anti-Slavery & Human Trafficking Prevention Policy
- Code of Ethics Values Statement
- Corporate Social Responsibility Policy
- Disciplinary Procedure
- Equal Opportunities Policy
- Grievance Procedure
- Health & Safety Policy
- Whistleblowing Policy
- Human Rights Policy (to be introduced in 2024-2025)

All employees have access to the Employee Handbook on our internal HR portal.



SUPPLY CHAIN POLICIES

We develop our supply chain policies in partnership with an external human rights expert, and we conduct regular reviews to ensure they reflect current best practices. These policies encompass all suppliers—whether they provide stock or non-stock items—as well as third-party brands, recruitment agents, labour providers, homeworkers, intermediaries, and subcontractors. The table below provides details about our supply chain policies, codes and statements.

SUPPLY CHAIN POLICIES

Policy, Code or Statement	Description
Supplier Code of Conduct	This code sets out our supplier expectations to ensure safe and fair working environments and practices within our supply chain. It is based on the ETI Base Code, an internationally recognised code of labour practice, founded on the conventions of the International Labour Organization (ILO).
Child Labour & Young Worker Policy	This policy sets out our requirements for ensuring children are not working within our supply chains, that young workers are adequately protected at work and remediation guidelines if child labour or young worker hazardous work is identified. It is based on the United Nations Convention on the Rights of the Child, the International Labour Organization's (ILO) Conventions, the UN Guiding Principles on Human Rights and the Children's Rights and Business Principles.
Supply Chain Whistleblowing Policy	This policy supports suppliers to establish proper worker dialogue channels that are accessible, safe and understandable to enable workers to raise concerns or disclose information confidentially.
Cotton Sourcing Statement	This statement sets out our reasons for prohibiting cotton sourced from Uzbekistan, Turkmenistan and XUAR region in China owing to ongoing concerns about child and/or forced labour.
Supplier Terms	These terms set out a framework governing how business should be conducted between Hush and our suppliers. It contains contractually binding agreements relating to production as well as our sustainability, anti-slavery and human trafficking and sub-contracting standards.
Migrant and Agency Worker Policy	DRAFT: This policy describes our requirements for suppliers and agencies to ensure migrant and agency workers are protected in the workplace, including a worker checklist for them to action prior to, during and after employment. It is based on the Universal Declaration of Human Rights, The UN Guiding Principles on Human Rights, the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Dhaka Principles for Migration with Dignity and the Responsible Recruitment Toolkit.
Supply Chain Homeworking Policy	DRAFT: This policy communicates our stance on homeworking in our supply chain and our commitment to work with suppliers to assess and improve conditions where homeworking occurs. It also contains our requirements for suppliers and intermediaries to put in place systems to protect homeworkers.
Responsible Exit Guidelines (internal only)	DRAFT: These guidelines set out the steps our internal teams and suppliers can take to minimise the impact of exiting a site on workers.



SUPPLY CHAIN POLICIES (Cont..)

Our new Migrant and Agency Worker and Supply Chain Homeworking policies are still in the draft phase. We hope to have these ready for deployment in the near future, along with internal guidelines, currently under development, on how to exit a supplier responsibly should the need arise. We commit to publishing these external facing policies on our website during the next financial year.

Our Supplier Sustainability Standards contain most of the documents mentioned above. As part of the onboarding process, suppliers must review and sign a declaration that confirms their commitment to these Standards. In the Due Diligence section that follows, we detail our approach to monitoring compliance and the measures we take if suppliers fall short of our requirements.

GRIEVANCE AND WHISTLEBLOWING MECHANISMS

Our employees have two ways to report concerns:

- They can raise concerns through Hush's Grievance Procedure.
- They can report more serious issues using Hush's Whistleblowing Policy.

We encourage everyone within the business to raise concerns in good faith through this safe channel without fear of retribution. We will investigate all reports fairly and confidentially and provide remediation when required. We will also provide feedback to whistleblowers on the progress and outcome of their concerns. We have a dedicated whistleblowing email address.

We also have a Supply Chain Whistleblowing Policy to help suppliers create safe and accessible channels for workers to raise concerns.



DUE DILIGENCE



Our goal is to build stable, lasting relationships with suppliers who align with our values. We seek to influence and support them over time in improving their product quality and sustainability standards.

NEW SUPPLIERS AND FACTORIES

We use our stock new supplier and factory onboarding process to assess new sites for their ability to meet Hush's sustainability and technical standards.

Here is an overview of our process:

NEW SUPPLIERS/FACTORY ONBOARDING PROCESS

1.
The Product team identifies a new supplier/factory and sends out our new supplier form which is designed to gather information about the supplier's human rights and environmental performance.
2.
The supplier completes the new supplier form and provides an ethical trade audit for each proposed Tier 1 site.
3.
The Technical team reviews and grades the audit. If the site meets Hush's requirements, it is approved. If the site falls short, the supplier is asked to address the issues, and support is provided if necessary. A pre-assessment visit may be conducted if greater visibility on the site's working conditions is necessary. If the site is unable or unwilling to improve, it will not be approved.

EXISTING SUPPLIERS

We have an ethical assessment programme in place for our Tier 1 stock suppliers. We support our suppliers by conducting site visits, factory assessments and remediation. We have partnered with a human rights consultancy, which support us in carrying out this work.

Once a site has successfully completed our onboarding process and begins producing Hush orders they move into in our ethical assessment cycle. The timing of assessments depends on the grading the site received during the onboarding process. During site assessments, the assessor evaluates the factory's ability to adhere to Hush's Supplier Code of Conduct and interviews vulnerable worker groups to gain further insight into their working conditions.

We monitor modern slavery indicators during assessments. In the event that indicators are identified, we undertake a thorough investigation, in partnership with human rights organisations to implement a plan of action that serves the best interests of the workers. To date, we have not found any instances of modern slavery through our investigations.





MODERN SLAVERY INDICATORS

- Presence of migrant workers
- Use of labour providers and recruitment agents
- Evidence of informal or indirect recruitment
- Child labour
- Accommodation tied to employment
- Abuse of vulnerability
- Deception during recruitment
- Restriction of movement
- Isolation from other workers or in remote locations
- Violence
- Intimidation or threats
- Retention of IDs
- Withholding of wages
- Debt bondage
- Abusive living or working conditions
- Excessive working hours

REMEDIATION

Our approach to site assessments focuses on problem-solving rather than fault-finding. If we identify any non-compliances during assessments, we support the supplier and factory to implement corrective action plan and resolve any issues found. Our assessors have the autonomy to address non-compliances with the factory directly to ensure timely resolution and support.

We expect the factory to continually improve over time. If serious repeated violations occur, and the site is unwilling to make improvements, Hush reserves the right to terminate all business with the supplier. We have internal responsible disengagement guidelines in place to ensure that we exit sites in a way that minimises the negative consequences for workers.



RISK ASSESSMENT



SUPPLY CHAIN

Our risk assessments activities include assessments and site visits, supplier self-assessment questionnaires and grievance mechanisms reports. We consider the following risk factors: product and service type, geographical location, worker type, including vulnerable worker groups, high-risk labour practices, such as excessive working hours, and the likelihood of involvement of recruitment and labour agencies and intermediaries. Our risk assessments have determined that our stock supply chain contains the greatest risk of modern slavery, so this is where we have been focusing our efforts through our ethical trade programme.

VULNERABLE WORKERS

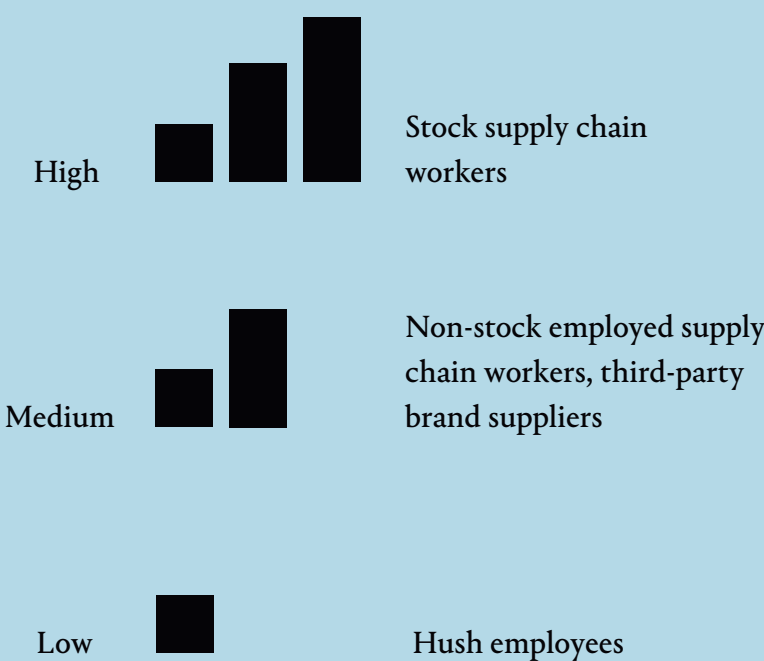
In order to protect vulnerable workers in our supply chain, such as Uyghur and other Turkic and Muslim-majority people, migrant and agency workers and homeworkers, we conduct worker mapping, ask questions about these worker groups during our assessments and have created policies aimed at enhancing protection for these workers.



OPERATIONS

Within our own business, we believe the risk of modern slavery is low; all of Hush’s employees are employed directly by us, with over 95% of our employees on permanent contracts.

MODERN SLAVERY RISKS WITHIN OUR BUSINESS AND SUPPLY CHAIN



TRAINING AND CAPACITY BUILDING



EMPLOYEE TRAINING

All employees are required to complete our “Tackling Modern Slavery Together” within the first 100 days of their employment commencing and participate in a refresher course annually. The e-learning programme consists of eight sections that cover topics such as understanding modern slavery, its various forms within the fashion industry and how to spot warning signs and report any concerns.

In addition to this, new employees also receive more general training on Hush’s sustainability programme during their induction process.

SUPPLY CHAIN CAPACITY BUILDING

Following the completion of our supply chain consolidation exercise in March 2025, our focus in the next financial year will be on strengthening our existing supplier relationships and starting to identify opportunities to upskill our suppliers to help them improve their human rights performance.

EFFECTIVENESS OF OUR APPROACH

EFFECTIVENESS OF OUR APPROACH

We have not found any instances of modern slavery in our business or supply chains during our due diligence and risk assessment procedures. Additionally, we have not received any reports of modern slavery through our grievance mechanisms.



PROGRESS AND FUTURE COMMITMENTS

Below is an update on last year's activities and new commitments for the upcoming year. Due to the comprehensive supply chain consolidation exercise we carried out in 24/25, we were unable to progress some of last year's commitments.

PROGRESS AND COMMITMENTS

Statement Section	2024-2025 Commitments/Notes	Progress	2025-2026 Commitments
Structure, business & supply chains – transparency	Update Hush's Third Party Brands Contract to require brands to comply with our Supplier Sustainability Standards	Completed	n/a
Structure, business & supply chains – transparency	New	New	Map tier 2 sites
Policies	Sign off and roll out Migrant and Contract Labour Policy, Homeworking Policy, Business Human Rights Policy. Continually review and improve policies	In progress – policies under review	Publish external facing policies on Hush's website
Due diligence	Finalise third-party brands SAQ and roll out	Completed	n/a
Due diligence	Ensure 100% of our tier 1 factories are assessed by us or another reputable third-party provider	Ongoing	Ongoing
Due diligence	Undertake assessment of warehouse at least every 2 years	Ongoing	Next assessment due FY 26/27
Training & capacity building	Collaborate with other brands to address supply chain issues collectively	Ongoing	Ongoing
Training & capacity building	Continue to provide training on modern slavery prevention to all employees	Ongoing	Ongoing

Signed:

A handwritten signature in black ink, appearing to read 'S. Miles', enclosed within a dotted rectangular box.

Sarah Miles, Chief Executive Officer, on behalf of the board of directors,
September 2025

