

Modern Slavery Statement 2024-2025

LIBERTY.

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Section 1: Introduction

This is our eighth Modern Slavery statement published in accordance with the Modern Slavery Act 2015. This statement reviews the progress made since our seventh statement in August 2024.

This statement is made on behalf of Liberty Zeta Limited and its subsidiaries. Liberty Zeta Limited is the parent company of the Liberty Group, which includes, among others, Liberty Retail Limited, Liberty Fabric Limited and Liberty of London Limited. This statement has been approved by the CEO and the Chairman of the Board.

2024-2025 Reflections from our CEO

Every initiative we've undertaken this year has been a tangible step towards a more transparent, accountable supply chain.

This year, our migration to a new supplier management platform, Retraced, was an example of the value of technology in our collective work in addressing modern slavery. The ability to harness our data in a more dynamic way has enabled our team to build a more nuanced picture of vulnerable communities in our supply chains.

Our continued publication of our Tier 1 facilities on Open Supply Hub embodies our belief that openness drives progress. There are still gaps, and we'll continue engaging with the remaining suppliers, confident that demonstrating the value of transparency will win more advocates to our cause. The extension of this work to Tier 2 is a challenge, but the cross-functional collaboration within our business on this topic stands us in good stead.

In our Fabrics division, expanding our supply chain traceability programme from five to ten bestselling bases illustrates a steady growth in our CSR programme within a complex, multi-layered business. The cross-functional visit to Tamil Nadu last year showed us that on-the-ground insights are as essential as desk-based analytics and as we look ahead to spinning mills and raw-material origins, that blend of data, fieldwork, and collaboration will remain our priority.

None of these milestones would be possible without the passion of our people and the trust of our suppliers and partners. I'm grateful for every internal and external conversation, assessment, and site visit that deepens our understanding of supply-chain risk. Together, we're not just mapping factories and sites but strengthening working conditions and ensuring that every link in our chain is free, fair, and dignified. Let's keep pushing forward.

Signed by:



Adil Mehboob-Khan
CEO
Liberty Zeta Limited, on behalf of the Liberty Group
Date: 23 September 2025

Section 2: Organisational Structure

Liberty is a leading luxury retailer and fabric and product design house. Our business is based in the UK with a head office in London, and is organised around three key divisions:

- Liberty Fabric, which is the home of our in-house fabric design studio and archive, and operates Liberty's global wholesale fabric business, including a wholly owned fabric printing mill in Italy
- Liberty Product, which designs and wholesales Liberty's own-brand 'Liberty' and 'LBTY' product lines and manages licensing deals with third parties; and
- Liberty Retail, which operates our flagship store in London and our online store at www.libertylondon.com - these offer for sale third-party brands alongside our own Liberty products.

Our business operations are delivered by 653 employees globally.

CSR Team

The CSR Team continues to comprise two full time posts (Head of CSR and CSR Coordinator), with the Head of CSR reporting into the General Counsel and Director of CSR.

Through the General Counsel and Director of CSR, the CSR department continues to have direct representation at Leadership level.

The CSR Team is responsible for defining the ethical trade and environmental strategy and programme of activity across Liberty's three business divisions.

Governance structure

The CEO and CFO retain ultimate responsibility for ensuring that the Liberty Group continues to monitor and mitigate its labour rights risk in regular meetings with the CSR Team, focusing on the following:

- Embedding and promoting responsible ways of working throughout the business;
- Providing programme governance;
- Endorsing and sponsoring new initiatives; and
- Ensuring effective devolvement of actions to individual departments.

As a full member of the ETI, the ETI base code has been integrated into Liberty's core business practices. The ETI's Progression Framework continues to guide the development of the business' ethical trade strategy. Through continued meetings with Senior Leadership „the work of the CSR Department, and cross-departmental collaboration, Liberty remains committed to respecting labour rights in our supply chain activities, in line with the ETI base code.

Section 3: Sourcing Models

Liberty’s ethical trade focus remains on our own-brand business as it is where we have the greatest influence and greatest ability to drive change.

Liberty Product apparel, accessories, home and gifting is sourced through a blend of direct, indirect and licensed models:

Direct factories	Indirect factories	Licensed factories
Products ordered directly from the assembly factory	Products ordered through partners, agents and/or suppliers who do not own factories	Licensed partners manage a particular product category and are wholly responsible for sourcing
28	56 Tier 1 factories (see “Tier Definitions” overleaf) Relationships managed through 30 agents/suppliers	26 Tier 1 factories Relationships managed by 13 Licensees*

Figures are correct as of July 2025.

*These numbers only include active Licensees and the factories they manage which fall within Liberty’s Ethical Trade Programme for Licensing Partners. There are a further 4 licensees that have not met the de minimis criteria to qualify for the Programme. More detail on this programme is available in **Section 6: Factory Onboarding**.

Liberty Fabrics manufactures printed fabrics for wholesale customers through a mixture of both direct sourcing, ordering directly from weaving mills, and indirect sourcing, working through agents and suppliers who support with a range of activities, such as product development and mill sourcing. The majority of the business operates through indirect suppliers, with 80% of our business operating through five agents.

Section 4: Mapping And Visibility

Launching Our Supplier Management Database

In Q1 2025, we began the process of migrating our offline supply chain data onto Retraced, a digital platform that enables comprehensive supply chain mapping and tracking. Our launch on Retraced has allowed us to strengthen our commitment to ethical trade, consolidating our supply chain data and providing more efficient access to human rights risk indicators. The platform also allows for effective supplier and factory collaboration on remediation, acting as a repository for remedial evidence.

The migration process demanded substantial time and resource, and a reworking of all existing onboarding processes to incorporate the uploading of data onto the system. By the end of Q1 2025, 82% of direct factories and partners, agents and suppliers were successfully onboarded, and we are now exploring further modules on the platform to enable us to visualise our supply chains beyond Tier 1.

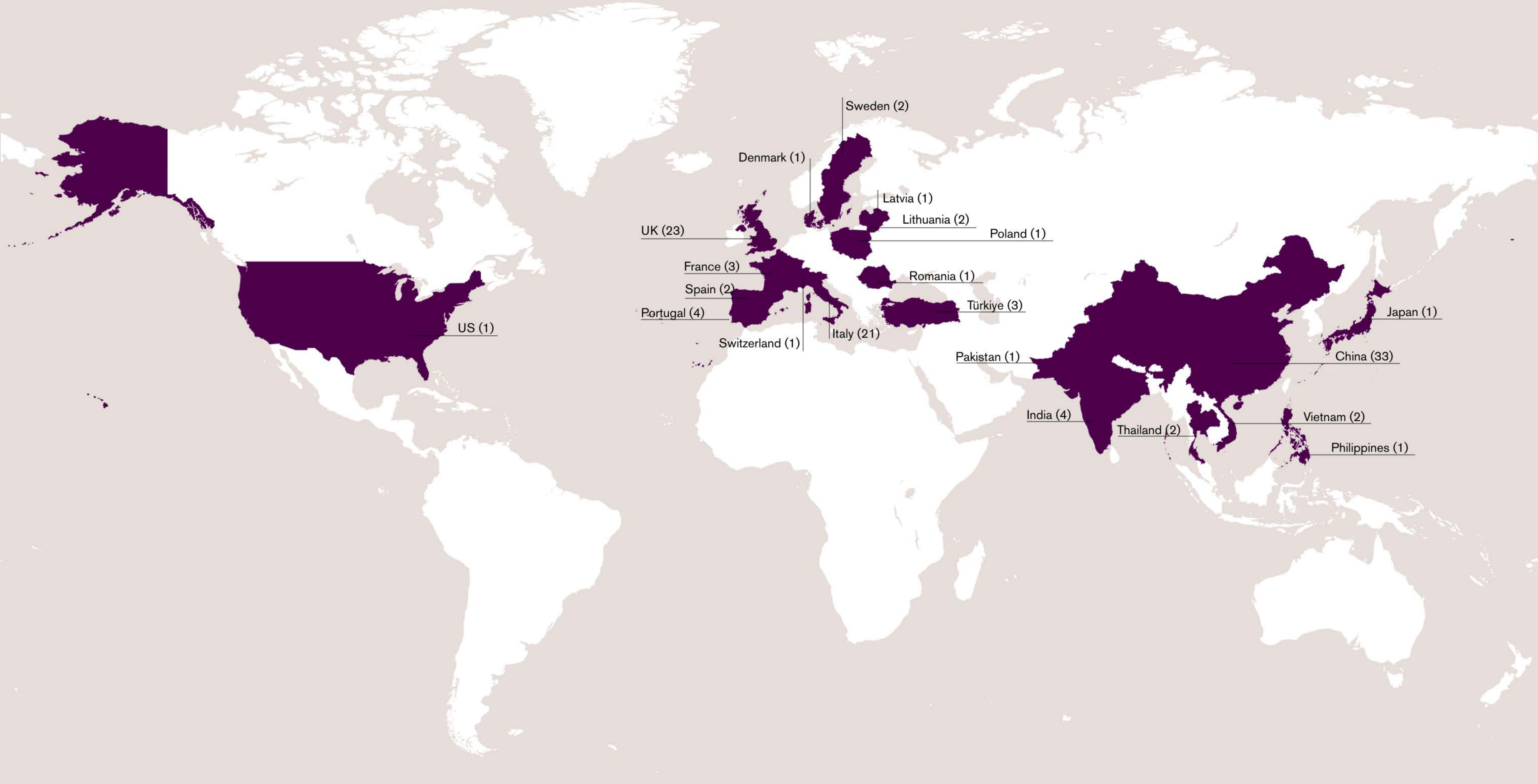
Liberty Product

100% of our Tier 1 suppliers have been mapped, across our direct, indirect and licensed sourcing models.

Tier	Tier definition	Status
Tier 1	Main production sites defined as cut, make, trim, sew, or finished goods production sites	Fully Mapped
Tier 2	Subcontracted Tier 1 sites including: embellishment, embroidery, printing, dying, washing, handwork (i.e., crochet), homeworking And Trims, buttons, linings, hardware (bought direct or through Tier 1 suppliers)	Partially Mapped
Tier 3	Fabric and Components: Tanneries, mills, i.e., fabric production and processing	Unmapped
Tier 4	Raw materials origin	Unmapped

Section 4: Mapping And Visibility

Liberty Product Tier 1 - Sourcing Countries And Factory Count:



Section 4: Mapping And Visibility

Public disclosure of Liberty Product Tier 1 suppliers

One of the requirements ETI membership is to publicly disclose our Tier 1 factories. We started this process by engaging all direct and indirect Liberty Product suppliers, and Liberty Licensees, to obtain their permission to publish:

- The name of their production facility;
- Its geographical location;
- The sector it operates in; and
- The nature of processing activities taking place there.

We remain committed to publishing this evolving list on Open Supply Hub.

In April 2025, we engaged Tier 1 suppliers on the public sharing of their details on Open Supply Hub, using an opt-out rather than opt-in approach and focusing on the value of transparency within our sector. Of a total of 65 direct and indirect suppliers, 59 agreed to have their factory details published. The small number of suppliers who did not wish to have their factory details published all cited commercial reasons; whilst they were fully transparent with our teams, they were not comfortable sharing their proprietary factory information publicly.

Liberty disclosed this to the ETI in April 2025. The ETI acknowledged the competitive constraints impacting supplier transparency and recognised that the non-disclosure of location details stemmed from supplier discretion rather than Liberty's unwillingness to disclose. As fewer than 10% of suppliers elected not to provide this information, Liberty was assessed as having fulfilled the relevant disclosure requirements.

Mapping Liberty Product Tier 2 suppliers

To date, we have successfully mapped 100% of our Tier 1 Suppliers, providing us with a clear view of our direct supply base. We have subsequently commenced the ongoing mapping of our Tier 2 Suppliers, which will deepen our understanding of potential risks further up the supply chain. We are moving to understand these details at a PO level. This exploration process has centred on meetings with key members of the team who are the product experts and know about their products at a granular level. This has meant we can understand and examine the data currently available to us and to explore how supply chain mapping can be embedded into the ways of working of our product teams. This approach is helping us adopt a more informed way of identifying and addressing modern slavery risks, reinforcing our commitment to transparency and embedding better business practices throughout our supply network.

Section 4: Mapping And Visibility

Liberty Fabrics

As outlined in last year's report, we continue to focus our traceability programme in Liberty Fabrics on active and new weaving mills producing our top five bestselling fabric bases and, in 2025, we embarked on the expansion of the project to our top 10 bestselling fabric bases (accounting for 80% of the division's business in 2024). The focus on weaving mills is driven by known country and sectoral risk, in comparison to our printing units that are predominantly in the Lake Como area of Italy. We continue to roll out our auditing programme at this level, mapping a total of 10 weaving mills. Site audits will continue through 2025, with ongoing engagement with agents, traders and suppliers. Once this stage is mapped and risk assessed, we aim to begin mapping spinning mills and conducting a preliminary needs assessment of this tier.

Top 10 bestselling bases:

Tier	Tier definition	Status	Location and count
Tier 2	Active printing units (4)	Fully Mapped	Italy (4)
Tier 3	Active weaving mills (10)	Fully Mapped	Pakistan (2), India (4), China (4)

The growth of our programme in the Fabrics division has enabled cross-departmental collaboration on the engagement of new weaving mills, with the CSR Team joining Fabric Technology and Sourcing Teams on a scoping visit to Tamil Nadu, India in 2024. The purpose of the trip was to meet with existing strategic suppliers and risk assess prospective weaving mills for Liberty Fabric's renowned Tana Lawn™ fabric base. Through ETI membership, the CSR Team were able to engage with civil society and member brands ahead of the trip, building our understanding of recruitment practices in the region and grievance mechanisms co-ordinated by local NGOs. The identification of home states of migrant workers formed a significant part of our risk assessment: whilst hires at the weaving mills we visited were local to the area, we know that this is a risk factor that needs to be prioritised when we expand this programme to spinning mills.

Section 4: Mapping And Visibility

Case Study 1: Utilising Supply Chain Data

As part of our ongoing commitment to responsible sourcing, we launched a strategic data project in 2025 to improve visibility of key social indicators at factory level, leveraging our supplier management platform Retraced.

Recognising that traditional audit reports are a snapshot of the conditions on the day and often lack depth or actionable insights, we set out to extract and structure relevant data from existing audits and combine it with direct disclosures from our suppliers. The objective was to build a more nuanced and measurable understanding of working conditions across our sourcing network, utilising a lot of data we already had to hand.

The dataset we are building focuses on critical indicators, including:

- Gender breakdown of workers
- Migrant vs local workforce composition
- Proportion of permanent versus agency staff
- Presence and strength of trade union representation or worker committees
- Production capacity

This data is now helping us to identify patterns that may indicate heightened risks of exploitation, for example, sites with high reliance on migrant agency workers and no worker representation.

The project is also enabling more targeted supplier engagement. Rather than splitting our attention equally, we can now prioritise and adjust communications to those suppliers with risk factors that correlate more closely with modern slavery vulnerabilities. This work also supports the successful utilisation of the Responsible Exit Policy (see Case Study 2), as the data helps us understand the vulnerability of workers on a site level very quickly.

By combining audit data with self-reported capacity metrics from suppliers, and embedding this insight into our due diligence systems, we are moving from reactive compliance to proactive risk management, and ultimately towards more equitable, transparent supply chains.

Section 5: Liberty Policies

Supplier and Partner Code of Conduct is aligned with the ETI Base Code and the International Labour Organisation (ILO) conventions, defining minimum standards from suppliers and expectations with regards to ways of doing business.

Child and Young Worker Policy sets out our position against the use of child labour in the manufacturing of our products, the steps needed to protect child and young workers, and methods to identify and remediate any instances of child labour found in our supply chain.

Migrant and Contract Labour Policy aims to safeguard the migrant workers who are particularly vulnerable to modern slavery, outlining the measures suppliers should take to formalise the status of migrant and contract labour workers in the workplace.

Homeworker Policy outlines our position in support of homeworking, and the steps we expect suppliers to take to ensure homeworkers are paid fairly, work in suitable conditions, and have the ability to convene with other homeworkers and communicate with those co-ordinating their work.

Cotton & Textile Policy requires that no cotton or textiles be knowingly sourced from Turkmenistan or Uzbekistan. Additionally, Liberty has suspended the sourcing of any cotton or textiles from the Xinjiang Uyghur Autonomous Region, China, until independent third-party verification in the region can be restored.

Contractual controls

Liberty's Terms and Conditions for all Licensing and Retail (third-party brand) partners include an obligation for suppliers and partners to operate in accordance with Liberty's Supplier and Partner Code of Conduct (or equivalent standards), which adheres to anti-slavery and human trafficking laws. We also require suppliers and partners to cascade provisions which match Liberty's position through their managed supply chains, allowing Liberty to clarify our values and enforce these through our upstream processes.

Section 6: Risk Management

Due diligence

Country risk monitoring

As the map of sourcing countries on page five demonstrates, we partner with suppliers from across the globe and we are mindful that working conditions and risk to workers in each geographical context can differ dramatically. To aid our awareness of these disparities, our CSR Team have created a country risk database covering all our sourcing locations. The data we collect comes from a variety of public sources such as, but not limited to:

- Labour and human rights indices e.g. Walk Free Foundation’s Global Slavery Index (GSI), US Government’s Office to Monitor & Combat Trafficking In Persons’ Trafficking In Persons (TIP) report, ITUC, the Global Reporting Initiative, The Human Freedom Index
- NGO and CSO reports
- News outlets
- Trade union and other industry bodies resources

Our CSR Team analyse the collated information and assign each current and prospective sourcing country a risk rating (extreme, high, medium or low). The rating is one of the criteria considered during ongoing CSR risk assessments and scoping discussions.

Modern Slavery risk

The table below shows the estimated prevalence of modern slavery in our top four sourcing countries for Liberty Product:

Sourcing country	Share of our supply chain	GSI 2024 score (prevalence out of 1,000 people)	TIP Report 2024 rating
China	30%	4	Tier 3
UK	21%	1.8	Tier 1
Italy	19%	3.3	Tier 2
India	3.6%	8	Tier 2

Tier 1 represents countries whose governments fully meet the Trafficking Victims Protection Act of 2000 (TVPA) minimum standards for the elimination of trafficking.
Tier 2 represents countries whose governments do not fully meet the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.
Tier 3 represents countries whose governments do not fully meet the TVPA's minimum standards and are not making significant efforts to do so.

Section 6: Risk Management

Factory onboarding

All Liberty Product direct factories are incorporated into our ethical trade programme and must go through a robust approval process before being authorised for production. Direct factories must provide key information about manufacturing sites and any subcontractors they use, further to providing a valid ethical audit. They are additionally obligated to sign our Supplier & Partner Code of Conduct and abide by our supplementary policies, which they must also cascade through their supply chains. Indirect factory relationships managed by suppliers will also undergo a similar process, with suppliers collaborating with us to communicate information requests to factories.

Liberty Fabrics' agents, traders, suppliers and weaving mills that produce our top 10 best-selling bases are all engaged in the same programme.

Liberty Licensees will undergo a preliminary risk assessment. We prioritise risk based on several factors including, but not limited to:

- Sourcing country/region;
- Industry/sector;
- Volume and value of licensing partnership; and
- Licensee's understanding and commitment to ethical trade.

Our risk-based programme in Licensing means we work closely with Licensees to build sectoral understanding of ethical trade – where this is limited, and other aspects of the partnership are high risk (for example, a hand embroidered product), we maintain a close relationship with the Licensee and their supply chain and seek visibility of working conditions to Tier 1. Where a Licensee has robust procedures in place, as indicated in their completion of the preliminary risk assessment, we regroup with them on annual basis only.

Social audit programme

Ethical audits are reviewed as part of the risk analysis of each factory producing Liberty Product. We require suppliers to submit a valid in-date audit on a cyclical basis, with the frequency of submission dependent on the severity of the findings of each audit. Where no valid audit exists, the CSR Team work with the factory, supplier or Licensee to arrange a full, semi-announced audit of the factory. We recognise that the cost of auditing can be expensive for our partners, so Liberty has an allocated budget to cover the cost of initial audits of all new sites.

We continue to partner with a global auditing company, QIMA, who have a network of local auditors in-country to help us carry out independent third-party audits.

Our audit protocol follow the principles set out within the ETI Base Code which is founded on the conventions of the ILO, an internationally recognised code of labour practice. Our social audits are made up of three parts: a factory tour, document reviews and worker interviews. Worker interviews are carried out in an individual and group setting and are conducted in a confidential and safe environment. We ensure workforce nationality data is collected in advance so QIMA can appoint an auditor who speaks and understands all languages spoken within the factory. We understand the importance of capturing direct feedback from workers and view this part of the audit as essential. Since last year, Liberty has commissioned 24 full audits, and our factories and suppliers submitted 45 third-party audit reports as part of their onboarding or cyclical auditing process.

Section 6: Risk Management

Zero Tolerance Remediation

When audits identify Zero Tolerance issues at a factory, production is paused until non-compliances are substantially progressed or resolved. We work collaboratively with the factory or supplier on an agreed viable remediation plan, incorporating regular check-ins to monitor progress and to provide them with further assistance where needed. At the end of the remediation process, we arrange for another audit to verify that the Zero Tolerance issues found during the initial assessment have been closed or improved upon and re-assess whether the site is ready to begin producing Liberty Products.

UK Labour Risk Assessment (LRA) Programme

The suppliers and factories that we work with vary in size, and several small-scale, artisanal suppliers continue to play a significant role in our supply chains. In 2024 we launched the LRA programme, which was focused on building a picture of working conditions at smaller, lower risk suppliers. Initially conducted in UK and Europe, we chose to refine the scope this year to focus solely on small UK suppliers, as the language barrier in Europe limited the effectiveness of the assessment.

LRAs have been carried out in collaboration with our Health & Safety team and, in the last year, five LRAs have been conducted.

Liberty Product LRA: Methodology

The LRA is divided into two key parts: a remote Management Survey and an in-person site visit. The former consists of an online questionnaire which covers:

- General information about the production facility;
- A checklist of policies in place (we ask for copies of all existing ones);
- Worker demographics;
- Seven areas of workplace wellbeing;
- Environment;
- Chemical management; and
- Quality control.

The results from the Management Survey and additional documents are then analysed by the CSR Team and any inconsistencies and gaps are filled in during the site visit.

In the UK, site visits are announced and the visit incorporates a site walkabout assessing health and safety compliance, and worker focus groups. The latter are held in a private room, where workers in groups of five fill in a worker survey accessed via a QR code (translated into the workers' native languages) in the presence of the Liberty CSR Team member. The questions focus on the same seven areas of workplace well-being which were also covered in the Management Survey: 1.Voice, 2.Growth, 3.Reward, 4.Security, 5.Job design, 6.Respect, 7.Health and well-being.

We triangulate all the findings and create a Corrective Action Plan Report which allows us to track the progress our suppliers are making in closing any non-compliances found. We conduct follow-ups and plan to revisit all suppliers at regular intervals, the length of which depends on the level of severity of the findings.

Section 6: Risk Management

Internal awareness raising and training

To ensure that accountability for managing modern slavery and other labour rights risks in our supply network is shared across the business, our CSR team runs regular training sessions and risk updates for Liberty's Product sourcing teams. We deploy business-wide virtual Modern Slavery training as part of our employee induction programme, and we conduct Enhanced Modern Slavery training for our supplier-facing teams. This year enhanced Modern Slavery training was delivered as the first instalment of our new Responsible Sourcing series. This training series, attended by Production, Development, Buying and Licensing teams, will be further developed in the coming year, providing teams with information on salient risks, industry news, and best practice case studies.

Case Study 2: Development of a Responsible Exit Policy

At the beginning of 2025, as part of our commitment to strengthening our approach to human rights and modern slavery, we initiated the development of a Responsible Exit Policy. This policy provides a clear framework for withdrawing from supplier relationships, particularly where we understand the supplier to be dependent on our business in some capacity and where engagement or remediation efforts have been exhausted or are no longer viable.

The need for a clear, values-drive approach to exit became evident following notification from the teams that they wanted to cease working with a supplier that we understood to be highly dependent on our business. We recognised that our decision to exit could negatively impact workers and render them more vulnerable to exploitation. The team had attempted to solve ongoing operational challenges with the supplier, but they were up against geopolitical conditions beyond their control. In the absence of a structured policy, the decision-making process risked being inconsistent and we recognised that a poorly managed exit could increase the vulnerability of workers, potentially leading to job loss, informalisation or exploitation amounting to modern slavery.

Drawing on the UN Guiding Principles on Business and Human Rights, we developed a policy and process that prioritises the rights and welfare of affected workers. The policy outlines the steps we take before exit, including consultation with stakeholders, and consideration of the broader social and economic impact on vulnerable communities. This includes early and open communication, appropriate notice period, mitigation strategies for adverse impacts and efforts to ensure continuity or support for affected stakeholders. By embedding the concept of Responsible Exit into our practices, we aim to uphold fair treatment, mitigate risks and support suppliers in building resilience wherever possible.

The Responsible Exit Policy was established through an initial training session with the product teams, and guidance was disseminated. 1-1 sessions were utilised with those who needed further support, ensuring that our teams understand when and how to apply the policy. It reinforces our commitment not only to identifying and responding to modern slavery risks but to doing so in a manner that upholds dignity, avoids unintended consequences and promotes long-term systemic improvement. By formalising our approach, we have taken a proactive step towards responsible business conduct, ensuring our actions align with our values, even in the most difficult circumstances.

Section 6: Assessment Of Salient Risks

To enhance our due diligence, we now conduct regular assessments of our salient human rights risks and share these with sourcing, development and production teams.

Liberty Product and Liberty Fabrics' most recent salient risk assessment carried out in July 2025 found four salient human rights risks in our global supply network:

- Fire safety in India, Türkiye, Portugal and the UK;
- Forced labour in China;
- Working hours in China; and
- Gender based violence and harassment in India

Please see the table below for the breakdown of each salient risk against the UNGP framework criteria and the mitigating actions taken by Liberty CSR:

Salient risk	Impact	Country focus	Mitigating actions
Fire safety (IN, TR, PT, UK)	Inadequate fire safety can lead to serious injuries or even loss of life	Wide/ global	▪ Working with suppliers to improve housekeeping and emergency preparedness ▪ Training Liberty Product's supplier-facing teams on spotting signs of poor fire safety practices and on what we expect in terms of precautionary measures
Forced labour (CN)	Workers are denied most of their basic rights putting their health and life in danger	Highest prevalence in Xinjiang province, conscious of labour transfers throughout the rest of China	▪ Conducting enhanced human rights due diligence in relation to current and prospective suppliers in China ▪ Collecting and sharing of data relating to product origin ▪ Communicating and ensuring compliance with Liberty's Cotton & Textile Policy throughout our supply chain and within our product teams

Section 6: Assessment Of Salient Risks

Salient risk	Impact	Country focus	Mitigating actions
Working hours (CN)	Long working hours and excessive overtime can lead to an increased risk of health and safety issues (lack of sufficient rest, accidents at work) and safety concerns (workers leaving factories late)	Predominantly in China	▪ Working with suppliers to reduce reliance on overtime through long-term remediation programmes ▪ Increasing our understanding of production capacity of the factories we work with and not making any changes that would unduly stretch it ▪ Building understandings of the implications of our purchasing practices amongst product teams
Gender based violence and harassment (IN)	Physical and psychological well-being of women is affected; GBVH is also indicative of wider societal issues prevalent in some apparel and textiles producing countries – patriarchy, casteism, poverty	Prevalent in many apparel and textiles producing countries, with our focus centred on India	▪ Exploring engagement with collaborative industry-wide GBVH-related projects ▪ Maintaining a focus on this when exploring lower tiers in our Fabrics supply chains

Section 7: Collaboration

ETI: is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. ETI's vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity. The ETI's nine-point base code is founded on the conventions of the ILO and is an internationally recognised code of labour practice. The diverse memberships allow for cross sector collaboration, initiatives encouraging knowledge sharing and collective action to improve the lives of workers throughout the supply chain.

QIMA: is a leading provider of supply chain compliance solutions that partners with brands and retailers to secure, manage and optimize their global supply network. They have on-the-ground presence in 85 countries, combining industry-leading experts for onsite inspections and supplier audits. Liberty has been working with QIMA as its global auditing partner since 2019.

British Retail Consortium: is the trade association for UK retail businesses, whose purpose is to make a positive difference to the retail industry and the customers it serves, today and in the future.

Small Brands Working Group: consists of CSR teams from smaller UK brands and retailers who come together to share knowledge on ethical and sustainable topics. Held on a two-monthly basis, these meetings provide an incredibly useful platform for companies to keep up to date on emerging CSR developments and challenges. Each member is able to discuss ideas, present examples of good practice and share resources among similar sized brands. This knowledge allows us to recognise where our combined leverage can give rise to collaboration across the sector.

Section 8: Performance Review And KPIs

Risk Focus Area	Key Performance Indicators 2024-2025	Progress	2024- 25: Activity Review	Key Performance Indicators 2025-2026
Improve visibility of Fabrics and Jewellery supply chains	Complete audits for the remaining printing and weaving sites in this programme and extend traceability to spinning mill.	Completed	Audits have been completed of weaving mills used for the business' top five best-selling fabric bases, with the programme now expanding to the top 10. Once complete, we will assess the most salient risks, engaging with agents, traders, suppliers and mills on remediation, and leaning on the expertise of civil society to help design worker-centred remedy.	Expand traceability programme to active and new weaving mills of top 10 best-selling fabrics and fully embed cyclical auditing as one method of assessing risk.
	Finalise qualification programme for new suppliers of top 5 bestsellers.	Completed		Expand traceability programme to active and new weaving mills of top 10 best-selling fabrics and fully embed cyclical auditing as one method of assessing risk.
				Begin mapping spinning mills of top 10 best-selling fabrics and conduct a preliminary needs assessment of this tier.
	Complete visibility aspect of the Liberty Jewellery programme, visiting all key production sites by the next reporting period.	In progress	Due to team changes and resource constraints, this programme was de-prioritised for 2024 but has now been re-established. As the product offering has grown, a renewed mapping exercise is underway, and the CSR team are creating a risk assessment for finished goods suppliers that focuses on the procurement processes of precious metals and stones.	Finalise mapping and rollout risk assessment to all finished goods jewellery manufacturers.
	Develop a programme to address risks in the lower tiers of the jewellery supply chain, drawing on industry best practice.	In progress		Begin planning risk remediation programme and provide update in next year's report.
Complete Tier 2 mapping of own-brand apparel, accessories, home and gifting	Continue the roll out of our Tier 2 mapping activity, to incorporate factories managed through indirect sourcing models.	In progress	Tier 1 suppliers have been fully mapped, and the Tier 2 mapping is underway in close collaboration with Production and Category Brand Management teams. We continue to engage with our Production teams to embed mapping at this tier into our existing operations, enabling a more systemic long-term approach.	Explore a PO level tracker of Tier 2 Suppliers, with a view to creating a library of our Tier 2 suppliers on Retraced.

Section 8: Performance Review And KPIs

Risk Focus Area	Key Performance Indicators 2024-2025	Progress	2024- 25: Activity Review	Key Performance Indicators 2025-2026
Address barriers to social dialogue mechanisms	Continue to monitor access to social dialogue and barriers to reporting, providing a full update in the next reporting period, outlining access across our supply chains, identified barriers, and any remediation measures.	Completed	Having mapped our trade union coverage throughout our supply chain, we have reflected on the various barriers to social dialogue and meaningful stakeholder engagement prevalent on a country level, and expanded the programme to ensure we overlay gender and migrant data.	In the absence of significant trade union coverage, we will utilise the STITCH Framework for Meaningful Stakeholder Engagement and the associated Principles for Meaningful Stakeholder Engagement to scope out, design and strengthen social dialogue mechanisms within our supply chain. We will continue to utilise our aggregated data taken from supplier disclosures and audit data to target social dialogue work.
Build understanding of procurement of non-stock suppliers (packaging, logistics, cleaning and security service providers)	Finalise list of active non-stock suppliers and our internal controls and set objectives for the next reporting period.	Refocused	In November 2024, the team began the process of assessing non-stock and service providers and determined that our greatest risk exposure (based on volume, spend and known sectoral risk) was at our UK distribution centre.	Conclude NGO-led worker-centred risk assessment, sharing recommendations and risk mitigation efforts in next year's report.
	Once the list is finalised, we will investigate partnering with the relevant industry organisations to conduct risk assessments for the key sectors covered in the list. We will then work on actioning the recommendations given as part of these assessments, prioritising the areas of highest risk.	Refocused	We have since proactively engaged with another customer at the distribution centre and an ETI NGO-member on conducting a Modern Slavery risk assessment of the site and its workers, and we hope to roll this out in Q4 2025.	

Section 8: Performance Review And KPIs

Risk Focus Area	Key Performance Indicators 2024-2025	Progress	2024- 25: Activity Review	Key Performance Indicators 2025-2026
Protecting homeworkers	Continue to monitor the presence of homeworking in supply chains and provide a full update in the next reporting period, outlining where it has occurred and what steps were taken to mitigate any risk to workers.	Completed, with continuous review	In the 2024-25 period, there were no additional homeworking networks disclosed to us in our own-brand supply chains. We are aware of one long-term Christmas supplier who works with homeworkers in the Noida region of India, and maintain close links to them.	Continue to monitor the presence of homeworking in supply chains.
Chinese sourcing	Continue to review the Cotton & Textiles Policy to align with risks to human rights.	Completed, with continuous review	In 2025 and as part of our internal Responsible Sourcing training series, we relaunched our Cotton & Textiles Policy to our teams, reiterating the importance of the dissemination of this within our supply chains. This has evolved into a wider communication exercise, with teams collaborating to re-engage suppliers with our policy, whilst also incorporating the mapping of all cotton fibre in cotton-based/cotton blend product during technical development stages.	Maintain internal awareness of Cotton & Textiles Policy and engagement of suppliers with the policy and mapping exercise. Incorporate cotton fibre mapping into technical team processes.
	Review approach to China sourcing and reassess risk mitigation measures, providing a full update in the next reporting period.	Completed, with continuous review		