

40
YEARS IN THE
MAKING

MODERN SLAVERY & ETHICAL TRADING STATEMENT

FINANCIAL YEAR ENDING 31ST JULY 2026

CHARLES TYRWHITT

JERMYN STREET LONDON

OUR COMMITMENT TO ETHICAL TRADING AND HUMAN RIGHTS

At Charles Tyrwhitt, we believe in making it easy for men to dress well. That means creating products with timeless style and lasting quality, and taking responsibility for how they're made.

The people who make our products are an important part of our business. Their wellbeing matters, and everyone in our supply chain deserves to be treated fairly, with dignity and respect. We believe that doing business in the right way is essential to our long-term success.

We have a zero-tolerance approach to modern slavery and human trafficking. Our ethical trading policies, supplier relationships and ongoing supply chain monitoring help us identify and address risks, and we work with our suppliers to ensure forced labour has no place in the making of our products.

We work with more than 30 suppliers across 12 countries, and some of those relationships go back more than 20 years. These partnerships are built on transparency, trust and shared responsibility. We know that protecting workers' rights takes ongoing attention, and we remain committed to upholding high ethical standards throughout our business and supply chain.

I am pleased to share Charles Tyrwhitt's Modern Slavery Statement for the financial year ending 31st July 2026. Prepared in accordance with Section 54 of the UK Modern Slavery Act 2015, this statement sets out the steps we have taken, and continue to take, to prevent modern slavery and human trafficking in our business and supply chains.



REBECCA HOWAT, MANAGING DIRECTOR

This statement was approved by the Board of Directors of Charles Tyrwhitt Shirts Ltd in September 2026 and will be reviewed annually.





OUR BUSINESS

Charles Tyrwhitt is a menswear brand dedicated to creating high-quality apparel and accessories, blending timeless British style with modern craftsmanship. Our products are designed at our London Headquarters, where our in-house teams bring together exceptional design and attention to detail.

We operate across retail, e-commerce, and wholesale channels to serve customers around the world. Across our head office, distribution centre, customer service centre and retail stores, our team averaged 1,156 direct employees during the reporting period.

We currently have 57 physical stores across the UK, USA, and France, supported by a network of 45 trusted third-party partners across 30 countries. Together, we share a commitment to responsible business and “doing things properly - the Tyrwhitt way”.

WHAT IS MODERN SLAVERY?

Modern slavery is an umbrella term that describes a range of exploitative practices in which people are deprived of their freedom for the purpose of personal or commercial gain. It encompasses forced and compulsory labour, human trafficking, bonded labour, and slavery itself. These abuses can occur in any country, developed or developing, and affect both foreign nationals and UK citizens alike.

Human trafficking involves the recruitment, movement, or harbouring of a person through coercion, deception, or abuse of power, for the purpose of exploitation.

Forced or compulsory labour refers to any work or service that a person performs involuntarily and under threat of penalty or punishment.

Bonded labour, also known as debt bondage, occurs when individuals are forced to work to repay a financial debt, often one incurred through recruitment fees or other charges, leaving them unable to leave their employment despite unfair or illegal conditions.

Slavery represents the most extreme form of exploitation, where one person exercises ownership or control over another, depriving them of their liberty and autonomy.

Modern slavery is complex, evolving, and often hidden, but its impact on individuals and communities is profound. Recognising and addressing these forms of exploitation is central to our commitment to ethical trading and responsible business practices.

OUR SUPPLY CHAIN

Our upstream supply chain spans Europe, Asia, and Africa, comprising skilled partners who help craft our clothing, accessories, packaging, and other materials. We recognise that the apparel industry carries inherent risks of modern slavery, and we are committed to identifying and mitigating those risks across every stage of production.

Our Tier 1 supply chain includes 30 suppliers, producing in 49 factories across 12 countries. Many of these are long-term partners, whom we have worked with for more than a decade.

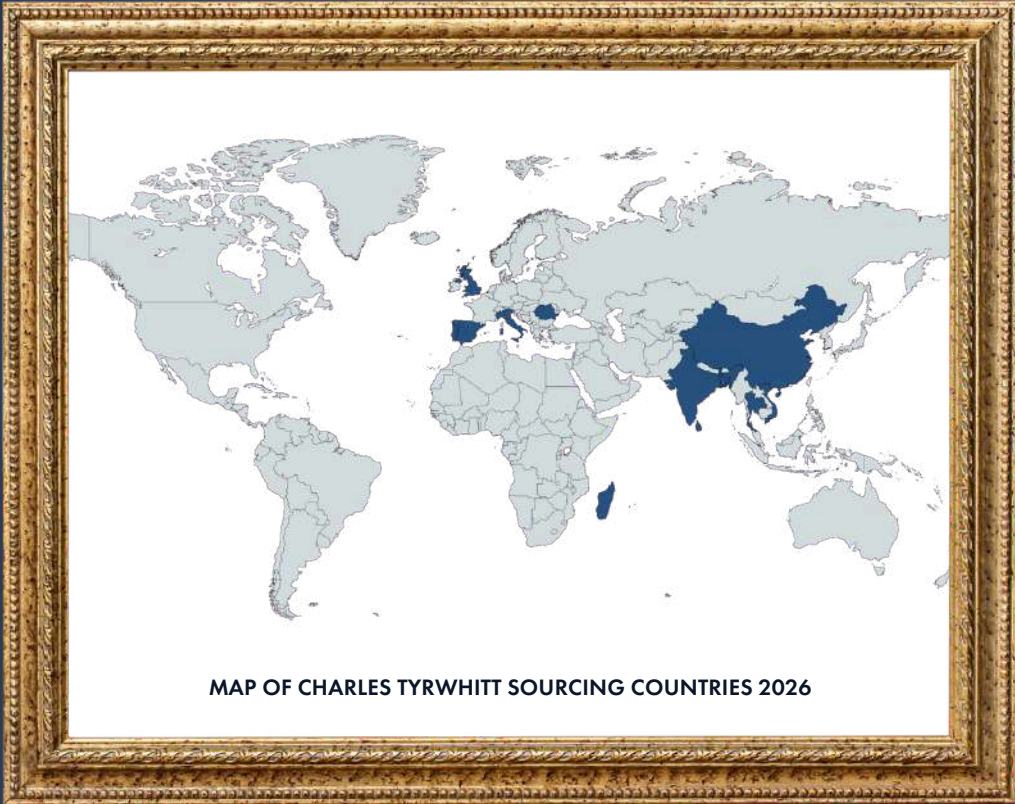
In 2025, we implemented a supply chain disclosure requirement within our Supplier Code of Conduct (SCOC) where suppliers are obligated to provide information on the sourcing of all components related to Charles Tyrwhitt products, allowing us to identify and mitigate possible risks of modern slavery throughout.

Over the coming financial year, with a clearer picture of Tiers 1 and 2, we will focus on mapping beyond Tier 2 to gain further transparency into where and how every element of our products is made.

Charles Tyrwhitt works directly and indirectly with goods and materials manufacturers, but also with packaging and labelling suppliers, suppliers of goods not for resale (e.g. shop fittings) and service providers (e.g. energy & logistics). Our goal is to apply the same ethical expectations and oversight across all categories.

TIER 1	TIER 2	TIER 3	TIER 4	TIER 5
ASSEMBLY OF FINAL PRODUCT	MATERIALS & FINISHING PROCESSES	COMPONENTS, TRIMS & PACKAGING	RAW MATERIAL, PROCESSING, CHEMICALS & DYES	RAW MATERIAL ORIGIN

^CHARLES TYRWHITT TIER SPLIT DEFINITIONS





OUR POLICIES

Our responsible sourcing framework is supported by a set of clear and actionable policies designed to prevent modern slavery and promote responsible practices. Each of these policies is communicated to relevant teams and suppliers, forming the foundation of our ethical approach to business:

Supplier Code of Conduct (SCOC): In alignment with the ETI Base Code and informed by the International Labour Organisation (ILO) standards and the UN Guiding Principles on Business and Human Rights, our SCOC sets out our prerequisites for labour rights, working conditions, and compliance with relevant international law. All Tier 1 Supplier partners must sign an acknowledgement and adhere to the SCOC, and we continue to work collaboratively with them to ensure fair working conditions and practices for all those involved in the supply of our products.

ETI Base Code: As foundation members of the Ethical Trading Initiative (ETI), we are committed to respecting labour rights in supply chains in line with the ETI Base Code and use it together with our suppliers to guide improvements in working conditions. We share the ETI Base Code with all Tier 1 suppliers as a foundational social compliance policy.

Anti-Forced Labour Statement of Compliance: In alignment with developing global legislation, we require our suppliers to make a written statement of understanding and compliance with global modern slavery regulations on an annual basis. This policy also acts as an annual reminder of our zero-tolerance policy for modern slavery within our supply chain.

Whistleblowing Policy: Encourages all colleagues to raise any concerns about illegal or unethical conduct safely and confidentially.

Anti-Bribery and Corruption Policy: Reinforces our zero-tolerance stance on corruption and unethical behaviour, which are often linked to exploitative labour practices.

Supplier Terms & Conditions: Includes an explicit prohibition of the use of trafficked, bonded, child or forced labour in our supply chain.

RISK ASSESSMENT & DUE DILIGENCE

Charles Tyrwhitt is proud to be a member of the Ethical Trading Initiative (ETI), the leading alliance of trade unions, NGOs and businesses, working together to advance human rights in global supply chains. As members, we are required to strengthen our human rights due diligence approach in line with ETI's HRDD Progression Framework, reviewing and improving our practices over time.

We continuously assess the risk of modern slavery across our operations and supply chain, considering factors such as geography, product type, and labour practices. Our assessments are informed by credible external sources, including, but not limited to, the International Labour Organisation (ILO), the Global Slavery Index, and the US State Department's Trafficking in Persons Report.

Using a mix of desk-based and on-site assessment, our due diligence process allows us to identify and prioritise areas where risks are highest, particularly in countries or regions recognised as such by international bodies, with labour intensive manufacturing, or where subcontracted, informal, agency, or migrant labour is more prevalent.

We recognise that these risks evolve over time, and we regularly review and refine our approach through engagement with industry peer groups, external experts, and ethical trading forums to ensure our practices remain effective and responsive.

TRAINING & AWARENESS

We believe awareness is one of the most effective ways to prevent modern slavery. Our Responsible Sourcing Manager has developed tailored training for colleagues across our buying, sourcing, and quality assurance teams, focusing on the specific risks within global supply chains and the part each individual plays in addressing them. The training enables teams to recognise indicators of modern slavery or unethical labour practices, report concerns safely and appropriately and apply due diligence during supplier onboarding and ongoing reviews.

Our goal is for every colleague involved in our supply chain to understand their responsibility for safeguarding human rights and to act with confidence when concerns arise, helping to uphold ethical standards at every stage of production.





MONITORING & COMPLIANCE

We maintain robust Human Rights Due Diligence (HRDD) processes to ensure our standards are upheld across the supply chain. Every new supplier is vetted against strict ethical criteria, and all are required to sign our Supplier Code of Conduct, which currently has a 100% adoption rate.

Where applicable, we conduct third-party social audits such as SMETA and BSCI methodologies, supported by trend and root-cause analysis. Currently, 92% of our Tier 1 factories hold a valid third-party audit, up from 88% in the last financial year. When improvements are needed, we work closely with suppliers through Corrective Action Plans (CAPs) to resolve issues, prevent recurrences, and drive continuous progress.

Whilst social audits are a useful tool in monitoring conditions within factories, we appreciate that these are only a snapshot in time and therefore carry out a programme of further due diligence beyond auditing. We will continue to build upon our process and policies in this space.

Our supplier relationships are built on openness and collaboration. Over the past 24 months, we have visited 69% of our Tier 1 factories, with regular visits to our largest partners, representing the majority of our production.

Where compliance cannot be achieved despite support, we follow a process of responsible disengagement, always prioritising fairness and accountability. Each year, we review the effectiveness of our approach, refining our systems to strengthen human rights protections across our business. As part of our ETI membership, we will develop a policy to establish a standardised process within our overarching business purchasing practices.

While we are proud of the progress made, we recognise ongoing challenges, particularly around data beyond Tier 1 and varying regional audit capacity, and continue to address these through closer collaboration, clearer expectations, and shared improvement with our partners.

EFFECTIVENESS & KPIS

We track our progress through a series of measurable performance indicators designed to assess both compliance and impact across our supply chain. These include the proportion of Tier 1 suppliers audited each year, the number of modern slavery concerns identified and resolved, the completion rate of training among relevant colleagues, and supplier adherence to our Supplier Code of Conduct.

We continue to refine how we collect, monitor, and report this data to ensure that we can evaluate progress consistently and measure the effectiveness of our actions year on year. This ongoing improvement helps us to identify emerging risks, strengthen accountability, and focus our efforts where they can make the greatest difference.

REMEDIATION

If an instance of modern slavery or forced labour is identified within our supply chain, our response will be guided by the [Walk Free Modern Slavery Response and Remedy Framework](#).

Each case is handled sensitively and on a case-by-case basis, ensuring that any affected individuals receive appropriate support and remedy. We also work closely with relevant partners to strengthen prevention and improve outcomes.

OUR FUTURE COMMITMENTS

Our actions for financial year ending July 2026 continue to support our longer-term goal of achieving full transparency and traceability across our supply chain. We remain focused on identifying the most vulnerable and high-risk workers and deepening our understanding of the people and processes involved in making our products. By working in partnership with our suppliers, we aim to gain greater visibility beyond our current supply chain mapping and ensure that ethical standards are upheld at every level.

Over the coming financial year, we will extend our mapping beyond Tier 2, increase supplier participation in independent social audits and strengthen the disclosure and approval of subcontractors. As foundation members of the ETI we will engage with the stakeholders across the organisation, building on our own good practice in alignment with the ETI Base Code. In addition, we aim to expand modern slavery awareness training across all departments to ensure that every colleague understands their role in protecting human rights.

By continuing to “do things properly”, we remain committed to protecting the people behind our products and upholding the integrity, responsibility, and trust that define the Charles Tyrwhitt brand.



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