



MODERN SLAVERY & ETHICAL TRADING STATEMENT

FINANCIAL YEAR ENDING 31ST JULY 2025

CHARLES TYRWHITT

JERMYN STREET LONDON

OUR COMMITMENT TO ETHICAL TRADING AND HUMAN RIGHTS

At Charles Tyrwhitt, our mission has always been simple - to make the finest menswear, designed with timeless style and crafted without compromise on quality. But excellence isn't just about what we make; it's also about how we make it and the people who help bring every Tyrwhitt product to life.

Our responsibility goes far beyond our own teams, it extends throughout our entire value chain. The people who make our products are an integral part of the Charles Tyrwhitt story, and their wellbeing is essential to the long-term success of our business. We believe that we build our brand one person at a time, and every individual deserves fairness, dignity, and respect.

Our values are the foundation of everything we do. We have a zero-tolerance approach to modern slavery and human trafficking, which is reflected in our strong Ethical Trading policies and the careful oversight we maintain across our supply chain. We work closely with our suppliers to ensure that forced labour has no place in the creation of our products.

Today, we partner with more than 28 trusted suppliers across 12 countries, some of whom we've worked with for over 20 years. These long-standing relationships are built on shared values, transparency, and trust. Together, we're committed to maintaining the highest ethical standards and doing business in the right way.

As part of this ongoing commitment, we are pleased to share our Modern Slavery Statement for the financial year ending 31st July 2025. This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and outlines the steps Charles Tyrwhitt has taken, and continues to take, to ensure that modern slavery and human trafficking have no place in our business or our supply chains.



LUKE KINGSNORTH, CEO

This statement was approved by the Board of Directors of Charles Tyrwhitt Shirts Ltd in September 2025 and will be reviewed annually.





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 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 1,145 direct employees during the reporting period.

We currently have 55 physical stores across the UK, USA, and France, supported by a network of 42 trusted third-party partners across 23 countries. Together, we share a commitment to responsible business and doing things properly - the Tyrwhitt way.



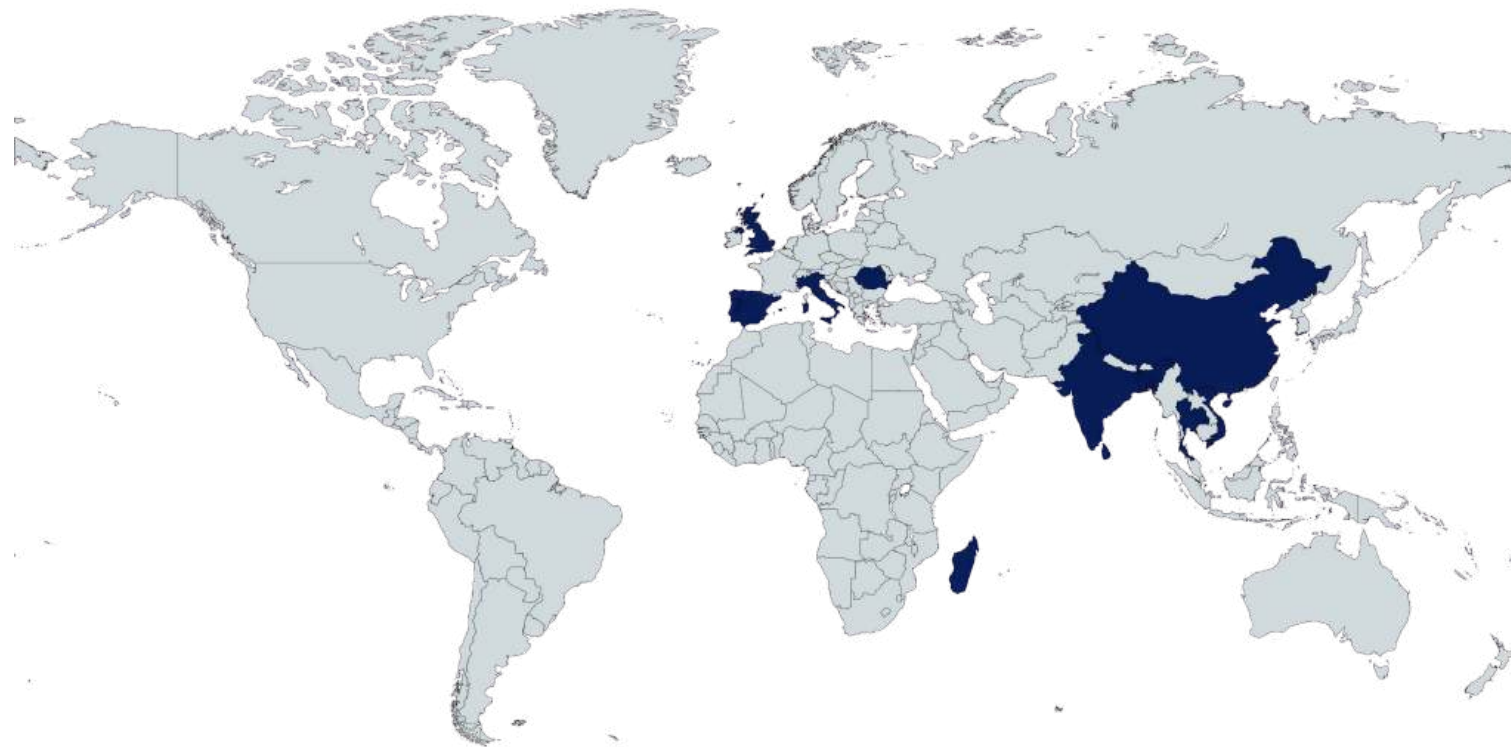
OUR SUPPLY CHAIN

Our supply chain spans Europe, Asia, and Africa, comprising of 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 28 suppliers, producing in 50 factories across 12 countries. Many of these are long-term partners, whom we have worked with for more than a decade. In FY25, we will continue to map our supply chain beyond Tier 1 to gain greater transparency over where and how our materials are made.

To support this, the requirement of supply chain disclosure has been added to our Supplier Code of Conduct, wherein suppliers are now obligated to provide information on the sourcing of all components related to Charles Tyrwhitt products, allowing us to identify possible risk throughout.

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.



Map of Charles Tyrwhitt Sourcing Countries





OUR POLICIES

Our ethical 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:

Ethical Trading Policy and Supplier Code of Conduct – Based on the Ethical Trading Initiative (ETI) base code, and informed by the International Labour Organisation (ILO) standards and the UN Guiding Principles on Business and Human Rights, these policies set out our expectations for labour rights, working conditions, and compliance with relevant laws.

All Tier 1 Supplier partners must sign an acknowledgement and adhere to our Supplier Code of Conduct 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.

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 Manual Terms & Conditions – Includes an explicit prohibition of the use of trafficked, bonded, child or forced labour within our supply chain.

RISK ASSESSMENT & DUE DILIGENCE

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 the International Labour Organisation (ILO), the Global Slavery Index, the Corruption Perceptions Index, and the US State Department's Trafficking in Persons Report.

This due diligence process allows us to identify and prioritise areas where risks are highest, particularly in countries or regions recognised as high-risk by international bodies, within labour-intensive manufacturing, or where subcontracted, 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 AND AWARENESS

We believe awareness is one of the most effective ways to prevent modern slavery. Our Responsible Sourcing Coordinator 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 in safeguarding human rights and to act with confidence when concerns arise, helping to uphold ethical standards at every stage of production.

MONITORING AND 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, BSCI, and WRAP, supported by trend and root-cause analysis. Currently, 88% of our Tier 1 factories hold a valid third-party audit. When improvements are needed, we work closely with suppliers through Corrective Action Plans (CAPs) to resolve issues and drive continuous progress.

Our supplier relationships are built on openness and collaboration. Over the past 24 months, we have visited 80% of our Tier 1 factories, with more frequent visits to our largest partners, representing the majority of our production. We continue to enhance transparency beyond Tier 1, gaining clearer visibility into our extended supply chain.

Where compliance cannot be achieved despite support, we apply a policy 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.

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.





OUR FUTURE COMMITMENTS

Our actions for FY25/26 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 year, we will extend our mapping beyond Tier 1, increasing supplier participation in independent social audits and strengthening the disclosure and approval of subcontractors. We also plan to begin the process of joining the UK Ethical Trading Initiative (ETI), further embedding recognised best practice into our approach. In addition, we will 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 defines the Charles Tyrwhitt brand.

EFFECTIVENESS AND 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 Code of Conduct, which currently stands at 100% adoption.

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.

“Since starting this business three decades ago, ‘doing things properly’ has always been important to me. To be a business that truly matters, we must always do the right thing.

It’s about making products properly and sustainably, making our business work for our people, our suppliers, and for our customers.

As I get older and perhaps even a little wiser, we are now doubly committed to this philosophy for the next 35 years and beyond.”

Nick

NICK WHEELER OBE
OWNER & FOUNDER, CHARLES TYRWHITT

