

DISTURBIA

MORDERN SLAVERY ACT

TRANSPARENCY STATEMENT

OCTOBER 2024

INTRODUCTION

This is Disturbia's first modern slavery statement and it is published in accordance with section 54 of the UK Modern Slavery Act 2015.

It outlines the initial measures Disturbia has undertaken to identify and prevent modern slavery and human trafficking within our operations and supply chains and sets out our commitments for 2024 - 2025.

We are committed to operating our business in a way that respects and protects the rights of our employees, contractors, supply chain workers and any other people that contribute to, or are affected by, our operations.

Our efforts to address these issues will be ongoing, and we are dedicated to continually improving our policies and practices.



BUSINESS & GOVERNANCE REVIEW

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An independent subculture fashion brand, Disturbia was founded in 2003 by Fashion and Photography graduates Francis and Helen, Built on a desire to ‘disturb the suburbs’ by creating unconventionally authentic attire for those with a penchant for all things strange and unusual.



Our Headquarters are based in Northumberland and London, with an in-house team consisting of Design, Product, Content, Customer Service, HR & Finance, Logistics and Management, who work collaboratively to develop our extensive product range and to deliver the best customer experience possible.



Most of our employees are directly employed by us on permanent contracts and we also engage with freelance contractors across digital and creative areas using standardised terms so we believe the risk of modern slavery within our own operations to be low.

Our warehouse and cleaning companies may use agency workers from time to time, who due to the nature of their recruitment and employment, may be more vulnerable to exploitation. This is mitigated through the use of authorised agencies only.

BUSINESS & GOVERNANCE REVIEW

We acknowledge that the textile & fashion industry is particularly high risk for modern slavery due to the way workers are recruited and managed within fashion supply chains.

Through supply chain mapping, desk-based research, visits, audits and external expert engagement we recognise that our product supply chains contain the most significant risks, so this is where we are currently focusing our modern slavery prevention efforts.

People are the heartbeat of our brand which would be nothing without our amazing team and network, our customers, and the talented individuals worldwide who craft our unique products. We stand firmly for fair workplaces where workers' rights are respected and protected.

As part of our ongoing efforts to maintain and monitor working standards for everyone involved, our People & Culture Manager regularly reviews any risk within our operations, whilst our Buying Director coordinates our supply chain efforts.



POLICIES

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POLICIES

CODE OF ETHICS POLICY

DISCIPLINARY AND CAPABILITY POLICY

ANTI-HARASSMENT AND BULLYING POLICY

EQUAL OPPORTUNITIES

DIVERSITY AND INCLUSION POLICY

FLEXIBLE WORKING POLICY

HEALTH AND SAFETY POLICY

GRIEVANCE POLICY

MODERN SLAVERY POLICY

WHISTLEBLOWING POLICY



SUPPLY CHAIN OVERVIEW

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We are committed to sourcing quality products from a range of countries. We value long-standing, mutually respectful relationships with our suppliers and commit to working in a transparent and open manner from the very start.

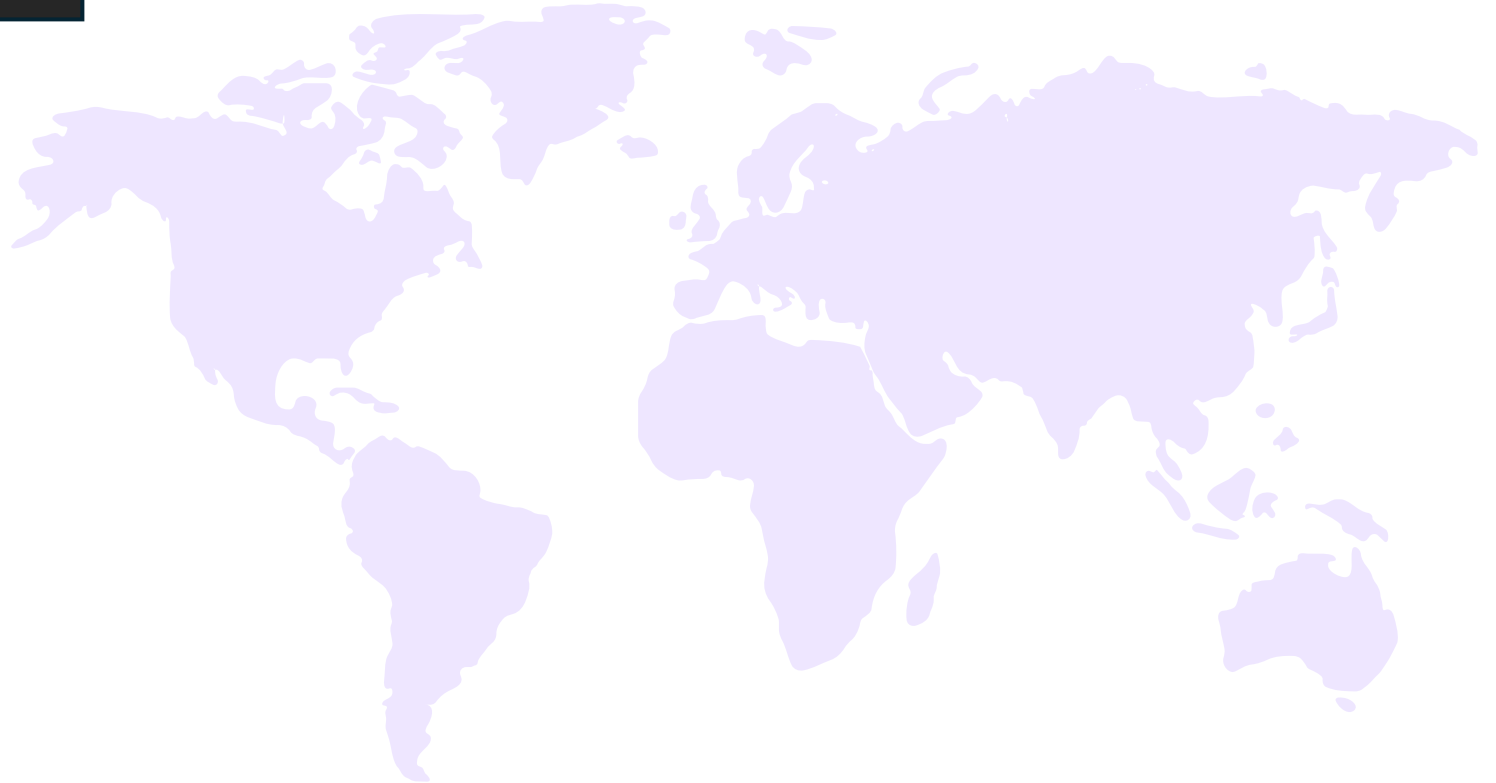
Our Buying, Tech and Production teams are in regular contact with supplier sand factories ensuring we have clear and open communication. We use independent third party auditing bodies to provide in-country oversight with regular audits to ensure the facilities used reach the required standards.



SUPPLY CHAIN OVERVIEW

PRODUCT SUPPLIER BREAKDOWN

COUNTRIES	SUPPLIERS
CHINA	32
INDIA	4
TURKEY	4
ITALY	1
PAKISTAN	2
VIETNAM	1





DUE DILIGENCE

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NEW SUPPLIER ONBOARDING

All suppliers are required to provide:

An in-date audit from a recognised audit body for the Tier 1 factory

A signed and dated cotton policy document detailing their commitment to ethical cotton sourcing that is not sourced from Uzbekistan, Turkmenistan and Xinjiang Uyghur Autonomous Region.

Signed confirmation that they have read and understand the Supplier Manual which details our Ethical code of conduct, Anti-Bribery policy and labour policies.

DUE DILIGENCE

MAINTAINING SUPPLIER STANDARDS



UK Buying, Production, Design and Technical teams are in regular email, in-person and phone contact with our supply base.



Audits are required to be kept up to date, the UK team review the audits regularly and review any non-compliance issues and plans to rectify within an agreed timeframe. The supplier is required to provide the follow up report from the audit body to show issues are resolved.



2024/25 COMMITMENTS

- Start to map Tier 2 suppliers
- Continue to monitor suppliers.



RISK ASSESSMENT

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SUPPLY CHAIN

From our own risk assessments of our main sourcing regions, we know the following modern slavery related issues and indicators could potentially be present in our supply chain:

- CHINA – Presence of Uyghurs and other Turkic and Muslim-majority people, child labour.
- INDIA – Restrictions placed on movement, retention of identity documents, withholding of wages, excessive overtime, debt bondage (agricultural sector), recruitment agencies and fees.

→ TURKEY – Syrian refugees, illegal migrant workers, casual workers employed through intermediaries, child labour and involuntary overtime.

→ PAKISTAN – Poor Health and Safety compliance, involuntary overtime.

→ VIETNAM – Human trafficking, child labour, forced labour.

We pay increased attention to these risks when selecting and training suppliers and when visiting factories.

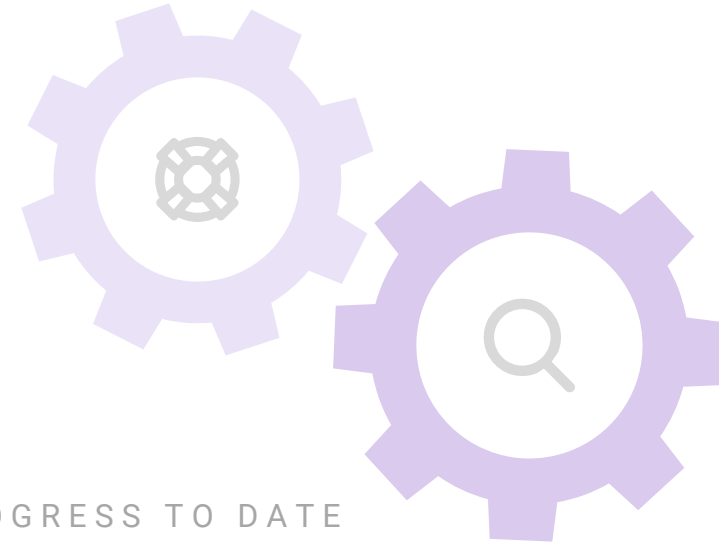
RISK ASSESSMENT

OPERATIONS

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This is mitigated through the use of authorised agencies only.



PROGRESS TO DATE

- Assessed risk profile of individual countries based on Global Slavery Index.
- Written confirmation from all suppliers that no cotton is sourced from Xinjiang Uygur Autonomous Region (XUAR) region, Turkmenistan & Uzbekistan.

RISK ASSESSMENT



2024/25 COMMITMENTS

- Develop modern slavery supply chain tools and assessment protocols to use during site visits.
- Work with suppliers to improve Modern Slavery awareness and benefits of robust policies.

- Assess agency worker risks.
- Assess risk associated with factories/suppliers without recognised social audit and associated action plan

EFFECTIVENESS OF OUR APPROACH

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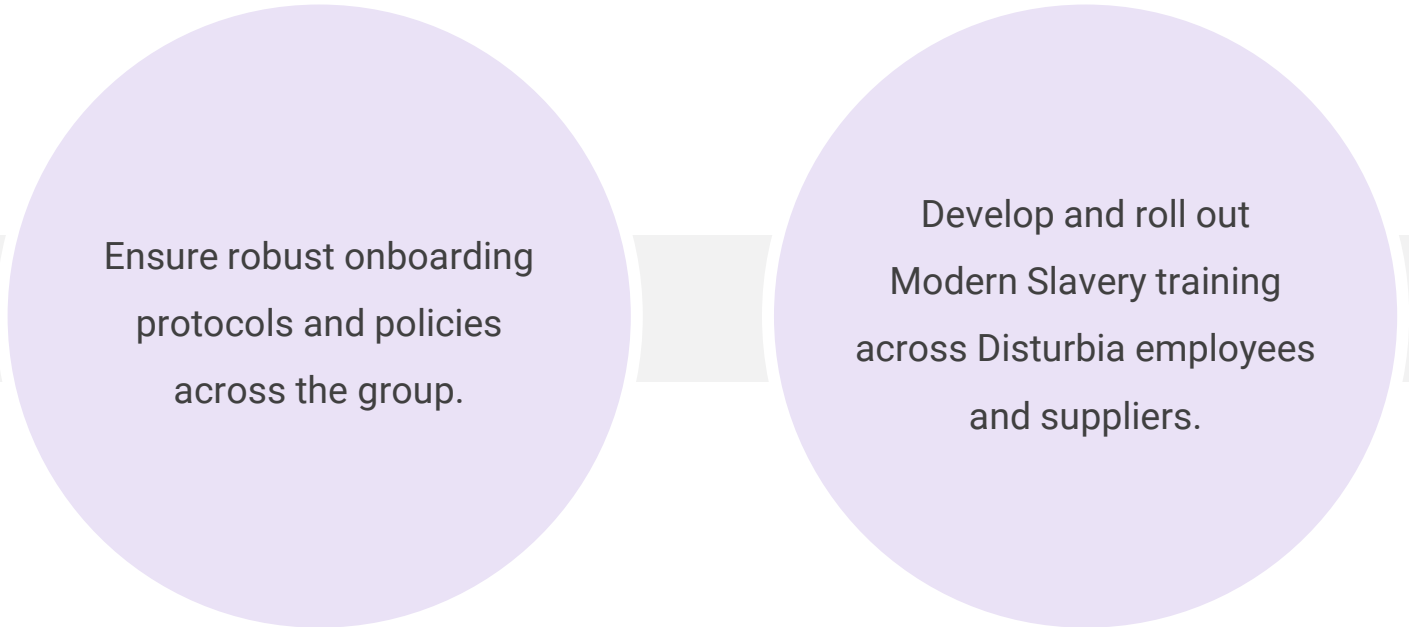
We know our modern slavery prevention program needs to keep evolving. We have not found any direct incidences or potential indicators of modern slavery within our business or supply chain, nor have we had any related grievances reported. We are committed to building our internal expertise and fine-tuning our approach.

GOAL

To be in a stronger position to detect and prevent modern slavery.

EFFECTIVENESS OF OUR APPROACH

KEY OBJECTIVES



Ensure robust onboarding protocols and policies across the group.

Develop and roll out Modern Slavery training across Disturbia employees and suppliers.

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