

The background of the slide features a photograph of four models (three men and one woman) standing in front of a large, curved, light-colored wall. They are wearing various pieces of sportswear, including hoodies and sweatshirts. One hoodie has the word 'HOODRICH' on it, and another has 'ADIDAS ORIGINALS' on it. The overall tone is muted and professional.

**JD Group**

# Modern Slavery Statement 2024/25

# Transparency statement

JD Sports Fashion plc (“Group”, “JD” ‘JD Group”, or “We”) ) recognises the importance of ethical sourcing and working to prevent modern slavery and human trafficking throughout our organisation and in our supply chain, both manufacturing and through our goods not for resale contractual agreements.

Human rights abuse allegations are taken seriously. We aim to protect individuals within both our own organisation, and our supply chains. We recognise that modern slavery has many causes and takes different forms across the globe.

Our Group Modern Day Slavery Transparency Statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and California Transparency in Supply Chains Act of 2010 (SB 657).

The Group sets out our standards, policies and processes aimed to prevent slavery and human trafficking from taking place in our supply chains or in any part of our business. The JD Group definition of slavery and human trafficking is aligned to section 54 (12) of the Modern Slavery Act 2015.

JD Sports Fashion plc has operations overseas and this statement acts as our intent to comply with the following acts:

- Dutch Child Labour and Due Diligence Act
- German Act on Corporate Due Diligence In Supply Chains
- French Devoir De Vigilance Bill

*Regis Schultz*

Regis Schultz  
Chief Executive Officer

Date:08/07/2025

*Dominic Platt*

Dominic Platt  
Chief Financial Officer

Date: 08/07/2025

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# What is modern slavery?

Before summarising our policies and management frameworks to reduce and prevent modern slavery, it is important to recap on the key definitions of modern slavery, and the areas of highest risk.

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including.

Defined in the 1926 Slavery Convention as the status or condition of a person whom any or all of the powers attaching to the right of ownership are exercised. In a later treaty, states agreed that there are also certain "slavery-like practices": debt bondage, forced or servile marriage, sale or exploitation of children (including in armed conflict) and descent-based slavery.

## 01. HUMAN TRAFFICKING

Defines by the UN Trafficking in persons Protocol as involving recruitment, transportation, transfer, harboring, or receipt of person by means of threat or use of force or other forms of coercion with the intent of exploiting that person for sexual exploitation, forced labour, or slavery, among other forms.

## 02. FORCED MARRIAGE

Any situation where persons, regardless of age, have been forced to marry without their free consent.



## 03. WORST FORMS OF CHILD LABOUR

Drawing on the 1999 Convention on Worst Forms of Child Labour, it includes situations where children are; exploited through slavery or slavery-like practices, including forced recruitment of children for use in armed conflict; used, procured, or offered for prostitution; used, procured, or offered for illicit activities including production and trafficking of drugs; engaged in hazardous work which may harm their health, safety or morals.

## 04. FORCED LABOUR

Status or condition where one person has pledged their labour or services (or that of someone under their control), in circumstances where the fair value of that labour or service is not reasonably applied to reducing the debt or length of debt, or the length and nature of the service is not limited or defined.



# Modern slavery - a global issue

**MORE PEOPLE ARE LIVING  
IN MODERN SLAVERY...**

On any given day in 2021 there were...

**10**  
MILLION  
increase  
since  
the 2018  
index

**50**  
MILLION  
PEOPLE  
living in modern slavery

**28**  
MILLION

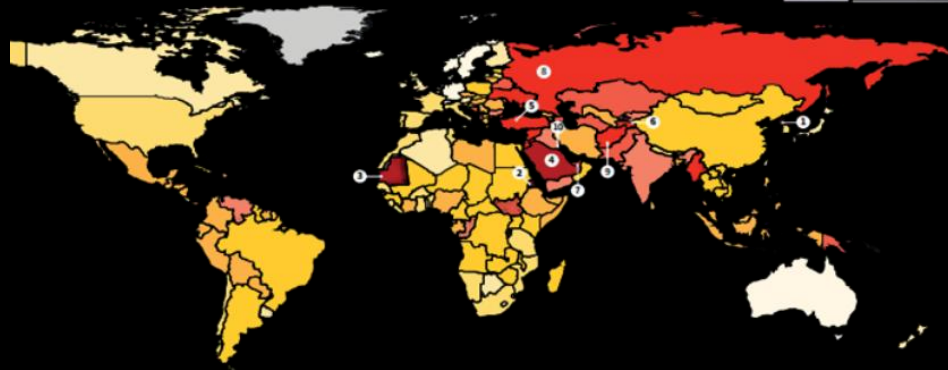
In  
FORCED  
LABOUR

**22**  
MILLION

In  
FORCED  
MARRIAGE

**12**  
MILLION

CHILDREN



Prevalence of  
modern slavery



Highest prevalence

- 1 North Korea
- 2 Eritrea
- 3 Mauritania
- 4 Saudi Arabia
- 5 Türkiye
- 6 Tajikistan
- 7 United Arab Emirates
- 8 Russia
- 9 Afghanistan
- 10 Kuwait

Lowest prevalence

- 160 Switzerland
- 159 Norway
- 158 Germany
- 157 Netherlands
- 156 Sweden
- 155 Denmark
- 154 Belgium
- 153 Ireland
- 152 Japan
- 151 Finland

**...BUT GOVERNMENTS ARE STILL  
NOT TAKING ENOUGH ACTION.**

Most government action

**68**  
PER CENT  
**UNITED  
KINGDOM**

**67**  
PER CENT  
**AUSTRALIA**

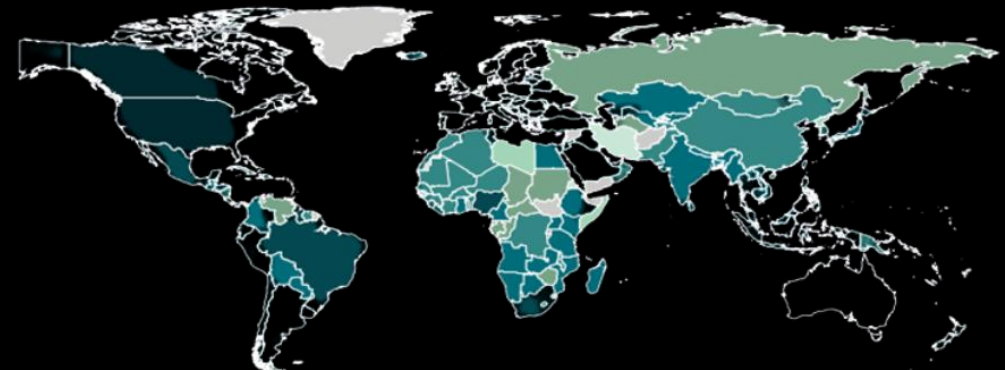
**67**  
PER CENT  
**NETHERLANDS**

Least government action

**5**  
PER CENT  
**ERITREA**

**8**  
PER CENT  
**IRAN**

**-3**  
PER CENT  
**NORTH  
KOREA**



Government  
response



Most action

- United Kingdom
- Australia
- Netherlands
- Portugal
- United States
- Ireland
- Norway
- Spain
- Sweden

Least action

- North Korea
- Eritrea
- Iran
- Libya
- Somalia
- Equatorial Guinea
- Russia
- Gabon
- Chad

Afghanistan, Palestine, South Sudan, Syria, and Yemen have been excluded due to ongoing conflict and extreme disruption to government function.

# Our business

Established in 1981 with a single store in the northwest of England, the JD Group is a leading global omnichannel retailer of Sports Fashion and Outdoor brands.

As of February 1st, 2025, the Group has 4,850 stores across 49 countries (including franchises and joint ventures) with a strong presence in the UK, Europe, North America and Asia Pacific.

Our headquarters are in Bury, UK, with additional offices supporting our businesses in the USA, Canada, France, Spain, Poland, Malaysia, and Australia.

Our Modern Slavery statement focuses on the two key areas under our operational control – the Private Label products we sell, and our own operations, such as warehouses where we hold stock.

JD Group

 **49**  
Countries

 **4,850**  
Stores

 **20 %**  
Online

 **97,000 +**  
Colleagues

## The products we sell

Group sales of branded sports fashion are made via two primary sources:

- Our **third-party brand partners**. Over 90% of sales are from globally recognised brands including Nike, adidas, New Balance, Puma and The North Face. Our brand partners manage their supply chains
- The balance of product sales are from **quality private label brands** managed and sourced by the Group, including McKenzie, Technicals and Unlike Humans. For private label, JD manages the supply chain

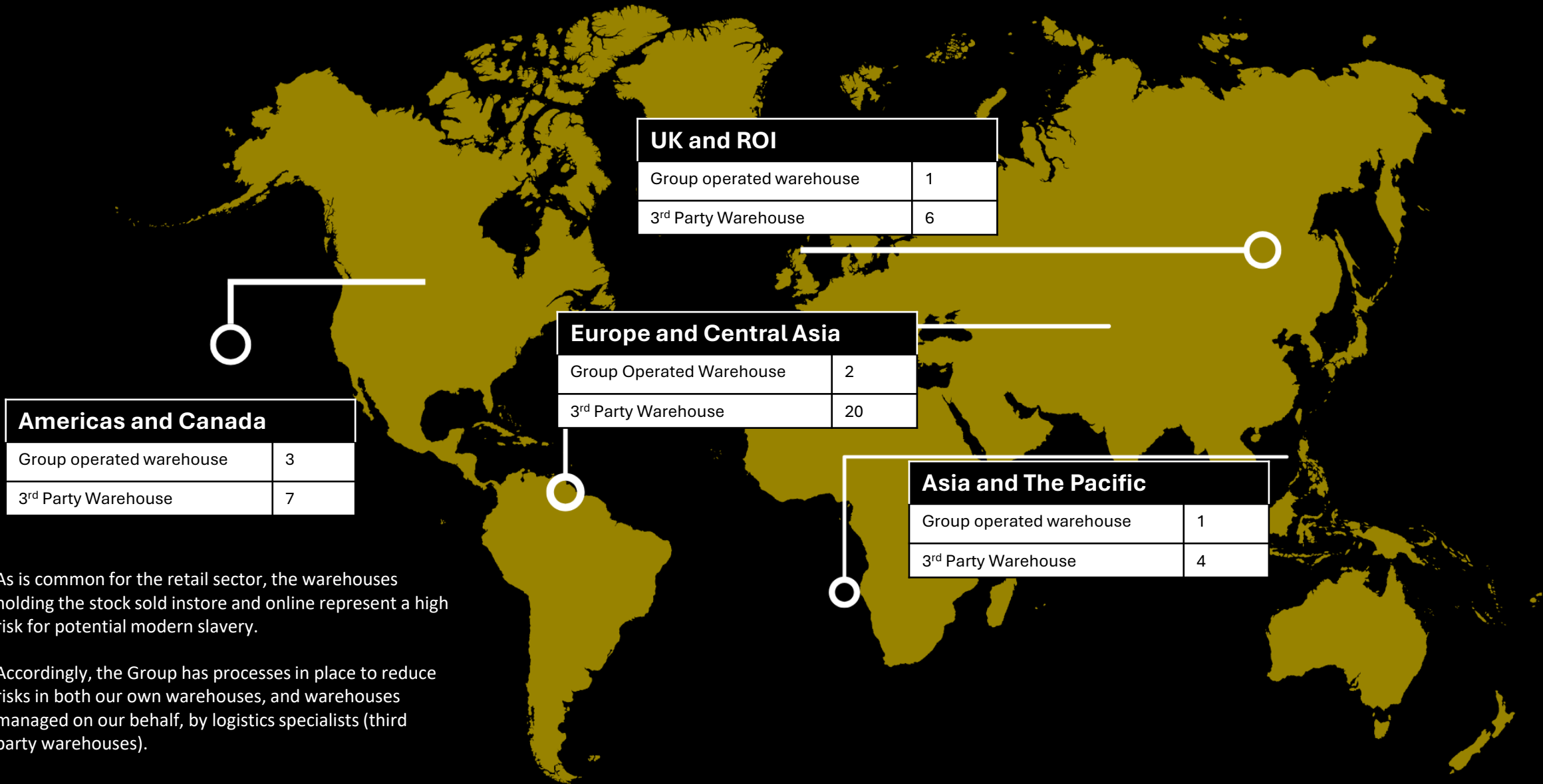
## Our operations

The Group uses warehouse facilities to distribute goods to both our retail stores, and online customers.

Our largest warehouse is located in Rochdale, UK, with additional warehouses in Europe, North America, and the Asia-Pacific region



# Operations – our warehouses



## Our approach and commitment

**Our Commitment:** The JD Group is committed to continuously improving our efforts to combat modern slavery and human trafficking across our own operations, and our private label business.

Beyond the Ethical Code of Practice and Code of Conduct, the Group undertakes additional measures to protect workers within the supply chains of both of private labels, and our own operations in the UK, and overseas.

**Our policy commitments:** We have a Modern Slavery policy that establishes our commitments to prevention of modern slavery, including human trafficking, and forced labour

We regularly review and update our Modern Slavery policy, practices, and procedures to reflect evolving best practices, regulatory requirements, and stakeholder expectations.

### Risks assessment within our own operations:

We conduct regular meetings with 3rd party labour providers to identify and evaluate modern slavery risks within our operations. For high-risk areas such as agency labour, we monitor supplier recruitment processes to ensure alignment with our policies.

**Private label supplier engagement:** We work with our suppliers to promote awareness of modern slavery risks in their own supply chain, whilst ensuring adherence to ethical standards and legislation within the countries where our suppliers are based.

**Training and awareness:** We provide colleague and supplier training and awareness programs to educate and inform on the signs of modern slavery, and their responsibilities in preventing its occurrence.

Together, with our employees, suppliers, and stakeholders, we are working towards a future where every individual within our operations and private label supply chain is free from the scourge of modern slavery and exploitation.

# 16,918

## EMPLOYEES COMPLETED MODERN DAY SLAVERY TRAINING

\*Feb 2024 to 31 Jan 2025 (UK Head Office and UK DC)

# Our Ethical Code of Practice and the Modern Slavery Act

Our Modern Slavery Act Transparency Statement is supported by the provisions of the JD Sports Fashion plc **Ethical Code of Practice** and **Code of Conduct**.

The **Ethical Code of Practice** applies to:

- Our **business operations**, including our warehouses
- Our **private label brands**, and their supply chains

The JD Ethical Code of Practice establishes the Code of Conduct standards, embedded in our business and the minimum standards we expect from our supply chain to ensure the protection of those workers, providing assurance that our products are manufactured within safe and fair conditions.

The Code of Conduct is a set of core principles that suppliers must commit to meeting as a condition of doing business with the Group, and is based upon international best practice, including International Labour Organization (ILO) and Fair Labour Association (FLA) principles and standards.



Our suppliers are assessed and audited against its standards and requirements.

The Code of Conduct prohibits key indicators of Modern Slavery, including but not limited to any type of prison, forced, bonded, or indentured labour and the withholding of free movement, including the withholding of identity documents.

We are dedicated to ensuring that our suppliers are responsible for ensuring that every site producing our products meets or exceeds minimum labour standards and adheres to both local laws and our Code of Conduct.

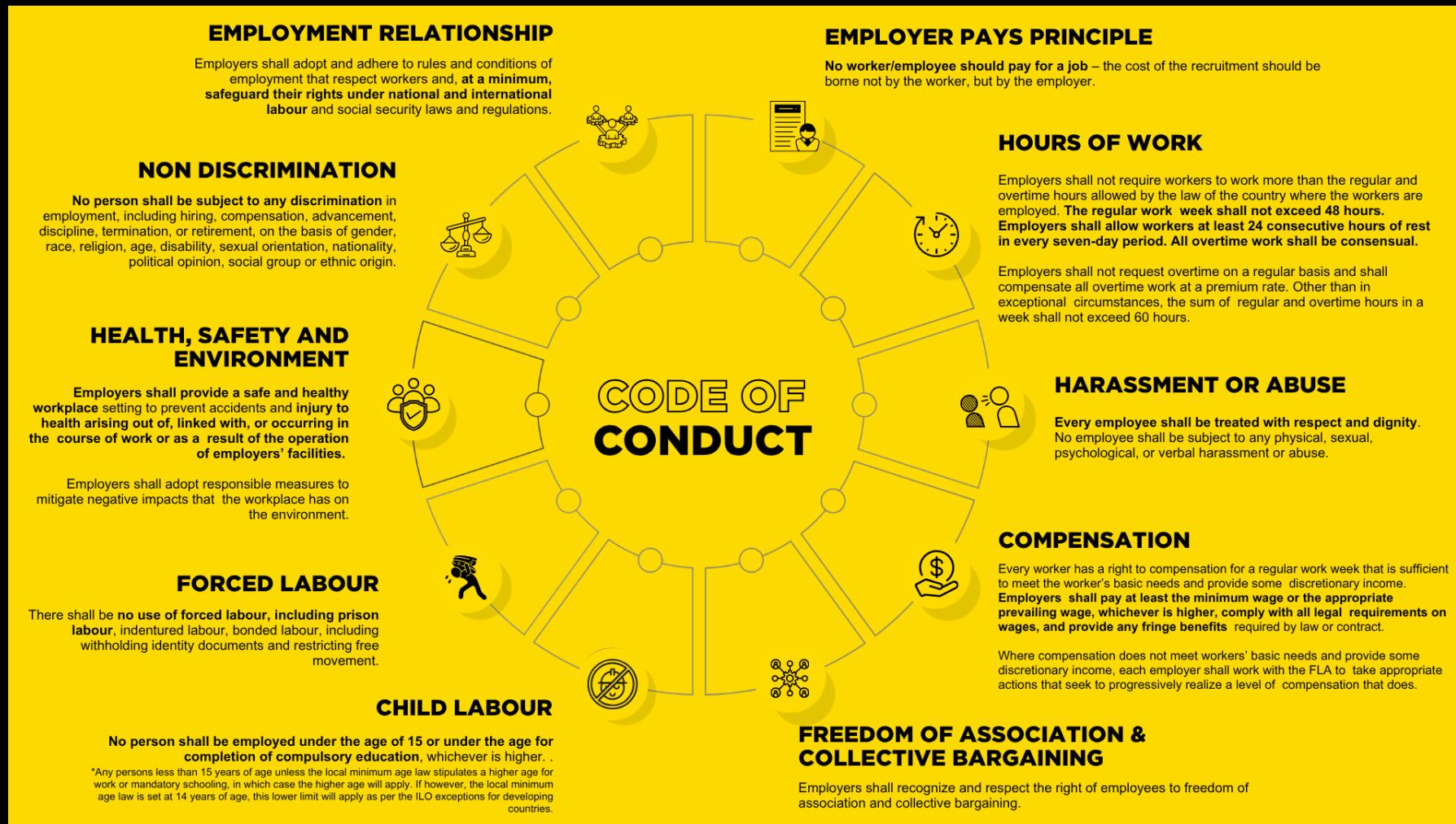
The people working for our suppliers, are to be treated with respect; their health, safety, and basic human rights must be protected and promoted. The Group recognises that human rights are fundamental principles which allow an individual to lead a dignified and independent life, free from abuse and violations.

We will not tolerate, nor will we condone, abuse of human rights within any part of our business or supply chains. Any allegations that human rights are not respected will be investigated, with appropriate action taken by the Group if the allegation is substantiated



# Code of Conduct – key areas

Our Code of Conduct is embedded into the Ethical Code of Practice, used for both our private label suppliers, and Goods Not for Resale (GNFR) suppliers working across our own operations



# Actions within the last reporting period

To reduce the risk of modern slavery within our own operations and private label supply chain, the Group completed the following actions and improvements during the period.

## POLICIES – OUR OPERATIONS AND PRIVATE LABEL

We reviewed and updated policies relating to our supply chain partners and created supplier guidance documents relating to:

- Suppliers using third-party providers of labour
- Forced labour policy
- Migrant worker policy
- Equality & diversity (inclusive of gender-based violence and harassment)

## AWARENESS – OUR OPERATIONS

Actions taken to reduce risks and exploitation within our own operations included:

- ✓ Implementation of welfare workers committees within our largest, main UK warehouse site
- ✓ Increased the numbers of colleagues trained to provide specialist modern slavery support
- ✓ Creation of strategic response unit (key personnel) at our main UK warehouse
- ✓ Updated human tracking and forced labour training material, including videos shown across our warehouse
- ✓ Partnered with Unseen to advertise our helpline number and confidential reporting avenues
- ✓ Updated our modern slavery and exploitation training (used in store, and warehouses) with key risk indicators

## IMPROVED REMUNERATION WITHIN OUR PRIVATE LABEL SUPPLY CHAIN

To improve conditions for workers within our private label supply chain, we apply cumulative remuneration, which takes account of both financial and non-financial benefits offered to workers.

The number of facilities meeting living wage, (based on our methodology below) was 71.15% in 2022, and whilst it has decreased to 61.16% in 2024, this is due increases in basic wages and is a positive outcome. as it affords better protection for workers.

We assess the data collected as below, from our private label suppliers:

- Basic wage
- Incentive pay such as bonuses
- In-kind benefits such as free meals, accommodation and transport
- Additional, non-wage cash benefits

# Actions Taken

## Transparency



We strive to maintain transparency in our supply chain, **achieving 100% transparency on our Tier 1 factories across the Group** and working with our contracted factories to ensure the full transparency of Tier 2 and 3 (Mill and Dye Houses). **Risk assessing all factories** prior to on-boarding and requiring information at the first stage on the names and locations of their value chain.

We **recognise the importance of assessing the environmental practices of the manufacturing chain** and the need to minimize the impacts they may have on the communities they operate in.

## Ethical Recruitment



We ensure that **all recruitment practices, for both direct and indirect employees, including agency workers, are conducted ethically, transparently**, and in compliance with applicable laws and regulations in the relevant country.

**In our UK operations we work collaboratively with 3rd party labour contractors** to affect a joined-up approach

## Worker Welfare



We **uphold the rights and welfare of our employees, including indirect workers** throughout our operations, including but not limited to, legal wages, safe working conditions, and freedom from discrimination and harassment.

## Reporting Mechanisms



We provide reporting mechanisms for direct employees in our global operations via an external program called One Trust.

**This gives a confidential voice to our employees to raise concerns and grievances.**

Regular reporting to the UK team ensures that such reports are investigated and addressed promptly and confidentially.

## Policies



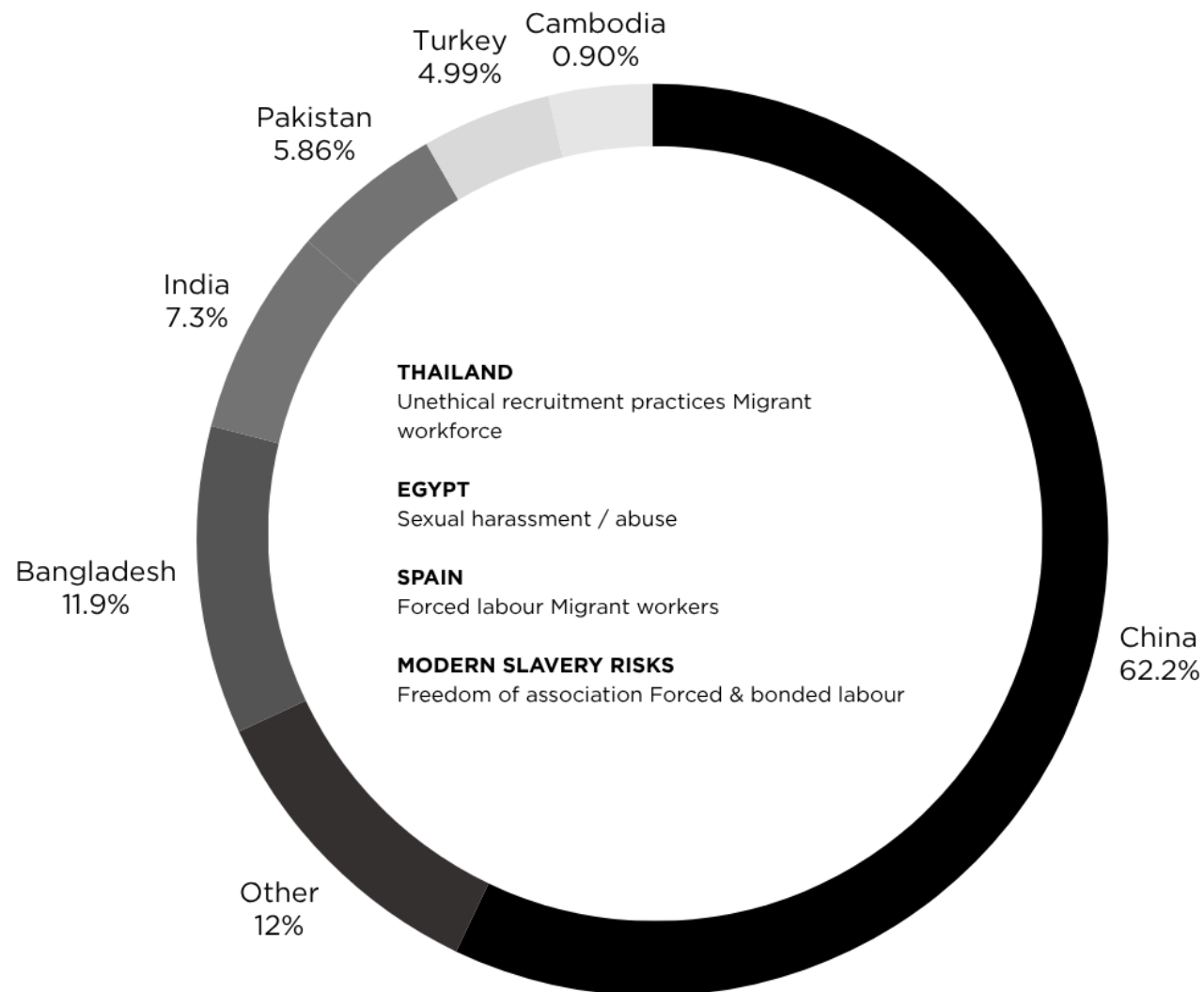
Policies for our supply chain, relating to modern day slavery and labour exploitation, are found on our PLC website below and the company SharePoint system for suppliers, in several languages.

**POLICIES**

Modern slavery risks differ based on geography and culture.

Examples of territory-specific risks identified within our private label supply chain include the following:

<b>MODERN SLAVERY RISKS</b> Freedom of association Migrant workers/ refugees Forced & bonded labour	
<b>MODERN SLAVERY RISKS</b> GBVH Forced and bonded labour Child labour Low Wages	
<b>MODERN SLAVERY RISKS</b> Freedom of association Gender based violence and harassment Child labour Culture and caste discrimination Sumangala system/ Dowry payments	
<b>MODERN SLAVERY RISKS</b> GBVH Forced and bonded labour Child labour Low Wages	
<b>MODERN SLAVERY RISKS</b> GBVH Forced and bonded labour Child labour Building Safety	
<b>MODERN SLAVERY RISKS</b> Freedom of association Migrant Forced & bonded labour	
<b>MODERN SLAVERY RISKS</b> Freedom of association Forced & bonded labour	



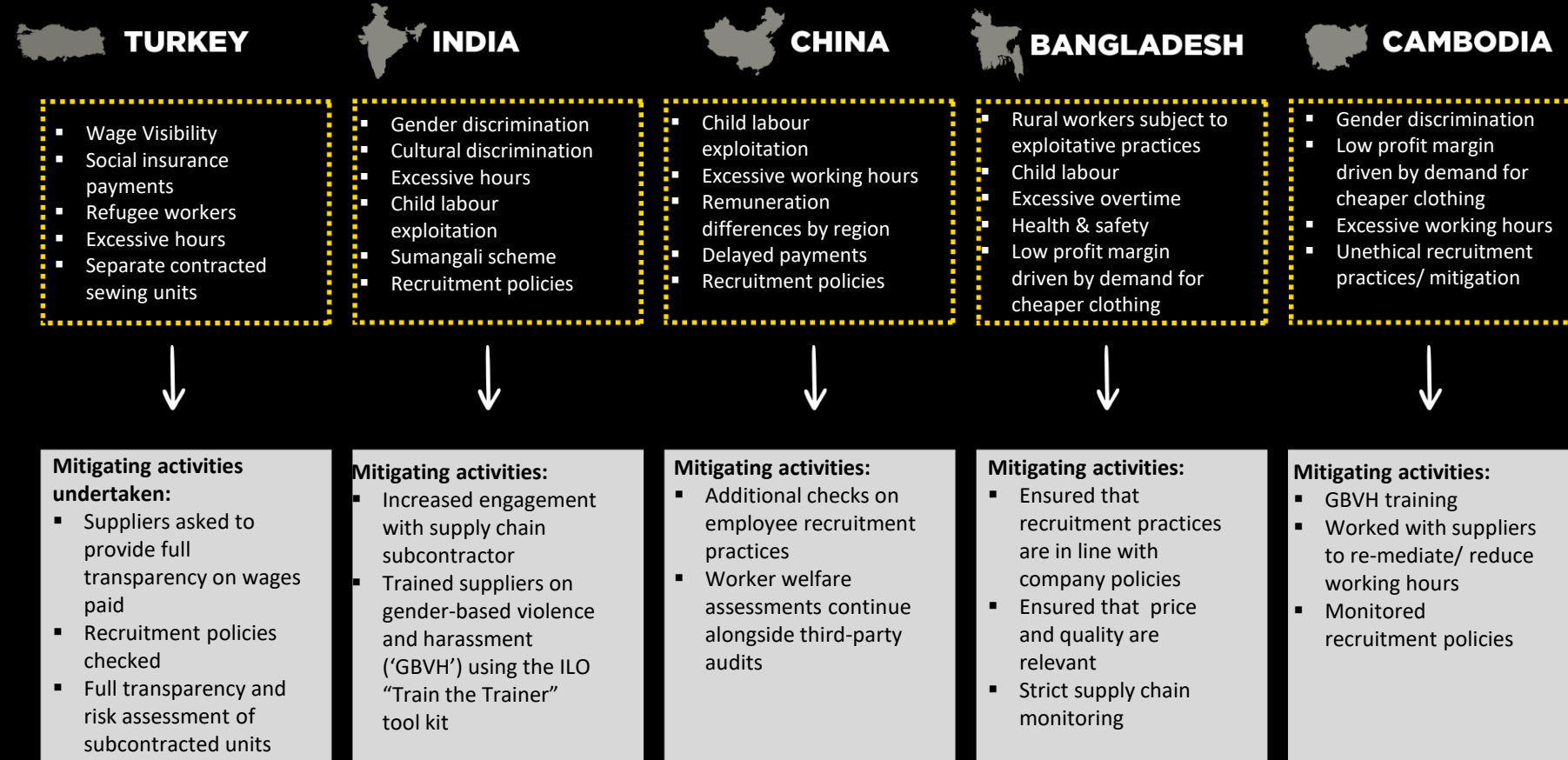


# Private label – territory risk analysis

FOCUSING ON RISK

Modern slavery risks differ based on geography and culture.

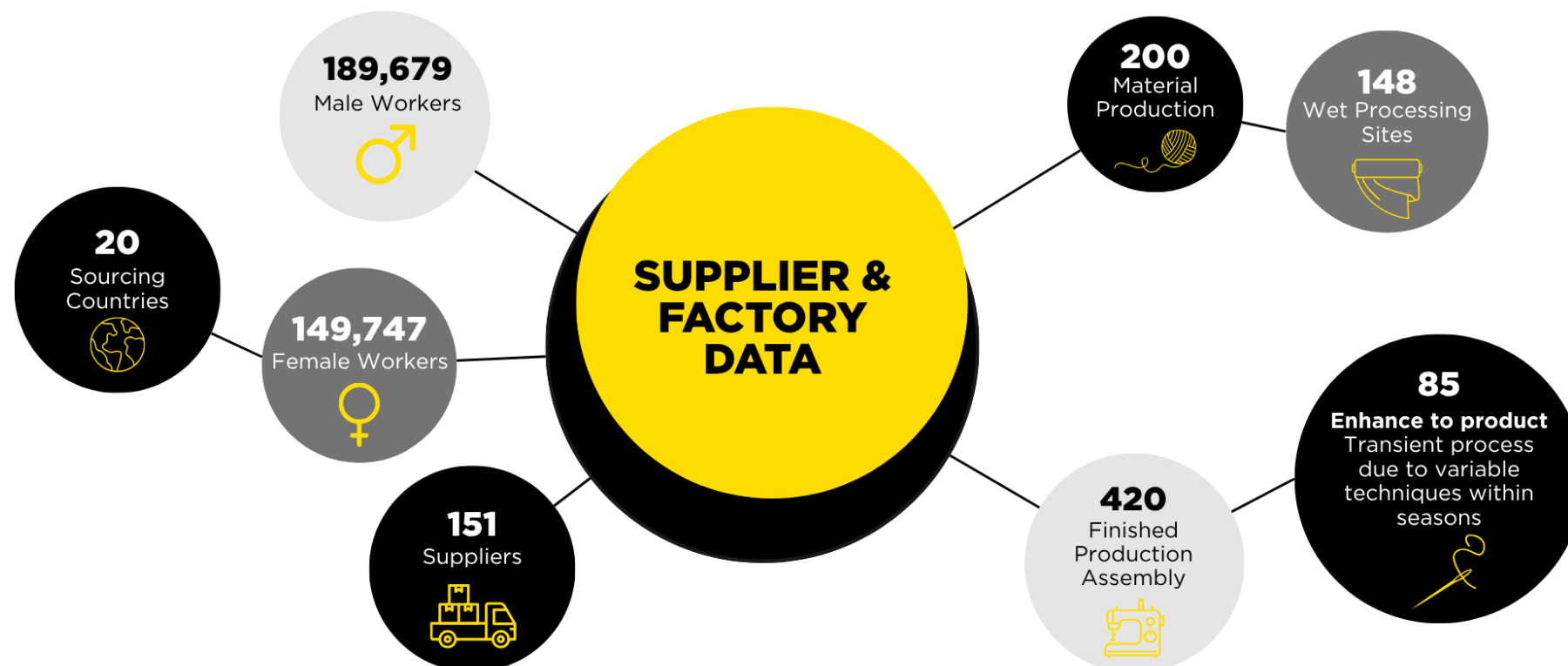
Examples of territory-specific risks identified within our private label supply chain include the following:



# Supplier and Factory Data – Our numbers

The analysis and consolidation of the supply base allowed us to reduce the number of Tier 1 suppliers and work to collaborate with Tiers 2-4 sites, giving better transparency and engagement within the indirect supply chain.

This has increased economies of scale in a narrower supply base and will establish closer ties with those not directly contracted to us and give greater opportunity to embed the company's strategy and standards.

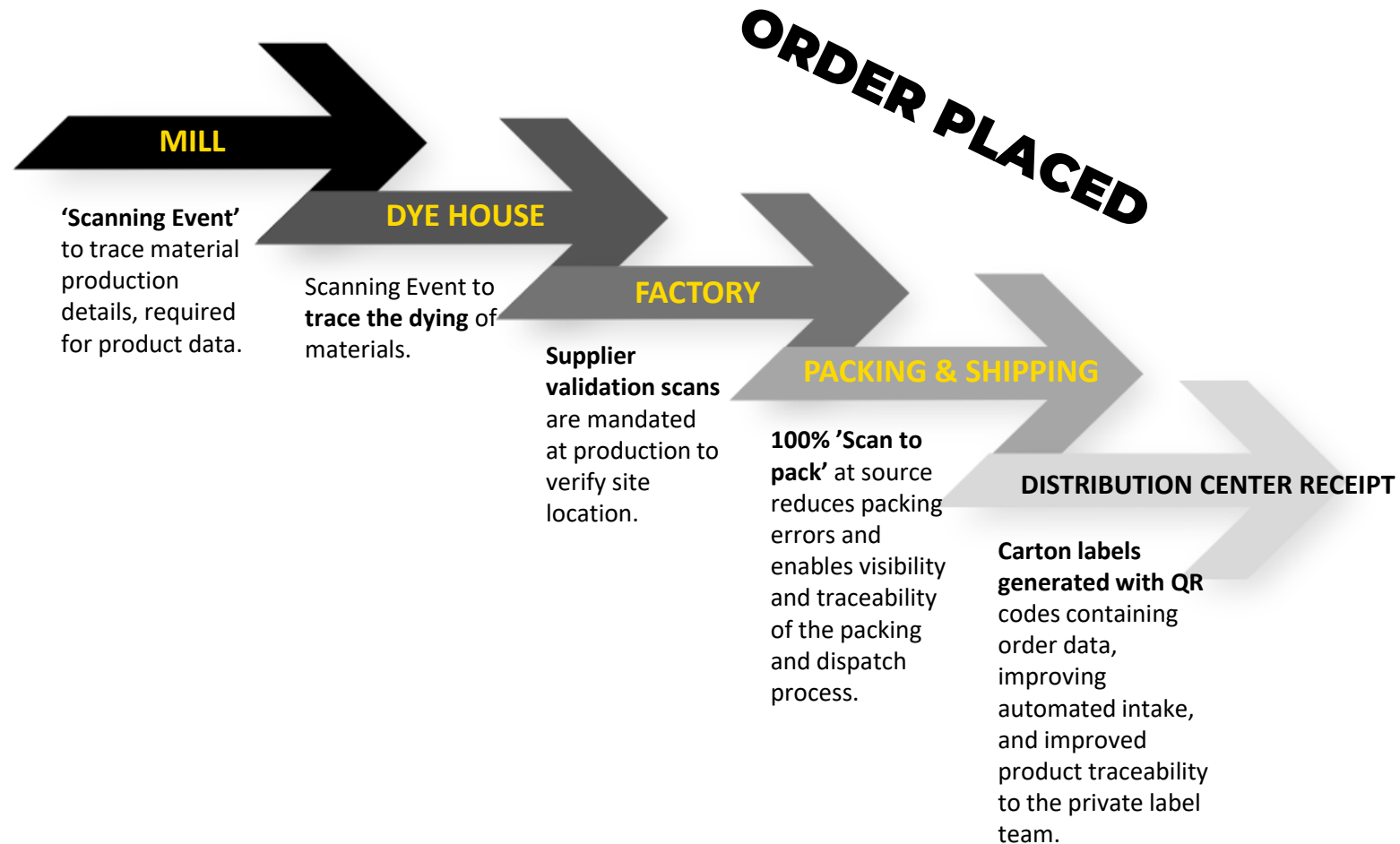


# Supply Chain - Transparency

Enhancing transparency and due diligence in our supply chain.

We have implemented scanning at each location in the private label value chain of each order, from raw material to packing and shipping to final receipt, providing real time visibility and full traceability.

This immediately red flags any unauthorized site and to prevent potential subcontracting giving better protection to workers.



# Private label – risk analysis

Our methods of risk assessment within our private label supply chain include:

- Third party audits
- Self-assessment questionnaires
- Supply chain mapping
- Country-specific engagements

**Risks that we pro-actively manage include:**

- Potential prevalence of Modern Slavery
- Territory/geographical-specific risks (see next slide)
- Political factors
- Worker demographics
- Environmental risks

To reduce modern slavery risks within our private label supply chain, we undertake assessments for lower supply chain tiers, even when we do not hold direct contractual agreements.

- Audits are not a fix to modern slavery, but aid the discovery and management of issue related to the principles within our Code of Conduct
- Our “Identify” “Act” and “Resolve” process ensures all non-compliance issues are investigated and resolved
- If a site is unable to provide an audit within the 12-month period, it is graded red, and the Group will not place additional orders





# Identify Act and Resolve

As an organisation committed to promoting safe and inclusive workplaces, we recognize the importance of implementing robust remedial actions to ensure the well-being and dignity of all employees, both direct and indirect.

The Group compliance team categorise all non-compliances within the manufacturing supply chain using our internal "Identify Act & Resolve (IAR)" methodology. It is important to Identify the root cause of the issues highlighted so that appropriate Action can be taken with the factory. Understanding the cause and effect of the issues results in the Resolution of these issues.

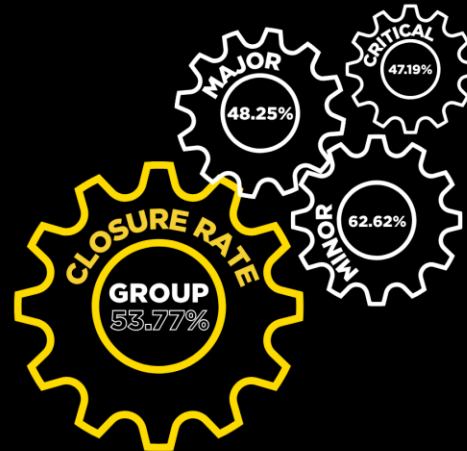
## Addressing Non-compliance

Identifying Issues and analysing the root cause, enables better collaboration with our supply chain achieving a higher success for resolution.

Realistic solutions can be implemented and affect long term change.

Our compliance team work consistently to apply the cause' to each non-compliance and detailed analysis reporting , giving a full picture of structures and policies that may be embedded into a factory process and lack of understanding of cause and effect on workers has not been recognised.

Giving our suppliers this insight promotes open transparency and understanding of challenges that we can work together to overcome, often avoiding perceived costs and disruption to their business.



### NON - COMPLIANCE

MINOR NO:924

MAJOR NO: 1449

CRITICAL NO: 28

# Our operations – risks and due diligence

## OUR OPERATIONS - WAREHOUSES



Risk area – recruitment, including:

- Workers from third-party agencies
- Policies relating to recruitment
- Specific worker status/checklists

Key mitigations in the period:

- ✓ We reduced the number of agency workers used
- ✓ Appointed and trained 'welfare champions'
- ✓ Conducted agency labour audits
- ✓ Audited warehouse recruitment files

## GOODS NOT FOR RESALE



Risks include:

- Lack of modern slavery awareness from small (<£30m) suppliers
- Sub-contracted services

Key mitigations:

- ✓ All new GNFR suppliers to the UK and UK-managed businesses are issued with the Ethical Code of Practice

## OUR STORES



Risks include: Subcontracted services, such as cleaning, security, and catering

International retail operations

Key mitigations:

- ✓ New colleague training
- ✓ Increased focus on modern slavery indicators

Due diligence undertaken within our own operations during the period included assessing and mitigating risks in our head office, warehouses, our stores, and across our GNFR supplier base.

# SPOTLIGHT ON RECRUITMENT

Training and due diligence for workers at our UK warehouses (both agency, and directly employed) are extensive, and act to both identify and deter forced labour and modern slavery.

Working closely with our labour agency provider, on processes and mitigation, has ensured increased identity checks and to close gaps in the management of personnel through application, to interview, induction to placement and on transfer to permanent employment. We recognised the need to ensure the person applying is the person on site, throughout the process.

## Automated reporting

- Periodic checks for duplicate property addresses, bank account numbers, and phone numbers, supported by welfare interviews. Weekly 'red flag' reports completed.
- Checks with local councils for unlicensed HMO's and alerts across the entire agency for multiple occupancy houses that would not otherwise flag in one company and can identify multiple occupants at other businesses

## Due diligence processes – worker identity:

- Risk assessments identified an increase in the use of fraudulent ID . Agency labour managers developed in house training on reporting mechanisms and methods to identify potential coercion/exploitation
- Photographs are taken at multiple stages – registration, induction, and placement. This ensures applicant identification and reduces the risk of 'employee substitution', a regular modern slavery risk

## Training:

- All agency employees receive mandatory modern slavery training. Detailed policies and procedures are available to all on the company system and apps.
- Agency labour account managers receive advanced training and meet with our critical response team bi-monthly
- Agency labour operations and account managers regularly attend events and webinars hosted by the ALP, S2G, GLAA etc to ensure company processes remain relevant

## Worker awareness:

- Worker newsletters – topics include modern slavery information and how to report concerns or request help
- [Compliance Hub](#) site link is included on payslip emails, to make workers aware of their rights

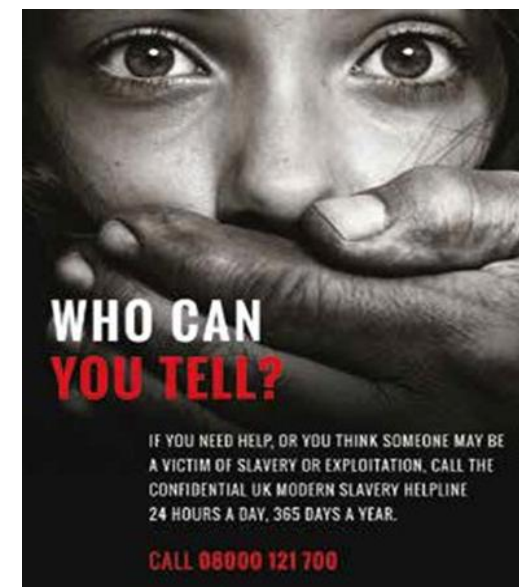
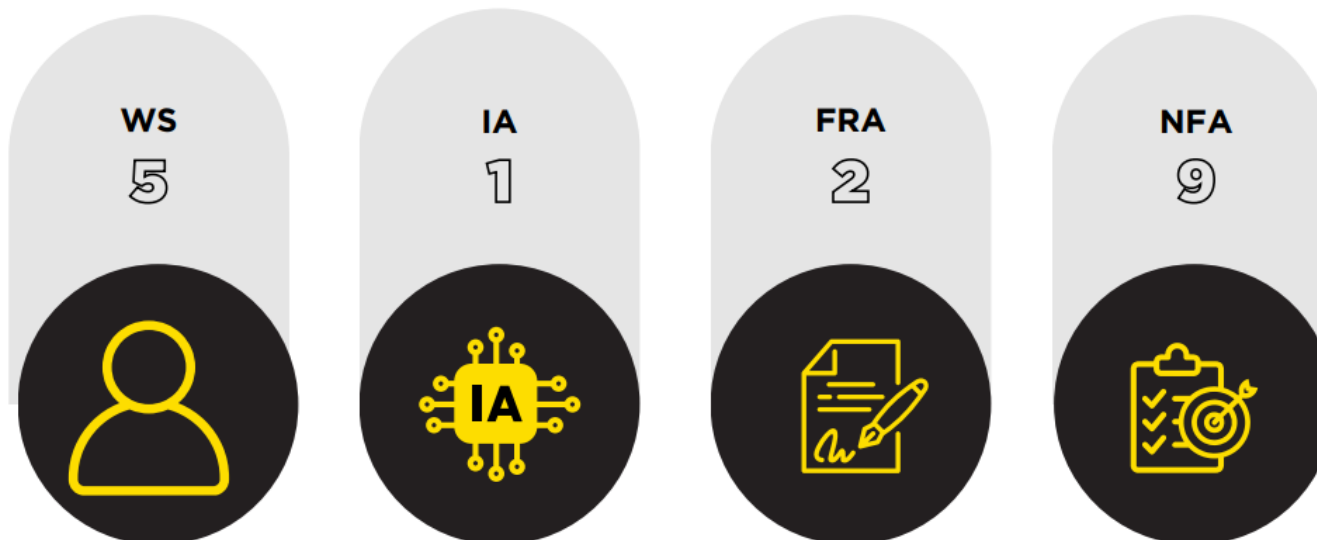
## Risk Assessments:

- Annual risk assessments are undertaken by the agency Head of Compliance, in addition to site-specific risk assessments introduced June 2025

# DISCLOSURES IN OUR UK OPERATIONS

Working with UNSEEN in the UK and sponsoring their helpline, has enabled us to develop a classification system for reporting potential Labour Exploitation and Modern Slavery concerns raised by employees by direct referral to our People Relations team, via the Welfare Champions or from the Helpline.

- FRA** First Responder Advice (Unseen, Police)
- IA** Internal Action (Further checks for senior team internally)
- WS** Welfare Support
- NFA** No Further Action





# Modern slavery training – an ongoing commitment

We continue to improve policies, ensuring clarity for our supply chain partners and ensure training materials are updated and relevant across our entire UK operations.

We are implementing a three-tier training program on our bespoke training platform for all colleagues across the business, targeting specific areas where enhanced understanding is vital within roles.

- \*Level 1: Mandatory for all colleagues to enable further recognition of labour exploitation factors, and awareness of reporting obligations and processes.
- Level 2: Enhanced level will be mandatory for employees responsible for i) procurement and negotiation, ii) employment of staff and iii) international teams working within high-risk countries and iv) Welfare Sponsors.



**\*89% of employees in the UK operations completed core level 1 training to date**

# On going commitment

## FORCED LABOUR

The main common risk identified is that of forced labour both globally and in the UK. JD recognises the importance of our direct and indirect workers and those in the extended supply chain. It is important that they can raise any issues of concerns with either JD personnel or an escalation team in confidence and safety.

The Group and subsidiary sites display posters throughout their UK operations or warehouses and retail stores in several languages, giving workers confidential contact information to report issues such as forced labour/debt bondage/withholding identity documents/threatening or violent behavior etc.

JD Groups approach to auditing is to reduce audit fatigue for both factories and businesses.

When we on-board a new factory we will accept an expired audit (Classed as Amber on the risk analysis) and within the previous 12-month time-scale, but we work to ensure all non-compliances that are still open are resolved. This allows the factory and our business to ensure that the partnership is the right one and will continue for a second quarter. A new audit is required during this second quarter.

## RECRUITMENT PRACTICES

Payment of salaries/bank accounts/overtime/social insurance

- Ensuring correct recruitment policies are in place and agencies are registered with no fees in place for workers
- Particularly difficult in rural areas, where recruitment is informal
- Ensure contracts are in place for all workers, inclusive of probation and termination
- Identify and protect home workers where used

## EXTENDED AUDITING POLICIES

Countries and regions of risk have been identified using documented data with a number of assessments trailed and introduced in China. This has been successful and proven to be more informative than worker interviews. For example, an issue with delayed payments was identified, which otherwise had not reported in the standard audit process. This issue was immediately remedied by working with the supplier and factory to align the payments. All workers now receive the payment in a timely manner, and this will continue to be monitored.

We recognise that different countries and cultures need different approaches and that whilst the issue are the same the reasons may be more complex. An example would be India and Bangladesh where GBVH is prevalent and beyond the scope of traditional auditing.

## RECRUITMENT PRACTICES

As the Group expands into territories that now have reporting responsibilities in their own right it is important that our Group works to assign responsibility and accountability for addressing human rights risks including modern day slavery and human trafficking in these countries .

## TRAINING

Regularly conduct a needs analysis for workers within the UK sites to determine and meet its need for internal capacity building training and specialist support. Upwards of 230 personnel within the UK Distribution center and key subsidiaries have been trained as welfare champions and sponsors. The JD Academy continues to train new starters and make training mandatory in key areas.

## POLICIES

Continue to communicate and review our policies and adapt them accordingly as needed. These are available on our PLC site and on a supplier SharePoint link in multiple languages.