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RESPONSIBLE RETAIL / TRANSPARENCY

Modern Slavery Transparency Statement

A practical framework for responsible sourcing, worker dignity and accountable purchasing.



DRAFT - MANAGEMENT REVIEW PENDING

Prepared for Koventi Ltd. This document sets out proposed commitments and processes. It does not assert completed audits, training, board approval or statutory applicability.

Purpose and document status

A proportionate approach to responsible retail

Why this document exists

Koventi brings clothing, footwear, bags, accessories and home essentials together through its online storefront. The way these goods are sourced matters as much as the way they are presented. This document sets out a practical framework for recognising and addressing risks of forced labour, servitude, human trafficking and exploitation in retail supply chains.

Status of the statement

This is a draft transparency framework dated 2 November 2026, prepared for management review. It is not a signed annual statement of verified actions. No supplier audit results, workforce statistics, training completion figures, financial reporting period or director approval have been supplied for this publication. Commitments below describe proposed standards and intended processes, rather than an assertion that those processes have already been implemented.

How to read it

The framework separates the known storefront context from measures that management should adopt, evidence and review. Where an action is described as proposed, planned or expected, it should be supported with records before it is reported as completed. A final annual statement should identify the reporting period, explain the steps actually taken and record the required approval where applicable.

REVIEW POINTS

- Do not equate a published policy with proof of implementation.
- Record actual actions and outcomes before making an annual performance claim.

Our retail context

Understanding the business and the goods we offer

Koventi online

The current storefront covers menswear, womenswear, childrenswear, footwear, bags and luggage, footwear accessories and home and kitchen products. Products are organised by department and product reference. This creates a starting point for connecting individual listings to the businesses that supply them, although a product reference alone does not establish the origin of raw materials or the conditions in a factory.

Business information

The business contact details provided for Koventi Ltd are 55 Argus Walk, Crawley, England, RH11 8BQ; info@koventi.co.uk; and +44 7878 800935. These details are a contact route, not evidence of a manufacturing facility or a certification. Company registration, turnover, employee numbers and supplier locations have not been verified for this document.

Scope boundaries

The proposed framework applies to purchasing, product onboarding, supplier relationships, contracted services and the operation of the retail website. It should extend to logistics, warehousing, packaging and recruitment services where Koventi uses them. It does not imply that Koventi owns factories, has audited any workplace or is affiliated with any organisation mentioned in source guidance.

REVIEW POINTS

- Map the legal seller, supplier, manufacturer and service provider separately.
- Maintain a record of who owns each supplier relationship.

Modern slavery risks

Recognising exploitation before it becomes invisible



Forms of harm

Modern slavery can include forced labour, domestic servitude, trafficking and exploitation linked to debt, threats or restrictions on movement. A worker may appear to have agreed to a role but still lack a meaningful ability to leave. Recruitment fees, retained identity documents and threats against family members can make a job coercive.

Warning signs in a retail supply chain

Indicators can include a supplier refusing to identify the production site, prices that appear incompatible with lawful labour costs, unexplained subcontracting, workers unable to speak privately, wage deductions that are not understood, or accommodation and transport controlled in a way that prevents people leaving. These indicators call for assessment; none alone proves that exploitation has occurred.

People at greater risk

Migrant workers, agency workers, temporary staff, young workers and people facing language or immigration barriers may have less access to remedy. Assessment should consider the worker experience rather than relying only on paperwork supplied by an employer. Any enquiry must avoid exposing a worker to retaliation, dismissal or coercion.

REVIEW POINTS

- Listen for evidence of restricted choice, not only visible physical restraint.
- Escalate concerns carefully and avoid making accusations without a factual basis.

Governance and accountability

Clear ownership for decisions and follow-through

Management responsibility

Koventi management should appoint a responsible lead for this framework and give that person authority to escalate supplier concerns. This document does not name a director or compliance officer because no appointment has been confirmed. The responsible lead should be identifiable internally, with an alternative route if the concern involves that person.

Purchasing decisions

Responsibility should sit with the people who choose suppliers and approve orders, supported by management oversight. Commercial pressure should not override a serious labour concern. A proposed decision record should show the issue, available evidence, immediate safeguards, decision owner, deadlines and the reason a relationship is continued, paused or ended.

Approval and review

Management should review the framework at least annually and after a significant change in sourcing or a serious incident. Where section 54 of the Modern Slavery Act applies, the statutory statement must follow the relevant approval, signature and publication requirements. A draft should never be presented as board-approved merely because it has been placed on a website.

REVIEW POINTS

- Assign a named internal owner before rollout.
- Keep a dated record of reviews, approvals and unresolved actions.

Supplier expectations

Standards to communicate before a purchase

Freedom and dignity

The proposed supplier standard prohibits forced, bonded and trafficked labour and expects workers to be free to leave employment in accordance with lawful notice arrangements. Identity documents should remain under the workers control. Workers should not pay recruitment fees to obtain a job, and any identified fees should be addressed through an appropriate remediation plan.

Employment conditions

Suppliers should comply with applicable wage, working-time, health and safety and minimum-age requirements. Work should be voluntary, terms should be understandable, and deductions should be lawful and transparent. These are proposed requirements for communication and contractual incorporation, not a claim that all existing suppliers already comply.

Transparency and cooperation

Suppliers should provide accurate business and production information, disclose authorised subcontractors and cooperate with proportionate enquiries. They should not retaliate against workers who raise concerns. A refusal to share basic information should be recorded and considered in the decision to onboard or continue purchasing.

REVIEW POINTS

- Share the standard in a language the supplier understands.
- Set clear expectations for subcontracting and changes of production site.

Supply chain mapping

Connecting a product to the businesses behind it

A practical starting point

The proposed supplier register should capture the trading and legal name, business contact, payment beneficiary, product references supplied, country of dispatch and known manufacturing location. Where information is not available, the gap should be visible rather than replaced with an assumption based on a listing or shipping address.

Looking beyond the first seller

Retail products may pass through importers, wholesalers, marketplaces, agents and factories. A seller may not be the manufacturer. For higher-risk categories, Koventi should seek further information about production and materials, prioritising areas where labour intensity, outsourcing or complex sourcing creates a greater risk of harm.

Maintaining useful records

Supplier information should be updated when ownership, payment details, production sites or subcontractors change. Supporting documents should be checked for consistency and kept securely with access limited to people who need them. The register should distinguish confirmed facts, supplier declarations and unverified statements.

REVIEW POINTS

- Use original Koventi product references to link records.
- Do not describe a supply chain as fully mapped without supporting coverage data.

Risk-based assessment

Prioritising attention where it can protect people



Risk factors

A proposed risk assessment should consider product type, raw materials, production processes, location, use of labour agencies, recruitment practices, subcontracting and supplier transparency. It should also consider order changes, unrealistic deadlines and commercial terms that might push excessive pressure further down the chain.

Proportionate review

Low-risk relationships may need basic identity and policy checks, while higher-risk suppliers may need more detailed evidence, management discussion or independent specialist support. A simple risk label should be accompanied by reasons and a review date. A questionnaire is a source of information, not a substitute for critical assessment.

Responding to change

Risk assessment should be revisited after credible allegations, unexplained changes, inconsistent documentation or a supplier moving production. A previously satisfactory review should not be treated as permanent assurance. No risk scores or supplier coverage percentages are reported here because the underlying assessment has not been provided.

REVIEW POINTS

- Record why a supplier is higher or lower priority.
- Reassess when facts change, not only when a calendar reminder arrives.

Due diligence and onboarding

Enquiries that lead to defensible decisions

Before onboarding

The proposed onboarding process should establish the suppliers identity, role in the chain and ability to meet the communicated labour standard. Questions should cover production locations, use of agencies, recruitment fees, wages, working hours, grievance routes and subcontracting. Requests should be proportionate and realistic for the relationship.

Evaluating evidence

A policy, certificate or audit report should be checked for issuer, scope, date and relevance to the actual facility and products. A generic certificate should not be used as proof of working conditions. Contradictions between a supplier statement, commercial documents and production information should be resolved before a positive assurance claim is made.

Decision and conditions

Onboarding should record the available evidence, unresolved gaps, conditions of purchase and follow-up actions. Where specialist review is needed, the relationship should be paused or limited until management has considered the risk. This framework does not state that any existing supplier has passed such a process.

REVIEW POINTS

- Validate evidence against the specific site and relationship.
- Keep unresolved issues visible in approval records.

Recruitment and worker safeguards

Putting freedom of choice at the centre

Responsible recruitment

Where Koventi engages staff or labour agencies, the proposed process should verify lawful employment arrangements and communicate pay, duties, hours and deductions clearly. Recruitment costs should not be transferred to workers. A worker should have access to their identity documents and an understandable way to raise a concern.

Agency and contracted labour

Contracted services can create risks even where goods are sourced separately. Cleaning, packing, warehousing, transport and temporary staffing should be considered where relevant. A business should understand who employs the worker, who pays them and who controls accommodation or transport, rather than relying only on an agency assurance.

Safe conversations

Questions about working conditions should be asked respectfully, without managers or recruiters influencing answers. Interpreters should be independent where possible. Personal data collected in these enquiries should be minimised, securely handled and not shared in ways that increase the risk to a worker.

REVIEW POINTS

- Do not retain identity documents as security for employment.
- Check that workers can understand their employment terms.

Child labour and vulnerable workers

A careful response that does not increase harm

Prevention

The proposed supplier standard should require compliance with applicable minimum-age rules and protections for young workers. Age verification should be lawful and proportionate. An apparent age discrepancy should be assessed carefully rather than resolved by dismissing a young person without support.

If a concern is identified

Where a child may be working unlawfully or in hazardous conditions, immediate safety should take priority. Management should seek competent safeguarding advice and a remediation plan suited to the person, local law and circumstances. The objective should be to remove harm without creating greater vulnerability or loss of access to education.

Other vulnerabilities

Workers may face language barriers, disability, displacement, insecure housing or dependency on an employer. These factors should inform how concerns are investigated and remedied. This document does not report any specific child-labour incident or claim a specialist partnership; none has been verified for Koventi.

REVIEW POINTS

- Do not publish identifying details of a vulnerable person.
- Seek qualified advice before taking action that could create further harm.

Reporting concerns

A route for customers, workers and suppliers



Contact route

Concerns about sourcing or labour conditions can be raised with Koventi through info@koventi.co.uk or +44 7878 800935. State the relevant product or supplier, what was observed and when, and any evidence that can be shared safely. Do not send identity documents or sensitive worker details through a public review or social media comment.

Handling a report

The proposed process is to acknowledge the concern, assess urgency, preserve relevant information and assign a responsible person. Information should be shared only with those needed to assess and address the issue. Koventi should not promise absolute confidentiality where legal disclosure or urgent safeguarding may be necessary.

Immediate danger

If someone is in immediate danger, contact the appropriate emergency services rather than waiting for a retail support response. Reports to Koventi are not a substitute for police, safeguarding or specialist assistance. A safe reporting process should prohibit retaliation and provide an alternative escalation route where a conflict exists.

REVIEW POINTS

- Separate a product-service complaint from a worker-safety concern where needed.
- Record the next action and who is responsible for it.

Investigation and remediation

From a credible concern to a responsible response

Triage and evidence

The proposed response begins by assessing immediate risk to people and the reliability of available information. Records, supplier correspondence and relevant transaction details should be preserved. Investigators should avoid alerting individuals in a way that could lead to intimidation or destruction of evidence.

A worker-centred plan

Remediation may include repayment of recruitment fees, return of identity documents, correction of wages or working conditions, access to safe reporting and specialist support. The right action depends on facts and local law. A corrective plan should identify a responsible owner, deadlines, evidence requirements and a way to verify that workers have benefited.

Commercial decisions

Suspending or ending a relationship may be necessary, but an abrupt exit can also harm workers. Management should consider leverage, safety and credible remediation alongside legal obligations. No guarantee of remediation success is made here. An annual report should distinguish actions agreed, actions completed and outcomes independently checked.

REVIEW POINTS

- Protect people before protecting a commercial relationship.
- Verify outcomes rather than closing an issue on a supplier promise alone.

Training and communication

Turning a written standard into everyday decisions

Proposed training

Relevant colleagues should understand common risk indicators, the limits of supplier documents and the reporting route. Purchasing staff may need practical examples of how deadlines, pricing and subcontracting interact with labour risks. Customer-facing colleagues should know how to escalate a concern without making unsupported assurances.

Supplier communication

Suppliers should receive the standard and be told how to ask questions or report a problem. Communication should be adapted to language and role. A one-off email is not evidence that a standard is understood; acknowledgements and follow-up discussions should be retained where appropriate.

Evidence of completion

Training records should identify the subject, date, audience and any learning checks. This statement does not report completed training or attendance figures. Those facts should be added only after implementation and verification, with an explanation of any gaps in coverage.

REVIEW POINTS

- Use realistic examples linked to purchasing and retail operations.
- Measure understanding, not only attendance.

Monitoring and evidence

Measuring progress without overstating assurance

Proposed measures

Useful measures may include the proportion of active suppliers identified, relationships risk-assessed, higher-risk issues with a documented action plan, actions overdue, relevant staff trained and concerns raised and addressed. Measures should have clear definitions and an accountable data owner.

Interpreting the numbers

A low number of reports does not prove that exploitation is absent. It may reflect poor awareness or inaccessible reporting routes. Likewise, a high questionnaire-completion rate says little without an assessment of the quality of answers. Monitoring should combine records, qualitative findings and worker-informed evidence where available.

Reporting honestly

A final annual statement should describe limitations, unresolved gaps and changes in approach as well as progress. No audit counts, factory coverage or success percentages are included in this draft. Management should keep evidence behind every public claim and avoid using stock or AI-generated imagery as proof of actual working conditions.

REVIEW POINTS

- Define numerator, denominator and reporting period for every metric.
- Distinguish internal review from independent verification.

Implementation roadmap

A staged plan for management adoption

Stage one: establish the basics

Confirm the framework owner, validate business details, identify active suppliers and service providers, communicate the proposed standard and establish a secure record of concerns. Determine whether a statutory annual statement is required, using the applicable legal tests and professional advice where needed.

Stage two: assess and act

Prioritise higher-risk relationships, resolve identity and production gaps, agree proportionate due diligence and record purchasing decisions. Train relevant colleagues and test the reporting route. Where issues are identified, establish corrective plans and track their progress rather than treating policy acceptance as closure.

Stage three: review and disclose

Review the quality of evidence, outstanding risks and the effectiveness of any remediation. Prepare an account of steps actually taken during a defined period. Obtain the required management or board approval and signature where applicable, and update the website and any appropriate registry. Dates should be realistic and assigned by management; this roadmap does not imply completed milestones.

REVIEW POINTS

- Assign dates and owners when this framework is adopted.
- Review after a material supplier change or serious concern.

References, review and contact

A transparent record of sources and limitations

Legal context

UK government guidance explains that section 54 reporting applies to qualifying commercial organisations, including the relevant UK-business and turnover tests. Organisations outside that scope may choose to report voluntarily. Koventi turnover and statutory applicability have not been established here, and this document does not claim statutory compliance.

Publication and approval

Prepared 2 November 2026 as a draft management framework. Reporting period: not yet confirmed. Management owner, approval date and director signature: pending confirmation. This draft should be replaced or clearly updated when the business has adopted the standards and verified its actions. Illustrative editorial images do not show a verified Koventi workplace.

Contact

Koventi Ltd | 55 Argus Walk, Crawley, England, RH11 8BQ. Email: info@koventi.co.uk. Telephone/WhatsApp: +44 7878 800935. Website: koventi.co.uk. Use these channels for questions about this framework or a sourcing concern; avoid including unnecessary sensitive personal information.

SOURCE NOTES

- GOV.UK: Transparency in supply chains - a practical guide.

- Modern Slavery Act 2015, section 54: legislation.gov.uk.

- Reference structure reviewed: NEXT Modern Slavery Transparency Statement 2025-26; no NEXT achievements, approvals or partnerships are attributed to Koventi.