## Who are we?

Urban Outfitters started in the UK in 1998. Were a passionate, creative, entrepreneurial bunch who think outside the box and are all about providing a unique shopping experience that is inspirational.

Operating across eleven countries in Europe with direct shipping globally requires URBN to have a large external supply chain traversing all our product areas.

That supply chain provides URBN with domestic and imported products from suppliers of apparel, accessories, shoes, homeware and furniture.

## Modern Slavery Act (Transparency in Supply Chains) Statement

This statement is made by URBN UK Limited in accordance with section 54 of the Modern Slavery Act 2015 and covers the financial year from 1 February 2019 to 31 January 2020.

Urban Outfitters, Inc. and its affiliated companies, without limitation, Urban Outfitters West LLC, UO.com, Urban Outfitters Wholesale, Inc., URBN Limited and UO Merchandise, Inc. ("Urban Outfitters" or the "Company") are committed to conducting business in a lawful, ethical and responsible manner. Moreover, the Company expects its manufacturing and market vendors and other entities in its supply chain ("Suppliers") to share this same commitment. In particular, the Company requires that its Suppliers employ and engage their workers according to applicable legal requirements and human rights principles. The Company prohibits its Suppliers from engaging in bonded or forced labour, human trafficking and other similar forms of modern slavery. Accordingly, the Company has implemented certain controls and programs to verify that its Suppliers are meeting the Company's legal and ethical standards.

The Company's statement of Corporate Policy and Code of Conduct (the "Code of Conduct"), as well as other corporate policies and procedures, set forth the Company's guiding principles that Suppliers must conduct business in a lawful, ethical and responsible manner. As a condition of doing business with Urban Outfitters, each Supplier must agree to conduct its business in conformance with the Code of Conduct.

## Certification

Under the Code of Conduct, Urban Outfitter's Suppliers certify that they will conduct business in compliance with the law, including, among other things, without child labour, without forced or compulsory labour, without corporal punishment, without discrimination and in compliance with wage and hour requirements, health and safety and environmental laws.

## Verification

The Company maintains long-standing business relationships with our EU business spanning 147 Suppliers across 11 Countries, which have been vetted through an internal screening process. For example, each tier 1 and 2 factory is scrutinised before being accepted as a supplier and is then subject to ongoing assessment including through (i) analysis of ethics audits (ii) assessment of their compliance with Urban Outfitters' Code of Conduct and (iii) audits by both our internal production, sourcing and compliance personnel, as well as external auditors.

Our current EU Head Office is in Brick Lane, London. We propose to carry out a risk analysis of the third parties that assist with operation of the office (including cleaners, security and waste management providers), and will work to ensure a robust auditing plan is put together to mitigate any risks, including:

- Assessing compliance with their obligations under the Act.
- Requiring them to commit to compliance with our Code of Conduct.
- Requiring them to confirm the steps that they have taken to mitigate the risks of modern slavery occurring in their onward supply chains.

This statement has been approved by URBN UK Limited board of Directors who will review and update it annually.

Signed,

Frank Conforti

**Chief Financial Officer**