

**Who are we?**

Urban Outfitters started in the UK in 1998. We are passionate, creative and entrepreneurial; we think outside the box and are all about providing a unique shopping experience that's 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 landed and FOB suppliers in terms of service and apparel, accessories, shoes, homeware and furniture. In total we have over 1,800 active suppliers that span 40 countries, including China and Italy.

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 2018 to 31 January 2019.

Urban Outfitters, Inc. and its affiliated companies including, without limitation, Urban Outfitters West LLC, UO.com LLC, Urban Outfitters Wholesale, Inc., URBN UK 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 Outfitters'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 a limited number of Suppliers which have been vetted through an internal screening process. One element of the screening process includes an internal assessment of the risk that the Supplier will not comply

with the Code of Conduct, including the prohibition against human trafficking and slavery. The Company's production, sourcing and compliance personnel visit manufacturing facilities to evaluate and address the risks of a Supplier's noncompliance with the Code of Conduct. During 2018/2019 fifty percent of the manufacturing supply chain were visited. During any visit, should we find any evidence suggesting noncompliance with the Code of Conduct, we would investigate fully to identify any breach, the cause and require resolution.

Audits

The Company uses a qualified, accredited, third-party, social compliance auditing firm to conduct risk assessments and to audit manufacturing vendors which meet certain risk-related criteria. Audits and inspections of these vendors may be announced or unannounced and these vendors are required to cooperate in any remedial efforts to ensure future conformance.

URBN UK Limited uses a number of external third party audit bodies including but not limited to SGS, Intertek and TUV.

Internal Accountability Standards

When non-conformance with the Code of Conduct is identified, Urban Outfitters works with the Supplier to identify the cause of the non-compliance and to develop an action plan to assure future compliance. The Company believes that this strategy is in the best interest of the Supplier, its employees and the Company's customers. Remedial efforts may also include additional audits or inspections. In the event of continued non-conformance or serious violations of the Code of Conduct, the Company reserves the right to terminate the business relationship with the Supplier.

Training

Urban Outfitters's production and sourcing personnel receive on-the-job training, are members of professional affiliations, and attend external training seminars to help further develop their ability to identify and evaluate risks in the supply chain.

During the financial year 2019-2020 we propose to roll out a programme of modern slavery eLearning which will enhance our employees' understanding of what modern slavery is and its impact on individuals. It will also help them spot the signs of modern slavery and know what to do if they suspect (i) that modern slavery is occurring or (ii) that there is a risk that it might be occurring in our organisation or supply chain. Employees will be selected to undertake this eLearning from a range of functions with the aim of achieving the greatest impact on reducing modern slavery risks and will range from junior employees up to URBN executive managers.

Internal risk management

We have identified a potential area of risk within our Distribution Centre in Northampton. We have addressed this risk with robust plans around Right to Work approval and have trained the management team accordingly on risk factors.

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