

Barbour®

J Barbour & Sons Ltd. MODERN SLAVERY STATEMENT 2023/2024

Summary for Financial Year 1 May 2023 – 30 April 2024
Dated 05-11-2024

This statement has been prepared in alignment with the requirements set out by the UK Modern Slavery Act (2015), section 54 (Transparency in Supply Chains) and is J Barbour & Sons Ltd.'s 8th statement. The previous statement was published on 27 October 2023.

This statement is a summary of the key actions taken by Barbour to combat modern slavery in our Supply Chain, during our 2023-2024 financial year, from 1 May 2023 through 30 April 2024, including a brief overview of some of Barbour's intended next steps for the following financial year. This statement will be uploaded both on Barbour's corporate website, and the U.K. Government's Modern Slavery Statement Registry.

It covers J Barbour & Sons Ltd., which owns and both retails and wholesales two brands, "Barbour" and "Barbour International", and three wholly owned trading subsidiaries, Barbour Inc. (USA), Barbour Europe GmbH & Co. K.G. (Germany), and Barbour Singapore Pte Ltd.

Barbour strives to uphold fair, safe and dignified working conditions for everyone in our value chain.

Our Business

Our Own Operations (United Kingdom) & Wholly Owned Subsidiaries (USA, Germany and Singapore)

Barbour is a fifth-generation family-owned business producing premium functional clothing, footwear and accessories, established in 1894, and headquartered in Barbour House, South Shields, Tyne & Wear, U.K., with our own factory and warehouse situated within the same site. Globally, Barbour employs 1140 direct employees: 1023 within the U.K., 76 in Barbour Inc. (Milford, NH, USA; est. 1987), 38 in Barbour Europe GmbH & Co. K.G. (Hamburg, Germany; est. 2014) and 3 in Singapore. Our three subsidiaries buy merchandise produced by the Barbour UK team and manufactured within our supply chain. Barbour runs 22 retail stores in the U.K., and 5 in the U.S.A., and supplies wholesale merchandise to retailers worldwide. We recognise that we have a responsibility to take a robust approach to Modern Slavery, and have adapted and re-promoted our existing corporate policies, including a speak up policy which allows employees to report any concerns confidentially. Our own warehouse and factory operations have a collective bargaining unit in place, providing employees an additional reporting structure.

Our Own Operations Direct Service-Provider Contractors and Labour Agents

Barbour engages two contractors to provide specialist cleaning and security services within our South Shields site buildings and another two labour agents for warehouse staff supply. Our South Shields site coordinates inbound logistics to its wholly-owned warehousing facility in the UK, and additional outsourced warehouses in Germany, the Netherlands, Vietnam and the U.S.A., from which Barbour goods are distributed to our wholesale partners and direct to consumers online and through our own bricks-and-mortar stores. We outsource global transportation logistics. Barbour engages labour providers that commit to compliance.

Our Own South Shields Factory

Barbour manufactures a portion of our classic wax jackets, the Bedale and Beaufort styles, in our own South Shields factory, in the U.K., which also operates our Wax-For-Life jacket rewaxing and repair services. Our own South Shields factory’s compliance with the ETI Code and U.K. law was audited in March 2024 using the SMETA 4-pillar audit tool.

Our Governance Structure

Barbour is committed to the welfare, health and safety of all of our own employees and Business Partners, our contracted manufacturers, and to delivering socially responsible products to our customers.

<p style="text-align: center;">Shareholders Company commitment to Sustainability</p>
<p style="text-align: center;">Company Directors Strategy and Vision</p>
<p style="text-align: center;">Senior Leadership Team Disseminates ethical strategy across the wider business to ensure alignment</p>
<p style="text-align: center;">Supply Chain and Ethical Trade Team Develops ethical trade policies and upholds standards in the Supply Chain</p>

Table 1: J.Barbour & Sons Ltd. Governance Structure

Our Supply Chain

Barbour’s International Supply Chain Manufacturers

As of 30 April 2024, besides from in our own South Shields factory, Barbour apparel, footwear and accessories are manufactured in an additional 115 contracted Tier 1 Finished Goods factories in the U.K., Italy, Portugal, Spain, Bulgaria, Moldova, Albania, Mauritius, Madagascar, Türkiye, India, Indonesia, Vietnam, Myanmar, and China. No unauthorised or undeclared subcontracting is permitted.

Our Supply Chain Tiers Definition

Barbour updated our Supply Chain Tiers definition as below, to also highlight our Tier 1+ indirect business partners who add value to finished goods production, acknowledging the work that responsible brand-retailers and civil society subject-matter-experts have published to foster industry alignment.

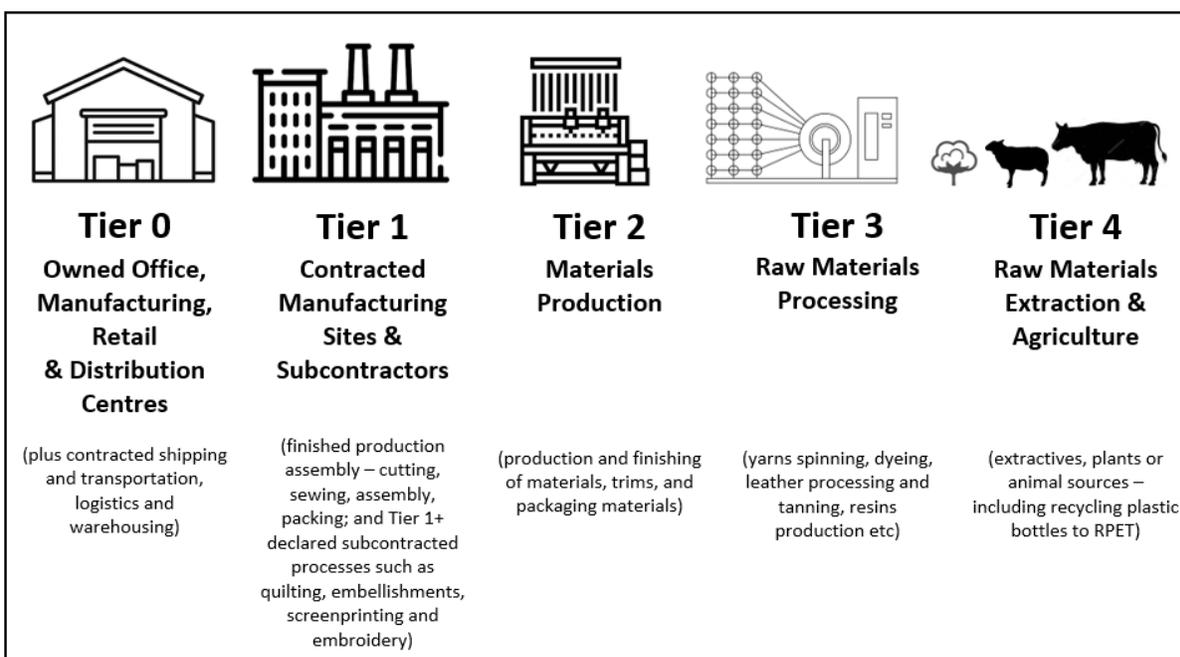


Table 2: Barbour Supply Chain Tiers definition v2 (2024)

Our Supply Chain Transparency

Barbour signed the [Transparency Pledge](#) in early 2021, committing to publishing our core Tier 1 Finished Production Assembly factory list twice a year, on our corporate website, within the [Barbour Corporate Social Responsibility page](#) in downloadable excel format, with information of number of workers and product type manufactured, and the **Gender Breakdown of Workforce** in each Tier 1 factory, as women are considered workers vulnerable to forced labour conditions: the totals are illustrated below. This factory list comprises all factories manufacturing Barbour retail products, excluding licensees. We acknowledge that this is an important step in driving greater transparency within the fashion industry, in order to support safe and fair working conditions for all workers in apparel, footwear, accessories and textile factories worldwide.

From June 2023 onwards, Barbour has uploaded our Tier 1 Finished Goods List to the [Open Supply Hub](#), twice per annum. All contracted suppliers have been sent instructions on how to claim their sites and are provided with ongoing remote support and engagement.

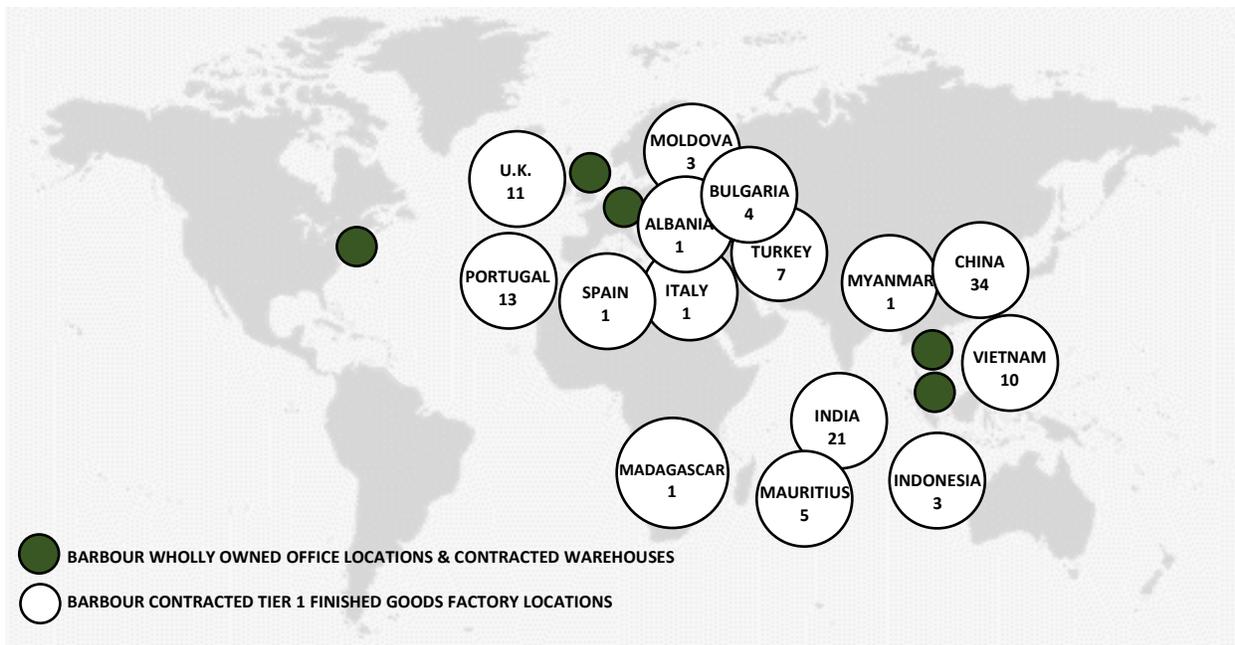


Table 3: Barbour’s Tier 1 Global Map of Contracted Manufacturing Sites (April 2024)

15 sourcing countries	115 Tier 1 Finished Goods contracted factories	44665 workers in Tier 1 Finished Goods contracted factories	69% workers are women
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Table 4: Barbour’s Tier 1 Ethical Trade Statistics (April 2024)

Prior to onboarding any new Tier 1 supplier, potential sites are visited by Barbour’s Supply Chain, Technical & Design teams; and Barbour’s Ethical Trade Manager reviews valid social audits uploaded to SEDEX database by the auditing company that performed the audit. Subsequently, audits are required by Barbour every 2 years at minimum, and Barbour’s Supply Chain team works together with traders and manufacturing sites to monitor rated non-conformances and subsequent corrective actions evidence uploaded to demonstrate improved legal compliance. SEDEX Self-Assessment Questionnaires (SAQs) are required to be completed annually and prior to SMETA auditing dates. Any Tier 1 sites expired audit reports (16%) on SEDEX had completed an SAQ prior and delivered planned next audit dates.

Our Supply Chain Mapping

From 2023 onwards, Barbour Supply Chain team required our contracted suppliers to also submit Tier 1+ site information and numbers of homeworkers along with standard Tier 1 Factory List information. Percentage of capacity used in each supplier site varies, as does leverage, and not all supplier sites or their workers continually produce Barbour products throughout the year. Barbour purchases a percentage of signature textiles and packaging from contracted nominated Tier 2 suppliers. Supplier lists beyond Tier 1 were not publicly posted within this financial year.

Our Supply Chain Ethical Trade Policies

Barbour communicates its Supply Chain Code of Conduct and policies in and via supplier manuals and meetings, and all Tier 1 suppliers have signed a commitment to our Code. Barbour contracts, and the ETI Code, require all Tiers of the manufacturing process to comply with local laws and standards relevant to the manufacturing country, and meet Barbour Ethical Trade Policies.

Barbour's Supply Chain Code of Conduct was revised during FY2022-2023 and v2 is [published on the Barbour corporate website](#), which clearly defines our supplier expectations regarding **Modern Slavery**. Barbour's Code is derived from both the Ethical Trading Initiative (ETI) [Base Code](#) and International Labour Organisation (ILO) core conventions that form the [Decent Work agenda](#).

Barbour's Forced Labour Policy was published during FY2022-2023 and is [also available on the Barbour corporate website](#). This policy draws on the ILO's (2012) [11 Indicators of Forced Labour](#), the U.K. Government Health & Safety Executive's "[Vulnerable Worker Guidance](#)", the United Nations Global Compact (UNGC) Ten Principles, [Principle 4](#), and the [AAFA/FLA Commitment to Responsible Recruitment](#). The **ILO Convention on Forced Labour, 1930 (No. 29)** defines **Forced Labour** as, "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself (or herself) voluntarily." **Sedex further defines Forced Labour as**, "Work that is not voluntary can include mandatory overtime, the withholding of personal documents, possessions or earnings, and restriction of movement; and, the threat of penalty for not working can include loss of wages or debt bondage, loss of return home transport, threat of reporting to the authorities of undocumented status, experiencing or witnessing violence. Vulnerables are more susceptible to conditions of modern slavery, and these groups tend to include migrant workers, workers in an informal setting, geographically isolated workers, young workers, unskilled or illiterate workers, and women and girls experiencing gender inequalities." Sedex clearly defines and rates **Freely Chosen Employment** non-conformances' criticality within its "**(SMETA) Non-Compliance Guidance v2.1 (May 2019)**" document, which is based on the [ETI Base Code and laws](#). Barbour commits to upholding the U.K. Human Rights Act (1998) article 4, that "no one shall be required to perform forced or compulsory labour."

Barbour's **Child Labour Remediation and Young Workers Protection Policy**, [available on the Barbour corporate website](#) since 2023, clearly defines our expectations to all Business Partners. We recognise [Principle 5](#) of the UNGC Ten Principles that, "businesses have the responsibility to abolish **child labour**."

Barbour developed our **Supply Chain Homeworker Policy** in early 2024 and this is [available on the Barbour corporate website](#). This policy aims to recognise the vulnerability of workers who may require adjusted working conditions to assure their full employment whilst meeting their individual life vulnerabilities; and the need for additional auditing time to interview a sample of homeworkers within their homes, if appropriate.

All four policies mentioned in this section are included in full in this statement's Appendix, on [our corporate website](#), and are shared in pdf form directly with our Suppliers in our Supplier Engagements.

Barbour's Sedex policy (January 2022) is routinely sent to our new and existing Suppliers for their Manufacturing Sites and Subcontractors, and highlights Sedex's "Business Critical" rated **Forced Labour Indicators**, and **Child Labour definitions**. From FY 2023-2024, new supplier factories with "Business Critical" or "Critical" rated non-conformances cannot be onboarded in the first instance, though Barbour recognises that, on occasion, non-conformances can occur and are to be well-managed.

Our Supply Chain Risk Assessment

Barbour’s Tier 1 – To understand our risks in Tier 1 sites, Barbour uses [SEDEX’s RADAR](#) global risk data scores to produce a numerical score colour-coded risk table, overlaid with alerts from publicly-available subject-matter-expert desktop reports reflecting risks in the apparel and footwear sector. Barbour’s Ethical Trade Risk Table informs senior management of risk for sourcing strategy discussions and creates a modern slavery due diligence focus for the Ethical Trade Manager. Pre-sourcing risk report 1-pagers are produced by the Ethical Trade Manager for supply chain management when any new country is considered as a finished goods sourcing potential, of which the SEDEX RADAR risk scores are one reporting element.

Barbour Tier 1 Risk Table – Top 3 Modern Slavery Risk Countries (summary) FY2023-2024				
Highest Risk Countries	Child Labour	Bonded Labour	Forced Labour	Long Working Hours
1 – Myanmar	•			•
2 – Mauritius		•	•	
3 – Vietnam	•			•

Upstream Tiers – Ethical Trade Country/Commodity Risk Tables – Barbour reviewed Tiers 2 and 3 Country Risk Profiles in FY2022-2023 for raw materials source countries; and engaged supply chain Tiers 1 and 2 with our Cotton Traceability Policy in FY2023-2024, based on the U.S.A.’s Department of Labor’s “TVPPRA List of Goods Made With Forced Labor and Child Labor (2022)” report.

Barbour acknowledges that Modern Slavery risks are more likely to occur upstream in higher Tiers.

Management of Risk – Our Heightened Due Diligence Process

Barbour adopted a heightened due diligence approach to assess and deliver remedy in response to stakeholder reports of specific risks in the highest risk countries we source finished goods from.

Risk in the Myanmar Supply Chain – Our Approach

Barbour’s annual Risk Table scored Child Labour in Myanmar as Barbour’s highest risk in Tier 1.

In August 2022, Barbour joined the **European Chamber of Commerce in Myanmar** and its Garment Advocacy Group. At Eurocham Myanmar’s suggestion, Barbour entered one contracted Myanmar apparel factory to the **SMART Myanmar** project in 2022 which provided “in-depth social compliance assessments, training workshops, and mentoring in social dialogue.” This programme was relaunched in December 2022 as the **Multi-stakeholder Alliance for Decent Employment in the Myanmar apparel industry (MADE in Myanmar)**, funded by the EU, and our contracted supplier continues throughout FY2023-2024 to participate. Working in collaboration with other brand buyers, in December 2002, Barbour also contracted **The Centre for Child Rights and Business** to conduct an age verification assessment and deliver age verification training to the site’s Human Resources management team, at our cost. As a result of the positive partnership, at their cost, our supplier subsequently became a member of The Centre for Child Rights and Business Working Group to remain informed of risks in the sector, training and collaboration opportunities throughout Asia.

Risk in the Mauritius Supply Chain – Our Approach

Barbour considered Mauritius as a risk country in Tier 1, for migrant worker issues.

Throughout FY2023-2024, Barbour participated in a brand collaboration working group buying from one shared Tier 1 contracted site in Mauritius producing apparel with foreign migrant workers. At the advice of a US-based labour rights NGO, the buyers group engaged an independent labour rights CSO to assess this site twice in FY2023-2024, using their own expertise, tools and methodology. Afterwards, the site implemented all corrective actions communicated by the brand group, by end July 2023, including the repayment of transportation costs incurred in migrant worker home countries prior to departure. After these assessments, in December 2023, three peer brand buyers, including Barbour, agreed to provide funds towards this site's Bangladeshi migrant workers' informal recruitment costs, at a level approved by the US-based NGO. The funds were dispensed in FY2024-2025.

Barbour visited all Mauritius contractor factories' worker dormitories in July 2023 to view migrant worker living conditions.

In July 2023, Barbour signed the **American Apparel and Footwear Association's** and **Fair Labor Association's** joint [Commitment to Responsible Recruitment](#) to further to align and collaborate with a wider working group of international brands and retailers, specifically to discuss migrant workers' working and living conditions in Mauritius.

Risk in the Vietnam Supply Chain – Our Approach

All Vietnam contracted Tier 1 supplier factories in Vietnam were actively monitored on SEDEX platform with standard audits. Barbour recognises the limitations of standard audits, and discussed a potential multi-stakeholder-initiative programme which could assess and train Vietnam factories on relevant risks.

Our Due Diligence Process

Monitoring our supply chain

Since 2010, Barbour has been a member of [Sedex, the Supplier Ethical Data Exchange](#), the ethical trade organisation, which provides a social and environmental data-sharing platform, supply chain assessment tools and auditing protocol for Barbour's supplier factories to follow.

Barbour requires all of its Tier 1 external manufacturers to:

- **Sign Barbour's Supply of Goods contract, agreeing with Barbour Supply Chain Policies** including our Supply Chain Code of Conduct and other sustainability and product integrity policies, **and submit a current valid social audit report (within 2 years prior) before manufacturing our products;**
- **Adhere to Barbour's Sedex Policy (January 2022)**, and Barbour requires manufacturers to:
 - join Sedex and connect with Barbour, allowing us to view social monitoring data
 - have a Sedex Affiliate Audit Company (Third Party) upload their latest report to Sedex, which allows for Sedex ratings to be applied to any legal non-conformance
 - transparently work on their corrective action plans (CAPs) on the Sedex platform
 - keep their site data current via their Sedex Self-Assessment Questionnaire (SAQ)
 - keep their audit valid within 2 years and in uploadable format to Sedex
 - assure Business Critical and Critical rated issues are immediately actioned.

Audit Validity – Barbour and Sedex accept SMETA, amforiBSCI, SA8000 and WRAP reports to be uploaded by the Sedex Affiliate Audit Company (SAAC) executing the audit.

Barbour-sponsored Audits – Eighty-six per cent of our Tier 1 manufacturing sites were audited within the last 2 years, and those without audits submitted SEDEX self-assessment questionnaires with their schedule for their next audit. In FY2023-2024, Barbour funded 5 SMETA 4-pillar audits in key Tier 1 manufacturing sites, in the U.K., Bulgaria, and Moldova, with our selected SEDEX-Affiliated Third Party Auditors; and an equal portion of the multi-brand assessment in Mauritius.

Social Audit Governance

Sedex Affiliate Audit Company (SAAC) auditors are engaged by a Full APSCA Member Firm, which are [transparently listed on Sedex's website](#). Sedex governs SAAC performance via its [Sedex Audit Quality Programme](#), which aims to improve audit quality, detect audit issues, ensure performance consistency, and promote industry best practice amongst member SAACs. Sedex audits SAACs' management systems, including auditor recruitment and training, reviewing complaints and grievances.

The Association of Professional Social Compliance Auditors ([APSCA](#)) is the professional standards setting body overseeing professionalism, consistency and credibility of individual auditors and organisations performing independent social compliance audits of the international supply chain, including SAACs performing SMETA (and other) audits and uploading these to Sedex platform. It is a practitioner-led initiative, governed by an Executive Board administered by an independent Chair, with an additional multi-stakeholder Board with industry, initiative and independent representation.

Social Audit Non-Conformance Criticality Ratings and Corrective Action Plans (CAPs)

Barbour's Supply Chain team (Category Managers and Global Ethical Trade Manager) reviews social audit report status according to Sedex ratings applied. All audit legal or ETI Base Code non-conformances, including Forced Labour Indicators for Freely Chosen Employment, are extracted from the audit report, with criticality ratings applied on the Sedex database as "Minor", "Major", "Critical" or "Business Critical". Any new "Critical" and "Business Critical" non-conformances that appear on social audits for existing factories are summarised to the Supplier and Supply Chain Director for discussion of remediation.

Factories are required to log their ongoing corrective actions against all audit non-conformances Corrective Action Plans (CAPs) on Sedex. Corrective Actions evidence is reviewed on the Sedex platform by the audit SAAC, who reviews in local language, according to local laws and standards, and will "verify" or "reject". Barbour holds quarterly reviews with key suppliers to monitor their compliance status.

Our Supply Chain Grievance Reporting Channel

In 2023, Barbour created a Supply Chain grievance email address, ethicaltrade@barbour.com, allowing non-compliances to be directly sent to Barbour House's Ethical Trade team.

Training on Modern Slavery & Trafficking

For Barbour Supply Chain Team

Barbour's Global Ethical Trade Manager underwent further online training, in April 2024, beginning the Global Reporting Initiative (GRI)'s Academy for Professional Certification course, to enhance understanding of human rights and business responsibility, and to enhance modern slavery reporting. Barbour's Supply Chain Ethical Trade Manager further trained two Barbour's Supply Chain team colleagues in Barbour Code and policies, with full explanation of Modern Slavery definitions, as part of mentoring through Ethical Trade modules of CIPS qualifications. In total, five Supply Chain production managers are undergoing CIPS training.

For Our Supply Chain

Barbour Supply Chain promoted our Code and policies through face-to-face engagement with suppliers in Mauritius, Myanmar, Vietnam, India, China, Hong Kong, Türkiye, Bulgaria and Moldova.

Next Steps – In Financial Year 2024-2025

Our Next Steps with Policy

1. Review our Code and Policies with a **key subject-matter-interest stakeholder** to assure they're fit-for-purpose;
2. Benchmark **modern slavery protocols**;
3. Updates to be included in the supplier manual and Barbour standard supplier agreements;

Our Next Steps with Transparency

4. Continue **twice per annum disclosure of Tier 1 supplier lists** on our website and the [Open Supply Hub](#), which advances our ability to collaborate with brand buyers sharing our contracted sites;
5. Disclose **Tier 1+ sites** on our website and the [Open Supply Hub](#);
6. Commence **mapping our core Tier 2 Raw Materials suppliers**;

Our Next Steps with Risk Mapping

7. Disclose greater detail of risk-mapping, and of upstream tiers;

Our Next Steps with Training

8. Further discuss Code and Policies with direct suppliers, and evolve cascading;
9. Deliver **engagement** in Mauritius;
10. Engage external subject-matter-expert on **bonded labour risks**;

Our Next Steps with Monitoring

11. Evolve Public-Private Partnerships for highest risk source country **heightened due diligence monitoring** approach to sites employing foreign migrant workers;
12. **Map Forced Labour Indicators (FLIs)** across Tier 1 standard auditing reports;

Our Next Steps with Heightened Due Diligence

13. Ongoing commitment to the MADE in Myanmar programme;
14. Assure assessment types capture migrant worker and recruitment issues;
15. Additional **due diligence spot-checks** in high risk locations in the Tier 1 Supply Chain;
16. Actively pursuing additional **Public-Private Partnerships and Brand Collaborations**;
17. Establish an external, formal, impartial and **meaningful grievance mechanism** in locations not covered by establish multi-stakeholder-initiative programmes, to connect better with workers in higher risk supply chain countries.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.

Information correct as of 30 April 2024.

Approved on 5 November 2024.



Ian Sime, Director of Supply Chain and Board Director, J.Barbour & Sons Ltd.

APPENDIX 1: BARBOUR SUPPLY CHAIN CODE OF CONDUCT (2023)

Barbour strives to uphold fair, safe, dignified and respectful working conditions for everyone in our value chain.

Barbour's Supply Chain Code labour rights commitments are based on the Ethical Trading Initiative [\(ETI\) Code](#) and the International Labour Organisation (ILO)'s [Decent Work Agenda](#) and [fundamental core conventions](#).

1. No Forced Labour – employment is freely chosen, and there shall be no forced, bonded, or prison labour. Workers are free to leave their employers at any time, with reasonable notice. Overtime shall be voluntary, Opt-In and there shall be no penalties for declining overtime requests. There shall be freedom of movement within the workplace, including access to drinking water and toilets. Workers shall not be required to lodge any deposits or documents, or to be subjected to any form of coercion to secure employment: employers must abide by the Employer Pays Principle, covering all employment costs. Employers shall not take advantage of Vulnerable Workers: including migrant workers, isolated workers, agency and temporary workers, women, new and expectant mothers, Young Workers, older workers, disabled workers, and others. See Barbour's Supply Chain Forced Labour Policy (2023).

2. Freedom of Association – freedom of association and the right to collective bargaining shall be respected, to form, join and organise trade unions and other worker organisations without harassment, interference or retaliation. Where these rights are restricted under law, the employer shall facilitate, and not hinder, the development of worker committees to assure fair representation. Worker representatives must enjoy freedom and support to carry out their representative functions in the workplace, and externally when necessary.

3. Working conditions shall be safe and hygienic – a senior manager shall be assigned responsible for, and trained in minimum standards, of health and safety in the workplace, providing periodical safety risk assessments of each role on site to detect, highlight, prevent, and mitigate, any threat to employee health and safety, including assuring all buildings are structurally-sound. Workers shall receive regular and recorded health and safety training, repeated for new or reassigned workers. Hygiene standards apply to all drinking stations, canteens, toilets and housing provided.

4. No Child Labour – the ILO defines minimum age as, “not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years”, except in countries where a higher age is specified by law. All facilities are required to review official proof of age documentation prior to hiring. Should minors be found working within a site, management will follow Barbour's Supply Chain Child Labour Remediation and Young Workers Protections Policy (2023), informing all Brand Buyers and acting responsibly in the repatriation and re-entry into paid schooling, granting at least minimum wage support, until mandatory school-leaving minimum age or working age is reached. Young Workers (aged 15-17) shall not be subjected to health and psychological hazards, working overtime, or night work.

5. Wages and Benefits – employers shall compensate workers for all work completed, to at least the minimum wage as required by law, or the prevailing industry wage if identified, with all legally-required benefits, maintaining equal compensation. Employers shall provide written and understandable compensation information prior to hiring, which shall be delivered upon during the full duration of employment without lowering, with payslips for every pay period, explained verbally to illiterate workers. There shall be no unlawful deduction of workers' wages, and workers shall be informed in advance for all legitimate wage deductions, but there shall be no deductions for disciplinary purposes. There shall be no false apprenticeships to coerce workers into low wage employment.

6. Working hours shall not be excessive – working hours must comply with national standards or as collectively bargained, and shall not regularly exceed 48 per week, to the maximum of 60 hours in any seven day period. All overtime shall be voluntary, and at minimum, there shall be one day off in seven (or two days off in fourteen, where prescribed or allowed by law). Overtime hours shall be compensated not below legal hourly or overtime rate.

7. No discrimination – all employment decisions and protections shall demonstrate respect and equality towards workers, and shall not be based on race, caste, national or social origin or societal position, religion, age, disability or health status, gender, marital or maternal/paternal status, sexual orientation, union membership or political affiliation.

8. Regular employment – a recognised and mutually agreed legal employment relationship shall be provided in written form. Obligations to workers under labour and social security laws and regulations shall not be avoided, and the use of labour-only contracting, sub-contracting, excessive use of fixed-term contracts, or home-working arrangements shall not be used to provide less than equal and legal protections. Employers shall arrange entitlement-to-work documents, where needed.

9. No harsh or inhumane treatment – workers shall be protected from physical, sexual, psychological or verbal harassment, abuse, attacks, coercion, intimidation, exploitation or threats, in any employer sites, or on the way to and from work.

10. Environmental Management – Suppliers shall uphold our commitment to the protection of the environment and continual improvement of environmental performance, for energy, water and natural resource usage, emissions and discharges, carbon footprint, waste management and impacts on biodiversity.

11. Compliance with all relevant national and international laws – all Business Partners shall comply with applicable laws and regulations in the country of manufacture and operations, maintaining inspections and permits, and obligations to monitoring and reporting, and meet Barbour Corporate Code of Ethics policy.

Reporting Grievances: talk to Barbour confidentially about Supply Chain Ethics, via ethicaltrade@barbour.com.

APPENDIX 2 – BARBOUR SUPPLY CHAIN CHILD LABOUR REMEDIATION & YOUNG WORKERS PROTECTION POLICY AND PROTOCOL (2023)

Child Labour

There shall be no hiring or use of child labour. The International Labour Organisation (ILO) [Minimum Age Convention \(1973\)](#) states that workers, “shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years”. All Tiers’ facilities shall maintain accurate official documentation for verification of every workers’ date of birth, and where official documentation is not available, site management shall use available family records to facilitate the age registration of the worker with local authorities, reviewed prior to employment start date.

Barbour does not tolerate Child Labour in our Supply Chain. Should Barbour or its stakeholders, a Barbour supplier’s management team or a Third Party auditor detect, or be informed of, child labour employed, or children present within their manufacturing premises, Barbour requires its Business Partners in any Tier to:

1. inform relevant Barbour staff, ideally immediately, but within 24 hours – by contacting Barbour’s Global Ethical Trade Manager or your Barbour Category Manager, or via email inform ethicaltrade@barbour.com;
2. take appropriate, agreed, and immediate actions to keep the child(ren) from harm, always protecting their best interests, and removing them from the workfloor, accompanied, to a safer space on-site;
3. list the names, genuine date of birth, and contact details of the child(ren) and guardian(s).
4. immediately co-operate with Barbour’s appointed Child Labour Remediation service provider, in the assessment of the child’s situation;
5. not formally terminate the child’s employment nor expel the child from the premises prior to the agreed plan between Barbour and Barbour’s appointed Child Labour Remediation service provider, nor seek to establish any separate agreement with the child or their guardian(s), or side-step this Policy or the agreed plan; and, not intimidate, threaten nor attempt to coerce the child or family, at any stage;
6. communicate to the child and their guardian(s), in initial communications, that:
 - i. the factory shall continue to pay the wage the child was contracted to earn, at least the national minimum wage, monthly, to the family via Barbour’s service provider, until the child reaches minimum working age, at which time non-hazardous decent work shall be offered within the site;
 - ii. the child’s family members shall be consulted and offered suitable decent work within the site;
 - iii. the factory shall pay the child’s education fees until reaching the end of compulsory school age or minimum working age, whichever is higher, periodically, via the Barbour-appointed service provider, which will track their attendance, and alternative means of learning;
7. undergo age documents verification training to upgrade the employment procedure, and begin a full review of recruitment practices to establish how the child(ren) were hired into the site;
8. refund Barbour, on request, any costs associated to the remediation cases;
9. commit to cease recruitment of child(ren) into all manufacturing sites, and uphold this Policy and relevant standards with subcontractor sites throughout all Tiers of manufacturing.

Young Workers

Young Workers are employees aged 15-17 years and are considered Vulnerable Workers requiring protections under law. Young Workers shall not be subjected to health and psychological hazards, and shall be exempt from working overtime, or night work, until reaching the age of 18.

Barbour requires all suppliers to actively implement Young Workers Protections. A list of Young Workers shall be maintained, and their assigned tasks reviewed for hazard risks prior to starting work. Young Workers shall undergo health checks, if required by law, paid for by the employer, and conducted by appropriate health professionals, prior to employment start dates, and logged with the local labour bureau, annually until reaching the age of 18. Employers are responsible for analysing health checks and ensuring young workers’ safety.

APPENDIX 3 – BARBOUR SUPPLY CHAIN FORCED LABOUR POLICY (2023)

Barbour's Supplier Code of Conduct details our commitment to uphold the International Labour Organisation's eight fundamental conventions for Decent Work throughout our value chain. To strengthen our understanding of Modern Slavery, Barbour refers to the ILO Indicators of Forced Labour (2012) and acknowledges the advancement of these definitions in the United Nations Global Compact's (UNGC) Ten Principles, Principle 4.

Forced Labour Policy

Barbour holds a zero-tolerance approach for human trafficking, slavery or Forced Labour, which the ILO has defined as, "all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily," in the ILO Forced Labour Convention, 1930 (No. 29). All Business Partners are required to comply with local and international laws referring to human trafficking and modern slavery. Forced Labour risks are complex, often hidden and difficult to identify. Barbour nevertheless strives to advance efforts to understand such risks and will uphold the UN Guiding Principles on Business and Human Rights by addressing adverse impacts and mitigating instances of Forced Labour throughout our Supply Chain tiers, requiring our Business Partners, direct or subcontractors, to uphold Barbour's Forced Labour Policy.

ILO Forced Labour Indicator 1 – Abuse of Vulnerability

Employers shall not take advantage of any vulnerable worker, to impose pressure to provide involuntary labour or economically compromise the worker and shall acknowledge and grant protections of vulnerables.

Vulnerable Workers - The U.K. Government defines vulnerable workers as those at risk of having their workplace entitlements denied, and who lack the capacity or means to secure them. These could include those unable to represent themselves, or without relevant language or communication skills, or in a compromised financial situation reducing resilience to represent themselves. Vulnerable Workers can include women, new and expectant mothers, Young Workers, older workers, workers with disabilities, migrant workers, gig-economy, agency and temporary workers, homeworkers, lone or isolated workers, or those new to a job developing skills to maintain their income. Vulnerability increases if there are multiple dependencies on the employer, such as pay with provisions of housing and food, or whole family work dependence on a single employer.

ILO Forced Labour Indicator 2 – Deception

Employers shall not use deceptive employment practices, and are required to adopt responsible recruitment protocols, including providing "return home" packages to migrant workers hired. Employers shall deliver on verbally agreed or written terms of employment, which shall be clearly communicated in the native language of workers at the first instance and throughout employment. Terms shall not be revised with negative economic impact nor impacts to freedoms.

ILO Forced Labour Indicator 3 – Restriction of Movement

Workers shall be free to enter employment and free to leave their job or employer, without menace of penalty. Employers shall maintain workers' personal travel documents and work visas to ensure migrant workers freedom of movement and access to "return home" at any time. Employers shall not restrict workers' freedom of movement, nor confine in any way, workers within the workplace, including guaranteeing free access to toilets and drinking water stations, nor in provided accommodation, either during or outside working hours.

ILO Forced Labour Indicator 4 – Isolation

Workers isolated at the time of recruitment, within the workplace or without easy access to fair employment advisory services are to be considered vulnerable workers and shall be afforded additional support relevant to their remote situation or workplace and monitored appropriately. Workers in informal or unorganised enterprises, at home, or in remote geographies shall be considered vulnerable to Forced Labour.

ILO Forced Labour Indicators 5 and 6 – Physical, sexual, and psychological coercion, intimidation and threats

Barbour does not tolerate abuse, intimidation or threats to workers throughout our value chain. Employers shall arrange Right to Work papers for all employees in the employment destination country, where necessary. Threats to revoke Right To Work with intent to coerce workers are considered an instrument of Forced Labour.

ILO Forced Labour Indicators 7, 8 and 9 – Debt Bondage, Retention of Documents and Withholding of Wages

Barbour upholds the "Employer Pays Principle" (EPP) that any costs of recruitment should be borne not by the worker but by the employer, and acknowledges that this is fundamental to combatting exploitation, or debt bondage at the outset of the recruitment process, forced labour, and trafficking of migrant workers in global supply chains. Barbour requires all employers within its value chain to implement the EPP and refers to the IHRB Leadership Group for Responsible Recruitment "6 Steps to Responsible Recruitment" guidelines which are based on The Dhaka Principles for Migration with Dignity (or, the "Dhaka Principles"). Private recruitment agencies and labour contracting in sending countries and receiving countries shall be legal

entities and monitored by each Business Partner according to the Responsible Recruitment guidelines, with prequalification assessments adopted before the hiring process begins.

Workers' personal property, and essential identification documents, shall not be involuntarily held by employers as a bond. Migrant workers must be free to leave at any time, with secured safe return-of-passage in their possession.

Employers shall pay wages directly to workers, in full and on time, according to local laws, including for all overtime hours, with documented wages. Wages shall not be systematically and deliberately withheld as a means to compel a worker to remain. There shall be no Deceptive Wage Practices employed, and all social insurances and taxes withheld from pay must be promptly paid to the local authorities to afford all workers equal rights to benefits. No excessive deductions, interest or false or inflated prices shall be charged for essential services or necessities for workers, and coercion into induced indebtedness shall be avoided.

ILO Forced Labour Indicator 10 – Abusive working and living conditions

Fair working conditions and good living conditions shall be assured by the employer (where dormitories are provided by the employer as a necessity due to lack of appropriate private accommodation). Workers shall not be held dependent on the employer via deprivation of food, shelter or other necessities.

ILO Forced Labour Indicator 11 – Excessive and Forced Overtime

Employers shall adopt Opt-In overtime protocols and shall demonstrate voluntary nature of overtime. Maximum regular hours shall be compensated at least to minimum hourly and monthly rates: overtime hours shall not be included in minimum wage calculations.

Prison Labour (involuntary or voluntary) and state-sponsored Forced Labour – including labour forcibly relocated under state-sponsored "labour transfer programmes", or work as punishment for personal ideology or political expression – shall not be used in the production of Barbour goods or in any value chain operation.

Subcontracting and upstream Tiers Business Partners – enterprises in high-risk geographies and/or processes in the Tiers shall comply with the Barbour Supplier Code and Forced Labour Policy.

Best Practice Guidance:

- International Labour Organisation's [eight fundamental conventions for Decent Work](#)
- The U.K. Government Health & Safety Executive's "[Vulnerable Worker Guidance](#)";
- International Labour Organisation (ILO) [Indicators of Forced Labour \(2012\)](#);
- The United Nations Global Compact (UNGC) UNGP Guiding [Principle 4](#): the elimination of all forms of forced and compulsory labour.
- The Institute for Human Rights and Business [Dhaka Principles](#) for Migration with Dignity.
- Fair Labor Association & AAFA [Commitment to Responsible Recruitment Resource List \(2019\)](#)
- CSG and AIM-Progress' [Guidance on the Repayment of Worker-paid Recruitment Fees and Related Costs \(Oct 2022\)](#)

APPENDIX 4 – BARBOUR SUPPLY CHAIN HOMEWORKERS POLICY (2024)

HOMEWORKERS POLICY

Barbour acknowledges that homeworking is a necessary option for specific workers whose circumstances compromise their ability to integrate with a manufacturing employer's workforce and would otherwise not gain access to essential wages. All Business Partners are required to uphold local employment laws, and assure fair, safe and dignified working conditions for all workers, including workers employed within their own homes, meeting the [Barbour Supply Chain Code of Conduct](#). Homeworkers are a vulnerable group of workers, and their rights and conditions are to be equally upheld. Barbour does not prohibit homeworkers from the Supply Chain. Our commitments to Transparency require all manufacturing partners to openly state the locations of manufacture of all goods and permit periodical assessments of homeworking conditions.

Requirements from Supply Chain Business Partners:

1. **Transparency** – all manufacturing units are required to declare how many homeworkers they employ:
 - a. in the SEDEX Self-Assessment Questionnaire (SAQ).
 - b. to auditors when scheduling the social audit, to allow for sufficient audit time to include homeworkers assessment, with the assignment of extra days, suggested as
 - i. 0.5 auditor day extra for 1-2 homeworkers assessment;
 - ii. 1 auditor day extra for up to 5 homeworkers assessment;
 - iii. an additional auditor day for every 5 homeworkers assessment;
 - iv. to 100% homeworkers assessment for the initial audit;
 - v. specific homeworkers audit, if more than 10% of employees work from home; unless audit standards state alternative guidance;
 - c. providing the map of homeworkers throughout the Tiers, when requested, with an employee list (names, verified age, address, social insurance number, contact number, working patterns);
 - d. to Barbour and other clients at onboarding stage, and at any requested time.
2. **Homeworker Management** – working conditions are to be communicated to:
 - a. assure employer commitments via written/communicated contract, with specified pay timelines;
 - b. local labour department/authorities to help register homeworkers for relevant welfare schemes and social insurances, and to establish an external grievance channel;
 - c. homeworkers via an employers training of workplace rights, including how to access employer tools and how to negotiate reasonable targets, and record piecework tracking and working hours correctly, together with advice for safety protections for safeguarding others within the home from any homework activities' potential impacts undertaken at the declared home site;
 - d. family members and the surrounding community via easy-read leaflets, highlighting that homeworkers cannot subcontract to family members, including children, and others (as a gangmaster), as a means of completing production targets.
3. **Brand protection** – all branded goods parts and commercial design information is to be assured confidentiality, and factory management shall not grant homeworking activity to workers/locations that may place brand protections at risk.
4. **Raw materials bundles management** - raw materials in and bundles out are to be accounted for and no branded parts or information are to remain in the home or to be placed in the hands of others. Means of transportation of parts and raw materials are to be arranged by the employer with assurances of brand protections.
5. **Equipment** used in the homeworking or offsite setting is to be employer-paid or provided, or promptly reimbursed at the next pay period if agreed upon, and adequate to the task.

USEFUL REFERENCES

- ILO Homeworking Convention (1996, C177) [link](#)
- UK National Group on Homeworking: www.ngh.org.uk
- Homeworkers Worldwide www.homeworkersww.org.uk
- Ethical Trading Initiative (ETI) Homeworking Guidelines [link](#)