J Barbour & Sons Ltd.
MODERN SLAVERY STATEMENT 2025/2026

Summary for Financial Year 1 May 2025 – 30 April 2026
Dated 10-11-2026

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 tenth statement. The previous statement was published on 12 October 2025.

This statement is made by J Barbour & Sons Ltd. ("**JBS**"), and describes relevant activities relating to the Barbour and Barbour International brands within its own business and value chain, to combat modern slavery in our Supply Chain, during our 2025-2026 financial year, from 1 May 2025 through 30 April 2026, including a brief overview of some of Barbour's intended next steps for the following financial year. This statement also includes relevant activities relating to JBS' wholly owned subsidiaries Barbour Inc. (USA), Barbour Europe GmbH & Co. K.G. (Germany) and Barbour Singapore Pte Ltd. JBS owns, retails and wholesales the Barbour and Barbour International brands. References to "Barbour" in the remainder of this statement will be construed as references to "JBS" or its subsidiaries, as the context requires. This statement will be uploaded both on Barbour's corporate website, and the U.K. Government's Modern Slavery Statement Registry.

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 1293 direct employees: 1163 within the U.K., 85 in Barbour Inc. (USA), 45 in Barbour Europe GmbH & Co. K.G. (Germany), 5 employed by our Singapore subsidiary (4 in Hong Kong and 1 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., 5 in the U.S.A., and 1 in Germany, directly employing 293 staff; and supplies wholesale merchandise to retailers worldwide. Our warehouses directly employ 187 staff in the U.K.. Warehouses in the USA, Netherlands and Germany are service providers, not owned or operated by Barbour. We conduct comprehensive compliance checks across our own operations, including verifying right-to-work documentation, adherence to the Working Time Directive, and other legal employment requirements, to ensure all individuals are engaged in fair and lawful working conditions. 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 allowing employees to report 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 three contractors to provide catering, 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, 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. Barbour engages labour providers that commit to compliance. We outsource global transportation logistics, and our downstream partners' commitments are detailed on page 6.

Our Own South Shields Factory
Barbour manufactures a portion of our classic wax jackets, the Bedale style, in our own South Shields factory, in the U.K., which also operates our Wax-For-Life jacket re-waxing, repair and Re-loved (circularity) services. Our South Shields factory's compliance with the ETI Code and U.K. law was audited in March 2026 using the SMETA 2-pillar audit tool, and will undergo a follow-up audit in FY26-7.

Our Governance Structure
Barbour is committed to the welfare, health and safety of all own employees and Business Partners, and our contracted manufacturers.

Shareholders Company commitment to Sustainability	
Company Directors Strategy and Vision	
Senior Leadership Team Disseminates ethical strategy across the wider business to ensure alignment	
Supply Chain and Ethical Trade Team Develops Supply Chain Code of Conduct and Policies, upholding standards with Business Partners	**Human Resources Team** Develops internal policies and upholds standards for Own Operations employees

Table 1: J.Barbour & Sons Ltd. Governance Structure (2025)

Our Supply Chain

Our Supply Chain Tiers Definition

Barbour updated our Supply Chain Tiers definition as below.

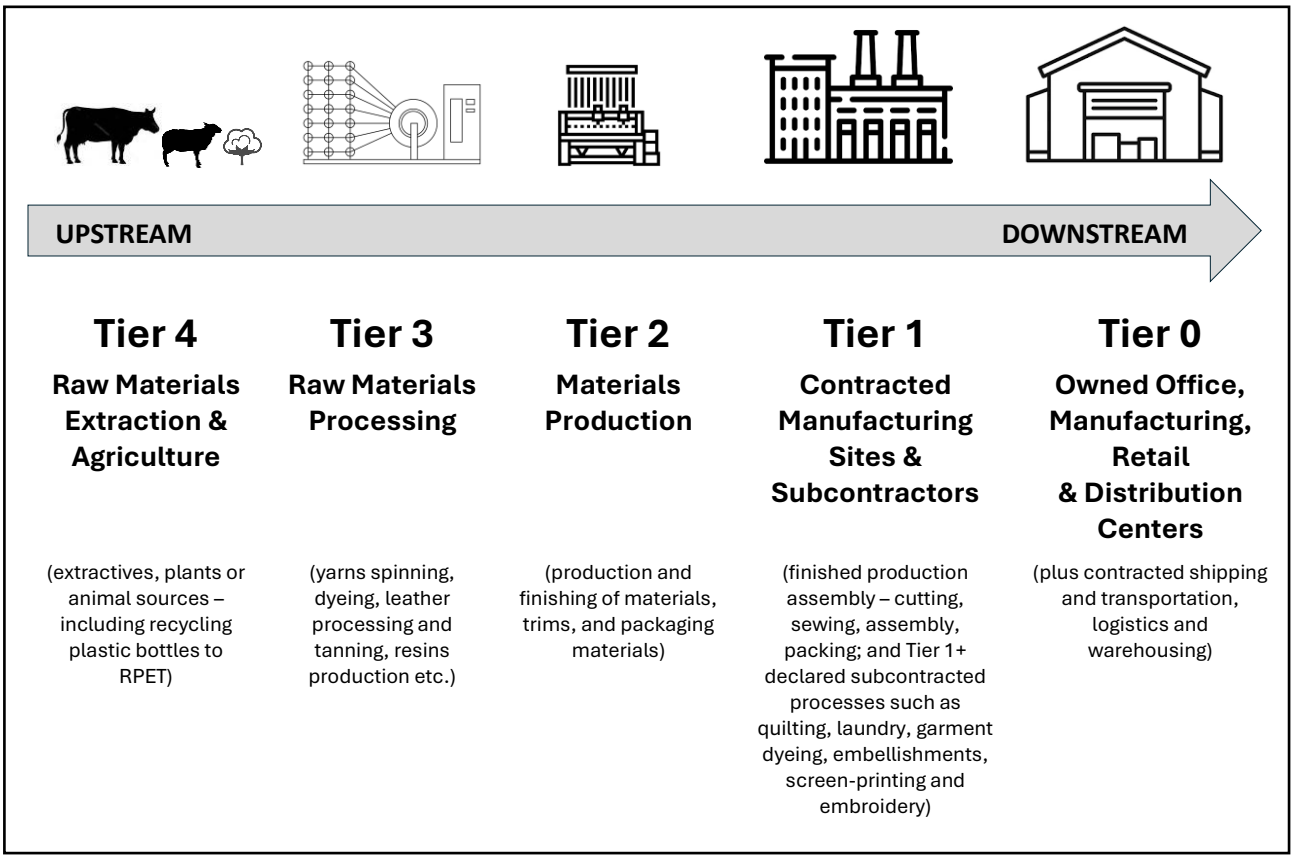


Table 2: Barbour Supply Chain Tiers definition v3 (2025)

Barbour's Direct Business Partners – Suppliers producing Finished Goods

As of 30 April 2026, asides from in our own South Shields factory, Barbour apparel, footwear and accessories are manufactured in an additional 120 contracted Tier 1 Finished Goods factories in the U.K., Portugal, Spain, Italy, Albania, Bulgaria, Moldova, Mauritius, Türkiye, India, Sri Lanka, Indonesia, Vietnam, Cambodia, and China. No unauthorised or undeclared subcontracting is permitted.

Our Supply Chain Transparency

Tier 1 Manufacturers of Goods-For-Sale (Core Supply Chain)

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 Modern Slavery Statement page in downloadable excel format, with information on 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 retailed products, excluding licensees, gifts-with-purchase, and not-for-resale branded goods used in promotions. 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, of core factories, to the Open Supply Hub, twice annually. Responsible buyers tag their supplier factories, and multi-stakeholder-initiatives also tag the factories within their membership network. All contracted suppliers have been sent instructions on how to claim their sites and we directly provide ongoing remote support and engagement, reaching 77 percent "claimed" Tier 1 sites within FY25-26. By claiming their site profiles, factories publicly confirm that their names and addresses are correct, and can make a statement on how their working conditions are monitored. The Open Supply Hub contains details of the last audit on each factory profile if the audit programme participates.



Table 3: Barbour's Tier 1 Global Map of Contracted Manufacturing Sites (April 2026)

15	120	49200	36050 (73%)	98%
Sourcing Countries	Tier 1 finished goods core supply chain factories	workers in Tier 1 finished goods core supply chain factories	workers are women	Tier 1 factories audited within the last 2 years

Table 4: Barbour's Tier 1 Ethical Trade Statistics (April 2026)

Onboarding Tier 1 Manufacturers

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, or on the ILO Better Work ASTRA and Transparency sites. Viewing audits on digital platforms guarantees Barbour access to authentic factory audit reports, allows us to see ratings of factory compliance levels, and facilitates the factory's corrective actions to be captured online for us to transparently view. Subsequently, third party audits or independent assessments 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 manufacturing site within China exporting Barbour-branded goods is added to Barbour's China Registry in exchange for our review of their social audit on SEDEX with no pending Critical non-conformances.

Tier 1+ – Indirect Business Partners – Manufacturing Core Product

From 2023 onwards, the Barbour Supply Chain team sought to require our contracted suppliers to also submit Tier 1+ site information to us along with their standard Tier 1 Factory List information. Barbour personnel have visited a number of these sites to review physical working conditions.

Tier 1 – Additional Direct Business Partners – Further Supply Chain Mapping of Consumer Goods Sites

In FY24-25, we mapped and monitored audit activity (on SEDEX platform) of our (fixed-duration contracted) Licensee Tier 1 suppliers and (spot purchase) gifts-with-purchase (GWP) Tier 1 suppliers. Barbour collaborated with a number of brands and retailers, accepting Barbour-branded goods from additional factories not included in our Transparency List online. Barbour strives to include contractual obligations in its supply chain contracts to oblige its suppliers to comply with our Code and policies in, and began actively engaging and monitoring our Licensee and GWP supplier sites on SEDEX in FY24-25 in the same way we monitor our own direct contracted business partners sites.

Upstream Tier 2 – Raw Materials

Direct Business Partners – Suppliers of Nominated Raw Materials

Barbour acknowledges that risks can exist in the upstream tiers. Barbour is known for our waxed cotton and signature tartans, used for manufacturing our core products. We design, order and deliver fabrics and trims from 72 nominated suppliers, to Tier 1 contracted manufacturers. Barbour does not currently monitor the working conditions of these Tier 2 sites.

Indirect Business Partners – Tier 1 Suppliers' Own Raw Materials Tier 2 Supply Chain

Barbour's Sustainability Team launched our Traceability Project pilot in February 2025, using a third-party digital portal to expand upstream tiers traceability mapping in preparation for upcoming Digital Product Passport requirements.

Downstream Tier 0 sites – Distribution Direct Business Partners – Shipping and Forwarding
Barbour contracts logistics business partners to send goods to our key sales markets. All business partners (operating in the U.K. with turnover over the minimum threshold) publish Modern Slavery statements, or policies if not subject to the Act (see links below).

Table 6 – Barbour's Direct Business Partners – Logistics (FY24-25) - with statement links					
Logistics Partner / Delivers to	U.K.	E.U. – Ireland	E.U. – NL	U.S.A.	Vietnam
TOLL Holdings Ltd.	•		•	•	•
DHL Group	•		•	•	•
A.P. Møller – Maersk A/S	•		•	•	•
EV Cargo Global Forwarding Ltd.	•		•		
DPD Group UK Ltd.	•				
Cargo Refridgeration			•		
Flexport Inc.				•	
Davies Turner PLC				•	
Countrywide Freight Group Ltd.		•			
BM Stafford	•				
LRM	•				

Our Supply Chain Ethical Trade Policies

Policies – Stakeholder Engagement
Barbour's Code of Conduct and monitoring expectations are included in Supply Chain contracts. After production starts, all revised policies are again shared with contractors by their key contact in Barbour.

The Barbour Supply Chain team is internally engaged on the content of all Barbour Ethical Trade policies, and the managers in the Supply Chain team further engage our direct business partners (suppliers and manufacturers) in regular supplier meetings.

Engaging Civil Society Organisations (CSOs) and Industry Initiatives to further develop Policy – In FY25-26, Barbour contracted The Centre for Child Rights and Business (The Centre) to review Barbour's Child Labour Remediation and Young Workers' Protection Policy, to further its protocol to reflect our partnership. In July 2025, Barbour joined the Fair Labor Association (FLA), and our Code of Conduct was benchmarked with theirs. Revisions will be launched in FY26-7.

Monitoring the Barbour Supply Chain for Adherence to Barbour Policy – All Tier 1 manufacturers' assessments are uploaded to SEDEX, which check compliance with local law and the ETI Code, unless non-SMETA alternative tools are used to alleviate audit fatigue, for example amforiBSCI, WRAP or SA8000. In FY25-6, Barbour joined the ILO Better Work progamme, and their assessments and training plans of supplier sites are stored on the ILO Better Work's ASTRA Portal. In all of these instances, Barbour policies are not referred to. Barbour specifically monitors sites' adherence to our Modern Slavery Policy where the highest risk is identified. In July 2024, Barbour commissioned a UK-based labour rights consultancy to assess three (3) Mauritius manufacturers and their compliance with Barbour's Modern Slavery policy, which details the ILO's Forced Labour Indicators. In FY25-6, we continued with this organisation by launching corrective action plans in Mauritius based on the assessment recommendations.

Our Supply Chain Risk Assessment

Barbour's Tier 1 – To understand risks in Tier 1 supplier site geographies, annually, Barbour Ethical Trade Manager an Ethical Trade Tier 1 global risk report using SEDEX's RADAR Risk Assessment data scores per country, specific to our industry and the products types manufactured for our brand, to produce a numerical score risk table. We overlay this with alerts from publicly-available subject-matter-expert desktop reports, and then colour-code this to visually communicate our highest risks. This creates a modern slavery due diligence focus for the Ethical Trade Manager. Pre-sourcing risk report 1-pagers are produced when any new country is considered as a finished goods sourcing potential, of which the SEDEX RADAR risk scores are one reporting element. An online desktop research sweep is routinely included as an additional element for the onboarding risk review of potential new supplier sites. The risk score table is used in internal communications for targeted sourcing discussions, and cascaded to all, including in Barbour's new-hire onboarding sessions.

In FY25-26, SEDEX RADAR Risk Reports continued to highlight similar highest risks as FY24-25.
In the U.S. 2025 Trafficking in Persons Report listed Myanmar as Tier 3, and Mauritius and India as Tier 2.

Table 7 – Barbour Tier 1 Top 3 Modern Slavery Risk Countries FY25-26	
Highest Risk Countries	Risks
1 – Myanmar	Child Labour and Long Working Hours
2 – Mauritius	Bonded / Forced Labour
3 – India	Forced Labour, Long Working Hours and Child Labour

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.

Addressing Risks in Myanmar – Our Approach
Barbour's annual SEDEX RADAR Risk Table scored Myanmar as the highest risk location in our supply chain for Child Labour and joint highest risk for long working hours. Myanmar's Forced Labour risk ranking was second-highest, the indicator widely reported being long working hours.

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 FY24-25 to participate. This programme provides robust onsite annual assessments, with follow-ups between assessments to check on the corrective action plan (CAP) time-bound deadlines; and the MADE team provide targeted offsite group trainings for factory responsible leaders and workers to address any capacity gaps found during those onsite engagements. There are three MADE in Myanmar signatory buyers now buying from this contracted site, collaborating with the factory on due diligence, as well as regularly attending the multi-stakeholder dialogue via Eurocham Myanmar.

Addressing Child Labour Risks in Myanmar – Working in collaboration with other brand buyers, in December 2022, Barbour also contracted The Centre to conduct an age verification assessment and deliver age verification training to the supplier 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's Child Rights and Business (CRIB) Working Group to remain informed of risks in the sector, training and collaboration opportunities throughout Asia. In FY24-25, Barbour also became a member of The Centre's Child Rights and Business (CRIB) Working Group group, which helps brands address child rights risks in global supply chains. This working group meets quarterly, bringing buyers together to discuss supply chain challenges, relevant local laws in countries of manufacture, and ways to embed best practices into core business operations. It also provides a platform to strengthen collaboration among members.

The MADE in Myanmar FY24-25 assessments advised a Young Workers management protocol to the site to: (1) develop continuous assessment of Young Worker workplace hazards identification; (2) apply effective control measures to ensure only low risk tasks and processes are assigned to Young Workers; and (3) advance dialogue between Young Workers and management.

Addressing Forced Labour and Long Working Hours Risks in Myanmar – The MADE in Myanmar FY24-25 assessments advised a protocol to ensure voluntary overtime monitoring, including a week's advanced notice of any overtime opportunities, every worker's agreement signature, and submission of overtime work documentation to the labour office.

This site promotes the Fair Wear Foundation (FWF) worker helpline to manage grievances, as two high-volume and long-term buyers are members of this organisation: MADE in Myanmar programme and all other buyers relinquish grievance mechanism responsibility to FWF and their member brands, as a result of this arrangement, on the agreement that any significant issues be highlighted to the factory-buyer stakeholder collaboration group.

Responsible Exit from Myanmar – In October 2025, after a 12 month gradual reduction in orders under full disclosure with the owners of our contractor supplier factory, Barbour exited buying from Myanmar, following our Responsible Exit Policy. The supplier factory owner stated that, in response to Barbour's exit, there would be no adverse effect on the workforce or the overall production activity level at the factory, due to strong demand from other clients and upcoming new manufacturing programmes. Barbour's membership and activity with Eurocham Myanmar's Garment Advocacy Group and MADE in Myanmar both remained active until June 2026. In January and February 2026, Barbour's Ethical Trade Manager shared our Responsible Exit approach with Fair Labour Association (FLA) and MADE in Myanmar organisations and membership, plus extended stakeholders.

Addressing Risks in Mauritius – Our Approach
Barbour continues to consider Mauritius as our highest risk Tier 1 manufacturing location for Bonded Labour, with the risk of foreign migrant worker debt-bondage of recruitment fees and transportation costs acknowledged as a Forced Labour Indicator.

Addressing Bonded and Forced Labour Risks in Mauritius – From January 2023 until February 2025, Barbour participated in a brand collaboration working group of peers 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 FY23-24, 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 fees, a hidden cost incurred in home (or "sending") countries prior to the official. or known, recruitment process, at a level approved by the US-based NGO. Following the Consumer Goods Forum and AIM-Progress' "Guidance on the Repayment of Worker-Paid Recruitment Fees and Other Costs" verification protocol, the brands' funds were dispensed to workers via the employer, in February 2025, with both the migrant worker list verified prior to funds release, and post-payment worker satisfaction verified, directly face-to-face by an international union, and subsequently publicly confirmed on the website of the US-based labour rights NGO monitoring remediation efforts.

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. This commitment requires signatory brands to periodically report on their actions to embed elements of the commitment in policies and processes vis modern slavery disclosures.

In January 2024, Barbour had publicly committed to expanding our audit processes in Mauritius. And in July 2024, appointed a consultancy for their subject-matter-experts on bonded labour risks to conduct worker-centred assessments and engage the three (3) remaining Tier 1 contracted factories in Mauritius, and their adherence of Barbour's Forced Labour Policy (published June 2023), detailed in the appendix. This policy includes the ILO's 11 Indicators of Forced Labour, and the assessments described factory adherence levels of each element. In April 2025, the consultancy was again contracted to work through corrective actions with advisory support, through FY25-26. For the duration of the contract, workers can report grievances to the consultancy key contacts, who have interviewed both local and foreign migrant workers in their own languages.

Barbour visited all Mauritius supplier factories' workers dormitories in both July 2023 and July 2024 to view migrant worker living conditions.

In FY25-26, Barbour continued to engage a labour rights consultancy with recognised expertise in analysing foreign migrant worker recruitment, employment and living experience, to advise Mauritius factory management, from mid-management to board level, on a continuous action plan to improve policy, worker and supervisor communications, understand recruitment costs, improve working and living conditions, and the return-home experience.

Addressing Risks in India – Our Approach
India is ranked our third-highest risk country for overall risk scoring; and for Child Labour.

Addressing Child Labour Risks in India – Barbour contracted a civil society partnership from 2025 onwards to review our policies and engage our India supply chain with an in-person full day training in FY25-6 with factory Human Resources and Safety Management representatives from all (one hundred percent) India supplier factories, responding to our Responsible Recruitment strategic approach. Barbour continues to engage our Tier 1 supply chain partners with support from expert civil society partnerships.

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, SA8000 and WRAP reports to be uploaded by the Sedex Affiliate Audit Company (SAAC) executing the audit. From March 2026, amfori no longer permitted BSCI audit reports to be uploaded to SEDEX, which led to a higher number of SMETA audits.

ILO Better Work Programme – In April 2026, Barbour was accepted as a Brand Partner by Better Work; and 16 (13%) of our Tier 1 factories were monitored and trained in this programme, in Vietnam, Cambodia and Indonesia. A core commitment of brands signing with the ILO Better Work programme is that no alternative audits are performed of supplier sites involved, therefore, Barbour ceases to monitor these sites on SEDEX. Better Work promotes decent work and competitiveness in the global garment industry. A partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC), a member of the World Bank Group, Better Work unites governments, employers' and workers' organizations, global brands, factory owners and workers to improve working conditions in the global apparel and footwear industry. The Better Work factory engagement model includes assessments, advisory services and training, targeting root causes of non-compliances by its capacity-building approach. Both brands and factories contribute funds to the programme; and traders are granted access to the ASTRA data platform when tagged as "Supply Chain Partners". All three parties

are engaged on a quarterly basis by the ILO Better Work teams in-country, to discuss factories' non-compliances and roadmap to "High Performing Factory" status.

Barbour-sponsored Audits – In FY25-26, ninety-eight per cent (98%) of our Tier 1 manufacturing sites audited within the last 2 years.

In FY25-26, to support Tier 1 monitoring costs for our manufacturing partners, Barbour:

- fully-funded six (6) SMETA audits, including for our own factory in England, and in Bulgaria, Moldova and Portugal;
- co-funded one (1) "Capacity Building for Foreign Migrant Worker Management Systems" assessment and corrective action plan engagement (in Mauritius), to capacity build its management systems, responding to international stakeholder demands to upgrade Barbour's approach to foreign migrant worker management systems assessments.
- joined the ILO Better Work programme, co-funding assessment and training costs for sixteen (16) factories, in Vietnam, Indonesia and Cambodia.

Social Audit Governance

SEDEX – 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 Advisory Committee.

ILO Better Work – This multi-stakeholder initiative (MSI) is a partnership between the International Labour Organization (ILO) and the International Finance Corporation (IFC), a member of the World Bank Group, and its stakeholder organizational governance structure includes governments, employers' and workers' organizations, alongside (2) global brand representatives. The Programme's progress is evaluated by the ILO's Evaluation Office (EVAL) High-Level Evaluation (HLE), via stakeholder consultations with 370 ILO national constituents in programme countries. Global brands view Better Work as a reliable compliance partner and press for its expansion to help meet new due-diligence obligations.

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 on a quarterly basis, and share an update with all Suppliers. 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.

SEDEX – 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 privately applied on the Sedex database as "Minor", "Major", "Critical" or "Business Critical". Factories are required to log their ongoing corrective actions to "close" all audit non-conformances Corrective Action Plans (CAPs) on Sedex within designated deadlines. 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". Any non-compliances that cannot be verified "closed" within the current cycle are carried-over into the next audit cycle and Barbour continues to monitor and review.

ILO Better Work – any "Critical" non-conformances are highlighted in reports from Cycle 1 onwards, and are posted publicly on the ILO Better Work Transparency Portal from Cycle 2 (year 2) onwards, which Barbour and intermediary supplier partners continually monitor.

Supply Chain Grievance Reporting Channels
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 for remediation.

SEDEX – grievances over audit quality can be reported to grievance@sedex.com.

Fair Labor Organization (FLA) – Tier 1 manufacturing site unresolved grievances can be reported anonymously with no-retaliation protections, to https://www.fairlabor.org/accountability/fair-labor-investigations/tpc/file-complaint/.

Training on Modern Slavery

For Barbour Supply Chain Team

Internal engagement – Barbour's Supply Chain Ethical Trade Manager engages Barbour's management teams leading design, technical, quality assurance and supply chain on policies and monitoring activities.

External training for Barbour Personnel – with the Fair Labor Association (FLA) eLearnings - Barbour's Global Ethical Trade Manager underwent further online training in FY25-26, in "Recognizing Child Labour", following FLA's resource "Guidance on Preventing and Addressing Child Labor in Supply Chains (January 2025)", and "Remediating Child Labor in Supply Chains", prior to co-hosting a full day in-person training for 100% India suppliers with The Centre for Child Rights and Business.

The Centre for Child Rights and Business – Barbour continues its membership of The Centre's working group CRIB, to share best practice and access the latest information and insights to counter risks of child labour in the sector's supply chains.

For Our Supply Chain
Barbour Supply Chain managers continue to promote our Code and policies through face-to-face engagement with suppliers in all source countries.

In our Top 3 risk countries (Myanmar, Mauritius and India) Responsible Recruitment trainings (detailed on pages 9-11) to identify and remediate Child and Forced Labour were delivered via established programme experts; and onsite for Mauritius in how to engage foreign migrant workers by a labour rights consultancy where established local programmes are not available.

In lower risk countries (Top 5):
Vietnam – ILO Better Work Vietnam provided trainings to a portion of Barbour supplier factories, on "Forced Labour Prevention", "Child Labor Prevention", "Labour Contracts", "Industrial Relations", and "Grievance Mechanisms".

Next Steps – in Financial Year 2026-7

Our Next Steps with Policy

1. Further develop Barbour's Code of Conduct and Child Labour policies, incorporating feedback from Civil Society Organisation (CSO) and Multi-Stakeholder Initiative (MSI) memberships;
2. Develop a new Migrant Worker Due Diligence Protocol (for Supply Chain manufacturers) in line with industry peers, to explain necessary steps required to establish robust Responsible Recruitment management systems;
3. Translate revised (relevant) policies into most relevant supply chain languages, to improve engagement with business partners and workers, prioritising migrant worker languages;
4. Launch a policy awareness engagement amongst our business partners, in highest risk source country locations and for highest risks.

Our Next Steps with Transparency & Traceability

5. Transparency – share further Tiers (1+ and 2), Licensee and GWP Tier 1 manufacturers' data publicly, expanding use of the Open Supply Hub;
6. Traceability – continue to implement the Traceability Project to extend upstream traceability accuracy for Barbour-branded products.

Our Next Steps with Risk Mapping

7. Identify all Tier 1 and Tier 2 sites (mapped) with migrant workers hired from overseas into employment.

Our Next Steps with Training

8. Train relevant internal and external stakeholders with new policies.
9. Promote digital training solutions.
10. Develop Ethical Trade reporting training to enhance future disclosures.

Our Next Steps with Monitoring and Heightened Due Diligence

11. Evolve Public-Private Partnerships to improve governance and due diligence approaches;
12. Continue to map Forced Labour Indicators (FLIs) across Tier 1 monitoring reports.
13. Using new Migrant Worker Due Diligence Protocols, develop focused monitoring approach for all Tier 1 and Tier 2 supply chain sites employing migrant workers hired from overseas into employment;
14. Map available external grievance mechanisms.
15. SMETA 4-pillar re-audit in FY27-8 of our own Barbour Factory in South Shields.

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015.
Information correct as of 10 November 2026.
Approved on 10 November 2026.



Steve Buck, Managing Director, J.Barbour & Sons Ltd.

APPENDIX 1: BARBOUR SUPPLY CHAIN CODE OF CONDUCT (v2, 2023)

Barbour

Barbour Supply Chain Code of Conduct v2, 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.

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

Signed: _____ **Steve Buck, Managing Director, J.Barbour & Sons Ltd.**

APPENDIX 2 – BARBOUR SUPPLY CHAIN CHILD LABOUR REMEDIATION & YOUNG WORKERS PROTECTION POLICY AND PROTOCOL (v1, 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 (v1, 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 (0ct 2022)

APPENDIX 4 – BARBOUR SUPPLY CHAIN HOMEWORKERS POLICY (v1, 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
- Homeworkers Worldwide www.homeworkersww.org.uk
- Ethical Trading Initiative (ETI) Homeworking Guidelines link