

J Barbour & Sons Ltd ('Barbour')

Modern Slavery Statement

Our Business

J Barbour & Sons Ltd is a fifth-generation family-owned business and has been trading for 127 years. We conduct our business through wholesale, retail and ecommerce channels.

Barbour has two trading subsidiaries, Barbour Inc (USA) and Barbour Europe GmbH & CO K.G. (Germany). Barbour distributes through independent authorised dealers in the UK and abroad. As the parent company of the Group, J Barbour & Sons Ltd organises the manufacture of its products on behalf of Barbour Inc and Barbour Europe GmbH & Co K.G.

We continue to manufacture classic wax jackets in our South Shields factory and engage trusted suppliers to manufacture products in our global supply chains.

At Barbour we have a commitment towards the welfare and interests of our employees and those of our suppliers. Our sourcing strategy exists to ensure people are treated fairly, with dignity and respect.

Our Policy

We fully endorse the Modern Slavery Act 2015, promote ethical business and condemn any abuse of human rights. Accordingly, we are committed to working with suppliers who comply with the human rights standards set by the International Labour Office (ILO). These are the basis of our Code of Practice at Appendix 1.

The ILO is an agency set up by the United Nations and brings together government, employers and workers of 187 member states to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

What Barbour has done in the last year

We have continued to monitor human welfare standards in our supply chain using the measures set out in this statement.

To further support this and to increase transparency of our factory base, we have joined the Human Rights Watch's globally recognised "Transparency Pledge".

When we have identified minor corrective measures to be taken with certain suppliers and areas of the supply chain, we set in place corrective action plans working with suppliers to monitor improvement and ensure changes are made swiftly.

We acknowledge and are monitoring the ongoing situation of cotton suppliers in the Xinjiang region of China. We can confirm we have never sourced nor have any plans to source cotton from this region and will continue to monitor our supply chain accordingly.

Measuring the ILO Standards

For Barbour, the ILO standards are paramount. Any serious breach of the standards would likely lead to termination of the business relationship between Barbour and its supplier.

Minor incidents will be considered in their context and proportionate action will be taken. Barbour may decide to engage the relevant supplier or factory in corrective action and will support the supplier or factory in improving their standards. The supplier's standards will be closely measured and any minor incidents must be rectified within a specific timeframe. By setting targets, we measure the effectiveness of our enforcement methods and ensure the ILO standards are maintained.

If the supplier does not adequately address any non-compliance points despite being required to do so by Barbour, then this will likely result in Barbour discontinuing the relationship.

- **Inspecting Factories**

Barbour's staff personally visit each factory before manufacturing takes place to assess its ethical compliance. No factory is used by Barbour unless it has been approved for use by a Barbour employee. We are happy to commit resources to do this to ensure the ILO standards are met.

- **Independent Audits**

Barbour will follow up in the measures above by engaging independent audits from third party experts once production has started to ensure that the standards are applied consistently.

No unauthorised subcontracting is allowed so we can control where our goods are made and the standards which are used at the factory.

We also engage local, professional, independent auditors to conduct detailed audits which will look in depth at compliance with these standards in the factories.

- **Ethical Trading Champion**

On many occasions, we will send our Ethical Trading Champion to our suppliers' factories to undertake compliance audits or to supervise and check the independent audit. Barbour's Ethical Trading Champion continues to undertake extensive training in order to be as skilled as possible when auditing factories.

- **Supplier Ethical Data Exchange (SEDEX)**

Barbour is a full member of SEDEX which is a not-for-profit organisation enabling access to independent and comprehensive audit reports on factories and suppliers.

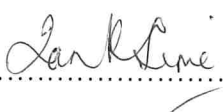
SEDEX is used to complement our assessment of our suppliers' ethical standards to ensure that ILO standards are always maintained.

When factories are members of SEDEX, we can verify that SEDEX audits have been satisfactorily completed on the factories.

- **Legal Agreements**

When Barbour engages a new supplier, we will set in place a legal agreement which includes enforceable obligations to ensure compliance with the ILO standards. This will give Barbour the ability to take legal action, if required, in respect of any non-compliance identified from audits.

This statement has been approved by the Board of Directors of J Barbour & Sons Ltd on 3 March 2021.

Signed..........

Ian Sime
Director of Supply Chain and Board Director
10 November 2021

Appendix 1 – Code of Practice

It is Barbour's policy that its suppliers must comply with the following ethical standards:-

- *Not to use forced or compulsory labour*
- *To pay the national minimum wage in the country the factory is based*
- *Working conditions must be safe and hygienic according to local health and safety legislation and workers must receive regular and recorded health and safety training for their role (the responsibility for health and safety being assigned to a senior management representative)*
- *Workers must have access to clean toilet facilities, drinkable water and clean facilities for food storage and, where accommodation is provided, this must meet the basic needs of the workers*
- *Not to use child labour in contravention of the provisions of the International Labour Office (no worker is employed under the statutory minimum working age in the country in which the factory is based)*
- *Overtime is voluntary, not demanded on a regular basis, paid at a premium rate and compliant with local laws*
- *Workers are not forced to lodge or deposit their identity papers, passports or other formal documents required for work and are free to leave employment with reasonable notice given by the worker*
- *No discrimination is practised in any way including race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation*
- *The workers' presence in the workplace is voluntary and not as the result of any direct or indirect coercion including force, bonded or prison labour*
- *No harsh or inhumane treatment is practised including mental cruelty, physical punishment, verbal abuse, sexual harassment or any other form of intimidation*
- *The worker's rights to freedom of association and collective bargaining are respected and there is no prohibition on joining a union which is not under the control of the management of the supplier*
- *Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace*
- *Workers must be provided with written and understandable information about their employment conditions in respect of wages and other conditions*
- *No deductions from pay are to be made which are not permitted by law without the consent of the worker*
- *Workplaces comply with all employment standards, regulations or other legal or statutory requirements including requirements relation to pay, working conditions, health, fire and safety regulations*