

Barbour®

J Barbour & Sons Ltd. MODERN SLAVERY STATEMENT 2022/2023

Summary for Financial Year 1 May 2022 – 30 April 2023
Dated 27 October 2023

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 7th statement. The previous statement was published on 31 August 2022.

This statement is a summary of the key actions taken by Barbour to combat modern slavery in our Supply Chain, during our 2022-2023 financial year, from 1 May 2022 through 30 April 2023, 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 prior to the deadline of six months following the end of the financial year, established to be 31 October, 2023.

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

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)

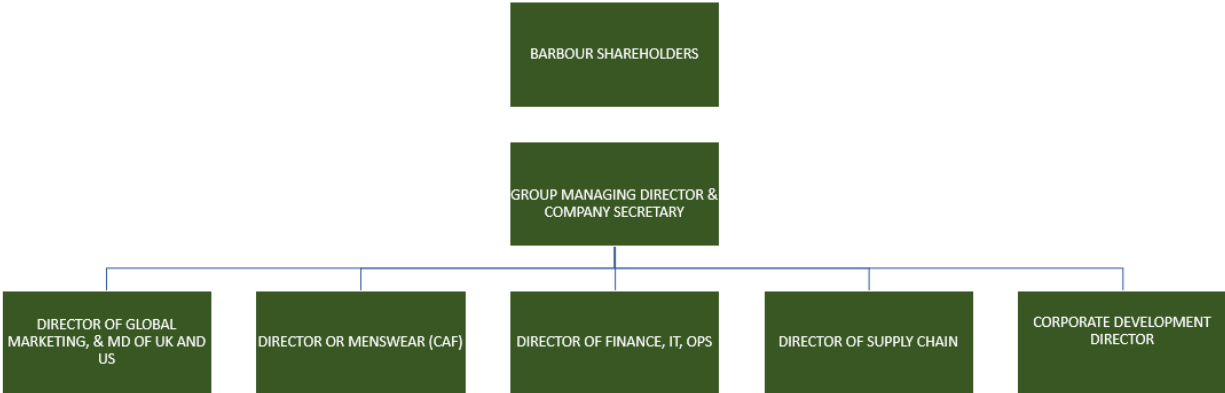
Barbour is a fifth-generation family-owned business producing premium functional clothing, footwear and accessories, established in 1894, and headquartered in Barbour House, South Shields, Tyne & Wear, U.K., with our own factory and warehouse situated within the same site. Globally, Barbour employs 1176 direct employees: 1066 within the U.K., 76 in Barbour Inc. (Milford, NH, USA; est. 1987), and 34 in Barbour Europe GmbH & Co. K.G. (Hamburg, Germany; est. 2014). Our two subsidiaries buy merchandise produced by the Barbour UK team, and manufactured within our supply chain. Barbour runs 18 retail stores in the U.K., and 6 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 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 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.



Our Supply Chain

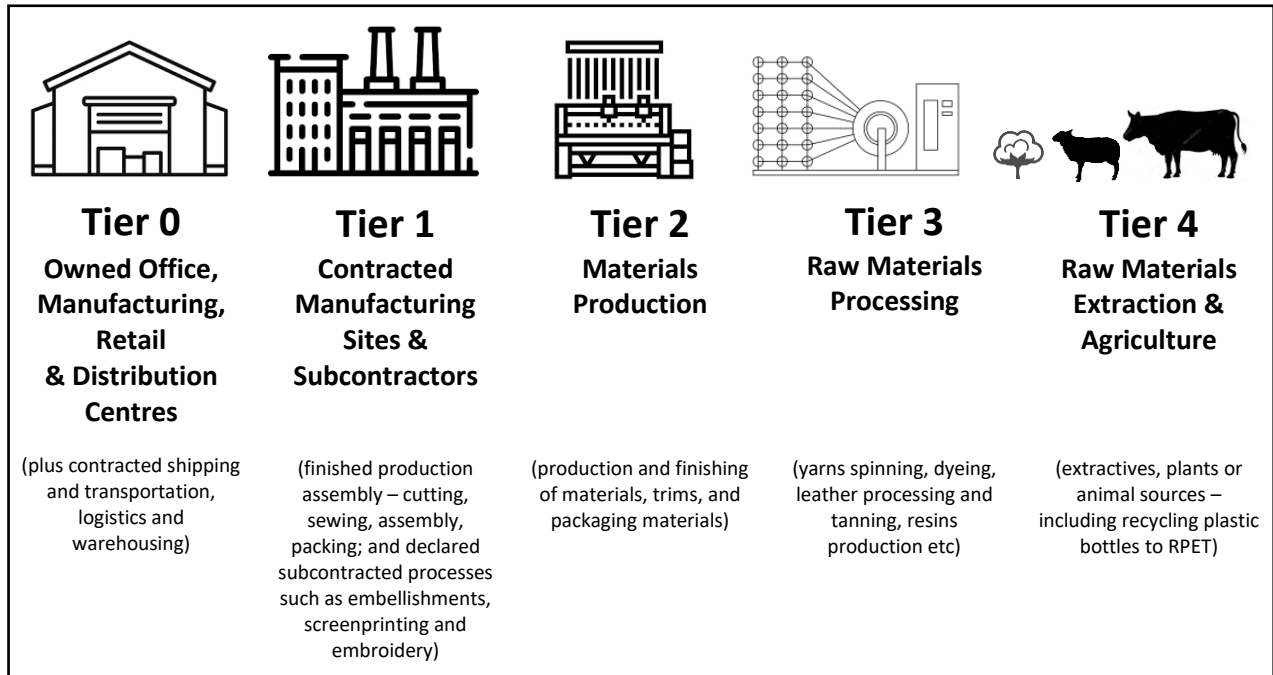
Barbour’s International Supply Chain Manufacturers

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. As of April 2023, including our owned factory, Barbour apparel, footwear and accessories are manufactured in 140 contracted Tier 1 Finished Goods factories in the U.K., Portugal, Spain, Bulgaria, Moldova, Türkiye, Mauritius, Myanmar, India, Indonesia, Vietnam and China. All Tier 1 Finished Goods

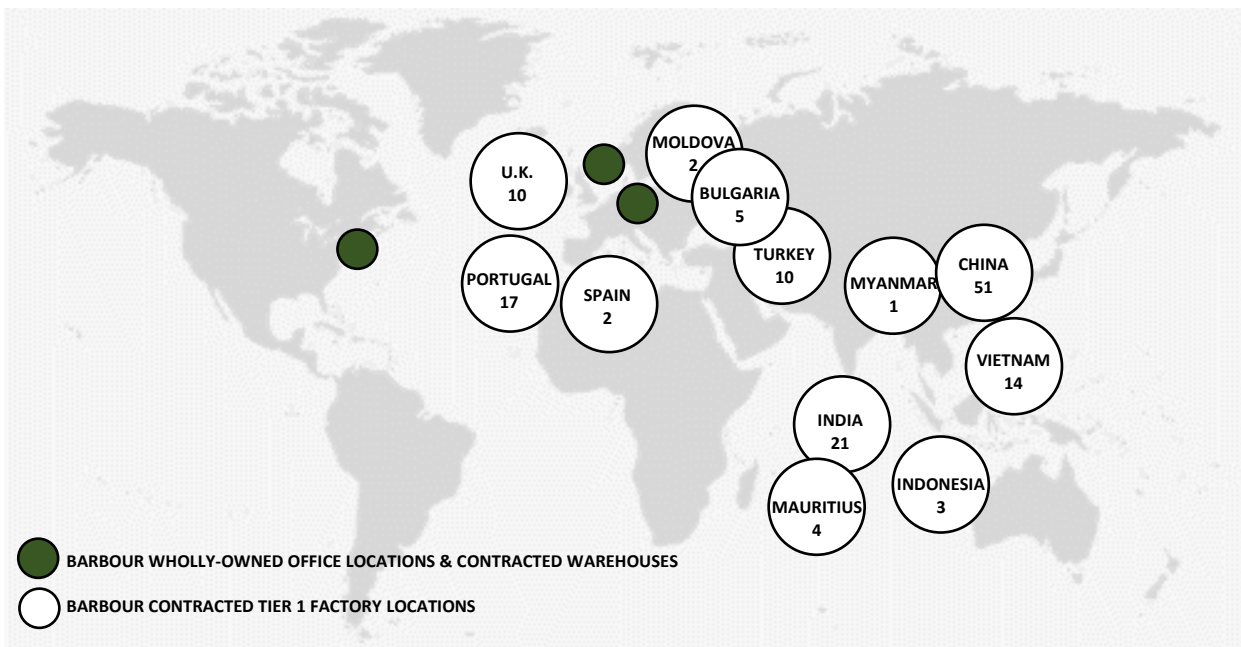
factories are site-visited, assessed and added to our portfolio by Barbour’s Supply Chain and Technical teams. Tier 1 factories are required to produce valid social audits (dated within 2 years) prior to onboarding, which are expected to be maintained on Sedex’s database for Barbour’s regular review.

Our Supply Chain Tiers Definition

Barbour defines our Supply Chain Tiers as below, acknowledging the work that a number of responsible brand-retailers and civil society subject-matter-experts have published to foster industry alignment.



Twice annually, we publish our core Tier 1 Finished Production Assembly factory list, and monitor their social audit and corrective actions. No unauthorised or undeclared subcontracting is permitted.



140 Tier 1 Finished Goods factories	12 sourcing countries	49616 workers in Tier 1 contracted factories	74% workers are women	85% factories audited within last 2 years	15% Tier 1 contracted factories Self- Assessment Questionnaires
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Our Supply Chain Transparency

Barbour signed the [Transparency Pledge](#) in early 2021, committing to publishing our Tier 1 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 above. 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.

Our Supply Chain Ethical Trade Policies

Although Tier 1 undergoes active social audit monitoring, all Tiers of the manufacturing process are contractually required to comply with local laws and standards relevant to the manufacturing site, and meet Barbour Ethical Trade and Sustainability Policies. Barbour communicates its Supply Chain Code of Conduct in contracts and Supplier Manuals, and all Tier 1 suppliers have signed a commitment to our Code.

Barbour’s Supply Chain Code of Conduct revisions were approved internally during FY2022-2023 (see next page) and the new code has been subsequently [published on the Barbour corporate website](#), which highlights (below) our supplier expectations regarding **Modern Slavery**. Barbour’s Base 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](#).

To strengthen Barbour’s commitments, Barbour further developed in 2022-2023 our first **Forced Labour Policy** and **Child Labour Remediation and Young Workers Protection Policy**, which have also been [published on the Barbour corporate website](#). Barbour’s Forced Labour Policy draws on the ILO’s (2012) [11 Indicators of Forced Labour](#), the U.K. Government Health & Safety Executive’s “[Vulnerable Worker Guidance](#)”, and the United Nations Global Compact (UNGC) Ten Principles, [Principle 4](#).

All 3 policies mentioned in this section are included in this statement’s Appendix.

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**.

Sedex 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](#).

Our Supply Chain Risk Assessment

To understand our risks in Tier 1 Finished Goods Assembly, Barbour used SEDEX's global RADAR risk assessment tool.

Barbour's Supply Chain Ethical Trade Manager trained Barbour's Supply Chain team in country-specific risk ratings categories of Forced Labour, Child Labour, Gender & Discrimination, Regular Employment, Safety, Freedom of Association, Wages and Working Hours in December 2022.

Country Risk Reports – Barbour's Ethical Trade Manager delivers comprehensive desktop Country Risk Profiles to Supply Chain Category Managers when considering any new source country, detailing due diligence expectations.

Barbour acknowledges that there is risk in not monitoring annually or beyond the Tier 1 finished product manufacturer, and the greatest risks for Modern Slavery within its supply chain are more likely to occur upstream in its higher Tiers, in less monitored sites. In Next Steps, Barbour details its intention to move beyond Tier 1 mapping, monitoring and due diligence.

Management of Risk – Our Heightened Due Diligence Process

Risk in the U.K. Supply Chain – Our Approach

Barbour is a member of **Stronger Together**, formerly known as Fast Forward UK. Stronger Together is a labour standards improvement programme, which combines a forensic auditing methodology aimed at uncovering hidden worker exploitation, promotes fair work practices to mitigate Modern Slavery risks, by providing supplier engagement tools, training and advice. Barbour entered 2 of our U.K. contracted Tier 1 CMT sites into the Stronger Together programme: one producing accessories and one producing iconic Barbour wax jackets. In July 2022, Barbour's accessories contracted manufacturer, in England, attended online Forced Labour risks training from Stronger Together. And in November 2022, Barbour worked with another brand buyer Stronger Together member to pre-audit the contracted apparel factory on-site in England, using Stronger Together tools.

Risk in the Mauritius Supply Chain – Our Approach

In January 2023, Barbour joined a brand collaboration group to contract **Verité** to assess Forced Labour risks in one shared Mauritius Tier 1 contracted site producing apparel with foreign contract labour, using Verité's expertise, tools and methodology.

Risk in the Myanmar Supply Chain – Our Approach

In August 2022, Barbour joined the **European Chamber of Commerce in Myanmar** and its Garment Advocacy Group, which supports businesses operating in Myanmar by providing reliable information and multi-brand stakeholder engagement to enable enhanced due diligence. Based on our Barbour Supply Chain Risk Assessment of Myanmar, and industry stakeholders' identification of the need for Heightened Due Diligence in the country, at Eurocham Myanmar's suggestion, Barbour entered our one contractor 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 to participate. Working in collaboration with other brand buyers, in December 2022, 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. Barbour will continue to monitor the situation closely.

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)**, which 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 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-five per cent of our Tier 1 manufacturing sites were audited within the last 2 years, and those without audits submitted SEDEX self-assessment questionnaires. Barbour supported 11 key Tier 1 manufacturing sites by organising SMETA audits in FY2022-2023, in Mauritius, China, Türkiye, Bulgaria, Portugal and the U.K., at our cost, with our selected SEDEX-Affiliated Third Party Auditors, Eurofins, QIMA and UL Solutions.

Social Audit Governance and Credible External Inspections

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.

Cotton Sourcing

Barbour’s Supply Chain Code of Conduct and Forced Labour Policy both prohibit the use of Forced and Child Labour in the manufacture of Barbour goods at any Tier in the Value Chain. Barbour recognises the complexity of the cotton fibre supply chain, acknowledges that cotton processing in some parts of the world may be associated with severe conditions of work, and that we have a duty of due diligence to check our branded goods are free of modern slavery. Current laws prohibiting the import of goods made with forced or child labour include the U.S. Tariff Act (1930) and the U.S. UFLPA (2021).

In December 2022, Barbour externally commissioned a traceability mapping of our core products’ supply chain, to farm level. Barbour Supply Chain developed an internal Cotton Sourcing Policy in April 2023, to establish protocols expected of all suppliers to ensure traceability and compliance.

Training on Modern Slavery & Trafficking

For Barbour Supply Chain Team - Barbour’s Global Ethical Trade Manager underwent further online training with the UN Global Compact and ILO’s “How to Understand and Take Action on the Global Goals” and “Advancing Decent Work in Business through the UNGC Labour Principles”, detailing the “UN Guiding Principles on Business and Human Rights”, and assessments for Child Labour and Forced Labour, in April 2023. Barbour’s Supply Chain team was trained by Barbour’s Ethical Trade Manager in Global Supply Chain risks of Forced Labour and Child Labour in December 2022.

For Our Supply Chain – Barbour sponsored Age Verification training for our 1 contracted manufacturer in Myanmar, and 1 contracted manufacturer enrolled in Stronger Together Forced Labour training in the U.K., as detailed in “Our Heightened Due Diligence Process” section (in pages 5-6 above).

Next Steps – In Financial Year 2023-2024

Our Next Steps with Policy

1. Embed Barbour’s revised Supply Chain Code of Conduct, and new Supply Chain Forced Labour Policy and Supply Chain Child Labour Remediation Protocol and Young Workers Protection Policies into new supplier contracts, requiring Tier 1 suppliers to uphold these standards;
2. Adopt the [AAFA/FLA Commitment to Responsible Recruitment](#) to further develop Forced Labour Policy Protocol, aligning with the international apparel and footwear industry;

Our Next Steps with Transparency

3. Enhance our Transparency commitments by updating our Tier 1 supplier lists on the [Open Supply Hub](#), which will advance our ability to collaborate with brand buyers sharing our contracted sites;
4. Commence mapping our core Tier 2 Raw Materials suppliers;
5. Further develop our raw materials traceability;

Our Next Steps with Risk Mapping

6. Evolve our risk-mapping to review the Barbour Supply Chain specifically, to focus heightened due diligence and spotchecks in highest risk countries and Tiers;

Our Next Steps with Training

7. Communicate Barbour’s revised Supply Chain Code of Conduct, and new Supply Chain Forced Labour Policy and Supply Chain Child Labour Remediation Protocol and Young Workers Protection Policies in key source country languages, to
 - our supplier-facing Barbour colleagues, enhancing risk-based Supplier selection;
 - our contracted Tier 1 manufacturers, engaging with local trainers with subject-matter expertise;

Our Next Steps with Monitoring

8. Work with Public-Private Partnerships to assess highest risk source country contracted manufacturers, with a heightened due diligence monitoring approach to sites employing foreign migrant workers;
9. Establish Forced Labour and Child Labour monitoring KPI, according to our risk assessment.

Our Next Steps with Heightened Due Diligence

10. Ongoing commitment to the MADE in Myanmar programme
11. Additional due diligence spotchecks in risk locations in the Tier 1 Supply Chain
12. Actively pursuing additional Public-Private Partnerships and Brand Collaborations

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

Information correct as of 30 April 2023.

Approved on 27 October 2023.



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

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 worker safety.

APPENDIX 3 – BARBOUR SUPPLY CHAIN FORCED LABOUR POLICY

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 \(Oct 2022\)](#)