

Equip Outdoor Technologies UK Limited (Equip) supports the UK’s Modern Slavery Act 2015 (“the Act”) and has taken steps to prevent modern slavery from occurring in its supply chain and within its operations. This statement, relating to the financial period January 2021-January 2022, has been published in accordance with Section 54 of the Act and applies to Equip and the Equip subsidiaries listed in the appendix.

1. Our business and supply chains structure

Equip is an international business with a head office in Derbyshire, UK. We are proud to own two specialist outdoor brands – Rab (established 1981) and Lowe Alpine (established 1967). We design technical outdoor products to meet the needs of our active customers.



THE MOUNTAIN PEOPLE

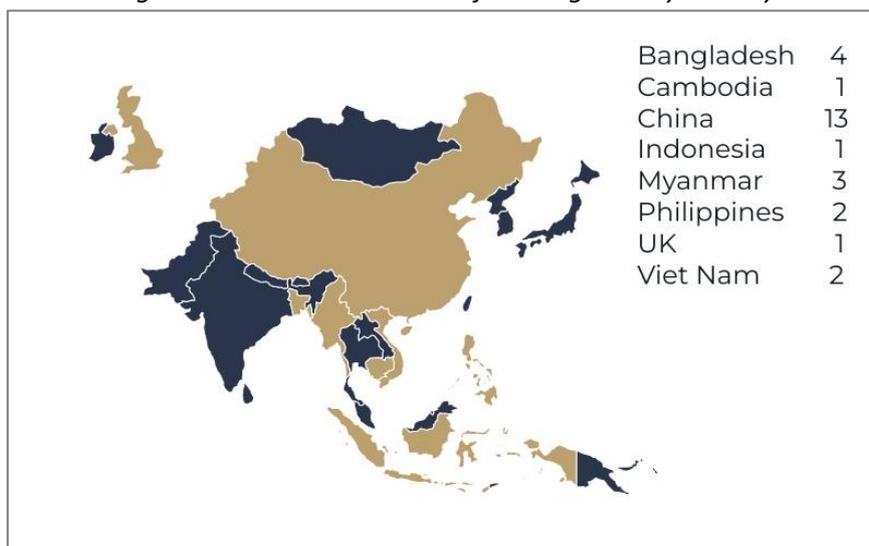
We employ approximately 160 team members in the UK. 125 of these team members work in our head offices designing, marketing, and selling our products or providing core functions to our business. 35 of these team members work in our distribution warehouse and factory site, where we fill our down sleeping bags, distribute to retailers and consumers, and operate a service centre for washing and repairing our products.

A further 45 Equip employees work across Germany, the Netherlands, Norway, Finland, Canada, and the USA marketing and selling our products to international markets. We also have small teams in China and Vietnam who are responsible for monitoring our manufacturers in Asia.

Equip does not own or operate any overseas manufacturing facilities, but we contract partners to manufacture our products to our required standards. We work closely with our manufacturers and have long-term stable contractual relationships with them.

In 2021, we worked with 17 manufacturing partners who operate 26 sites across Bangladesh, Cambodia, China, Indonesia, Myanmar, the Philippines, and Viet Nam. Over 22,000 people are employed by our manufacturing partners globally.

Figure 1: Our 2021 CMT manufacturing sites by country



2. Managing the risk in our operations

2.1 The risk

The majority of our direct employees operate in roles that are low risk for modern slavery, these include teams such as design, marketing, sales, and other core functions. However, we recognise that employees who work in our UK factory and warehouse undertake roles that are considered high-risk for modern slavery by the UK Gangmaster and Labour Abuse Authority (GLAA). According to the GLAA, using agency staff in these sectors is a major risk driver for modern slavery as it undermines accountability and reduces oversight into workers' experiences.

2.2 Our policies and due diligence

We are proud that all our regular team members in the factory and warehouse are Equip employees, not temporary agency staff. By keeping our teams in house, we are mitigating much of the risk associated with our operations. We occasionally use temporary agency staff during peak periods to support our operation. This typically occurs a handful of times a year and involves small numbers who remain on-site for a few weeks. In 2021, due to growth in our order volumes, disruptions in global supply chains, and staff shortages caused by Covid-19, we used agency staff more than we have in previous years. Section 3.2.6 outlines the due diligence we have conducted on our labour provider.

We recognise there is still a small risk for direct employees as modern slavery can affect anybody. We manage this by having clear recruitment policies and processes where relevant checks are carried out on all new starters and maintain open relationships with our staff with regular face-to-face check-ins.

In 2021, we introduced a new Whistleblowing Policy that provides all staff, including permanent and temporary team members, a formal procedure for reporting criminal offences or breaches of legal obligations, including modern slavery. Team members at our factory and warehouse also have access to the Fair Wear Complaints Helpline, detailed on posters displayed throughout the site. In 2021, we did not receive any complaints regarding our UK operations from the Fair Wear Helpline.

3. Managing the risk in our supply chains

3.1 The risk

In 2021, we conducted a supply chain risk assessment to identify suppliers at a heightened risk of being exposed to modern slavery based upon their country of operation and economic sector. This assessment showed that we have two groups of high-risk suppliers, (1) our partners manufacturing our products in Asia and (2) our on-site service providers in the UK.

Although there are human rights risks throughout apparel supply chains, we identified that the final product manufacturing stage (CMT) is the most labour intensive and is where most violations occur in the industry. As well as prioritising by sector, we recognise that the country of operations can impact the risk of modern slavery occurring in our supply chains. According to the Global Slavery Index (2018), of the countries our manufacturers operate in, Cambodia has the highest prevalence of modern slavery and Myanmar the second. However, as we recognise that all the countries we source from face human rights risks, we are committed to carrying out due diligence in all of them.

In China, we recognise an additional risk that our supply chains will be associated with forced labour and human rights violations inflicted upon the Uighur people in Xinjiang region, North-Western China.

Using GLAA's typologies, we identified that suppliers of cleaning services, agency staff, and security personnel from our UK-based service providers, are the greatest risk due to their economic sector.

3.2 Our policies and due diligence

Since 2020, Equip has been a member of Fair Wear, a movement for change that seeks to push the garment industry towards the new normal: a world where working conditions are fair for the people who make our clothes. We are committed to supporting garment workers' rights to safe, dignified and properly paid employment, and making garment production fair for everyone.



We uphold and promote Fair Wear's [Code of Labour Practices](#) (COLP), which includes a specific standard for ensuring freely chosen employment.

In 2021-22, Equip adopted a new Due Diligence Policy that formalises the steps we take to (a) identify and evaluate potential risks when selecting new manufacturing partners, (b) monitor our existing partners, and (c) minimise the impact when exiting business relationship. Our Due Diligence Policy addresses all human rights and safe and fair working conditions, including the prohibition of forced labour, human trafficking, and modern slavery.

3.2.1 **Supplier selection and onboarding**

Our Due Diligence Policy establishes the checks that all potential suppliers must undergo during selection. This includes an evaluation of each supplier's working conditions and employment practices by our CSR team who review suppliers' completed evaluation surveys and any relevant policies or audit reports. A potential supplier's CSR performance is included in their scorecard and contributes to the selection decision.

Once selected, all suppliers are informed of what our Fair Wear membership means to them. In short, we require all our manufacturers to:

- Endorse Fair Wear's Code of Labour Practices (COLP)
- Inform their workers of the COLP and Fair Wear's [Complaints Helpline](#) by displaying information in their workplaces in the local language
- Co-operate with Equip to remedy any complaints submitted by workers or findings identified in audits, addressing root causes where possible.

Suppliers must annually sign our Manufacturing Supplier Manual that contractually binds them to abide by our Fair Wear and our other sourcing requirements.

3.2.2 **Supplier monitoring**

We maintain long-term relationships with our manufacturing partners as this enables them to invest in both the individuals that work there and the facilities they provide. We understand long term partnerships don't guarantee good working conditions, however, we believe our influence and support contributes to improving conditions over time.

We have regular in-country meetings with manufacturers to help forge these long-term relationships. Personnel from Equip at all levels, including our directors, design, operations, materials planning and buying as well as our corporate social responsibility team have regular discussions and make frequent site visits. Equip personnel use our Site Visit Checklist to raise any concerns to our CSR team who investigate further. Our teams continued to face travel restrictions due to Covid-19 throughout 2021-22, with several of the countries we sourced from facing lockdowns lasting several months. Despite these challenges, we were still able to visit many of our key manufacturing partners during 2021 thanks to our in-country teams.

In addition to our internal factory visits, for several years we have required our manufacturers to be audited against the [amfori BSCI Code of Conduct](#) which establishes standards that companies must abide by to protect their workers' human rights. As established in our Due Diligence Policy, we require manufacturers to be audited by third parties at least every two years, share the audit reports with us, and work with us to correct any non-compliances. Several of our manufacturing partners have also been audited by Fair Wear whose auditing methodology emphasises the importance of on and off-site worker interviews.

3.2.3 Worker training

In 2021-22, we commissioned Fair Wear training for workers at our key manufacturing partners. This training, delivered in-person by Fair Wear trainers, teaches workers about their rights and the standards they should expect; explains how they can use the Complaints Helpline to raise violations of the COLP; and promotes social dialogue between the workers and management. In 2021-22, over 60% of our production volume was manufactured at sites where workers had received Fair Wear training in the last three years.

3.2.4 Responsible purchasing practices

As a member of Fair Wear, we follow fair purchasing practices that promote safe, dignified, and properly paid employment. We are committed to ensuring continuous production for our manufacturers and provide yearly production forecasts to help them plan accordingly. We also avoid short term deliveries as we recognise that this places undue pressure on our manufacturers and increases the chance of excessive overtime or temporary workers.

Although our business continued to be affected by the Covid-19 pandemic in 2021-22, with many of the countries we source from being affected worse than in 2020, we upheld our responsibility to the people who make our products by not cancelling any orders.

3.2.5 Sourcing restrictions

In response to the risk of forced labour in China, we have taken active steps to ensure that none of the cotton sourced for our products originates from the Xinjiang region of China and that none of our manufacturers, or their subcontractors, operate in the region. We also prohibit the use of cotton from Uzbekistan and Turkmenistan in our products due to the risk of forced labour.

3.2.6 UK-based service suppliers

In September 2021, we conducted due diligence on the high-risk service suppliers identified in our risk assessment – cleaning, labour providers, and security. These suppliers completed a modern slavery survey and were required to provide relevant employment and recruitment policies. Reviewing these documents, as well as any press coverage and online reviews of the companies, our CSR concluded that all our high-risk suppliers are mitigating their risk sufficiently.

4. Training

All Equip team members that visit our manufacturing partners are made aware of potential human rights issues, including modern slavery, by our CSR team. They are expected to raise any concerns with the factory management at the time or report to the Equip CSR team using the Site Visit Checklist to be investigated further.

5. Measuring our performance

5.1 KPIs

In our 2020-21 Modern Slavery Statement, we introduced the following key performance indicators to help track our performance.

Indicator	2020-21	2021-22
<p>Fair Wear Brand Performance Check score for the reporting year</p> <p><i>This annual assessment scores our approach to improving working conditions for workers in our supply chain. Our purchasing practices, supplier monitoring programme and transparency are all assessed. Fair Wear's assessment methodology is available here.</i></p>	NA 1 st Year Member	59 Rating: Good
<p>Percentage of production volume from manufacturers where a business relationship has existed for at least five years.</p> <p><i>This indicator measures how well we know our manufacturers. Long-term relationships allow us to encourage our manufacturers to introduce strong human rights safeguards.</i></p>	89%	86%
<p>Percentage of production volume from manufacturers that have been visited by one of our team members in the reporting year.</p> <p><i>This indicator measures our supply chain oversight and demonstrates our commitment to maintaining close relationships with our manufacturers. Third-party audits are conducted in addition to these visits.</i></p>	89%	46%*
<p>Percentage of production volume from manufacturers that we provide a continuous production plan for</p> <p><i>This indicator measures how we mitigate fluctuating demand for our suppliers, enabling them to employ workers permanently rather than on temporary or seasonal contracts.</i></p>	58%	62%

*NOTE: This figure was reduced due to ongoing Government travel restrictions as a result of the Covid-19 pandemic.

5.2 Our Progress

In our 2020-21 Modern Slavery Statement, we outlined five next steps we intended to take in 2021-2022 to build on our human rights performance:

2020-21 Commitment	Progress
Formalise our supplier due diligence processes into a policy	Complete
Conduct due diligence on our UK-based service suppliers	Complete
Pilot a living wages and excessive overtime supplier engagement project	Ongoing
Deliver country-specific human rights training to supplier facing teams	Not Started
Report on our KPIs established in our 2020-21 statement	Complete

Apart from delivering internal human rights training, all our 2020-21 commitments have either been completed or are in progress. Our wider internal human rights training to supplier facing teams was delayed due to increased pressure on operating priorities and resource limitations as a result of the Covid-19 pandemic. In 2022-23 we intend to continue to engage suppliers on living wages and excessive overtime and will progress the country-specific human rights training to our supplier-facing teams.

6. Statement approval

This statement covers the financial period January 2021-January 2022 and has been approved by the Board of Equip Outdoor Technologies UK Ltd on 01 March 2022.

Signed by Matt Gowar

Chief Executive Officer at Equip Outdoor Technologies UK Ltd.

01 March 2022

6.1 List of Equip subsidiaries

Equip Deutschland GmbH

Equip Benelux BV

Equip Outdoor Technologies UK Ltd

Equip Outdoor Technologies Ltd

Equip USA LLC

Equip Canada Inc

Equip Norway AS

Lowe Alpine Systems International Ltd

Rab Carrington Ltd