SEASALT
CORNWALL

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2023

Since we were founded in 1981, Seasalt has been committed to doing business responsibly. We craft beautiful clothing that inspires and endures, while making the best choices for our people and the planet.

Part of this important work is ensuring there is no forced labour or human trafficking in our business and supply chains.

This statement sets out the steps we take to prevent modern slavery and human trafficking in the production of our products and business operations.

ABOUT SEASALT

Seasalt is a clothing brand and retailer based in Cornwall in the UK. We have 68 stores, nearly 500 wholesale customers in the UK, Europe, the USA and New Zealand and an online store that sells our products all over the world.

Our head office is in Falmouth, Cornwall, where our creative teams design and develop Seasalt's distinctive products. It is also home to our buying and merchandising, marketing and communications, finance, property, administration and development teams. Seasalt's central distribution centre and customer services team are located in Redruth, Cornwall.

Seasalt manufactures and imports its products from supply chains in the following countries: India, China, Pakistan, Bangladesh, Vietnam, Portugal, Spain, Italy, Morocco, Turkey, Bulgaria, Sri Lanka and the UK.

A Dedicated Compliance and Ethics Team responsible for human rights in our supply chain

Our in-house Compliance & Ethics team, reporting to our Director of Technical & Product Compliance and Ethics, review all supplier audits and self-assessments, analyse and support our existing supply chain, and any new suppliers we start working with, this includes Seasalt's extended supply chain as supplier tiers are mapped.

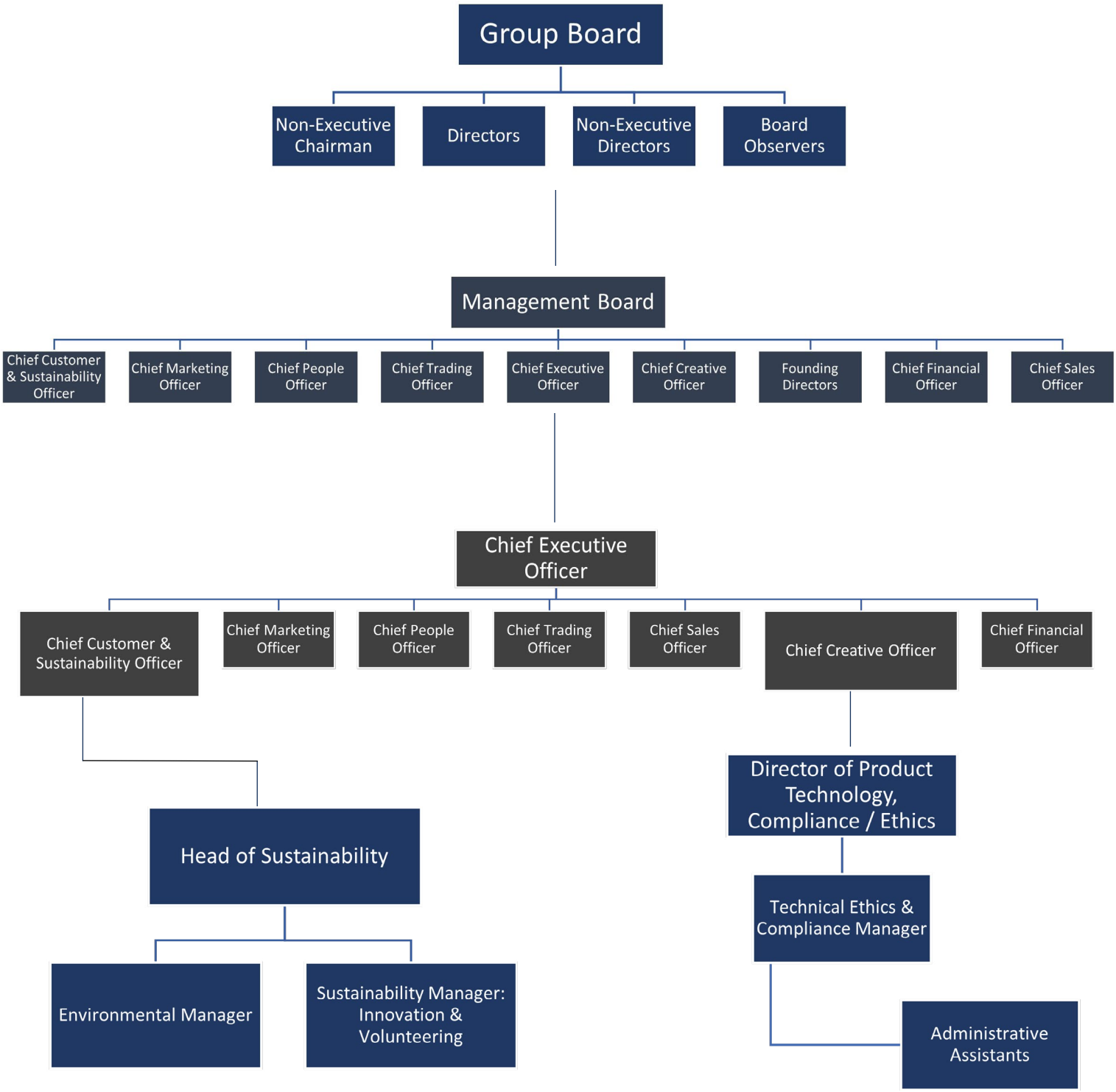
The Compliance and Ethics team provides support and ETI guidance for our suppliers. The team supports suppliers to resolve any challenges they face when implementing best practice through the supply chain. The team receives training and valuable learnings from the ETI, which they cascade to our suppliers, the wider head office, including our Board of Directors. This ensures all areas of our business that work with our supply chain have the necessary resource to manage best practice.

The Compliance & Ethics Team report directly to our Director of Technical & Product Compliance and Ethics, who in turn reports to our Chief Creative Officer. The Compliance and Ethics team create a monthly report for the Management Board on supply chain risks, including likelihood of risk of forced labour or human trafficking. This is used to populate our business risk register where the risk is considered appropriate and plan supportive resolution plans if needed.

Our Management Board's key purpose is to develop and recommend the Company's strategy, secure Group Board's approval, and implement the strategy to deliver our vision and overall goals. The Management Board represented by our CEO ultimately reports to the Group Board.

The Group Board's key purpose is to ensure the company's security and prosperity by collectively overseeing the company's affairs, whilst meeting the appropriate interests of its shareholders and stakeholders.

The Group Board is ultimately responsible for approving the Company's Vision and Strategy and ensuring that it is shared by all stakeholders; ensuring the Company's Organisation is efficient and effective; and preserving the Seasalt Culture & Values. This includes setting high standards of corporate governance, corporate social responsibility and corporate ethics and ensuring that the customer experience and innovation continue to be at the heart of everything we do.


Group Board
Non-Executive Chairman
Directors
Non-Executive Directors
Board Observers
Management Board
Chief Customer & Sustainability Officer
Chief Marketing Officer
Chief People Officer
Chief Trading Officer
Chief Executive Officer
Chief Creative Officer
Founding Directors
Chief Financial Officer
Chief Sales Officer
Chief Executive Officer
Chief Customer & Sustainability Officer
Chief Marketing Officer
Chief People Officer
Chief Trading Officer
Chief Sales Officer
Chief Creative Officer
Chief Financial Officer
Head of Sustainability
Director of Product Technology, Compliance / Ethics
Environmental Manager
Sustainability Manager: Innovation & Volunteering
Technical Ethics & Compliance Manager
Administrative Assistants

WORKING WITH SUPPLIERS THAT UPHOLD OUR STANDARDS

We understand that we are only as good as the partners we work with. To ensure our ethical standards are upheld in every part of the supply chain, we require all our contracted partners and suppliers to sign and comply with our Ethical Standards Commitment Statement.

This is based on the Ethical Trading Initiative (ETI) Base Code, an internationally recognised code of labour practice designed to protect workers' rights. This code covers issues including forced labour, working conditions, living wages, child labour and discrimination.

Seasalt is a member of the ETI, which places us at the forefront of best practice for managing our supply chain. ETI memberships allows us to become aware of potential issues as soon as they arise and supports us in investigating, challenging and remedying any risks we may find in our supply chain.

Seasalt's ethical standards policies clearly state that forced labour and lack of freedom of association are not acceptable. We work closely with our partners in the supply chain, so we can resolve any issues that arise together.

Our Tier 1 supplier list, the suppliers who manufacture our beautiful Seasalt Clothing, Accessories, Footwear and Products, can be found at Open Supply Hub - Seasalt Supplier list

The Open Supply Hub (OS Hub) is an accessible, collaborative, supply chain mapping platform, used and populated by stakeholders across sectors and supply chains. It is a neutral, non-profit organization registered in the USA. The OS Hub maps garment facilities worldwide and allocates a unique ID to each. It is populated by contributors across the garment industry, including many members of the ETI. This allows Seasalt to facilitate better collaborative action and will increase our leverage to address any risks in our supply chain. Since 2019, the OS Hub has mapped over 90,000 facilities.

Our Tier 1 supplier list will be updated annually in April.

TRANSPARENCY IN THE SUPPLY CHAIN

In addition to signing Seasalt's supplier contract and Ethical Standards Commitment Statement, all our suppliers are required to join Sedex, the Supplier Ethical Data Exchange.

Sedex is a not-for-profit, membership organisation dedicated to improving responsible and ethical business practices in global supply chains.

Our suppliers are required to complete self-assessment ethical workbooks on a regular basis and share copies of any external independent audits as well as their own policies and procedures, relating to forced labour and freedom of association.

Sedex works with many brands and high street retailers and is uniquely placed to support and advise us and our suppliers, providing a global view on the ethical challenges of manufacturing around the world.

DUE DILIGENCE & AUDITING

We carry out extensive due diligence and auditing of our suppliers. The results of these investigations directly influence our supplier and sourcing strategy each season and are key to ensuring we make the best products in the most responsible way possible.

Here are some of the ways we improve visibility in our supply chain.

1.Self-Assessments
We collect information via the Sedex Self-Assessment Questionnaire that could indicate forced or bonded labour (such as the holding of identity documents, wage deductions made, etc.) The self-assessment is a free four-pillar, ethical trade audit system, created by Sedex to help businesses and their suppliers capture information. Any issues can then be addressed, often via a third-party audit, and managed by our in-house Compliance & Ethics team.

2.Audits
We use independently conducted audits to review practices within our supplier's facilities. All of our Direct supplier (Tier 1 suppliers) are required to provide an independent Audit. The Audits requested can be SMETA- Sedex Members Ethical Trade Audit, but we accept audits from other companies such as Amfori BSCI and WRAP and include all the content of the self-assessments and independently verified by the auditor in our reviews.

3.Risk Assessments
Sedex works with global risk analytics experts and has a data base that references hundreds of indices - from human rights violations to political risk factors - to flag country and industry risk factors.

4.Reporting Tools
Using the Sedex platform we are able to monitor trends across the supply chain and look for possible signs of self-assessment or audit non-compliance that could indicate forced or bonded labour.

5.A Dedicated Compliance and Ethics Team
Our in house team, reporting to our Director of Product Compliance and Ethics, reviews all audits and self-assessments and analyses our existing supply chain and any new suppliers we start working with. The Compliance and Ethics team provides support and ETI guidance for our suppliers. The team supports suppliers to resolve any challenges they face when implementing best practice through the supply chain. The team receives training and valuable learnings from the ETI, which they cascade to the wider head office, including our board
of directors. This ensures all areas of our business that work with our supply chain have the necessary resource to manage best practice. Our Compliance and Ethics team creates a monthly report for the board on supply chain risks, including likelihood of risk of forced labour or human trafficking. We use this to populate our business risk register where the risk is considered appropriate and plan supportive resolution plans if needed.

6.Supplier Visits
Members of the Seasalt team regularly visit our suppliers to review and assess their factories, working conditions and employees to check the facilities against Audit contents. Any issues

can then be addressed directly with our suppliers. Travel to our suppliers has recently been disrupted due to Covid -19 travel restrictions. We look forward to visiting our suppliersnow that travel restrictions have been relaxed.

7. Seasalt Agents
Where we don't work directly with our suppliers, we have agents who are our eyes and ears on the ground. Our agents visit our suppliers regularly (at least once a week or more when our products are being made) and provide us with an honest appraisal of the situation locally. Where Covid-19 restrictions are still in place our agents follow WHO guidance, social distancing guidelines and any local restrictions relevant in the areas where they are working.

OUR ONGOING COMMITMENT, OUR PROGRESS SO FAR:

Seasalt has made a public pledge to map its tier 2 supply chain in full by the end of 2023.

Supply chains consist of several tiers. We are committed to mapping and assessing our supply chain to gain a clear picture of any challenges that could be hidden regarding forced labour and human trafficking.

Progress Update: Mapping Our Supply Chain Tier 1 -
Global T1 supply chain mapped: completed and maintenance part of our day to day business practice.

We have a clear, fully mapped, view of our Tier 1 supplier partners who we work with directly and who make the finished products we sell. All independent audits and required commitments are checked by our in-house Compliance & Ethics team. The full process detailed above is in place to support the compliance of our Tier 1 supplier partners.

We have confidence in our Tier 1 suppliers. We are committed to working in partnership to provide clarity and support on best practice to engage, support and map our Tier 2 suppliers (those who supply our Tier 1 supply chain partners)

Priority:

The team have risk assessed all sourcing countries and regions of our known supply chain partners using the Sedex RADAR risk assessment tool and information provided by the ETI and other NGOs to help us prioritise where to start mapping as a priority.

The first priority for Seasalt was identifying if there was risk of slavery and human trafficking in our Tier 2 suppliers in China. This has formed phase 1 of our Tier 2 supply chain mapping. This is informed by the concerning reports of bonded or forced labour in the Xinjiang area of China and the persecution of the Uyghur and other ethnic minorities.

Tier 2 supply chain mapping-Phase 1- China.

To bolster our efforts in mapping and resolving any challenges we may find within our Chinese supply chain, Seasalt signed the Coalition to End Forced Labour in the Uyghur Region Call to Action:

The Call to Action sets out actions for brands to follow to prevent their supply chains – including secondary and tertiary suppliers – from being linked to the human rights abuses in the Xinjiang region. By signing up, Seasalt committed to driving positive change across the retail industry and in our own supply chain, including detailed mapping of suppliers and sub-suppliers across China.

Seasalt worked closely with Anti-Slavery International and the Worker Rights Consortium to establish new rules allowing smaller brands to sign up to the Call to Action. As a result of the collaboration, brands with revenue of less than $100m in 2019 are permitted an extended period to map certain parts of their supply chains.

Full details of the commitments in the Call to Action can be found here – Coalition to End Forced Labour in the Uyghur Region (enduyghurforcedlabour.org)

Our progress phase 1 China mapping:
Tier 1 - China

We have identified that we have no manufacture of goods in our Tier 1 supply chain in the areas identified as high risk.
We are aware that forced labour may not just be present in the risk area of Xinjiang and that people could be moved and so have ensured that our Tier 1 suppliers do not have any evidence of large groups of migratory ethnic minorities in any of their facilities. This commitment continues and now forms part of the day to day work our Compliance and Ethics team perform when reviewing updated Audits from our Tier 1 suppliers.

We have provided information about the issues to our Tier 1 suppliers, discussed it with them and offered guidance and support on how to identify key indicators of forced labour in the supply chain.

Seasalt has now mapped its Tier 2 suppliers in China.

- We contacted 100% of our Tier 1 Chinese suppliers to provide Tier 2 company names and addresses for all materials used in product manufactured in 2021.
- 93% have responded, allowing Seasalt to collate Tier 2 supplier detail and cross check against the sustainable fabric certifications issued by suppliers to confirm.
- We created three online surveys asking Tier 2 suppliers to provide details about their company, workers, working conditions and health & safety practices. Key questions were asked in relation to wages, working hours, access to freedom of association and migrant

worker origins.
- We identified that our Tier 1 and Tier 2 facilities in China are located in the Eastern and Southern provinces and none are located in the Xinjiang region.
- We have risk assessed the contents of the online surveys and discussed with our Tier 1 and Tier 2 suppliers any areas that required clarity or further investigation.
- No initial evidence of government provided labour has been found in any of the Tier 2 suppliers to date.
- We have crossed referenced all China Tier 2 suppliers businesses against lists of parent companies that have known links to business in the Xinjiang regions or migratory forced labour. We have found no connection to businesses connected to forced or migratory labour practices.
- Regular updates are provided to the senior management, including our CEO.
- The compliance and ethics team check if we have any new T2 suppliers each season and ensure they complete our online surveys so continued risk assessment, remediation and documentation of our T2 Chinese suppliers is on going.

China Work in progress and next steps:

With support of our Tier 1 and Tier 2 suppliers we will continue our deep dive into the Tier 2 suppliers work force and verify the information provided to us for worker origin and employment status to ensure no connection to Government provided labour forces.

We will collect the balance of outstanding information (7% of China suppliers) and risk assess, address any requirements for remediation and evidence any remedy.

This project will continue and will be concluded by the end of 2023, when this work will be absorbed as business as usual for our compliance and ethics team along with our T1 supplier support.

Further steps taken against human rights violations in our supply chain in 2021/22:

As a business we are aware of the connection of cotton farming and harvesting being connected to serious human rights breaches, not just in China but other areas of the world as well.
To further ensure that we are not indirectly supporting any type of forced labour or human rights violations Seasalt has committed to ensuring that **all of its cotton is 100% organic and fully traceable by 2024.**

The use of the Organic standards that come with fully traceable transaction certificates is key to us being able to trace the origin of all our cotton globally and independently verify the working conditions in our supply chain back to source.
Seasalt has worked with the Global Organic Textile Standards (GOTS) and our global auditing partners to ensure that cotton from prohibited regions are eliminated from their certified supply chains and to ensure we can trace cotton back to origin using the chain of custody process and global auditors.

We have also created a cotton origin and Human rights policy and have created a specific zero tolerance approach to cotton sourced from the below locations in line with our commitments as a responsible business and our call to action commitments.
Areas we have prohibited cotton from are:

Turkmenistan, Uzbekistan, Azerbaijan and Tajikistan

Xinjiang / Xinjiang Uyghur Autonomous Region (XUAR), China

We started fully tracing our cotton supply chain and cotton origin in Aug 2022 and will report our findings and any remediation work we may have had to action in our next Modern Slavery Statement.
Phase 2 : Tier 2 mapping rest of world:

Progress to date:
Preparation for rest of World mapping:

Seasalt has built a unique supplier ethical data base to hold all of our information and independent social compliance evidence on our supply chain.
This complex database enables the Compliance and Ethics team to easily view all suppliers information, track the relationships to our Tier 2 suppliers and hold all documentation and evidence to easily review, risk assess and action remediation promptly.

Next Steps for phase 2 Rest of world mapping:

Seasalt have issued a request for information on all Tier 2 suppliers outside of China in early August 2022

- We have created online surveys asking Tier 2 suppliers to provide details about their company, workers, working conditions and health & safety practices. Key questions will be asked in relation to wages, working hours, access to freedom of association and migrant worker origins.
- These surveys will be collected, added into our supplier ethical database and reviewed by the Compliance and Ethics team as we have for all of our Chinese suppliers.
- This information will be reviewed, risk assessed against global risks, the Sedex risk assessment tool and information provided by the ETI and other NGOs.
- Any remediation requirements will be identified and key dates for remedy agreed with suppliers.

We plan to have this work completed and any remediation concluded by the end of 2023 in line with our pledge to map our full Tier 2 supply chain by the end of 2023.

We will update on our progress in our next Modern Slavery Statement.

Additional support for our suppliers:

The Compliance and Ethics team along with Sourcing and our product teams put full effort into supporting our Tier 1 suppliers through the pandemic while continuing the priority of mapping our China supply chain.

You can read about the work we have done to support our suppliers through the pandemic in our 2022 sustainability report here: Sustainability Report & Policies - Seasalt Cornwall

Final commentary:

If Seasalt identifies any risks or non-compliances to the ETI Base Code anywhere in our supply chain we will resolve it by working in partnership with our Tier 1 supplier partners, the ETI and utilising the wider ETI community to tackle and remedy any non-compliances.

We will update our progress in our next Modern Slavery Statement and in our annual sustainability report.

Seasalt recognises its responsibility to every person involved in our business and the manufacture of our products. Forced labour and human trafficking are global issues that are often difficult to detect but we are committed to working closely with suppliers to uphold our ethical standards and get the most honest view of our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Seasalt slavery and human trafficking statement for the financial year ending 31st January 2024. It was approved by the board on the 1st February 2024.

Signed by:



Date: 1st February 2024

Review Date: 1st February 2025

Paul Hayes
Chief Executive Officer