

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 2023-January 2024, has been published in accordance with Section 54 of the Act and applies to Equip and the Equip subsidiaries listed in the appendix.

## 1. Equip’s business and supply chain structure

Equip is an international business with a head office in Derbyshire, UK. We are proud to own two specialist outdoor brands – Rab (established in 1981) and Lowe Alpine (established in 1967). Equip’s mission is to inspire adventure. We do this by building technical products that last, whilst driving industry-wide change to protect the planet, respect human rights, and increase participation in the outdoors.



**THE MOUNTAIN PEOPLE**

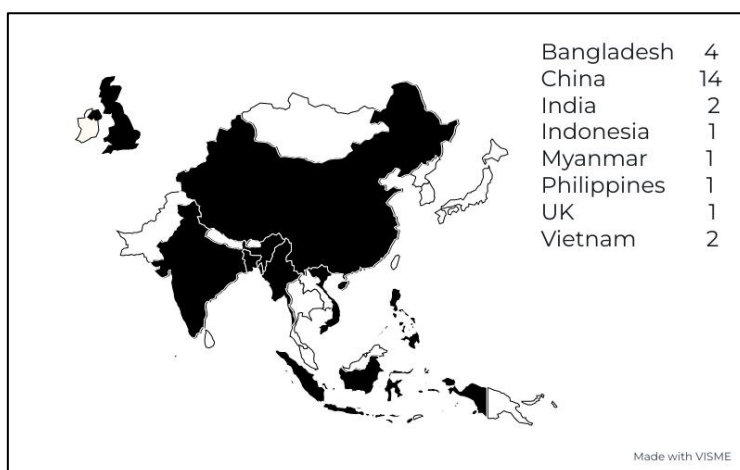
We employ approximately 180 team members in the UK. 130 of these team members work in Equip’s head offices designing, marketing, and selling our products or providing core business functions. 50 of these team members work in Equip’s distribution warehouse and factory, where we fill our down sleeping bags, distribute them to retailers and consumers, and operate a service centre for washing and repairing our products.

A further 50 Equip employees work across Germany, the Netherlands, Norway, Finland, Canada, and the USA, marketing and selling our products to international markets and running our product service centres. We also have small teams in China, Bangladesh, and Vietnam who are responsible for monitoring manufacturers in Asia.

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

In 2023-24, we worked with 19 manufacturing partners who operated 25 sites across Bangladesh, China, India, Indonesia, Myanmar, the Philippines, and Vietnam as well as our site in the UK. Over 13,000 people are employed by our manufacturing partners globally.

Figure 1: Equip’s 2023-24 manufacturing sites by country



## **2. Managing risk in our operations**

### **2.1 The risk**

The majority of Equip's direct employees operate in roles that are low risk for modern slavery. These include design, marketing, sales and other core functions. However, we recognise that employees who work in our UK factory and warehouse are in 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 undermines accountability and reduces oversight of workers' experiences.

### **2.2 Equip's policies and due diligence**

All of Equip's regular team members in the factory and warehouse are Equip employees, not temporary agency staff. By keeping our teams in-house, we mitigate much of the risk associated with our operations. We occasionally use temporary agency staff during peak periods. This typically occurs a handful of times a year and involves small numbers who remain on-site for a few weeks. Section 3.2.7 outlines the due diligence conducted on our labour provider.

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. We maintain open relationships with employees with regular face-to-face check-ins.

We have a Whistleblowing Policy that provides all employees, 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 Foundation Complaints Helpline, detailed on posters displayed throughout the site. In 2023-24, we received no complaints regarding UK operations from the Fair Wear Helpline.

## 3. Managing risk in our supply chains

### 3.1 The risk

Following the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, Equip conducts Human Rights Due Diligence (HRDD) as part of standard operating procedures. This includes routinely conducting risk assessments to identify actual and potential harms in our supply chain, including forced labour and modern slavery.

Our HRDD risk assessment is guided by Fair Wear's resources including country studies, external resources published by international bodies, NGOs, social audits, worker complaints, and annual self-assessments completed by manufacturing partners. For more information on Equip's HRDD processes, see Equip's [2023-24 Social Report](#).

Our risk assessment highlights that the final product manufacturing stage, known as 'cut make trim' (CMT) is the most labour-intensive tier of apparel manufacturing and is where most violations occur. As well as prioritising by sector, the country of operations can impact the risk of modern slavery. According to the Global Slavery Index (2018), of the countries our manufacturers operate in, Myanmar<sup>1</sup> and India have the highest risk for modern slavery. In China, we have an additional risk that our supply chains will be associated with forced labour and human rights violations inflicted upon the Uighur people.

In addition to wider risk assessment, primarily focusing on final product assembly, we conduct tier / sector-specific assessments.

#### 3.1.1 *Trim suppliers and subcontractors*

Equip's HRDD processes primarily focus on the two sectors that are the most material to our supply chain; fabric manufacturing and product assembly. However, there are suppliers operating in other tiers that may pose a risk of forced labour, which includes suppliers of:-

- trims (such as zip pullers and care labels),
- manufacturing partners' subcontractors, and
- suppliers of factory-sourced components.

In 2022, we conducted a risk assessment of these suppliers based on country, sector, and commodity risk. Our assessment showed that the sectors with the highest risks were:-

- injected-moulded plastic components (such as buckles),
- leather components, and
- metal components (such as eyelets).

Cotton was the commodity risk of main concern due to its association with forced labour in multiple countries, including China.

Of nearly 400 suppliers assessed, we categorised 40 as a priority for further due diligence based on their risk. They either manufacture components containing cotton; or operate in high-risk countries in above-average-risk or high-risk sectors in above-average-risk countries.

#### 3.1.2 *UK-based service suppliers*

Equip uses suppliers in the UK to provide a range of services, from professional to on-site provisions. Using GLAA sector risk typologies to assess our service supply chain, we identified

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<sup>1</sup> As of 18<sup>th</sup> January 2024, we have completed our responsible disengagement from Myanmar and no longer source from the country. See our [Myanmar Statement](#) for further information.

cleaning services, agency staff, and security personnel from UK-based service providers, as the greatest risk due to their economic sector.

### 3.2 Equip's policies and due diligence

Since 2020, Equip has been a member of the Fair Wear Foundation, a movement for change that seeks to push the garment industry towards 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.



The [Equip Responsible Business Conduct \(RBC\) Policy](#) establishes the principles of how Equip conducts business. It outlines what stakeholders can expect from Equip and, where relevant, what Equip expects from them. The RBC includes the commitment that Equip will ensure the prohibition of forced and child labour throughout our supply chain and conduct HRDD on all relevant harms, including forced labour and modern slavery.

Equip's [Human Rights Due Diligence \(HRDD\) Policy](#) integrates the commitments made in our RBC into our daily business practices. It follows the 'OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector' when taking steps to cease, prevent, mitigate and remediate harms when they do occur.

The commitments, expectations, and procedures established in the RBC and HRDD policies, are communicated to our manufacturing partners through Equip's Manufacturing Supplier Manual. This internal document is issued annually and signed by each manufacturing partner.

Below is a summary of Equip's relevant due diligence steps. For a full overview and progress per manufacturing partner, see Equip's [2023-2024 Social Report](#).

#### 3.2.1 **Supplier selection and onboarding**

Equip's Human Rights 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. Our CSR team reviews suppliers' completed evaluation surveys, relevant policies, and 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 Equip's Fair Wear membership means to them. 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, and
- Co-operate with Equip to remedy complaints submitted by workers or findings identified in audits, addressing root causes where possible.

Suppliers must sign Equip's Manufacturing Supplier Manual annually, which contractually binds them to abide by Fair Wear standards and other sourcing requirements.

### 3.2.2 **Supplier monitoring**

We maintain long-term relationships with our manufacturing partners enabling them to invest in both the individual workers and the facilities they provide. While long-term partnerships don't guarantee good working conditions, we believe our influence and support contribute to improving conditions over time.

We have regular in-country meetings with manufacturers to help forge long-term relationships. Personnel from Equip at all levels, including directors, design, operations, materials and buying, as well as our corporate social responsibility team, have regular discussions and make frequent site visits.

Equip employees use our Site Visit Checklist when visiting manufacturing sites, to raise any concerns or feedback to our CSR team who investigate further.

Since 2019 we have required our manufacturers to be audited against the [amfori BSCI Code of Conduct](#) which establishes standards they must abide by to protect their workers' human rights. As established in our Human Rights Due Diligence Policy and Manufacturing Supplier Manual, 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-compliance. Several manufacturing partners have also been audited by Fair Wear whose methodology emphasises the importance of on and off-site worker interviews.

In 2023-24, we introduced supplier scorecards for all our tier-one manufacturing partners. The annual scorecards allow us to monitor and arrange constructive fact-based discussions relating to opportunity areas, improvement areas, and risk areas in the partner's operations. We include three social measures that we feel highlighted the most important risks: social improvement and remediation, social dialogue and freedom of association and living wages.

### 3.2.3 **Worker training**

Since 2021, we have commissioned Fair Wear training for workers at our key manufacturing partners. This in-person training delivered 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 2023, we also commissioned Fair Wear's anti-gender harassment training at our key partner's site in Bangladesh. Our HRDD risk assessment had identified it as a significant risk.

In 2023-24, over 55% 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, Equip follows fair purchasing practices that promote safe, dignified, and properly paid employment. Our commitment to responsible purchasing practices are summarised in our [Sourcing Principles](#). We are committed to ensuring continuous production for manufacturers and provide yearly production forecasts to help them plan accordingly. We avoid short-term deliveries as we recognise this places undue pressure on manufacturers and increases the chance of excessive overtime or temporary workers. We pay for finished goods upon receiving the bill of lading with no delay in payment. If partners require us to alter standard payment terms, such as partial upfront payment, we remain willing to meet their requests as far as practically possible.

### 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 Turkmenistan in our products due to the risk of forced labour. In 2022, we lifted our prohibition of Uzbeki cotton in response to the Cotton Campaign ending their call for a global boycott.

### 3.2.6 **Trim suppliers and subcontractors**

Following our risk assessment of the trim suppliers and subcontractors, we conducted additional due diligence on 40 suppliers identified as a priority. These suppliers completed a self-assessment regarding their employment practices, provided audit reports where available, and submitted evidence of their cotton's country of origin where relevant. Suppliers operating in China were asked additional questions regarding the regions their workers came from, and their involvement in poverty alleviation labour transfers (so-called "Xinjiang Aid") that can be connected to Uighur forced labour. Having reviewed all suppliers' responses and following up on any queries, Equip is satisfied that these suppliers have been able to effectively mitigate the risk of forced labour.

### 3.2.7 **UK-based service suppliers**

In 2021-22, 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 and any press coverage and online reviews of the companies, Equip concluded that all our high-risk suppliers are mitigating their risk sufficiently. None of these high-risk service suppliers have changed since we last conducted the due diligence.

## 4. Training

All Equip employees that visit our manufacturing partners are made aware by our CSR team, of potential human rights issues, including modern slavery. Employees 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.

In 2022-23, our CSR team delivered training on the risks of forced labour and modern slavery to teams that visit and most engage with our manufacturing partners. Equip employees from product development, production, and merchandising all attended. The training covered an introduction to forced labour and modern slavery, relevant legislation, how our industry is impacted, the risks in our supply chains, and how to report concerns. It also included a specific section on the risk of Uighur forced labour in China, recognising the risk is no longer limited to the Xinjiang region.

## 5. Measuring Performance

### 5.1 KPIs

Since Equip's 2020-21 Modern Slavery Statement, we have reported on the following key performance indicators:

Key Performance Indicator	20-21	21-22	22-23	23-24
<p>Fair Wear Brand Performance Check score for reporting year.</p> <p><i>This annual assessment scores Equip's 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 <a href="#">here</a>.</i></p>	NA 1 <sup>st</sup> Year Member	59 Rating: Good	80 Rating: Leader	66* Rating: Leader
<p>Percentage of Equip's production volume from manufacturers where a business relationship has existed for at least five years.</p> <p><i>This indicator measures how well Equip knows our manufacturers. Long-term relationships allow us to encourage our manufacturers to introduce strong human rights safeguards.</i></p>	89%	86%	74%	76%
<p>Percentage of Equip's 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%	94%	94%
<p>Percentage of Equip's production volume from manufacturers that we provide a continuous production plan</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%	50%	59%

\*Note: Fair Wear updated their scoring methodology in 2023-24, increasing the standards that member companies must exceed in response to the increased calls for corporate human rights due diligence legislation.

## 5.2 Equip’s Progress and Commitments

In our 2022-23 Modern Slavery Statement, we outlined two further steps we intended to take in 2023-2024 to build on our human rights performance:

2023-24 Commitment	Progress
Work with our partner in Indonesia to explore how we can support wage increases now we have set a wage baseline and living wage target	Complete
Further improve our HRDD processes to ensure outputs are integrated into teams’ decision-making and all relevant tiers are assessed routinely	Complete
Explore how we can better address gender equality in our supply chains	Ongoing

Using an independent third-party cost of living assessment conducted by WageIndicator, we successfully calculated and financed a wage rise at our key partner’s site in Indonesia. This wage has been paid to workers since October 2023, and we intend to continue checking that it meets the local living costs periodically.

Our new supplier scorecards, which include measures for social performance, have enabled us to formally integrate outcomes of our partner risk assessments and monitoring into our decision-making. These scorecards now inform discussions during site visits and sourcing strategy.

In 2023-24, we improved the data we collect annually from partners relevant to gender equality, including asking for average wage data per gender. Additionally, we commissioned Fair Wear’s anti-gender harassment training at our partner’s site in Bangladesh as we identified it as high risk. However, we recognise there are still further improvements we can make and will keep this action open for next year.

In 2024-25 we intend to:

- Continue to address gender equality in our supply chains
- Compare our payment practices to the Common Framework of Responsible Purchasing Practices (CFRPP) and identify improvements.
- Formally capture feedback from tier-one manufacturing partners on Equip’s sourcing practices.

## **6. Statement Approval**

This statement covers the financial period 1 February 2023-31 January 2024 and has been approved by the Board of Equip Outdoor Technologies UK Ltd on 23 July 2024.

Signed by

**Matt Gowar**  
**Executive Chair**  
**Equip Outdoor Technologies UK Ltd.**

23 July 2024

### **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