Sweaty Betty

Modern Slavery Statement

2019



01. Introduction

Introduction

The Modern Slavery Act (MSA) was introduced by the UK government in 2015, this legislation was implemented to ensure that slavery, servitude, forced or compulsory labour and human trafficking do not occur within UK businesses. At Sweaty Betty we acknowledge our responsibility to prevent modern slavery and human trafficking throughout our business and supply chain. As a UK market leader within the activewear market we recognize we need to practice what we preachWELL + FIT = HAPPY, ensuring everyone who works for us or who produces goods under the Sweaty Betty brand is treated well and chose said employment freely.

Business Overview

In 1998, in Notting Hill, in one small boutique... the Sweaty Betty Brand was born, with the mission to redefine the way women dress for fitness and beyond. Since our humble conception, Sweaty Betty has grown exponentially to our current position with stores and concessions across the United Kingdom and the United States as well as wholesale accounts in the United States. With the ever evolving and changing retail landscape, Sweaty Betty has diversified into a multi-channel retailer with a newly relaunched state-of-the art digital ecommerce flagship (UK, US, Europe and Australia) and mobile platform. We now have over 700 employees across the UK and US, of which we have identified these departments in taking key roles in addressing Modern Slavery; Design, Buying, Garment Technology and Human Resources.

As Sweaty Betty has evolved into a global multi-channel fitness fashion brand, one thing remains at the heart of the business... Sweaty Betty's unwavering mission to inspire women to find empowerment through fitness and beyond.

We have pioneered the women's active wear market since 1998, offering customers the ultimate combination of performance and style. Today we continue to lead and innovate the market with inspirational, original and premium product to take the customer from the barre to the bar and beyond. We design our collections seasonally inspired by Tamara and the Design team travels fused with our inherent London aesthetic, creating collections which are inherently and innovatively Sweaty Betty. All of our garments are 100% designed in London, UK by an all-female design team. To read more about our story please click here.

We recognize the Modern Slavery Act (MSA) covers both our own operations and our supply chain. At Sweaty Betty we are committed to sourcing the highest quality garments for our customer from many countries with diverse cultures and economies around the world. We highly value our long standing working relationships with all our suppliers and strive to always work in partnership and collaboration to create the best possible product, whilst maintaining positive working environments for the factory teams. As such, we have around 30 suppliers, some of which we have been working with for 20 years to ensure we offer the best technical active wear and beautiful fabrics from around the globe. Over 70% of our product suppliers have been with us for three years or more. Our top sourcing countries are China, Cambodia, Turkey & Portugal, which account for 80% of all our product. 100% of our suppliers are used by other retailers.

Sweaty Betty hosts an annual Supplier Conference with all our key partners, building strong relationships with our suppliers and factories.

SUPPORT THE WORLD

02. Our Policies

Our Policies

We recognize the MSA covers both our own operations and our suppliers.

Equal Opportunities

At Sweaty Betty, we really value the diversity of our people. We recognise that everyone has a right to work in an environment which provides equal opportunities for all, regardless of race, colour, nationality, religion, sex, sexual orientation, gender reassignment, marital status, age or disability.

We are committed to being a business in which equality of opportunity is a reality and in which every individual can seek, obtain and enjoy employment without unfair discrimination. We will do our best to ensure that Sweaty Betty is a place where individuals are treated equally and fairly and decisions on recruitment, selection, training, pay, promotion and career management are based solely on objective and job-related criteria.

We will not tolerate, permit or condone any form of discrimination, harassment, bullying or intimidation and we will take these matters very seriously. However, we require your help and co-operation to ensure that every team member complies with their obligations under our policy.

We require all our team members to co-operate with measures introduced by us to ensure equal opportunity and non-discrimination and to inform their manager or our People Team if they suspect that discrimination is taking place. If any of our team members discriminate against or harass another member of our team, such conduct will not be tolerated and appropriate disciplinary action will be taken.

If someone believes they have suffered discrimination, they should notify their manager or our People Team soon as possible. Team members can use either the grievance procedure set out in this People Guide or the procedure in the harassment policy to complain about discrimination. If someone is unable to use either of these procedures, the complaint may be raised directly with our People Team.

Whistleblowing

Sweaty Betty wants to conduct its business with honesty and integrity and believes that it has a duty to take appropriate measures to identify and remedy any malpractice within or affecting the organisation. We expect all of our team members to maintain high standards and to report any wrongdoing that falls short of those standards. Sweaty Betty's policy provides guidance on how to do this and is available to our employees in our People Guide (Employee Handbook) or the internal intranet.

Supply Chain Policy

Our supply chain is segmented into four main categories:

- 1. Sweaty Betty own-label products.
- 2. Goods produced by 3rd party brands supplied to and sold by Sweaty Betty.
- Goods not for re-sale. Goods that are produced for our use but not sold to consumers eg: store fittings and fixtures.
- **4.** Services supplied to Sweaty Betty eg: cleaners, catering, NDC Staff.

Currently our focus on modern slavery within our supply chain focuses on Sweaty Betty own–label products. This area can be extrapolated into four tiers:

Tier 1	Factories where primary manufacturing process occur eg: cutting, sewing, bonding.
Tier 2	Factories where secondary manufacturing processes occur eg: printing, washing.
Tier 3	Inputs production eg: mills, dyeing.
Tier 4	Raw Materials eg: cotton, wool, polyamide.



02. Our Policies

Supply Chain Policy (cont)

We have a Supplier Ethical Code of Conduct which is based on the ETI base code (https://www.ethicaltrade.org/eti-base-code) encompassing the conventions of the International Labour Organisation (ILO) and is a globally recognised code of labour practice and conduct. Our Supplier Ethical Code of Conduct outlines our minimum requirements and standards we expect from any suppliers engaged in the manufacture Sweaty Betty product. This code guards workers' fundamental rights and freedoms including the elimination of forced labour. Under this code they agree to industry standards and national laws, including working hours, health and safety, wages and employment law.

We have implemented this code with all our supplier's through our Supplier Manual, which we update as required. ALL suppliers must sign this document before working with us, including the Supplier Ethical Code of Conduct. We request that all suppliers communicate and cascade our code of conduct to their employees in the local language. We convey our requirements to our first tier suppliers who ensure their own suppliers implement these standards as we acknowledge the risk of Modern Slavery to be greater further down the supply chain- notably tier two: sub-contractors & secondary supply base. We have a sub-contracting policy and are clear in our conditions of trading that any sub-contracting must be declared to Sweaty Betty to receive a written confirmation & a full audit before using these factories for Sweaty Betty production.

Supply Chain Auditing

Sweaty Betty does not own or operate any factories. All suppliers that produce goods for Sweaty Betty must hold a valid third party ethical audit with corrected non compliances. Sweaty Betty will not onboard a new supplier without a valid fully compliant third party ethical audit.

To minimize audit fatigue for our suppliers, Sweaty Betty accepts ethical audit reports requested by other retailers or brands that meet our minimum requirements (approved independent auditing company, non-modifiable, ETI base code et al). These audits will include health and safety reports, working hours, site inspections, interviews with workers in their local language.

Our audits follow the traffic light grading scheme (Red, Orange and Green). Where violations of our Code of Conduct are found, a Corrective Action Plan (CAP) will be agreed between the factory and the auditing body. The supplier is required to complete the CAP within the Sweaty Betty specified time frames. Sweaty Betty will continue to work with suppliers who show progress towards full compliance with our Code of Conduct and who strive for continuous improvement of standards in the work place. If an audit is recorded as a red grade, we will cease manufacturing with the supplier until necessary remedies to address the causes for the red grading are thoroughly addressed and rectified. Orange classified issues are often more complex and we will work with supplier on CAP remediation. We continue to look for opportunities to realize improvements to our internal auditing process.

The Product Team regularly visit our suppliers and their factories around the world and communicate our continued commitment to ethical trade.



03. Due Diligence

Recruitment

We have an internal recruitment team meaning we can monitor and control our candidate journey. We carry out Right to Work checks on all new starters and offers are subject to qualified references.

We endeavour to directly source all candidates, lowering the risks that come with suppliers. However for rare and niche roles, we might collaborate with select recruitment agencies from our preferred suppliers list.

Remuneration practices

All SB employees are paid above government's National Living Wage. In our stores these wages are determined by a transparent pay structure based on turnover of store and location to ensure fair and equal pay. We are compliant with Gender Pay Gap Reporting obligations and our GPG report can also be found on our website.

We always pay wages direct to bank accounts, never cash in hand.

04. Training

SB currently offers managers training on recruitment best practice including; unconscious bias and discrimination training, interview skills and right to work obligations. However, we recognise we do not offer ethical trading training within our own operations and this could be an opportunity for us.

05. The plan going forwards

At Sweaty Betty, we are constantly striving to greater heights in both our product innovation and the support of the people (staff and suppliers) who have enabled us to realize the Sweaty Betty dream. We remain dedicated to driving continuous improvements of standards within Sweaty Betty and our supply chain over the next year, with the key areas of further focus being:

- Training Empowering the Buying, Design and Garment Technical team to understand further their roles within the management of ethical trade and the subsequent impacts and responsibilities with the suppliers and how to mitigate risk.
- Policies Ensuring our policies relating to Modern Slavery are evolving in reaction to the requirements within the industry.
- Supply chain visibility and risk assessment of four tiers - Continue to work in collaboration and partnership with our Suppliers and to improve visibility and clarity of full supply chain as we recognize this is quintessentially vital in eradicating modern slavery challenges.

We will measure, monitor and report on future Modern Slavery statements using the following parameters:

- All suppliers (including key tier two-three) signed up to the Sweaty Betty Code of Conduct through the Sweaty Betty Supplier Manual.
- Valid third party ethical audits submitted for all suppliers, including CAP reports.
- 3. Train relevant staff on ETI.
- 4. Identify and address high risks within our supply chain.

