

J Barbour & Sons Ltd ('Barbour')
Ethical Treatment of Workers

Barbour will ensure that we comply with relevant, current legislation and industry standards to ensure that labour standards and human rights at the work place are met. This includes compliance with the Modern Slavery Act 2015 and the International Labour Office (ILO) to prevent forced and compulsory labour, discrimination at the work place and child labour in the countries in which we operate.

What Barbour is doing

1. Factory Audits by Barbour

In order to monitor compliance with these standards:-

- our Supply Chain Team visits factories in person; and
- we engage local, professional third party independent auditors to conduct detailed audits.

Barbour has a dedicated Ethical Trading Champion who receives training and updates on ethical standards and the ILO standards.

2. SEDEX (Supplier Ethical Data Exchange)

Barbour is a full member of SEDEX which is a not-for-profit organisation enabling access to independent and comprehensive third party audit reports on factories and suppliers. These are used to complement our assessment of our suppliers' ethical standards.

3. Non-Compliance

Where Barbour becomes aware of any non-compliance, Barbour may either terminate the business relationship or alternatively, depending on the seriousness of the non-compliance and in order to improve the working environment of the factory, may engage the factory in formal corrective planning to ensure compliance within agreed timescales.

4. Signed Legal Agreements for Ethical Supply Standards

Barbour insists on compliance with these ethical standards in a legal framework. If suppliers materially breach these standards (which would be identified by Barbour when undertaking factory audits or assessing third party audits), then Barbour would not tolerate such material breaches and discontinue supply.

5. Statement of Compliance

All factories involved in the production of Barbour branded goods must have given their written commitment to the principles set out in Appendix 1. This must happen before Barbour will approve use of any factory or workplace.

Barbour considers the above measures are an effective means of ensuring that all workers in our supply chain have a fair and safe workplace which is free from forced labour and provides a safe and fair place to work.

Appendix 1 – Code of Practice

It is Barbour's policy that its product manufacturers must comply with the following ethical standards:-

- *Not to use forced or compulsory labour*
- *To pay the national minimum wage in the country the factory is based*
- *Working conditions must be safe and hygienic according to local health and safety legislation and workers must receive regular and recorded health and safety training for their role (the responsibility for health and safety being assigned to a senior management representative)*
- *Workers must have access to clean toilet facilities, drinkable water and clean facilities for food storage and, where accommodation is provided, this must meet the basic needs of the workers*
- *Not to use child labour in contravention of the provisions of the International Labour Office (no worker is employed under the statutory minimum working age in the country in which the factory is based)*
- *Overtime is voluntary, not demanded on a regular basis, paid at a premium rate and compliant with local laws*
- *Workers are not forced to lodge or deposit their identity papers, passports or other formal documents required for work and are free to leave employment with reasonable notice given by the worker*
- *No discrimination is practised in any way including race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation*
- *The workers' presence in the workplace is voluntary and not as the result of any direct or indirect coercion including force, bonded or prison labour*
- *No harsh or inhumane treatment is practised including mental cruelty, physical punishment, verbal abuse, sexual harassment or any other form of intimidation*
- *The worker's rights to freedom of association and collective bargaining are respected and there is no prohibition on joining a union which is not under the control of the management of the supplier*
- *Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace*
- *Workers must be provided with written and understandable information about their employment conditions in respect of wages and other conditions*
- *No deductions from pay are to be made which are not permitted by law without the consent of the worker*
- *Workplaces comply with all employment standards, regulations or other legal or statutory requirements including requirements relation to pay, working conditions, health, fire and safety regulations*

This statement has been approved by the Board of J Barbour & Sons Ltd in October 2017

Signed..........

Ian Sime
Director