

MODERN DAY SLAVERY STATEMENT

No person should work under conditions of slavery or forced compulsory labour. This basic right is enshrined in international law, regional instruments and national laws. Yet for many workers, freedom to choose employment remains beyond reach. In 2016 the [Global Slavery Index](#) estimated that 45.8 million people are in some form of modern slavery across 167 countries. One in four victims of modern slavery are children. 58% of all those living in slavery are in 5 prominent countries; India, China, Pakistan, Uzbekistan, and Bangladesh - the latter being a main sourcing destination for Rowlinson products.

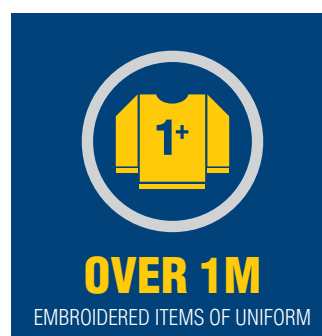
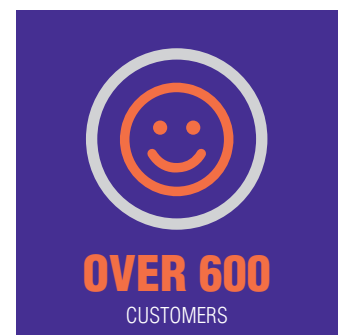
While the highest numbers of forced labourers were reported in Asia, forced labour is found all around the world, including in Europe. The UK Government estimated in 2013 that 10-13,000 people are in modern slavery in the UK at any given time.

Modern slavery is an umbrella term that includes forced labour, debt bondage, servitude and trafficking for the purposes of labour exploitation. The prohibition of forced labour forms Clause 1 of the Ethical Trading Initiative (ETI) Base Code, which states “employment is freely chosen”, as it is the most blatant labour rights violation. Forced labour describes a situation in which a worker performs work or services involuntarily and under a threat of some form of penalty.

Rowlinson Knitwear is a Foundation member of the ETI. We endorse and adopt all base codes within the ETI structure, and it is our expectation that all suppliers within our supply chain will do the same.

This statement has been published in accordance with the Modern Slavery Act (2015). It provides information on our activities and commitments to prevent modern slavery in our business operation and supply chains.

Rowlinson Facts and Figures



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Our Supply Chain

All Rowlinson Knitwear's products are designed and specified in-house. Our product range is small and focused to maximise on service and quality. We source directly from all Tier 1 suppliers and one Tier 2 supplier (acrylic yarn from Turkey). Embroidery embellishments are manufactured by our overseas garment suppliers (on-site), as well as from third-party suppliers in the UK.

	DEFINITION	EXAMPLE	STATUS
TIER 1	Main production sites, sourced directly by Rowlinson.	Garment manufacturer and direct embellishments such as embroidery.	Fully mapped.
TIER 2	Provider of one or more components to Tier 1 supplier crucial to the completion of final product.	Yarn, dye house and accessory manufacturers.	50% mapped - completion by end 2019.
TIER 3	Raw materials.	Man-made and natural textile fibres.	We recognise that most raw materials in our supply chain are not mapped - work to commence end 2019.
TIER 4	In-direct service providers.	Delivery systems, including sea/air freight and couriers.	Direct providers mapped - no investigations conducted at this stage.

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About Rowlinson Knitwear Limited

Based in Stockport, Cheshire, UK, Rowlinson Knitwear Limited was established in 1935, an employee-owned business since 2015 and is a member of the Employee Ownership Association.



We supply schoolwear and uniform clothing to our customer base choosing not to supply directly to the public, or in the case of our school uniform garments, to schools or shops within schools. In those cases, we support the specialist independent retailers who have loyally supported our business for many years. We believe that it is important to adopt a transparent and ethical approach to business.



We only use factories which can demonstrate to our satisfaction that they are fully compliant with all local health, safety and labour regulations, and we choose partners who share our ethical values and ambitions. Our policy in relation to ethical trading is aligned with the principles of the Ethical Trade Initiative (ETI) Base Code and these are used to drive our activity in the area of supply. Rowlinson Knitwear is a Foundation Member of this organisation.



Rowlinson Knitwear is an accredited Living Wage employer. The Living Wage commitment means that everyone working at Rowlinson Knitwear in the UK, regardless of whether they are direct employees or third-party contracted staff, receives a minimum hourly wage of £8.75, or £10.20 for those in London. Both rates are significantly higher than the statutory minimum for over 25s of £7.50 per hour introduced in April 2017.

Wherever possible, Rowlinson Knitwear is committed to directly employing staff and providing equal opportunity for remuneration, promotion and training. If we use temporary labour in the UK, we work with labour providers that are committed to becoming a member of the Association of Labour Providers (ALP) and are engaged with working within the best practice guidelines outlined in the [Stronger Together Initiative](#).

We supply our customer base from five major sourcing locations worldwide - Egypt, Bangladesh, Turkey, Philippines and the UK. All our suppliers are long-term serving organisations to our supply chain, and in many cases, we have partnered with suppliers for over ten years. We build strong supplier relations and employ a team of people that work for Rowlinson Knitwear independent of the factories we source from, but based within the factories, ensuring that satisfactory working practices are upheld. It is our intention to expand the roles of these individuals to assist in our ethical strategy and be vigilant to ensure that we minimise the risks of modern day slavery occurring within our supply chain. This initiative will be delivered through training and discussion directly with our Overseas Director. We believe having our own employed staff working directly in our Tier 1 supply chain allows us to strengthen this position, minimising the risk and potential harm to workers.

We do not own an overseas operation. However, all overseas suppliers are managed by our full-time Overseas Director based in Asia, who also sits on our main board and drives our ethical strategy.

We work hard with our supply base to maintain transparency and compliance with modern slavery and human trafficking. All our Tier 1 suppliers are aware of Rowlinson Knitwear's affiliation with the ETI and understand the requirements of the ETI Base Code, particularly the first principle relating to employment being freely chosen, including no forced labour, bonded or involuntary prison labour, as well as ensuring employees have the right to leave an employer after reasonable notice. This is achieved through dialogue with owners, management, production staff, and the use of public workplace notices where the ETI Base Code is displayed in the local languages.

Policies

With our core values of trust, care and be better, we endeavour to respect human rights across our global supply chain. We have several methods in working towards this through a number of policies and our compliance with the [ETI Base Code](#), which we work with Tier 1 suppliers to enshrine in their own working practices.

Ethical Statement

This follows very closely the ETI Base Code and explicitly references that employment is freely chosen. All our TIER 1 suppliers have been issued with copies of this policy and understand our expectation that they will implement it within their own organisation. We expect to audit this during 2018/19 and report back on compliance.

Whistle-Blower Policy

We recognise the importance of giving people in our supply chain a voice, affording them an opportunity to share concerns and ideas anonymously and with confidence, knowing that we will react to issues in our supply chain. No one understands these issues better than the worker at the very front of our supply process. We believe new technologies and growing awareness of social media platforms are the primary method to achieve this. Rowlinson Knitwear is embarking on an initiative to develop a social network forum where all people at our Tier 1 suppliers can post information directly to us, so we can act quickly to resolve issues. We aim to fully explore the capabilities of this by 1st January 2019 with a view to having a viable system in place during the first half of 2019.

In addition, we will continue to ensure that our employed staff on the ground are available to accept comments and are engaging directly with the workforce to address any issues.

We will continue to monitor, reflect and improve our engagement with workers and their representatives through this technology and not use the technology as a barrier to meaningful engagement in potential issues.

Supplier/Buyer Code of Conduct

By the end of 2018, all our Tier 1 suppliers will have been issued with copies of our Supplier/Buyer Code of Conduct in a local or supplier chosen language and we invite suppliers to openly discuss any aspects that they feel are difficult to enact due to the local workplace environment. Explaining our expectations and what the supplier can expect from us completes our two way commitment to ethical trade.

Cotton Policy

Through the process of mapping our supply chain, we have already evaluated the potential threat of Uzbekistan and Turkmenistan cotton being used in our supply chain. Cotton from these sources is reported to openly and regularly use exploited and forced labour, including child labour in the harvesting of cotton fibre. We have made investigations to confirm that such cotton is not being used with our knowledge or consent in any of our products, and all suppliers have reassured us of this position in writing. In addition, we have developed our [Cotton Policy](#) and issued copies to all Tier 1 suppliers.

Anti-Bribery and Corruption Policy

Our anti-bribery and corruption policy exists to set out the responsibilities of Rowlinson Knitwear Limited and those who work for us in regards to observing and upholding our zero tolerance position on bribery and corruption.

A copy of all our policies can be viewed on our website: www.rowlinson-knitwear.com

Due Diligence & Risk Assessment

Previously, Rowlinson Knitwear has primarily focused on health and safety with our Tier 1 suppliers, capturing annual health and safety audits as part of this process. In order to be effective in our new initiative focusing on ethical trade and modern day slavery, our first tactic is to adopt a more comprehensive audit programme to encompass more social compliance. We expect the first of these audits to be conducted and publicly published in December 2018.

We recognise that audits alone are not an effective measure but can be used as a component of monitoring activity. We are now advancing our understanding of the importance of active and ongoing due diligence and risk assessment processes, coupled with effective grievance procedures, should activity that indicates a breach of best practice be identified. Our Overseas Director will undertake comprehensive training during Q4 2018, in order for us to develop our understanding and knowledge prior to implementing further applications afterwards.

Mapping of our Tier 1 supply chain is now complete, with 50% of our Tier 2 supply chain mapped and we aim to complete Tier 2 mapping by the end of 2019. To date, this has highlighted high risk concerns in relation to cotton fibre sources, which have already been addressed, with our cotton policy established and shared with suppliers stating our clear position on this.

We are working closely with the ETI to understand more about the importance of due diligence and risk assessment in these early stages of our development. The [Global Slavery Index](#) has already highlighted two potential high risk areas for our supply strategy, namely Bangladesh with 1.5 million people estimated to be in slavery, and Egypt with over 0.5 million estimated to be in slavery. These will be our main areas of focus on audits for 2018, and any remedial action required.

In addition we have already identified the lack of trade union representation, or poor worker representation in both our Bangladesh and Egypt supplier operations. We are seeking to engage more closely with the Worker Participation Committee (WPC) in our Bangladesh operations to see what more we can do to support and strengthen this. Specifically, we are investigating Social Dialogue programmes with workers through the ETI's initiatives already established in this area. In Egypt, we plan to formally establish and launch a WPC with our supplier by March 2019, reporting back on this in our 2019 statement.

We have conducted employee and gender analysis for all Tier 1 suppliers, including our UK contract embroiderers, to further assist us in understanding more closely our Tier 1 suppliers and areas of improvement.

Action taken to address modern slavery

We work exceptionally closely with our direct (Tier 1) suppliers, with our own employees based within their operations, and arrange frequent visits from Rowlinson Knitwear’s Directors. This means we have a strong oversight of the operations and working practices in place, and a positive relationship that encourages open and honest discussion of potential risks or issues.

We are Foundation members of the ETI, demonstrating our commitment to continuous learning on how to be better in terms of ethical trade and implementation of the code with our supply chain partners. We have achieved some steps forward, with action taken to address modern slavery, including mapping our supply chain where we discovered the potential for our products to contain unauthorised cotton picked and sourced from Uzbekistan and/or Turkmenistan, where both countries are reported to use forced labour and child labour in the collection of cotton crops. We took the initiative to enquire of all suppliers providing cotton blend products to us, checking and obtaining written assurances from them that no such cotton was used. We are pleased to report that this position has been confirmed by suppliers. However, we recognise that additional surveillance measures may be needed in the future, to ensure that suppliers remain committed to this goal.

As a result Rowlinson joined and became signatories to the Turkmen and Uzbek Cotton Pledge with the [Responsible Sourcing Network](#). It is our intention to check and seek guidance that this position remains in our supply chain annually and reported here.

We work closely with the ETI Bangladesh office and have already identified areas of concern related to the representation of workers through Worker Participation Committees in Bangladesh, a legal requirement in this country, and an area that would assist us in monitoring modern day slavery.

To establish this, we are investigating internal training with staff at all levels within our largest Bangladesh supplier through a Social Dialogue Programme organised by ETI, Bangladesh. We look forward to delivering more positive news on this throughout 2019.

ACTIONS	COMPLETION
We conduct annual supplier performance audits on our direct (Tier 1) suppliers to ensure safe and positive working conditions. These are being expanded in scope to include ethical trade.	Audit procedures formalised by August 2018. Audits at all Tier 1 suppliers complete by December 2018.
Dialogue with all Tier 1 suppliers on our expectations in relation to Ethical Trade, particularly in relation to the ETI Base Code, Modern Slavery, and buy-in from all Tier 1 suppliers to our current Supplier/Buyer Code of Conduct.	Dialogue and sign-off of Supplier/Buyer code of conduct by December 2018.
Mapping our supply chain beyond Tier 1 suppliers so that we can evolve and ensure the highest levels of ethical trade are adhered to throughout our supply chains beyond our direct suppliers.	Tier 1 – Complete. Tier 2 – Complete by end December 2019.
Investigation of online Whistle-Blower platforms to take advantage of social media and bring greater transparency to the issues that can be conducive to modern day slavery.	Viable options understood and commitments to implementation made by 1st January 2019.

Training on Modern Slavery

As a values-led business, we are dedicated to evolving the ethical trading and modern day slavery governance throughout our supply chain. We have already embarked on the first stage of training with senior staff.

Our Commercial and Overseas Directors have both attended essentials training on ethical trade with the ETI in May 2018. Our Overseas Director, who leads the ethical strategy and modern day slavery initiative is continuing this training with further ETI essentials training courses in London scheduled for October and November 2018.

The Modern Day Slavery Act training in conjunction with CIPS was completed in June 2018. A three-day training on Human Rights due diligence will be completed in the final quarter of 2018.

We understand and appreciate the difficulties of identifying modern day slavery in the workplace, especially in overseas operations. Therefore, we directly employed five Quality Control staff at all our high risk locations in Egypt and Bangladesh, and plan to provide training on modern day slavery to these individuals who work on a day-to-day basis within our supplier operations. We believe delivering this training will enhance our ability to identify issues and work on remedial actions with suppliers.



Donald Moore
Managing Director
Rowlinson Knitwear Limited