

MODERN DAY SLAVERY STATEMENT

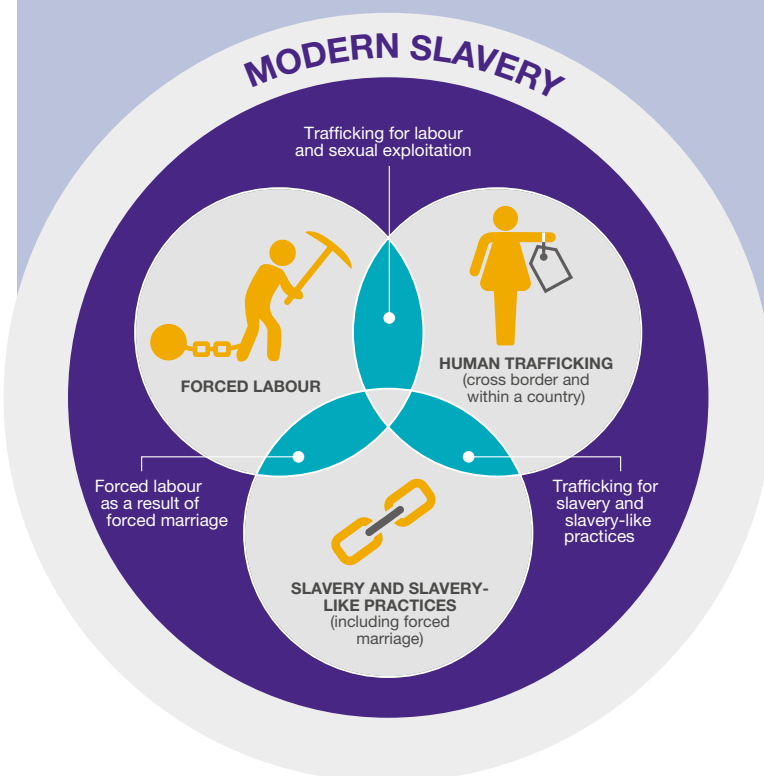
No person should work under conditions of slavery or forced compulsory labour. This basic right is enshrined in international law, regional instruments and national laws. Yet for many workers, freedom to choose employment remains beyond their reach. In 2018, the Global Slavery Index estimated that 40.3 million people across the world are in some form of modern slavery, with 70% of these being women and girls. In the past five years, 89 million people experienced some form of modern slavery for periods ranging from a few days to the whole five years.

While the highest numbers of forced labourers were reported in Africa, forced labour is found all around the world, including in Europe. The Global Slavery Index estimates that 136,000 people were living in modern slavery in the United Kingdom on any given day in 2016, reflecting a prevalence rate of 2.1 victims for every thousand people in the country.

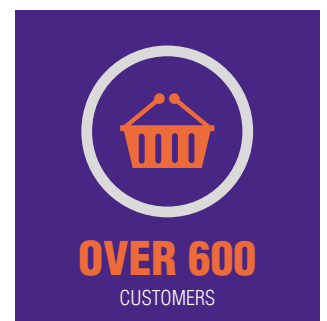
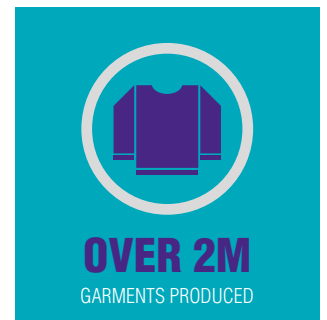
Modern slavery is an umbrella term that includes forced labour, debt bondage, servitude and trafficking for labour exploitation. The prohibition of forced labour forms Clause 1 of the Ethical Trading Initiative (ETI) Base Code, which states “employment is freely chosen”, as it is the most blatant labour 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 we expect that all suppliers within our supply chain will do the same.

This is our second Modern Slavery Statement published in accordance with the Modern Slavery Act 2015. It explains our actions since we published our first Modern Day Slavery Statement in August 2018, together with details of our commitment to prevent modern slavery in our business operation and supply chains.



Rowlinson Facts and Figures



MODERN DAY SLAVERY STATEMENT

Our Supply Chain

All of our products are designed in-house. Our product range is small and focused to maximise on service and quality. We source directly from our Tier 1 suppliers and from one Tier 2 supplier (our knitwear yarn). Embroidery embellishments are manufactured by our overseas garment suppliers in their factory, as well as from third-party suppliers in the UK. We nurture strong, long-term relationships with all our suppliers so that we can manage the supply chain efficiently, and to be effective in our awareness and required actions.



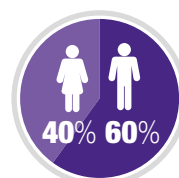
10 TIER 1 PRODUCTION SITES



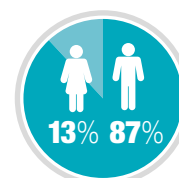
38 TIER 1 SUPPLIERS



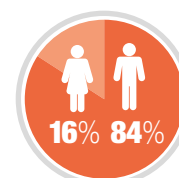
4 COUNTRIES



10,138 WORKERS



SENIOR MANAGEMENT LEVEL



SUPERVISORY LEVEL

	DEFINITION	EXAMPLE	STATUS
TIER 1	Main production sites that we source directly from.	Garment manufacturer and direct embellishments, e.g. embroidery.	Fully mapped and published to our website in June 2019.
TIER 2	Provider of one or more components to Tier 1 supplier that are crucial to the completion of final product.	Yarn, dyehouses and accessory manufacturers.	Fully mapped.
TIER 3	Raw materials.	Man-made and natural textile fibres.	All raw materials recognised and our supply chain is partially mapped.
TIER 4	In-direct service providers.	Delivery systems, including sea/air freight and couriers.	Fully mapped.

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About Rowlinson Knitwear Limited

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



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



We only use factories who can demonstrate to our satisfaction their compliance with all local health, safety and labour regulations. We choose partners who share our ethical values and ambitions. Our ethical trading policy is aligned with the principles of the ETI Base Code. These principles drive our activity in the area of supply. Rowlinson Knitwear is an ETI Foundation Member and the business is in its second year of membership.



Rowlinson Knitwear is an accredited Living Wage employer. The Living Wage commitment means that everyone working at Rowlinson Knitwear in the UK receives the accredited living wage set at the time by the Living Wage Foundation.

Wherever possible, we are 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 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 four sourcing locations. Ranked in order of spend, these locations are Bangladesh, Egypt, Philippines, and the UK. We build and maintain strong supplier relationships and all our current suppliers are long-term partners.

In some cases, we have partnered with suppliers for over fifteen years. We directly employ a team of people that work for us and are based in the overseas factories we source from, ensuring that satisfactory working practices are upheld. We intend 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 employed staff working directly in our Tier 1 supply chain allows us to strengthen this position, minimising the risk of potential harm to workers. This has already been proven with the SMETA Audit initiative launched by our Egyptian QC Officer across all Tier 1 suppliers.

We do not own overseas operations. 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 values of trust, care and be better, we endeavour to respect human rights across our global supply chain. We have several methods of achieving this through several policies and our compliance with the ETI Base Code, which we work with Tier 1 suppliers to enshrine in their working practices.

Ethical Statement

Our Ethical Statement closely follows the ETI Base Code, confirming 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 2019/2020 and report back on compliance.

Whistleblower Actions

We recognise the importance of giving people in our supply chain a voice, allowing them to share concerns and ideas anonymously, and with confidence that we will respond appropriately 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 methods to empower workers with an easy-to-use, confidential channel to raise issues. Through extensive investigations we have already embarked on our first initiative with our entire Bangladesh supply chain, giving voice to workers through the Amader Kotha helpline. This is a 24-hour, 7-day a week free of charge helpline that workers can call to report any aspects of concern in the workplace. More than 500 workers at our primary knitwear supplier were given access to Amader Kotha in August 2019. It has already been in place for several years with 9,000 workers at our blazer supplier.

Further information: <https://amaderkothahelpline.net/>

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. Also, we have developed our Cotton Policy and issued copies to all Tier 1 suppliers. Rowlinson is a signatory to the Responsible Sourcing Network's Turkmen and Uzbek Cotton Pledge, alongside brands including M&S, Nike, Adidas and H&M Group. This is a public commitment that we will not source cotton from Turkmenistan and Uzbekistan until forced labour in its cotton sector has been eliminated.

Anti-Bribery and Anti-Corruption Policy

Our anti-bribery and anti-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

SPOTLIGHT ON AMADER KOTHA HELPLINE

The Amader Kotha helpline is a successful grievance mechanism that allows workers in Bangladeshi garment factories to report and quickly resolve workplace issues before they escalate into major problems.

The objective of the Amader Kotha helpline is to identify and resolve workplace problems, strengthen internal factory grievance handling processes, and provide assurances to brands consistent with principles of human rights and global best practice. The helpline accomplishes this objective by providing a best-in-class call intake and handling protocols.

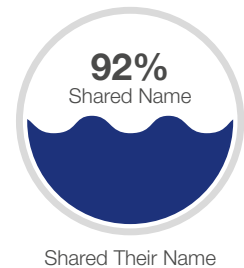
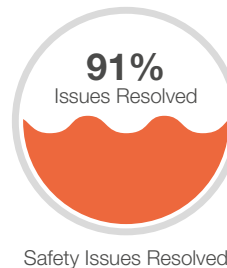
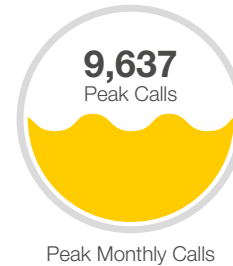
It is operated by a unique partnership between three globally recognised, award-winning project partners.

Clear Voice, a project of The Cahn Group which specialises in hotlines and effective complaints procedures in supply chains.

Phulki, a respected civil society organization working to improve the lives of workers and their families in Bangladesh.

ELEVATE, the parent company of Laborlink, a leading business risk and sustainability solutions provider.

As one of the most successful communication channels, the helpline receives more than 500 safety and non-safety issues every month, resolving over 80% of all issues. Issues are closed when workers are satisfied with the response they receive or when experts conclude a factory is safe.



“ It is fantastic to see brands and retailers, like Rowlinson Knitwear, adopting the Amader Kotha helpline within their supply chain to ensure factories are protecting workers from safety and labour risks as well as aiding factory managers to improve workplace conditions. ”

Doug Cahn, Amader Kotha Helpline

The Amader Kotha helpline is now fully implemented with all Tier 1 suppliers in Bangladesh, representing more than 70% of our supply chain.

Due Diligence & Risk Assessment

To be effective in our initiative of focusing on ethical trade and modern-day slavery, our first tactic is to adopt a more comprehensive audit programme to encompass more social compliance. Our first steps were to have all Tier 1 suppliers formally registered with Suppliers Ethical & Database Exchange (SEDEX). This work has now been completed and we are embarking on stage 2 of this initiative, which will see all our Bangladesh Tier 1 suppliers complete a Sedex Members Ethical Trade Audit (SMETA) by the end of 2019.

We recognise that audits alone are not an effective measure but can be useful 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, supported by our UK Planning Officer, has undertaken comprehensive ETI training during 2018-19 and has further training scheduled for 2020, to increase our knowledge of ethical trade.

Mapping our Tier 1 supply chain is now complete and made public on our website. Our Tier 2 and Tier 4 supply chain is also fully mapped. To date, this has highlighted high-risk concerns about cotton fibre sources, which have already been addressed, with our cotton policy established and shared with suppliers.

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. These potential high-risk areas are Bangladesh, where almost 600,000 people are estimated to be in slavery, and Egypt, where over 500,000 people are estimated to be in slavery. Our largest presence in purchase and production is in Bangladesh, which will be our main focus of attention for audits in 2019/20.

We have identified the lack of trade union representation or poor worker representation in our Bangladesh and Egypt supplier operations. We are working hard 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 existing initiatives in this area. We are optimistic that we will be able to establish formal Worker Participation Committees within our primary Bangladesh supply chain during 2020.

We have conducted employee and gender analysis for all Tier 1 suppliers, including our UK contract embroiderers, to enhance our understanding of our Tier 1 suppliers and any areas of further improvement.

Action taken to address Modern Slavery

We work closely with Tier 1 suppliers and with our employees based in their operations, and as well as having full-time, on-site staff at all primary Tier 1 suppliers, we also arrange frequent visits from senior members of the Rowlinson UK team. As a result, we have clear visibility 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 learn how we can continue to be better at trading ethically and how we approach implementing the Base Code with our supply chain partners. We have made some steps, taking action to address modern slavery, which included mapping our supply chain where we discovered the potential for our products to contain unauthorised cotton picked and sourced from Uzbekistan 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 check and obtain written assurances from all suppliers of cotton blend products that no such cotton was used. In addition, we visited Chinese yarn operations in 2018/19 to confirm this position. However, we recognise that additional surveillance measures may be needed in the future, to ensure that suppliers remain committed to this goal.

We are particularly proud of our new initiative - which went live in August 2019 - to implement the Amader Kotha helpline to almost 10,000 members of staff in our supply chain throughout Bangladesh. More details of this initiative are detailed on page 5 of this Statement.

As a result, Rowlinson Knitwear joined and became signatories to the Responsible Sourcing Network's Turkmen and Uzbek Cotton Pledge. We intend to check and seek guidance that this position remains in our supply chain annually and reported here.

We work closely with the ETI's 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 plan to begin this work in early 2020.

In October 2018 we met with the Home Office Modern Slavery Unit in coordination with the Behavioural Insights Team. This meeting allowed them to conduct research with smaller organisations to understand how best to approach producing a modern day slavery statement. This proved a very beneficial meeting for Rowlinson and the Insights Team, and resulted in our modern day slavery statement being registered online for fuller transparency with the Modern Slavery Registry and TISC report Modern Slavery Act Compliance Tracker.

Further details available from:
<https://www.modernslaveryregistry.org/>
<https://tiscreport.org/>

MODERN DAY SLAVERY STATEMENT

Progress Against 2018 Modern Day Slavery Statement

ACTIONS	COMPLETION	ONE YEAR PROGRESS
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 of all Tier 1 suppliers completed by December 2018.	Sedex platform expanded to include all Primary Tier 1 suppliers. SMETA Pillar 2 Audits scheduled and confirmed for completion by September 2019. All non-conformances to be eradicated by end 2019.
Dialogue with all Tier 1 suppliers on our expectations in relation to ETI, specifically the ETI Base Code and modern slavery, to gain 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.	We decided to commit to a more public agreement between supplier and buyer, publishing full-colour, branded ETI Base Code notice boards in all Tier 1 suppliers. This lends greater transparency to our expectations and agreements with suppliers, as well as clearly communicates the rights of workers in our supply chain. This work was completed in Aug 2019. No further work progressed in relation to a Buyer/Supplier Code of Conduct.
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.	All Tier 1, Tier 2 & Tier 4 supply chains have been mapped and we have published the Tier 1 supply chain map on our website for further transparency.
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.	We launched the Amada Kother helpline with all our Tier 1 Bangladesh supply chain in August 2019. This is fully supported by Rowlinson, giving workers access to a helpline and support on any work-related issues they may have.

2019/20 Actions

ACTIONS	COMPLETION
Complete all Sedex Members Ethical Trade Audits (SMETA) with Tier 1 Bangladesh supply chain. Identify non-conformances and complete corrective actions.	June 2020
Establish on-site audit procedures for remaining Tier1 and Tier 2 suppliers.	Aug 2020
Begin work on mapping supply chain at Tier 3 level.	Dec 2019
Establish an elected worker participation committee with our largest Tier 1 supplier through on-site training using the ETI Social Dialogue Programme.	Aug 2020

Training on Modern Slavery

Rowlinson Knitwear has been an ethical business for a long time. True to our values of trust, care and be better, we're proud to have achieved so much. Whether we're manufacturing safe, high quality clothing, caring for all colleagues and workers in our overseas operations or reducing our environmental impact, we care deeply about our actions. However, we know there is much more to do and we are dedicated to evolving ethical and modern day slavery governance throughout our supply chain.

In our first year operating within the scope of our modern day slavery statement, senior colleagues undertook comprehensive training on modern day slavery and effective due diligence work.

In this second year, we will extend training to our UK-based Planning Assistant Officer who supports our Overseas Director on all ethical trade processes. We have also committed to develop a more comprehensive role within our supply chain.

We understand the challenges of identifying modern day slavery in the workplace, especially in overseas operations. To maintain a consistent and monitored presence, we directly employ five Quality Control staff at all our major locations in Egypt and Bangladesh. Our directly employed Overseas Officer based in Egypt has completed relevant training to ensure the effective implementation of SMETA Pillar 2 audits at our supplier operations, as well as personal on-site audit processes at all Tier 1 suppliers for the 2019/20 period. We have also scheduled further colleague training in 2019 and 2020, to be delivered by ETI in London.

We're proud of the progress we have made so far. However, we know that there is much more work to do and we're acutely focused on improving our understanding of our supply chain. It matters deeply to us that we achieve greater transparency, so that we can take appropriate and decisive action to mitigate the risks of modern day slavery in our supply chain.



Donald Moore
Managing Director
Rowlinson Knitwear Limited