



Modern Slavery Report 2024

The Regatta Group of Companies: Regatta Great Outdoors, Regatta Professional, Craghoppers, Dare2B, Hawkshead, Risol Ltd and Countryside Trading Ltd.

1.1 Our Business

1.1.0 Introduction

The Regatta Group first published its Modern Slavery statement in July 2017 in accordance with the UK Modern Slavery Act 2015. We are now proud to share our eighth statement, which summarises our activities and progress during the past year ending January 2024 to prevent modern slavery of all forms in our business and supply chain.

1.1.1 A Message From Our Director

As a privately owned family business, the Regatta Group have strong family values and operate a culture where staff are encouraged to voice any concerns using the appropriate reporting channels. Everyone must play their part and be alert to the warning signs of slavery.

It remains The Regatta Group's top priority to continue to ensure that we trade ethically, source responsibly and work to prevent modern slavery and human trafficking throughout our organisation and in our supply chain. We have a zero-tolerance approach to modern slavery of any kind. From Board level, and throughout all aspects of our business we understand that it is not just about what we do, but rather how we do it. Our core values of honesty and respect are central to this, as they have been for generations.

The current economic climate presents many challenges for any trading business; however, we remain alert to the risks and unknown circumstances in our industry as new crisis situations across the globe unfold. Our risk management strategies have proved robust, and we are committed to ensuring that all persons involved in our business are free from exploitation.

Ethical Trading has always been a cornerstone of our business; and we believe making good quality clothing, footwear, accessories, and equipment should not come at the expense of others.

The progress we have made over the past year and throughout our journey as ETI members makes me super proud, and whilst this work is never complete, there will always be more we can do to improve the impact we have on others. This report sets out the achievements and future goals of the Regatta Group, and I cannot wait to see what difference we can make this year.



This statement was approved by the board of Directors of the Regatta Group of companies: Regatta Great Outdoors, Regatta Professional, Craghoppers, D2B, Hawkshead, Risol Ltd and Countryside Trading Ltd on the 26/6/24

Signed: Joanne Black
Director / Owner, July 2024

1.1 Our Business

1.1.2 Internal Governance and Accountability Structure

Board Level

Our Board are regularly informed at their bimonthly meetings on ethical trade and sustainability progress and business endeavours. As a board member, Joanne Black, is an owner of the business and responsible for buying and retail at Craghoppers. This ensures that buy-in across the group comes from the top level. [?](#)

CSR Committee

At the head office in Manchester, Joanne Black chairs the Group’s CSR Committee, which meets twice a year. Members include our COO, Buying Directors from each Brand, and Senior Managers from across the business. The Committee develop the group's CSR business plan and set KPIs for all sourcing countries.

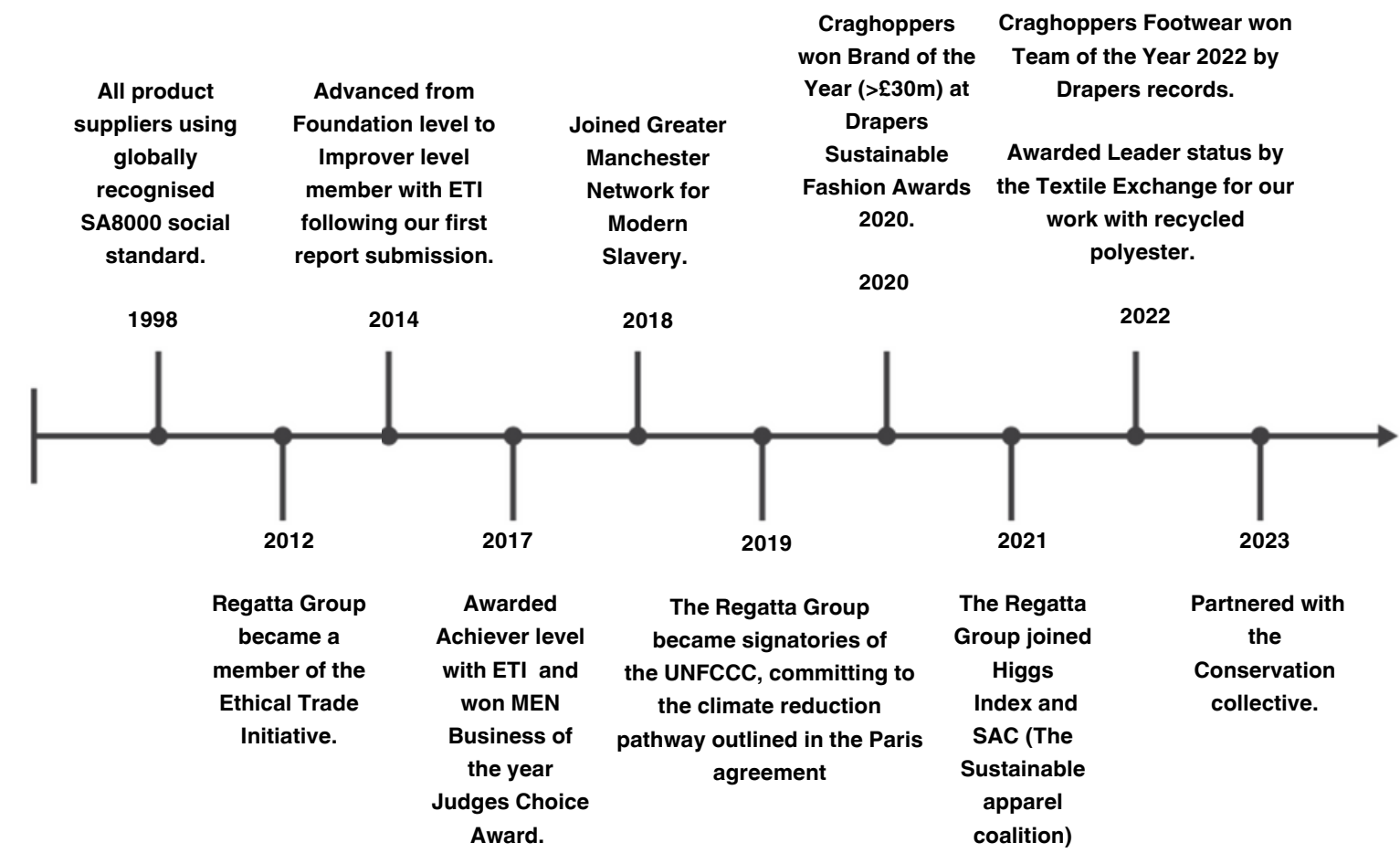
Sustainability Committee

The Sustainability Committee comprises Managers from across the business, who meet on a quarterly basis to ensure a coordinated and effective approach to the delivery of the Sustainability business plan companywide. The Committee includes Managers from operational and facilities, Logistics, E-comms, People, Distribution, Brand Marketing, Product and Sourcing. They are responsible for the day-to-day key climate-related impact areas for the Group, e.g. buildings, sourcing, and logistics. They will advise the CSR Committee of any issues. The Sustainability Committee is also responsible for preparing and managing information to ensure correct reporting on the Sustainability business plans KPIs.

Compliance Managers

Overseas, we have dedicated compliance managers in our key sourcing countries who work closely with our supply partners to ensure that all our objectives and initiatives are followed and that our code of conduct is adhered to at all sourcing sites.

1.1.3 Our Milestones & Achievements



“We expect each and every person touched by our brands & products to have a positive experience; this includes the sewing workers in our partner factories, our colleagues across the globe, and our customers ”

Joanne Black, Company Owner & Director.

1.1 Our Business

1.1.4 Our History

Regatta was founded by the visionary Lionel Black. Lionel found a need for high-quality yet affordable outdoor clothing, shaping us into the company we are today. In 1981, he handed the reins to his son, Keith Black, who remains our committed CEO. Later, Joanne Black, Lionel's daughter, joined Regatta, bringing her expertise to improve our buying process, and today champions our CSR initiatives. Regatta is more than a business; it's a family, reflected in how we care for our customers, global staff, and partners.

Despite humble beginnings in 1981, our brands have grown into strong multi-channel, global market players, and we are now the biggest outdoor group in Europe. Our brand portfolio includes Regatta Great Outdoors, Regatta Professional, Dare2b & Craghoppers.

We continue to grow through our own stores, concessions, retail partners, and online platforms, both in the UK and internationally. This year, our brand's presence has expanded substantially, building great relationships with customers such as Marks & Spencers, House of Fraser, ASOS, John Lewis, Next & Screwfix.

Our focus for the future is to continue to grow the business in our European markets to the same strength as our home UK market.

Our approach is clear: We care and treat people in our business and supply chain fairly, with honesty, courtesy, and respect, as we ourselves would expect to be treated.

In the words of our founder Lionel Black:

“A successful business does the right thing, sticks to its values and doesn’t just chase profits” Lionel Black, Founder.

1.1.5 Business statistics

Annual Group
Turnover for the year
2023/24
£322m

Number of Group
Employees
2173

Number of
Global offices
10+

Number of 1st &
2nd tier nominated
factories
218

Number of workers
within our nominated
product suppliers
75,000+

1.1 Our Business

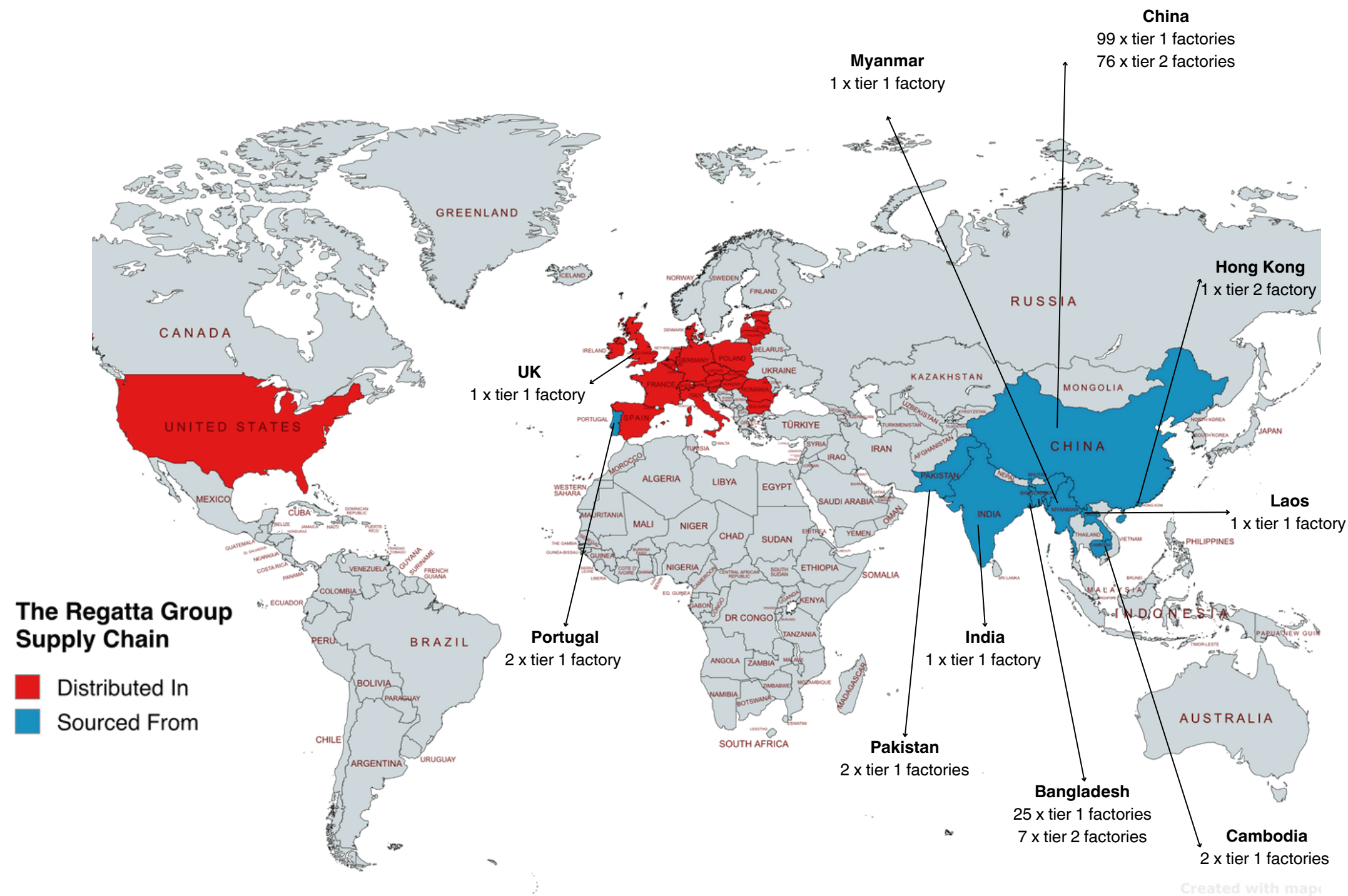
1.1.6 Our Global Reach and Supply Chain

Our supply network is well established and currently includes 218 factories that we deal with directly across our 4 brands for tier 1 and 2. We do not own the factories or suppliers who produce our goods, but we understand that our biggest exposure to modern slavery is within our product supply chains. Therefore, we take a hands-on approach to work with all our partners to ensure our company ethics align. Our focus centres on understanding the risks associated within our supply base, prioritising those of highest risk, and expanding beyond audit to uncover root causes.

The Regatta Group believes that fostering long-lasting, mutually beneficial partnerships can help manage complex supply chains. We are proud to report that over 40% of Strategic Suppliers have been with us for over 5 years, and 20% of Strategic Suppliers have been with us for over 10 years. This helps us maintain high levels of trust and transparency.

Since 1981, our core strength has been in our product and product supply chain. Sourcing products from 10 countries predominantly in eastern Asia, we have built great relationships with our suppliers and are extremely proud of our longstanding strategic partners. We remain alert to the vulnerability of modern slavery that may exist not only due to the high-risk nature of the countries that we source from but also the predominantly female workforce that associates with the garment-making industry.

In addition to adhering to local laws, the Regatta Group and all its suppliers must adhere to the ETI Base Code founded on the ILO conventions, as well as our own code of conduct for responsible sourcing and the environment.





1.2 Our Policies

1.2.0 Corporate Social Responsibility

**“CSR is always at the core of everything we do”
Joanne Black, Company Owner & Director.**

The Regatta Group publicly commits to respecting human rights. We recognise our responsibility to support these rights across our value chain through; our group Code of Conduct, and under the UN Guiding Principles on Business and Human Rights. (UNGP’s)

Our policies reflect our strategy to tackle modern slavery, developed by external experts and signed off at board level to ensure senior accountability they represent the ground rules within the Regatta Family.

1.2.1 The Honesty Project

The Honesty Project is our Ethical and Environmental program, which underpins everything we do. It focuses on creating fantastic products thoughtfully engineered for the great outdoors while ensuring that those involved are treated fairly and in good working conditions.

**“We all have a responsibility to be alert to the risks, however small”
Maya Fox, Product Director Regatta**

1.2.2 Supplier Code of Conduct

Our Supplier Code of Conduct aligns with The Regatta Group's fundamental values, principles, and overall strategy, reflecting our continuous efforts to mitigate carbon emissions across the supply chain whilst ensuring this is not at the cost of other people. .

Our commitment lies in producing sustainable and ethically made products, prioritising the reduction of environmental impact and the human rights of the workers making the products.

We aim to work with our suppliers to help identify the risks and improve the conditions across our supply chain, and we expect all our suppliers to achieve either low or medium-risk status. We require transparency and collaboration with all our suppliers as we perform our own due diligence checks and partner with 3rd party companies.

1.2.3 Child Labour and Young Workers Policy

Regatta Group’s Child Labour and Young Workers policy sets out our Brands position and expectation against the use of child labour in any form, as well guidance on remediation if such situation were to be discovered in our supply chain.

1.2.4 Grievance and Remedy

Regatta Group’s Grievance and Remedy policy sets out our approach to ensure that all workers and employees have access to a clear and effective reporting mechanism, and that the reporting channels offer a suitable remediation process.

We endeavour to act promptly and effectively to support human rights, in any circumstances reported to us, setting out a remediation plan to support the worker involved both at the time of the incident, and for the long-term future.

1.2.5 Subcontracting, Forced and Prison Labour

The Regatta Group will only permit suppliers to outsource production to facilities that have been approved by The Regatta Group and that uphold the ETI base code requirements for safe, fair labour practices and working conditions.

Unauthorised subcontracting threatens transparency and trust within The Regatta Group. Additionally, if any Regatta goods are discovered in unauthorised factories or prisons, we, without any hesitation, will cease trading with the supplier, and we will not take the goods in question.

1.2 Our Policies

1.2.6 Xinjiang Uyghur Autonomous Region

The Regatta Group have noted the concerning allegations made regarding human rights violations against Uyghur and other Turkic and Muslim communities in the Xinjiang Uyghur Autonomous Region and other areas of China.

The Regatta Group endorses Better Cotton's choice to discontinue all operations in Xinjiang Uyghur Autonomous Region due to progressively unsustainable operations. Following the above, we ensure all our cotton is bought through accredited cotton buying schemes such as Better Cotton, GOTS or OCS and that no garments, accessories, yarns, or fabrics are produced in the Xinjiang Uyghur Autonomous Region.

Suppliers are required to relay this directive to their entire supply chain and ensure that there is no involvement in cotton sourced from the above specified regions. To ensure the above requirements are met, The Regatta Group's suppliers must also be able to identify the Country of Origin in which the raw cotton is sourced and where necessary provide the relevant documentation to confirm this. We also review in-depth information about migrant workers in our factories and their origins.

1.2.7 Myanmar Sourcing

The Regatta Group were deeply concerned by the military coup in 2021 and ongoing violence against the people of Myanmar. As ETI members we support creating good working environments where workers can exercise freedom of association without penalty or violence.

The Regatta group contributed financially to the Myanmar Enhanced Due Diligence Sectorial Assessment carried out by the ETI appointed DDD (Due Diligence Design), and we have since acted upon advice from the ETI, reducing our order volume from Myanmar responsibly, consolidating our supply base for a soft, responsible exit over a 12-month period.

The few remaining suppliers in Myanmar that we still have production with are all enrolled on the MADE in Myanmar program which focuses on improving social compliance, workplace dialogue and management systems. We also check more in-depth information about factory associations and funding particularly focused on any military connections following the coup in Myanmar.

1.2.8 Foreign and Metal Objects

To ensure all Regatta Group shipments are free from any foreign and/or metal objects; procedures are followed to check 100% of our finished products are free from foreign and/or metal objects of any kind.

Contamination in a product can pose a safety risk. All our suppliers have effective foreign and or metal object control procedures throughout their manufacturing processes which is supported by our in house team.

1.2.9 Regatta Platforms & Initiatives

Beyond our core policies, **BeWell** is our well-being and social initiative that promotes healthy working and lifestyle choices. The benefits and services available include pension schemes, enhanced maternity pay, and access to support networks, as well as a recently launched electric car scheme for employees.

We were very proud to receive the **2023 & 2024 Royal Society for Prevention of Accidents (ROSPA)** gold medal award, winners for the 9th consecutive year. We continue to invest actively in recognition programs and offer development opportunities across the business.

Our **Viva Engage** online platform provides easy communication and access to all levels of the business, and our CEO gives regular updates to keep staff connected. We've also adopted a flexible model of working from home and the office.

Our **Project 5** initiative encourages every employee to set their own sustainability targets and has been included within the company development review structure. We've introduced a rewards scheme for those who promote sustainability within their roles.



国际劳工组织法律文件

01 强迫或强制劳动公约 (第29号公约)
1948年
禁止强迫劳动的广泛
国际劳工组织公约

02 废除强迫劳动公约 (第105号公约)
1957年
禁止各种形式强迫劳动

03 强迫劳动公约的议定书
(第29号公约2014年议定书)
2014年生效
要求批准国采取有效措施防止强迫劳动, 保护受害者
并促进受害者重返社会

04 关于有效禁止强迫劳动的补充措施建议书
(第203号建议书)
2014年
为如何实施议定书提供进一步建议

UNIFORM
STAFF

1.3 Our Partners

1.3.0 Responsible Partners

We align ourselves with business partners who have the same philosophy as ourselves. We only work with those who have the same policies & values on modern slavery. This is reflected in our Supplier's Code of Conduct, which is reviewed and signed off each season by senior management. In addition, we encourage all our business partners to create their own CSR plans, which we review with them annually to ensure they are progressing, and align the objectives within these plans with our ethical and environmental assessments of their facilities. .

Across our goods and services not for resale (GSNFR) partner suppliers in the UK and across Europe, our questionnaire developed by external experts SGS continues to map out our partners depending on their own modern slavery practices.

As part of our new supplier introduction pack, our T&Cs ensure that modern slavery is part of our partner's strategy and that a policy is available and published, if applicable, in line with UK labour law. In addition, as part of our tender process, we also ask suppliers to submit their sustainability plans for review. In 2023, we began the process to develop a scorecard system to this area of the business, where all suppliers will be evaluated by a set of criteria and awarded platinum, gold, silver, or bronze status for their ethical and environmental achievements. This will allow us to better measure, identify and partner with the companies who are leading the way with CSR. Our Scorecard is set to launch later this year.

Meanwhile our focus across GSNFR over the last 12 months has targeted the credentials of our service providers such as our legal service providers, travel service providers and our insurance providers, to ensure whatever aspect of our business we operate the same approach, treating people and our planet with respect.

We also extend the same level of due diligence and care to workers beyond our own business, such as the agency staff in our Polish Distribution Warehouse site, where we check proof of rights to work, perform unannounced auditing of the living quarters through a 3rd party auditor, and ensure the workers' onboarding process when they arrive at new locations is complete, from translating documents to showing them the nearest pharmacy, or where to catch the bus.

Within our own operations, Usdaw (Union of Shop, Distributive and Allied Workers) are recognised for the purposes of representing and consulting on collective issues for all Regatta's employees at the Ellesmere Port site, excluding senior managers. This is a voluntary agreement between Regatta and Usdaw, who are committed to working together in a spirit of co-operation, mutual respect and trust to the common benefit of Regatta and its employees.

1.3.1 Collaborative Partners within the Industry

We recognise that modern slavery cannot be combatted alone, and so we believe in sharing best practices at all levels with Industry experts as well as other brands and retailers. Our involvements include:

- Collaboration and sharing of best practices with other brands and members within the European Outdoor Group (EOG) and the Outdoor Industry Association (OIA).
- Collaboration with supply partners through projects such as the Better Work project in China, MADE in Myanmar in Myanmar, and collaboration with an NGO in Bangladesh. These programs aim to improve H&S, HR, Recruitment, and management systems in factories and encourage free elections and the establishment of workers' committees to give the workers a voice.
- As a supplier ourselves, we continue to offer support and collaborate with our customers and other ETI members to complete their own risk assessments by being open and transparent about our business practices and policies as well as those of our supply chain partners. We have collaborated with UK retailers and ETI members to help advise on challenges they were facing in their own CSR agenda.
- We are members and attend the Greater Manchester Modern Slavery Business Network quarterly meetings. These provide an opportunity for businesses based in or with connections to the region to work together and support each other in tackling modern slavery. It is a great opportunity for representatives from a wide range of businesses and sectors to hear about some of the good work that is going on in the region, as well as share some of the challenges businesses face in tackling this horrific crime. After hosting the first virtual meeting previously, we continue to collaborate and support the network.

1.3 Our Partners

1.3.2 The Ethical Trade Initiative (ETI)

The ETI brings together brands, retailers, suppliers, unions, and voluntary organisations to improve conditions for workers around the globe. The ETI Base code, founded on the conventions of the International Labor Organisations (ILO), is an internationally recognised code of labour. Its 9 key principles form the baseline for our minimum expectations from our partner suppliers as set out in 1.3.4. Our journey with ETI began in 2012, and we have progressed along the ETI landscape to achieve full member status, moving our focus for 2024 to their progression meetings which bring members together to discuss key topics, and collaborate.

1.3.3 Regatta Group Product Supplier Onboarding

From the offset, all our product suppliers are introduced to the base code, and compliance with its principles becomes a necessity for working with us. We carry out face-to-face meetings and send letters of commitment for suppliers to sign back. Each supplier signs Regatta policy documents for unauthorised subcontracting, prison labour, child labour, the XUAR sourcing policy, modern slavery, as well as our sourcing code of conduct. An additional foreign and metal objects policy and procedure were introduced in 2024.

We are constantly benchmarking our supply chain in line with the base code, and our suppliers are required to participate in ethical trading audit assessments, which are carried out by our highly qualified in-house teams or by an internationally accredited third-party auditors. All ethical assessments (in house and 3rd party), are followed up by a corrective action plan being drawn up which is signed off by the suppliers management team. Suppliers then have an agreed time frame to improve and close on any points raised. Aside from audit, we work closely with all our direct suppliers to build up their knowledge of ETI base code and compliance related issues depending on the factories geographical location, volume and value of business with Regatta, and the factories own experience with ethical trade, and size of their workforce.

We require all our nominated suppliers in tier 1 to hold valid 3rd party audits and we accept audits from accredited providers such as BSCI Amfori, Sedex, Smeta and WRAP. Where suppliers do not hold a 3rd party audit, we work closely with our partner audit provider SGS to organise audit within the first 12 months of starting business with a supplier.

Last year across China and Bangladesh we completed 89 tier 1 site assessments through our internal compliance team. Our focus over the last 12 months has been to increase the transparency of our lower supply chain tiers, and within our tier 2 facilities we completed 31 internal assessments, with 15 tier 2 sites holding accredited 3d party audits. Within our tier 3 sites we completed 10 assessments by our internal compliance team, and a further 5 sites hold accredited 3rd party audits. We operate the same benchmarking process following all assessments and corrective action plan monitoring is put in place.

1.3.4 The ETI Base Code Principles



1. Employment is freely chosen



2. Freedom of association and the right to collective bargaining are respected



3. Working conditions are safe and hygienic



4. Child labour shall not be used



5. Living wages are paid



6. Working hours are not excessive



7. No discrimination is practised



8. Regular employment is provided



9. No harsh or inhumane treatment is allowed

1.4 Assessing Risk

1.4.0 Country Risk Analysis

At Regatta Group we operate across a global supply chain, and so we are aware that different laws, cultures, politics and economical factors will constantly impact on the way our supply partners act, and react

Our Internal risk analysis database documents the risks to workers in each of our geographical sourcing locations, taking account of disparity in working conditions.

The data we collect comes from a variety of public sources such as, but not limited to:

- Labour and Human Rights Indices such as the Global Slavery Index (GSI)
- International Labour Office (ILO)
- Business and Human Rights Resource Centre
- WHO Global Health Observatory
- UNICEF
- The Centre For Child Rights and Business
- Human Rights Watch
- The Global Gender Gap Index
- The Gender Inequality Index

Based on the severity and likelihood of the risks involved, each country is assigned a risk rating (Very High, High, Medium, or Low) in a matrix. This rating serves as one of the criteria for our CSR risk assessments, and it helps us make informed decisions when sourcing for our business.

We constantly review this matrix, and make sure to update our database regularly to maintain the most accurate information possible as circumstances within our supply chain are constantly evolving.

1.4.1 Prioritising Risks

Once our country specific risks are mapped onto the risk matrix we can identify the risk rating, We prioritise the salient risks rated as very high as our top focus areas.

LOW	This risk is something the Regatta Group considers but it is not a high priority at the moment
MODERATE	Some concerns have been raised regarding this risk, and upcoming audits will focus on improving it as it fluctuates.
HIGH	There have been a handful of cases within the supply chain and the Regatta Group are working with suppliers to eliminate the risk.
VERY HIGH	This risk is a top priority for the Regatta Group. Constant monitoring is required to reduce the risk rating.

1.4.2 Salient Risks from our Sourcing Countries.

- Forced Labour in the China garment production industry
- Child Labour in the Bangladesh garment production industry
- Discrimination and Inequality in the Bangladesh garment production industry
- Health and Safety of Bangladeshi garment workers and associated persons
- Working hours for all Bangladeshi garment workers and associated persons are not excessive
- Worker Representation within the China & Myanmar garment production industry
- Living Wages in the Bangladesh garment production industry

1.4 Assessing Risk

Salient Risk	COUNTRY	RISK RATING	ACTIONS & MITIGATION
Forced Labour	CHINA	VERY HIGH	<p>Regatta policy documents signed by each supplier for unauthorised subcontracting and prison labour, XUAR sourcing policy and modern slavery. Additional foreign and metal objects policy and procedure introduced 2024.</p> <p>Penalties added to Regatta policy for any instances of modern slavery or subcontracting if found based on the case in question with serious cases ending in termination.</p> <p>3rd party audit including payroll analysis, ID checks, worker interviews.</p> <p>Capacity agreements and factory loadings in place to monitor production per factory.</p> <p>Training to internal teams on modern slavery indicators.</p> <p>Ban from any links within our supply chain to Xinjinag Autonomous Region.</p> <p>Regatta operated hotline for greivance reporting.</p> <p>Regatta initiated Worker wellbeing survey.</p>
Child Labour	BANGLADESH	VERY HIGH	<p>Regatta policy documents signed by each supplier for child labour.</p> <p>3rd party audit including payroll analysis, ID checks, worker interviews.</p> <p>Set a baseline for raising the standard of the childcare facilities within all of our factories.</p> <p>RHEP (Regatta Health & Education Program) to support women with family & life choices.</p>
Discrimination and Inequality	BANGLADESH	VERY HIGH	<p>Regatta policy documents signed by each supplier for discrimination.</p> <p>3rd party audit including payroll analysis, ID checks, worker interviews.</p> <p>Worker wellbeing survey completed with all factories.</p> <p>Regatta operated hotline for greivance reporting.</p> <p>NGO operated hotline for greivance reporting.</p> <p>Womens training and progression program run by Better Work initiated in 1 factory.</p> <p>International Womens Day celebrations performed within strategic partner factories.</p>
Health and Safety	BANGLADESH	VERY HIGH	<p>3rd party audit including worker interviews.</p> <p>Ongoing assessments by internal compliance teams.</p> <p>Worker wellbeing survey completed with all factories.</p>

1.4 Assessing Risk

Salient Risk	COUNTRY	RISK RATING	ACTIONS & MITIGATION
Working hours	BANGLADESH	VERY HIGH	3rd party audit including analysis of working hours and overtime records. Purchasing practices including factory loadings and monthly capacity booking with suppliers to ensure steady demand of orders rather than peaks and troughs. Capacity building programs such as Better Work to help enable more efficient production. Worker wellbeing survey completed with all factories.
Worker Representation	CHINA	VERY HIGH	Ensuring the workers within our China supply chain have access to a WCC or TU. 3rd party audit collecting details of Union & CBA. Worker wellbeing survey completed with all factories.
Worker Representation	MYANMAR	VERY HIGH	3rd party audit collecting details of any Union or Workers Committee & Collective bargaining agreement. Enrolment of all factories onto MADE in Myanmar program. Worker wellbeing survey completed with all factories. Screening of factory ownership documents.
Living Wages	BANGLADESH	VERY HIGH	3rd party audit including payroll analysis, ID checks, worker interviews. Worker wellbeing survey completed with all factories. Regatta wage analysis and checks in line with living wage data from BSCI. Womens training and progression program run by Better Work initiated in 1 factory

1.5 Mitigating Risk

1.5.0 Performance Monitoring & Measures

Despite the challenges that come our way we are committed to ensuring the work and progress we do to prevent modern slavery continues to embed into our own business and through our business partners alike. We have the following procedures and documents in place to ensure KPIs are tracked and reviewed to mitigate against our salient risks.

- Our transparency map is one way we keep check of how far we have come, and we are constantly updating and expanding this further to our 2nd, 3rd & 4th tier suppliers of packaging, embroidery, washing and printing. We enforce the same principles and ask partners to align with us. Our supply chain is constantly evolving, and so knowledge and awareness are the greatest tools for preventing exploitation.
- Our CSR business plan sets objectives and strategy over a 3-year period, and we regularly review it across the business and at the Board level regarding modern slavery. We also collect CSR business plans from our top business partners to ensure they have a plan for progression and that their objectives align into our strategy.
- Our ETI membership helps us to explore human rights issues more deeply and monitors our progress through newly introduced progression meetings.
- Our Cascale (Sustainable Apparel Coalition) membership allows us to benchmark our business against industry set criteria, in addition to our supply partners who are also in the process of enrolling onto the Higg Index to submit their own data.
- Our Salient Risk Analysis documents our own supply chain priorities, comparing the likeliness and severity of such risks occurring, and we review this regularly in line with an evolving supply chain.
- Our questionnaire and supplier policies, which are circulated to the wider supply chain of GSNFR providers, allow us to benchmark a suppliers ability to detect and mitigate modern slavery risk through policy and training, trading relationships, recruitment, and employees' working conditions and wages.
- 3rd party audit reporting, including worker interviews and document checks, and reporting through an NGO controlled hotline.
- We have a continuous presence in our factories through employees on the ground, right up from our Asia team to our owner and company MDs.

Audit through 3rd party & Internal teams

- Supplier mapping & Benchmarking
- Transparency
- Payroll Analysis and wage checks
- Worker Interview
- Worker ID checks
- Working hour checks
- Corrective Action Plans
- Remedial action delivered by 3rd party experts, NGO's or trade unions.

Goods and services not for resale (GSNFR)

- 3rd Party Questionnaire, SGS
- Payroll Analysis
- Ethics Analysis
- Risk Analysis
- Supplier Mapping & Benchmarking
- Transparency
- Supplier selection based on ethical and environmental values.

1.5.1 Beyond Audit Approach

We raise our game every year, continuously improving the way we source our garments so that workers benefit. We help our suppliers be better employers and benchmark our procedures within our supplier base with the most forward-looking companies in the UK and Europe. Whilst our auditing methods are necessary to benchmark, as a company, we cannot rely on these methods alone to prevent exploitation and respect workers' labour and human rights. The methods below summarise some of the ways we have gone beyond audit to delve deeper into our supply chain and identify root causes, systematic pressures and worker grievances.

- | | |
|-----------------------------------------------------|-------------------------------------------------------------|
| • ILO's SCORE project, China | • NGO run hotline facility for grievances |
| • MADE, Smart Myanmar, Myanmar | • Wage Analysis checks in line with living wage data (BSCI) |
| • ETI's Social Dialogue, Bangladesh | • Social Insurances Analysis |
| • Better Work Program, China | • Regatta Health & Education Program |
| • Workers Wellbeing Survey | • International Womens Day Celebrations |
| • 3rd party Training sessions to factory management | • Womens Progression and Empowerment Program |

1.5 Mitigating Risk

1.5.2 Worker Wellbeing Survey

Our worker wellbeing survey has now been rolled out to over 10,000+ workers across our supply chain. The survey, which uses a concise 14 question format devised by Sedex, aims to guide us on what areas the factories need to improve their operations to create a positive workplace environment for their workers.

We developed the survey in a digital format so that workers could access it via their mobile phones. This ensures that participants do not feel nervous that their response forms are being monitored, and we expect a more truthful response under such anonymous conditions.

Offering the survey to the workers themselves gives a clear channel to raise grievances and a direct line of communication to reduce the chance of exploitation occurring in our production sites.

After the survey our compliance managers discuss the results firstly with the worker committee group representatives to ensure they are in agreement that the results are a true reflection of the workers voice. Secondly the results are shared with the factory management and action plans are drawn up with each individual factory. We have a six-month follow-up procedure in place to review the progress each factory has made to improve its score and to ensure the workers voice has been heard.

Some of the positive actions initiated from the findings of our survey include the following.

- Worker training on grievance procedures.
- Worker training on H&S procedures.
- Introduction of worker exit interviews.
- Mid-level management training on worker dialogue.
- Introduction of worker WeChat groups for easy communication throughout the workforce.
- The introduction of weekly briefing meetings to answer any questions and get feedback from workers.
- Teambuilding events to improve worker/supervisor relationships.
- Skills training to improve production speed and efficiency.

This year, we have extended our survey to 5 factory sites maintaining positive results in all areas. The below table details the survey results to date across all 42 participating factories.

Avg Score out of 10	General	Income	Safety	Respect	Total
Bangladesh Factories	9.68	8.50	9.53	9.17	9.15
China Factories	9.55	8.98	9.58	9.39	9.36
Myanmar Factories	9.79	7.67	9.26	9.31	8.89

1.5.3 Modern Slavery Indicators and Training

Despite all the work being achieved by our teams both in the UK and overseas, we remain alert to the fact that we cannot monitor all production sites around the clock. Therefore we utilise every routine visit and in-line quality inspection of goods within each factory as an opportunity to check for indicators of modern slavery.

We worked with 3rd party specialist providers TUV this year to deliver a training program to our office team in China, including compliance managers, quality control managers and merchandisers. For those staff visiting our production sites we wanted to ensure they were equipped with knowledge and skills to spot modern slavery indicators, and any signs of forced labour. In addition to this a separate virtual training session was delivered to 53 of our Chinese suppliers.

The training focused on the ILO’s (International Labor Organisation’s) indicators of forced labour, which includes but not limited to:

- abuse and vulnerability
- retention of documents
- abusive working conditions
- excessive overtime

The sessions also highlighted case studies and typical findings specifically noted for the garment and footwear industry to ensure our team have the practical knowledge to read situations within the factories.

1.5 Mitigating Risk

1.5.4 Freedom of Association

Within our supply chain, we are committed to creating environments that are safe for the workers in our factories, respect their human rights, and promote a positive culture where workers can exercise freedom of association and collective bargaining. We fully support trade unions in negotiating on workers' behalf, and we encourage and educate our supplier partners to have the same open attitude to organised dialogue and Trade Union membership.

In our Bangladesh supply chain, we have previously worked very closely with our partner factories, as well as ETI's Social Dialogue Program, to educate both management and workers on the benefits of worker dialogue. It is now part of our factory assessment to ensure a functioning workers committee is elected, and we confirm that meeting notes are documented at each meeting. Our compliance managers share good practices and lessons learnt for our wider supply chain, and we continue to increase participation in beyond-audit programs which engage workers and improve working conditions. Consequently, an elected worker participation committee covers 98% of the workers in our Bangladesh factories, with the remaining factories having active trade unions operating on behalf of the workers.

Our focus now turns to our China supply chain where we are undergoing a project to ensure every factory we work with has either an active trade union or a worker representative in place, as well as the other mechanisms to allow worker voice.

Through the committee meetings held within our partner factories, the key issues being raised focus around:

- The working environment
- Earned leave
- Salary owed and bonus payments

Our Compliance Managers ensure that the issues raised are kept on review until resolved.

1.5.5 Grievance Mechanisms

As part of our supply partner requirements, we operate the below lines of communication, giving the workers in our supply chain a voice and access to grievance mechanisms that meet the United Nations Guiding Principles (UNGP) criteria.

- Regatta Hotline Numbers distributed to all workers
- 3rd party NGO Hotline active in selected factories
- Worker Interviews performed by 3rd party during annual audits
- Regatta Worker Wellbeing Survey in all factories
- Grievance Boxes in all factories
- Regatta Health and Education Program offers a safe space for women workers to build dialogue.

To support the above we have organised online webinar training sessions through 3rd party providers SGS to all of our Chinese suppliers, assisting them on how to establish and effectively maintain worker grievance mechanisms within their own operations.

Partnerships

- Better Work China
- Ethical Trade Initiative
- Made in Myanmar
- NGO Bangladesh

In our audits and discussions with workers and factory management, we particularly check for the following modern slavery indicators:

- Withholding wages.
- Ensuring workers are not in a position where they can never pay off loans to agents and factories
- Exploiting child labour
- Excessive overtime, which is not voluntarily
- Not letting workers out of the factory and withholding their IDs
- Deception about pay and working conditions – no contract in place or the contract is ambiguous.
- Gender-related issues and the gender pay gap
- Connections to the Xinjiang Uyghur Autonomous Region

Extra Measures

- Within our third-party audit, we ensure all workers have access to representation in the workplace, details of the collective bargaining agreements are recorded, and checks are made to ensure any worker representatives are not discriminated against in the workplace.
- We monitor wages within the factories we work with and are taking steps to bridge the living wage gap.

1.6 Actions Taken in 2023/4

Supply Chain Transparency

- Continuation of internal assessment & 3rd party auditing process, including payroll analysis, ID checks, and worker interviews collecting details of any Union or WCC & CBA.
- Extending our worker's wellbeing survey to 5 further factories, (total 42 factories to date) and continuing to analyse the results, discussing any findings with factory management teams and putting action plans in place.
- All China factories continue to be monitored on an ongoing basis against the 5 social insurances offered. Workers are trained to promote registration into the schemes.
- Continuation of our payroll analysis, which compares wages with the legal minimum wage and the national/regional living wage data as BSCI guidance. We also continue to monitor, maintain, and, where possible, improve the wages status with our supply partners.
- We have also increased our roll out to a total of 75 factories enrolled with the Higg Index as part of our membership with SAC, using the Facilities Environmental Module (FEM) to report and review their carbon footprint and plan to continue the rollout within 2024

Active Management and Remediation

- Each supplier signed updated Regatta policy documents for unauthorised subcontracting, prison labour, child labour, the XUAR sourcing policy, and modern slavery. An additional foreign and metal objects policy and procedure was introduced in early 2024.
- Penalties were added to the Regatta group policy for any instances of modern slavery or subcontracting, with serious cases ending in termination.
- All Myanmar factories continue in the MADE in Myanmar program.

Training and Awareness

- Forced labour and modern slavery indicators training performed in China to both our Internal team and 53 direct suppliers.
- Women's training and progression program initiated by Better Work started in 1 factory Bangladesh.
- International Women's Day celebrations are performed within strategic partner factories.

Collaboration

- Continuous review with our top 10 supply partners of their own CSR business plans created in 2023 to maintain alignment with Regatta's overall CRS objectives.
- The group has continued supporting the Alzheimer's Society with its sponsored walk activities, providing further T-shirts and kits for the Trek26 events across the UK.
- Continued funding of our Savar school in Bangladesh that we have supported for 13 years, providing education for 260 children aged 4-14 in a safe and exciting environment. The school offers balanced meals, school uniforms, teacher training, a library, colouring books, and computer access. We also run the Regatta scholarship program, providing extra tuition to ensure final-year students receive the best possible education and start in life.



1.7 Focus Areas

1.7.0 Objective setting for 2024/5

We look forward to the next 12 months and outline the below focus points to work towards across our business plan for 2024/25:

Due Diligence

- Continue to monitor our supplier base through audit assessments, and review and update our salient risk country sourcing analysis.
- Continue our memberships with ETI, Cascale (SAC), and Better Cotton.
- Launch our scorecard analysis across our GSNFR network.

Beyond Audit

- Complete 10 further factories Worker Wellbeing digital surveys.
- Establish 1 fair price shop supporting workers with bridging the living wage gap in Bangladesh.
- Target every worker in our China supply chain to have access to a worker representative or trade union.

Transparency

- Publish our new Responsibility pages on Regatta.com website including our tier 1 & 2 sourcing map.
- Share a number of our factories on the Open Supplier Hub database in line with the minimum requirements of the ETI Corporate Transparency Framework.
- Internally assess a further 10 3rd tier facilities across the Regatta group supply base.

Gender Representation

- Enrol 3 more factories into the Gears Better Work program in Bangladesh to educate & increase the number of women in management positions.
- Introduce a Regatta gold standard for childcare facilities in our factories in Bangladesh to promote retention of women in the workforce.

Holistic Work Environment

- 100% suppliers to have at least 1 factory enrolled within Higg Index and complete FEM self-assessment by 2025.
- Updating our sustainability reports and publishing on all brands websites within the group.

1.

2

3

4

5



**REGATTA
GROUP**