

# SEASALT

## CORNWALL

## SLAVERY & HUMAN TRAFFICKING STATEMENT

Since we were founded in 1981, Seasalt has been committed to doing business responsibly. We craft beautiful clothing that inspires and endures, while making the best choices for our people and the planet.

Part of this important work is ensuring there is no forced labour or human trafficking in our business and supply chains.

This statement sets out the steps we take to prevent modern slavery and human trafficking in the production of our products and business operations.

### ABOUT SEASALT

Seasalt is a clothing brand and retailer based in Cornwall in the UK. We have 71 stores, nearly 500 wholesale customers in the UK, Europe, the USA and New Zealand and an online store that sells our products all over the world.

Our head office is in Falmouth, Cornwall, where our creative teams design and develop Seasalt's distinctive products. It is also home to our buying and merchandising, marketing and communications, property, administration and development teams. Seasalt's central distribution centre, customer services and finance teams are located in Redruth, Cornwall.

Seasalt manufactures and imports its products from supply chains in the following countries: India, China, Pakistan, Vietnam, Portugal, Spain, Italy, Turkey, Bulgaria and the UK.

### WORKING WITH SUPPLIERS THAT UPHOLD OUR STANDARDS

We understand that we are only as good as the partners we work with. To ensure our ethical standards are upheld in every part of the supply chain, we require all our contracted partners and suppliers to sign and comply with our Ethical Standards Commitment Statement.

This is based on the Ethical Trading Initiative (ETI) Base Code, an internationally recognised code of labour practice designed to protect workers' rights. This code covers issues including forced labour, working conditions, living wages, child labour and discrimination.

Seasalt is a member of the ETI, which places us at the forefront of best practice for managing our supply chain. ETI memberships allows us to become aware of potential issues as soon as they arise and supports us in investigating, challenging and remedying any risks we may find in our supply chain.

Seasalt's ethical standards policies clearly state that forced labour and lack of freedom of association are not acceptable. We work closely with our partners in the supply chain, so we can resolve any issues that arise together.

## TRANSPARENCY IN THE SUPPLY CHAIN

In addition to signing Seasalt's supplier contract and Ethical Standards Commitment Statement, all our suppliers are required to join Sedex, the Supplier Ethical Data Exchange.

Sedex is a not-for-profit, membership organisation dedicated to improving responsible and ethical business practices in global supply chains.

Our suppliers are required to complete self-assessment ethical workbooks on a regular basis and share copies of any external, independent audits as well as their own policies and procedures, relating to forced labour and freedom of association.

Sedex works with many brands and high street retailers and is uniquely placed to support and advise us and our suppliers, providing a global view on the ethical challenges of manufacturing around the world.

## DUE DILIGENCE & AUDITING

We carry out extensive due diligence and auditing of our suppliers. The results of these investigations directly influence our supplier and sourcing strategy each season and are key to ensuring we make the best products in the most responsible way possible.

Here are some of the ways we improve visibility in our supply chain.

### **1. Self-Assessment**

We collect information via the Sedex Self-Assessment Questionnaire that could indicate forced or bonded labour (such as the holding of identity documents, wage deductions made, etc.) The self-assessment is a free, four-pillar, ethical trade audit system, created by Sedex to help businesses and their suppliers capture information. Any issues can then be addressed, often via a third-party audit, and managed by our in-house Compliance & Ethics team.

### **2. Audits**

We use independently conducted audits to review practices within our supplier's facilities. All of our Direct supplier (Tier 1 suppliers) are required to provide an independent Audit. The Audits requested can be SMETA - Sedex Members Ethical Trade Audit, but we accept audits from other companies such as Amfori BSCI and WRAP and include all of the content of the self-assessments independently verified by the auditor.

### **3. Risk Assessments**

Sedex works with global risk analytics experts and has a data base that references hundreds of indices - from human rights violations to political risk factors - to flag country and industry risk factors.

### **4. Reporting Tools**

Using the Sedex platform we are able to monitor trends across the supply chain and look for possible signs of self-assessment or audit non-compliance that could indicate forced or bonded labour.

### **5. A Dedicated Compliance and Ethics Team**

Our in-house team, reporting to our Director of Product Compliance and Ethics, reviews all audits and self-assessments and analyses our existing supply chain and any new suppliers we start working with. The compliance and ethics team provides support and ETI training for our suppliers and supports suppliers to resolve any challenges they face when implementing best practice through the supply chain. The team receives training from the ETI, which they cascade to the wider head office, including our board of directors. This ensures all areas of our business that work with our supply chain have the necessary resource to manage best practice. Our compliance and ethics team creates a monthly report for the board on supply chain risks, including likelihood of risk of forced labour or human trafficking. We use this to populate our business risk register where the risk is considered appropriate.

### **6. Supplier Visits**

In normal circumstances specially trained members of the Seasalt team regularly visit our suppliers to review and assess their factories, working conditions and employees to check the facilities against Audit contents. Any issues can then be addressed directly with our suppliers. Travel to our suppliers has recently been disrupted due to Covid -19 travel restrictions. We are committed to visiting our suppliers as soon as it is safe to do so.

### **7. Seasalt Agents**

Where we don't work directly with our suppliers we have agents who are our eyes and ears on the ground. Our agents visit our suppliers regularly (at least once a week or more when our products are being made) and provide us with an honest appraisal of the situation locally. Where CV-19 restrictions are in place our agents follow WHO guidance, social distancing guidelines and any local restrictions relevant in the areas where they are working.

## **OUR ONGOING COMMITMENT, OUR PROGRESS SO FAR:**

Supply chains consist of several tiers. We are committed to mapping and assessing our supply chain to gain a clear picture of any challenges that could be hidden regarding forced labour and human trafficking.

### **Progress Update: Mapping Our Supply Chain Tier 1:**

We have a clear, fully mapped, view of our Tier 1 suppliers partners who we work with directly. All independent audits and required commitments are checked by our in-house Compliance & Ethics team. The full process detailed above is in place to support the compliance of our Tier 1 supply partners.

We have confidence in our Tier 1 suppliers. We are committed to working in partnership to provide clarity and support on best practice in our Tier 2 supply chain (those who supply our Tier 1 supply chain partners, such as print mills, and fabric mills.)

### **Progress Update: Mapping Our Supply Chain Tier 2:**

We have started to map our Tier 2 suppliers to enable us to understand if there is any risk of forced labour or human trafficking. In 2019, we identified 167 Tier 2 suppliers across our global supply chain.

The team have risk assessed the supply chain against global risks, the Sedex risk assessment tool and information provided by the ETI and other NGOs. The first key focus for Seasalt is identifying if there is risk of slavery and human trafficking in our Tier 2 suppliers in China. This is informed by the concerning reports of bonded or forced labour in the Xinjiang area of China and the persecution of the Uyghur ethnic minority.

### **China Mapping To Date:**

We have identified that we have no manufacture of goods in our Tier 1 supply chain in the areas identified as high risk. We have provided information about the issues to our Tier 1 suppliers, discussed it with them and offered support. We are aware that forced labour may not just be present in the risk area of Xinjiang and that people could be moved and so have ensured that our Tier 1 suppliers do not have any evidence of large groups of migratory ethnic minorities in any of their facilities.

### **Work In Progress And Next Steps:**

With support of our Tier 1 suppliers we will now investigate our Tier 2 supplier's as well as mapping the origin of any cotton fibres to ensure they are not grown or spun in the areas of high risk.

Progress in mapping our Tier 2 suppliers has been set back about four months by the Covid-19 pandemic. We have re-established our time scale for gathering all information required and are in the process of acquiring a multifaceted supplier data portal to help us manage the view of all suppliers risks. Our next focus will be on Tier 2 suppliers in India, with work starting in July 2021.

If Seasalt identifies any risks or non compliances to the ETI base code anywhere in our supply chain we will resolve it by working in partnership with our Tier 1 supply partners, the ETI and utilising the wider ETI community to tackle and remedy any non-compliances.

We will update our progress in our 2022 slavery statement and in our annual sustainability report.

Seasalt recognises its responsibility to every person involved in our business and the manufacture of our products. Forced labour and human trafficking are global issues that are often difficult to detect but we are committed to working closely with suppliers to uphold our ethical standards and get the most honest view of our supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Seasalt slavery and human trafficking statement for the financial year ending April 2022. It was approved by the board on 10<sup>th</sup> December 2020.

Signed by:

18<sup>th</sup> January 2021



Paul Hayes  
Chief Executive Officer

*Review date: April 2022*