

EQUIP

OUTDOOR TECHNOLOGIES UK LTD



June 2024

Responsible Business Conduct Policy

Purpose of this document

The Equip Responsible Business Conduct (RBC) Policy is a comprehensive framework that guides Equip Outdoor Technologies' (Equip's) operations, supply chain practices and relationships. The policy underscores the Equip's commitment to conducting business with integrity, honesty, and transparency while ensuring compliance with all applicable laws and regulations. It encompasses topics such as environmental sustainability, respect for human rights, responsible sourcing, health and safety standards, and fostering diversity and inclusion.

By integrating these principles into our day-to-day operations, Equip aims to create a culture of ethical business practices that is evident throughout our workforce and supply chain, promoting trust and accountability at every level of the organisation.

The policy communicates these principles to stakeholders throughout the value chain, including employees, manufacturing partners and partners, consumers, and the communities where Equip's products are used. It outlines what stakeholders can expect from Equip and, where relevant, what Equip expects from them.

The RBC policy is aligned with international frameworks including the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#), the UN Guiding Principles on Business and Human Rights (UNGPs), and guidance from Fair Wear Foundation. It underscores our commitment to conducting comprehensive due diligence and embedding responsible business practices into our corporate structure and management systems.

The policy is reviewed annually and republished when updates are identified.

The policy is published online and communicated directly to partners and employees.

Section 1: Mission and principles

Equip's mission is to inspire adventure. We do this by building technical products that last, whilst driving industry-wide change to reduce our impact and protect our planet, respecting human rights, and increasing participation in the outdoors. By acting as a responsible business, we have a positive impact on the lives of our employees, manufacturing and retail partners, consumers, and communities where our products are made and used.

"It's our role as business to influence change for the better"
- Matt Gowar, Equip Executive Chair and Owner

Our actions contribute to the realisation of UN Sustainable Development Goals. All the goals are important, but we believe the five areas where we can have the biggest influence are:

- Goal 3:** Good health and well-being
- Goal 5:** Gender equality
- Goal 8:** Decent work and economic growth
- Goal 12:** Responsible consumption and production
- Goal 13:** Climate action

For Equip, conducting business responsibly is part of our DNA and always has been. We drive this through four principles:

Product | Creating more sustainable products

Equip has always been committed to developing technical products that are fit for purpose. We have care and repair solutions and offer lifetime warranties. We work with the best quality materials sourced from reputable suppliers who are willing to work towards more sustainable solutions. We are committed to minimising the end-of-life impact through design, innovation, and alternative ownership models.

Planet | Minimising environmental impacts

The climate crisis requires immediate action from actors across society, including companies. Equip fully embraces this responsibility and is committed to minimising the environmental impacts of our business operations.

We have set ambitious science-based greenhouse gas reduction targets for all scopes in line with limiting global warming to 1.5°C above pre-industrial levels. Equip is committed to promoting environmental best practices across our supply chain and industry, and adheres to all applicable environmental legislation.

Partner | Respecting human rights throughout our value chain

Equip is committed to respecting and upholding human rights as established in the UN International Bill of Human Rights and the values upheld in the UN Guiding Principles on Business and Human Rights. We facilitate pathways for remedy when violations arise in our value chain by engaging with our manufacturing partners and other relevant stakeholders.

This obligation extends to any situation where our actions could lead to, contribute to, or be associated with infringements, encompassing both our immediate activities and those within our supply chains. Recognising the heightened vulnerability to human rights contraventions in the garment sector, due to high production demands and the prevalence of lower-skilled labour, we take comprehensive measures to mitigate potential risks.

Please refer to our complete [Human Rights Due Diligence Policy](#) to understand how Equip addresses and rectifies human rights violations within our supply chain.

People | Promoting diversity and inclusion

The outdoors is for everyone. Equip is committed to playing our role in supporting access to the outdoors for underrepresented groups.

Throughout Equip's business, operations, communities, and partnerships we will strive to remove barriers to access and increase opportunities for individuals to feel welcome and encouraged to benefit from the outdoor environment.

Section 2: Responsibilities and expectations

Translating our principles into practice, Equip embraces ten core responsibilities that are at the centre of everything we do. We expect the same high standards as we hold ourselves to from our employees, manufacturing partners, retail partners and other stakeholders. Partner expectations are outlined below alongside each relevant Equip core responsibility.

1. Respect the rights of our employees

Equip will:

- Strive to be a responsible and fair employer by respecting our employees' rights, providing equal opportunities, and having a zero-tolerance for discrimination.
- Provide safe and healthy workplaces and actively support our employees' mental health needs.

Employees will:

- Treat colleagues fairly and with respect, following Equip's Anti-Bullying & Harassment Policy.

2. Champion responsible purchasing practices

Equip will:

- Seek to build mutually beneficial partnerships with carefully selected manufacturing partners that share our values. We maintain long-term relationships with these partners allowing them to invest in both the individuals that work there and the facilities they provide.
- Work closely with our partners to collaboratively plan production. By providing seasonal forecasts, long lead times, and spreading production across the year, we minimise the pressure on our partners and their workers.
- Assess and address responsible purchasing practices in line with the Common Framework for Responsible Purchasing Practices (CFRPP).
- Commit to fair payment terms. As standard, we pay for finished goods upon receiving the bill of lading with no delay in payment.

Retail partners will:

- Facilitate responsible purchasing practices by placing orders on time and avoiding late changes or cancellations.

3. Conduct human rights due diligence

Equip will:

- Follow steps taken in our HRDD policy and Respect human rights, as outlined in the Universal Declaration of Human Rights and other international standards.
- Routinely conduct human rights due diligence to prevent or mitigate actual and potential adverse human rights impacts and to remediate any findings.
- Ensure due diligence addresses all relevant human rights impacts, paying particular attention to the risk of forced labour, child labour, excessive overtime, homeworking, gender inequality, below minimum wage payment, and unsafe working conditions.
- Ensure the prohibition of forced and child labour throughout our supply chain.
- Conduct a risk-scoping exercise annually to address and identify harms in our supply chain. This is based on risks identified across sectors, products, countries, business/ sourcing models, and factories outlined in our Due Diligence Policy below.
- Commit to achieving gender equality and strive to follow a gender-responsive due diligence process. This ensures that Equip will systematically consider gender when assessing risks.
- Engage and cooperate with other Fair Wear brands and non-member brands in risk identification, prevention, mitigation, and remediation.

Employees will:

- Respect human rights when carrying out their duties, particularly when making decisions that affect the workers in our supply chains.

Manufacturing partners will:

- Sign and adhere to all principles outlined in the Equip Supplier Manual.
- Routinely provide us with data regarding all production locations including subcontractors, workforce demographics, and production volumes.
- Endorse Fair Wear's Code of Labour Practices and provide workers with information about their rights (Tier-1 only). Display and evidence the CoLP poster in the factory and share the CoLP poster with their subcontractors to display.
- Share worker committee minutes with Equip to develop understanding of social dialogue in the supply chain.
- Be audited by a third party at least every two years to demonstrate they are respecting human rights. (Tier-1 only).
- Select suppliers that share our values and will uphold the standards we expect.
- Not utilise subcontractors, homeworkers, or third parties to produce Equip products without written approval and authorisation from Equip.
- Not carry out forced or child labour in any circumstances as outlined in the Fair Wear CoLP.
- Conduct due diligence on their own operations and their suppliers to ensure they are upholding and respecting human rights.

Retail partners will:

- Increase consumers' awareness of initiatives seeking to improve working conditions in garment supply chains, such as the Fair Wear Foundation.
- Ensure that necessary actions are taken to carry out due diligence in their value chain while respecting human rights.

4. Support manufacturing partners to improve working conditions**Equip will:**

- Work closely with our partners to enhance working conditions in our supply chains. We provide support to prevent possible negative impacts or rectify actual ones by creating corrective action plans that tackle root causes. Additionally, we maintain regular communication with our partners to ensure transparency and accountability.
- Recognise that social dialogue is critical to achieving fair and safe working conditions, we provide training to the workers in our supply chain to encourage an environment where risks and issues are addressed internally. We also encourage manufacturing partners to include workers in decision-making.
- Commit to urgently addressing any identified violations of freedom of association in our supply chain, and address any complaint received through the Fair Wear.

Manufacturing partners will:

- Follow the principle of continuous improvement and remediate issues identified or reported.
- Communicate and actively respond to due diligence requests from Equip.
- Cooperate in the remediation of due diligence violations.
- Engage with Fair Wear's Workplace Education Programmes to promote awareness of rights and social dialogue in the factory (Tier-1 only).
- Commit to improve and promote gender equality throughout their sites.

5. Provide access to remedy in our operations and supply chains**Equip will:**

- Ensure workers in our supply chains have access to remedy through the Fair Wear Complaints Hotline. This does not replace internal grievance mechanisms but acts as a safety net that workers can call upon if internal mechanisms fail.
- Commit to meaningful engagement with stakeholders via Fair Wear's in-country teams when complaints are submitted.
- Ensure all Equip employees have access to our internal grievance mechanism to raise concerns or report wrongdoing. Equip's Whistleblowing Policy provides a further mechanism to report wrongdoing.

Employees will:

- Follow Equip's Whistleblowing Policy and report any fraud, misconduct, or wrongdoing by Equip employees.

Manufacturing partners will:

- Provide an accessible and trusted grievance mechanism.
- Inform their workers about Fair Wear's Complaints Hotline and fully cooperate with the complaint process to remedy any issues (Tier-1 only).
- Follow the complaints procedure outlined in the Equip Supplier Manual.

6. Minimise the environmental impacts of our products**Equip will:**

- Actively design products to have lower environmental impacts over their entire lifecycle. Durability, repairability, and circularity are critical to our design process.
- Operate in-house service centres in many of the countries where our products are used. High-quality repair and wash service helps our customers to extend the lifecycle of their kit.
- Maintain strict chemical requirements for all products and regularly test to ensure compliance. Equip has committed to phasing out PFAS (fluorocarbons) from all our products by AW25.
- Guide our partners to actively reduce their carbon emissions and promote the use of sustainable energy in our manufacturing partners' sites.

Employees will:

- Contribute to Equip's environmental strategy by identifying and championing innovative solutions to reduce our environmental impacts.
- Consider the environmental impact of their travel choices and select the lowest impact option available for their expeditions.
- Seek to wash, care and repair products to prolong life and reduce impact. Plus seek opportunities to donate or identify recycling options and avoid disposing of unused or end of life product.

Retail partners will:

- Educate consumers on how to maintain their kit and encourage them to repair rather than replace when required.
- Champion products with reduced environmental impacts transparently and accurately.

Equip sponsored athletes and ambassadors will:

- Consider the environmental impact of their travel choices and select the lowest impact option available for their expeditions.
- Document and promptly share all travel-related information about Equip-sponsored trips with the CSR team and Athlete lead to facilitate annual carbon accounting for Equip.
- Seek to wash, care and repair products to prolong life and reduce impact. Plus seek opportunities to donate or identify recycling options and avoid disposing of unused or end of life product.

7. Support manufacturing partners to reduce environmental impacts**Equip will:**

- Work closely with our manufacturing partners to minimise our products' environmental impacts which occur during manufacturing.
- Encourage partners to identify technology to reduce their impacts, support in measuring and in installing the infrastructure needed to reduce their reliance on fossil fuels.
- Select partners partially on their ability to demonstrate environmental best practices and will continue to support partners to further reduce their impacts where possible.

Manufacturing partners will:

- Comply with all relevant environmental regulations.
- Consider the environmental implications when making changes to their facilities or operating procedures.
- Adhere to the policies we provide and follow what is outlined in the supplier manual.

8. Increase participation in the outdoors

Equip will:

- Support grassroots groups that provide access and remove barriers to entry for underrepresented groups.
- Produce representative imagery from participants and athletes from underrepresented groups.
- Drive increased diversity and inclusion when supporting events, selecting partners, seeking business support, and designing products and colour palettes.

Employees will:

- Apply Equip's Values and Behaviours (Synergy, Determination, Ingenuity, Integrity and Ambition) as our guide to how we wish to behave and engage others in outdoor participation.

Retail partners will:

- Utilise assets to actively engage under-representative groups.
- Encourage participation for underrepresented groups.

9. Conduct business in an honest and ethical manner

Equip will:

- Commit to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

Employees will:

- Act in accordance with Equip's Anti-Corruption and Bribery Policy to ensure we continue to do business in an honest and ethical manner.

Manufacturing and retail partners will:

- Act professionally, fairly and with integrity. Taking a zero-tolerance approach to bribery and corruption.

Equip sponsored athletes and ambassadors will:

- Act professionally, fairly and with integrity.

10. Drive industry-wide change through cooperation

Equip will:

- Drive cooperation and collaboration throughout our value chain, to facilitate systemic change to industry-wide issues.
- Commit to working with other companies either directly or through industry groups and associations to find common solutions to global and industry challenges.
- Commit to coordinating our remediation activities with manufacturing partners that we share with other outdoor companies.

Retail partners will:

- Engage with Equip and other brands to drive industry change through cooperation and collaboration with reputable industry groups.
- Support in the use of industry-led platforms and initiatives.

Section 3: Policy integration

While the principles outlined within this document are not exhaustive, they provide the principles by which Equip will operate with key partners. These responsibilities and expectations are integrated into our business practice through a range of company policies. Critical for integration into our supply chain procedures is our Human Rights Due Diligence Policy and Supplier Manuals.

Equip Human Rights Due Diligence Policy: Establishes standard operating procedures for all stages of our sourcing strategy, including manufacturing partner selection, partner onboarding, responsible purchasing practices, ongoing partner monitoring, and responsible exit. The policy assigns key responsibilities to Senior Management, our Buying, Development, Production, and CSR teams.

Equip Supplier Manuals: Communicates Equip's requirements and standard operating procedures to Tier 1 (final assembly) and Tier 2 (materials) suppliers. The manuals include legal, social, environmental, and ethical business practice requirements applicable to each tier. Suppliers are required to sign the updated manuals annually.

This policy has been approved by Equip Outdoor Technologies Board of Directors.

Equip reserves the right to amend this policy in the future.

Signed by

Matthew Gowar

Equip Outdoor Technologies UK Ltd Executive Chair and Owner

Dated: 28th June 2024