



TOG24

Modern Slavery Statement

2022/2023

About Us

TOG24 was founded in 1958 in the Spen Valley, Yorkshire. Our name, TOG24 stands for “Truth Over Glory Everyday”. We’re not about the elite “Glory” side of the outdoors; planting flags on mountains or skiing down sheer ice walls, we’re about the “True” outdoors that everybody can be involved with; walking with friends to the pub or skiing with the family to a bar.

TOG24 are a product of our location; we try to do things right, we don’t believe the marketing hype that’s out there and everything we make represents quality and value for your hard-earned pound.

TOG24 designs and develops outdoor clothing for everyday life from our offices in Heckmondwike, West Yorkshire, our manufacturing takes place internationally, with trusted nominated suppliers.

Our Vision

To be the outdoor brand for everyone

Our Purpose

To create outdoor clothing for everyday life

Our Values

We believe in doing what we say

We believe in value for money

We believe in being inclusive





Introduction

We are pleased to outline our business and supply chains' modern slavery prevention activities within this statement. We recognise that the fashion and textile industry is a high-risk area due to the complexity of the supply chains, but we have a zero-tolerance commitment to modern slavery.

This is the second statement for TOG24, in reference to the financial year June 2022 – June 2023.

Modern Slavery involves one person depriving another of their liberty in order to exploit them for personal or commercial gain (UN Guiding Principles on Human Rights).

Forms of modern slavery can be identified as follows:

- Human trafficking: a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion.
- Forced labour: any work or services which people are not doing voluntarily, and under a threat of some form of punishment.
- Bonded labour: demanded labour as a means of repayment for a debt or a loan.
- Slavery: a situation where a person exercises (perceived) power of ownership over another person.

Organisational Structure & Supply Chain

TOG24's Head Office and Warehouse are based in Heckmondwike, West Yorkshire, with 25 retail stores and 49 retail concessions throughout the UK. TOG24 employs 298 people, all employees are on full or part time contracts with valid rights to work in the UK, this is checked prior to employment commencing. TOG24 also partners with third party retailers; Next, Very, Zalando, Amazon, Studio & JD Williams.

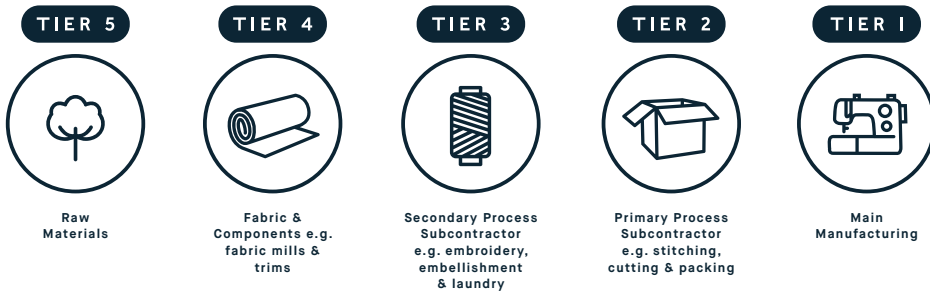
For the year June 2022 - June 2023 our manufacturing took place internationally within 9 countries – China, Rwanda, Myanmar, Cambodia, Sri Lanka, Vietnam, India, Italy and Turkey.



Our Supply Chain cont.

Within these countries of manufacturing, we have 25 Tier 1 suppliers using 36 approved factories defined as our main manufacturing sites. At the time of manufacturing for AW22 and SS23 collections within the 2022/2023 year we had 100% of audits valid and in date.

Our onboarding processes and procedures for all new factories and suppliers ensures that we have full visibility and transparency of any new partners added to our supply chain. We request that suppliers provide an up-to-date audit with an acceptable result, we ask that the suppliers fill in our ‘new supplier form’ which provides us with a detailed understanding of the factories in use by that supplier, and finally the supplier is required to read and sign our supplier manual which outlines the fundamentals of the ETI Base Code and required working practice.



For the current financial year ending June 2023 TOG24 has focused on improving the internal transparency of our Tier 1, 2 and 3 suppliers which we have now successfully mapped. The majority of suppliers confirmed to us that their Tier 1, 2 and 3 processes were carried out in their Tier 1 factory, only a small number of suppliers declared further sites for which we obtained all relevant audit certificates for.

Tier	Process	Status	Target
Tier 1	Main Manufacturing	100% mapped	Complete
Tier 2	Primary Process Subcontractor E.g. stitching, cutting, packing	100% mapped	Complete
Tier 3	Secondary Process Subcontractor E.g. embroidery, embellishment, laundry	100% mapped	Complete
Tier 4	Fabrics & Components E.g. fabric mills & trims	Incomplete	June 2024
Tier 5	Raw Materials	Incomplete	June 2030

Our Supply Chain cont.



Our manufacturing takes place in 9 different countries around the World



We work with 25 Tier 1 suppliers & manufacturing takes place in 36 different factories



We started working with 7 new suppliers in the last year as we continue to expand our collections



**9752 Tier One workers (34% Male, 66% Female)
572 Tier Two workers (22% Male, 78% Female)**



**We have 25 retail stores & 49 retail concessions
TOG24 also employs 298 people & 4 whippets!**



All suppliers sourcing cotton for AW22 & SS23 confirmed that no cotton was sourced from the Xinjiang region

Policies & Due Diligence

Our supply chain policies are aligned to the ETI Base Code which covers the following key 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

Each of our suppliers agree to these principles by signing our supplier manual, which is renewed annually. Failure to meet these minimum requirements can result in TOG24 terminating the partnership.

At TOG24, Corporate Social Responsibility (CSR) within the supply chain is reviewed by the product design and development team. The team is dedicated to reviewing all 3rd Party audits, factory visits when possible, maintaining close working relationships; all whilst supporting working together in partnership and collaboratively.

Identifying and obtaining transparency in the supply chain is essential to understanding and combating the risks of modern slavery.

When TOG24 starts working with a supplier they are required to complete a new supplier form, which asks the supplier to declare all their factory information and agree to the principles of the ETI base code.

TOG24 has processes in place to ensure that all Tier 1, 2 and 3 suppliers are audited against local law and ETI Base Code by an independent 3rd party auditor such as BSCI/SEDEX/SMETA. All suppliers must ensure that non-compliances on the audit are corrected in the time frame provided on the Corrective Action Plan (CAP). The supplier must have an appropriate audit that is in date before any orders will be placed with them. Suppliers are also required to declare which Tier 1, 2 and 3 factories are being used for each SKU when orders are placed.

TOG24 aims to build long term partnerships with suppliers and are now working towards better transparency at Tier 4 level suppliers. Investment in the development of a track and trace platform will allow us to actively monitor our supply chain more closely going forward.

Policies & Due Diligence cont.

Our HR Team oversees CSR within our UK offices, warehouses, and stores to ensure employees have a valid right to work in the UK. Successful applicants are required to provide original photographic identification to the recruiting manager from the list of acceptable documentation, or alternatively a share code to allow an online check to be completed. A record of this check is sent to HR and retained on the employee's file. Follow up checks are not completed, unless an employee's right to work in the UK is time limited. In this case the follow up check would be completed by HR at the appropriate time.

We also have the following comprehensive policies to be able to protect our employees:

1. Equality Policy
2. Whistle blowing Policy
3. Recruitment and Selection Policy

COVID – 19

Our consistent approach to the impacts of COVID-19 is to support our suppliers. In the last year we have maintained a flexible approach to unforeseen delays because of localised lock downs which are still occurring throughout some provinces in China.

We haven't made any alterations to our product ordering from China as we value and support our partnerships with the suppliers based there.

Risk Assessment

Risk identified	Who is affected?	Action
<p>Myanmar are suffering from political unrest, high levels of poverty and are susceptible to natural disasters due to their lengthy coastlines.</p>	<p>The population of Myanmar.</p>	<p>Despite there being high risk with Myanmar production, we shouldn't remove any existing business we have there as this would only contribute to poverty levels in the country. By manufacturing in Myanmar, we would be supporting workers and allowing people to earn a wage, instead we need to make sure we are doing as much as we possibly can for our due diligence by not placing any orders without full factory audits and keeping track of current affairs.</p> <p>Our partners in Myanmar are foreign owned and do not have any direct connection with the Myanmar military or authority. The factory has been visited by our supply partner and all audits meet requirements and are in date.</p> <p>We will always continue to monitor the situation in Myanmar.</p>
<p>Sri Lanka are facing a cost-of-living crisis and the country is struggling financially. There has been increasing amounts of political protests.</p>	<p>The Population of Sri Lanka.</p>	<p>A cost-of-living crisis poses threats within modern slavery as it means individuals often turn to finding alternative forms of finance which isn't always legal, ethical, or safe.</p> <p>We are supporting our suppliers at this difficult time and where requested have made payments for goods earlier than the agreed terms to aid their cash flow.</p>

Risk Assessment cont.

Risk identified	Who is affected?	Action
<p>China have seen continuous localised lock downs due to COVID-19 and therefore have seen reduced staff levels and/or factory closures.</p>	<p>The population of China.</p>	<p>China have faced continuous localised lock downs because of COVID-19, we have supported our suppliers by offering flexibility to unforeseen delays to manufacturing when factories have been working with reduced staff levels.</p> <p>We believe we have a responsibility to support our supplier partnerships which is why we haven't cancelled any orders but worked with our suppliers to balance our lead-times and reduce the pressure on factories at this difficult time.</p>
<p>The war between Russia and Ukraine commencing in February 2022 has seen a reduced supply of oil and gas from Russia. Demand has exceeded supply which has pushed prices to a record high.</p> <p>The war has also impacted the amount of grain available which has affected food prices.</p> <p>There have been reports of exploitation of refugees that are fleeing Ukraine and have been used in bonded slavery for illegal activities.</p>	<p>Worldwide.</p>	<p>Inflation always poses risks to supply chains as individuals or businesses look to find ways to reduce the associated costs, this can often mean that labour is not being paid fairly or on time. It is important that we continue to monitor audits to ensure that workers are receiving fair remuneration. Ensuring that we are paying suppliers on time and negotiating costs fairly.</p> <p>We are implementing a fair remuneration policy to help suppliers understand our zero tolerance to workers not being paid fairly or on time.</p> <p>The risk to exploitation of Ukrainian Refugees should be a lower risk in Asian territories but we will continue to monitor the hiring processes of workers.</p>

Prevention & Mitigation

We aim to continuously improve our efforts to prevent Modern Slavery and had set the below targets for year 2022-2023, please see below our progress updates.

Structure, Business & Supply Chain Transparency

- We intend to map our Tier 3 supplier sites by June 2023 – *Completed, we contacted all suppliers and requested that they declare which factories were being used for these processes and we have now collected all site information and added to our records.*
- We will create an action plan to map Tier 4 and 5 supplier sites by June 2024 – *After initial discussions with our suppliers we understand that the Tier 4 supply base is very extensive. We are still hoping to achieve Tier 4 tracking by 2024 and Tier 5 by 2030.*
- We will review and aim to apply to join to relevant certified associations that supports the people and workers within our supply chain – *We are continuing to review joining certified associations. We are mindful of the current cost of living crisis and want to avoid adding costs to our sourcing and want to avoid increasing our retail prices. We will continue to short-list relevant certified associations with an aim to becoming members at the right time.*
- Review further opportunities to work with sustainable accredited materials where the purchase of materials supports the workers and their working conditions – *We continue to review our fabric usage and have now published our first Sustainability Report as a company, where we are implementing a clear action plan to ensure that this area of the business is continually being reviewed and improved.*
- We will be creating country fact files where TOG24 manufacturing takes place, so we have a thorough understanding of Social, Political, Cultural, Environmental and Ethical issues within each country. With more knowledge and understanding of each area there is more opportunity to identify risks and improve our due diligence. This work will provide the basis for training material amongst our team. – *Country fact files have been created for each of our current sourcing countries and potential sourcing countries. This has allowed us to make informed decisions about which suppliers and territories to produce with. It has also helped us identify risks and carry out risk assessments to ensure we are aware and able to prevent as many risks as possible before sourcing occurs. We will continue to monitor each country to help support and protect our supply chain.*

Prevention & Mitigation cont.

Policies

- We will conduct an annual review of our supplier manual and ensure our ethical and compliance procedures are up to date and to standard. – *Our Product team have reviewed our supplier manual as part of our annual update to ensure all details are correct and follow current legislation, this is then distributed to each supplier who read, signed, and returned the manual agreeing to our procedures and expected standards.*
- We will review all internal policies for due diligence – *We have identified areas where we can introduce more policies to help support our suppliers understanding of our expectations throughout the production process and within the supply chain. This will offer more protection to the local workers and improve our transparency with our suppliers.*

Training

- Develop Modern Slavery Training for TOG24 employees, starting with teams in direct contact with the supply chain where there is the most risk. – *TOG24 have invested in Modern Slavery training which is to be rolled out to the whole company, alongside teams in direct contact with the high-risk areas. This is a huge achievement and investment from the company and expresses our commitment to reducing the risks of modern slavery and equipping our teams with the skills to identify and report any issues that could be linked to modern slavery.*

Due Diligence

- Review all Tier 1 audits to ensure they are still in date and any non-compliances have been closed – *We continue to review audits every season; all audits were valid and in date whilst our AW22 & SS23 production was going through each factory.*
- Conduct factory visits – This is subjective to COVID-19 risk assessments and ensuring it is safe to travel. – *Unfortunately, due to the continued high risk associated with travel due to COVID-19, factory visits still haven't taken place for the year June 2022-June 2023. We are constantly reviewing this in the hope that we can commence factory visits again soon.*
- Create further transparency with Tier 1 suppliers with requests to declare and provide information relating to our Tier 3 suppliers – *All suppliers confirmed the correct factory sites which were used for tier 1 to tier 3 processes for the SS23 and AW23 season.*
- Maintaining constant awareness of global issues that could cause risk within our supply chain. – *The country fact file database has been set up which allows for continuous review of current affairs in countries within our supply chain. We are already researching alternative potential supply base countries to ensure we are informed of any risks should we decide to expand our supply base. Our Head of Product and Compliance Co-Ordinator have monthly updates on this.*

2022-2023

Our extra achievements...

- Alongside a 3rd party company, we have developed and are implementing a traceability and tracking platform which will offer even more visibility of our supply base and allow us to ensure all audits are up to date.
- TOG24 has acknowledged the scale and importance of compliance within the company and have added the role of Compliance Co-ordinator to our team.
- The majority of our garment trim and packaging has been moved to a nominated supplier which has helped to condense our supply base in this area which helps with traceability.

2023-2024

What we would like to do next...

Structure, business and supply chain transparency

- Investment in an online platform to log all supplier audits and important traceability indicators.

Policies

- Introduction of a fair remuneration policy and a gender equality policy, which will help with worker protection and safety within the factories.

Due Diligence

- We will begin mapping our tier 4 suppliers and start to gather audits and/or accreditations for these facilities.
- Offer improvement road maps to all suppliers where any issues are identified on the audit reports.
- Conduct factory visits – Subjective to COVID-19 Risk assessments & travel safety.

Visibility

- Improve transparency on our website for country of origin helping our customers to have a greater transparency into our supply chain locations.

Thank you for taking the time to read our latest Modern Slavery Statement, we are committed to undertaking due diligence to protect the human rights of all people within our business and supply chain. We are proud of the work we have done to date and will continue to do more to ensure we are protecting our people.

A handwritten signature in black ink that reads "Mark Ward".

Mark Ward, Managing Director on behalf of the board of directors