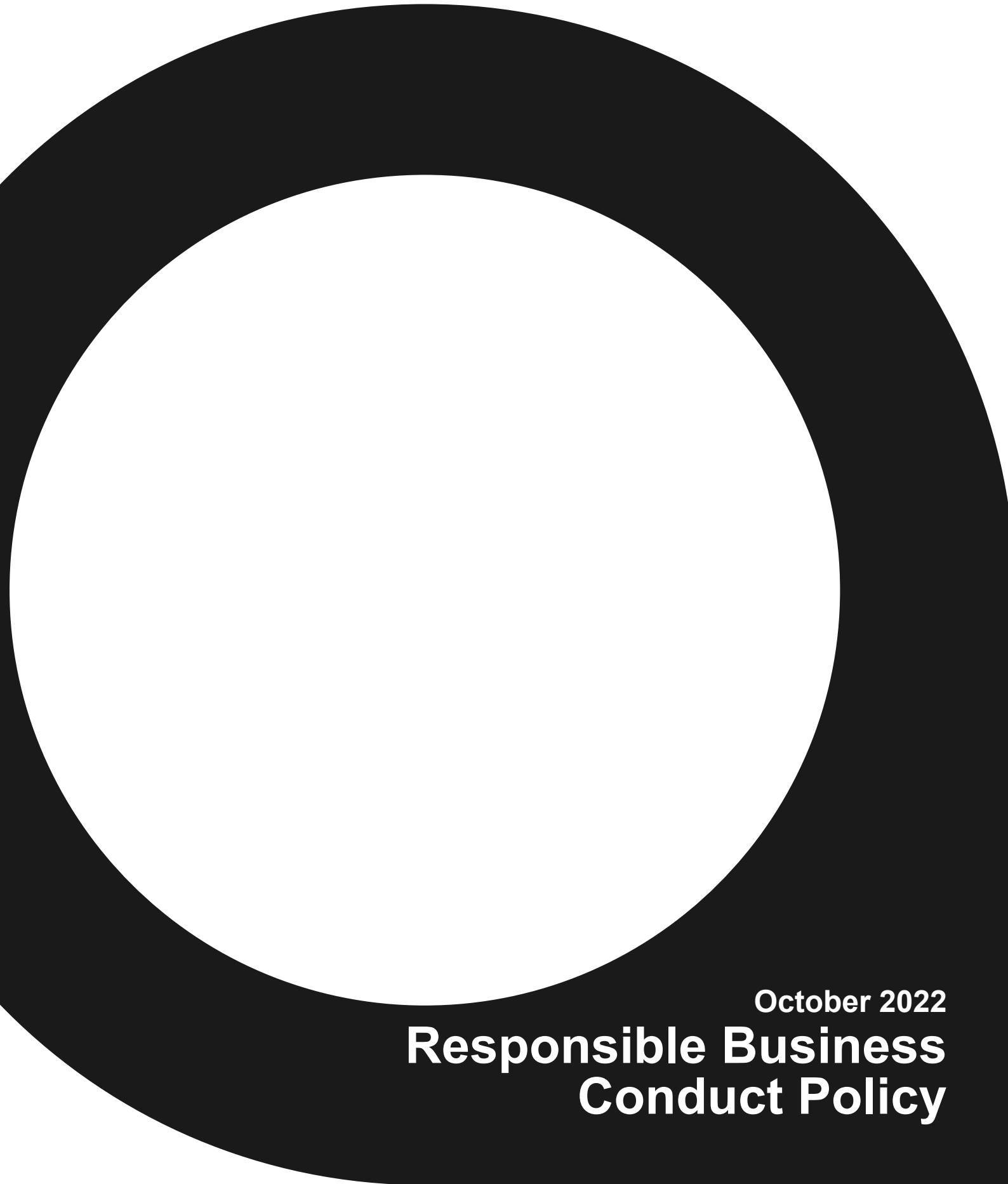


EQUIP

OUTDOOR TECHNOLOGIES UK LTD



October 2022

Responsible Business Conduct Policy

Purpose of this Document

The Equip Responsible Business Conduct Policy establishes the principles that are the foundation of how Equip Outdoor Technologies conducts business. The company's operations and supply chains are within scope.

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

The policy has been written in compliance with the [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#) and further guidance from the Fair Wear Foundation.

The policy is reviewed annually. Changes are outlined in the version control below.

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

Version Control

Version	Date	Change(s)
1.0	October 2022	First version

① Equip 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 protect our planet, respect human rights, and increase participation in the outdoors.

By acting as a responsible business, we can have a positive impact on the lives of our employees, manufacturing partners, retail partners, consumers, and the communities where our products are made and used.

"It's our role as a business to influence change for the better"

Matt Gowar, Equip CEO

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:

Partner: Respecting human rights throughout our value chain

Planet: Minimising environmental impacts

Product: Creating more sustainable products

People: Promoting diversity and inclusion

Respecting Human Rights

Equip is committed to respecting and upholding human rights as established in the UN International Bill of Human Rights.

Endorsing the principles enshrined in the UN Guiding Principles on Business and Human Rights, we recognise that we have a responsibility to both respect human rights and to provide access to remedy when violations occur. This responsibility applies wherever our decisions could cause, contribute to, or be linked-to violations, in both our direct operations and our supply chains.

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 in our supply chains and adhering to all applicable environmental legislation.

Creating More Sustainable Products

Branded consumer goods, particularly in the apparel industry, have long been criticised for creating low-cost short-life products. Equip has always been committed to developing quality, long-lasting, hard-wearing technical products which won't let users down on the mountain.

If an item fails due to a manufacturing defect during its usable lifetime, Equip will seek to make it right with a repair, which reduces waste and takes a more sustainable approach. If the fault is due to accidental damage, the Rab in-house Service Centres are available to repair or service items to keep them in use for longer.

We work with the best quality proven 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.

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.

2 Responsibilities and Expectations

Translating our RabDNA 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, and retail partners. Partner expectations are outlined below alongside each relevant Equip core responsibility.

1. Respecting 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.

Employees will:

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

2. Championing 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.
- 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. Conducting human rights due diligence

Equip will:

- 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 rights impacts, but pay particular attention to the risk of child labour, excessive overtime, homeworking, gender inequality, below minimum wage payment and unsafe working conditions.
- Commit to achieving gender equality and strives to follow a gender-responsive due diligence process that ensures that gender is always considered when assessing risks.

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:

- Routinely provide us with data regarding production locations, workforce profile, and production volumes.
- Endorse Fair Wear's Code of Labour Practices and provide workers with information about their rights. (Tier-1 Only)
- 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.

Retail Partners will:

- Increase consumers' awareness of initiatives seeking to improve working conditions in garment supply chains, such as the Fair Wear Foundation.

4. Supporting manufacturing partners to improve working conditions

Equip will:

- Work closely with our partners to improve working conditions in our supply chains. We offer support to prevent potential or remediate actual impacts by developing corrective action plans that address the root causes.
- Recognise that social dialogue is critical to achieving fair and safe working conditions. By providing training to the workers in our supply chain we can encourage an enabling environment where risks and issues are addressed internally.
- Commit to urgently addressing any identified violations of freedom of association in our supply chain.

Manufacturing Partners will:

- Follow the principle of continuous improvement and remediate issues that are identified or reported.
- Engage with Fair Wear's Workplace Education Programmes to promote awareness of rights and social dialogue in the factory. (Tier-1 Only)

5. Providing 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. The hotline does not seek to replace internal grievance mechanisms but acts as a safety net that workers can call upon if internal mechanisms fail.
- Commit to meaningful engagement with affected stakeholders via Fair Wear's in-country teams when complaints are submitted.
- Ensure all 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)

6. Minimising the environmental impacts of our products

Equip will:

- Actively design our products to have lower environmental impacts over their entire lifecycle. Durability, reparability, and circularity are all critical to our design process.
- Operate in-house service centres in many of the countries where our products are used. By offering high-quality repair and wash service we can help our customers to extend the lifecycle of their kit.
- Maintain strict chemical requirements for all our products and regular test to ensure compliance. Equip has committed to phasing-out fluorocarbons from all our products by AW24.

Employees will:

- Contribute to Equip's environmental strategy by identifying and championing innovative solutions to reduce our environmental impacts

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.

7. Supporting 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 innovative technology to reduce the impacts, support them in measuring their impacts and in installing the infrastructure needed to reduce their reliance on fossil fuels.
- Selects 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.

8. Increasing 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 pallets.

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. Conducting 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 & Retail Partners will:

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

10. Driving industry-wide change through cooperation

Equip will:

- Drive the Rab Mountain Manifesto commitment as a tool to 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. This is particularly true for other Fair Wear members where we share supply chain data.

Retail Partners will:

- Engage with Equip and other brands to drive industry change through the Mountain Manifesto and industry groups.

3 Policy Integration

Equip integrates these responsibilities into our business practice through a range of company policies. Critical for integration into our supply chain procedures is our Due Diligence Policy and Supplier Manuals.

Equip 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 Equip Outdoor Technologies UK Ltd CEO, Matthew Gowar.
Dated 12/10/2022