



OUTDOOR & SPORTS COMPANY



Social Report 2023

January to December 2023



sprayway.com



mountain-equipment.co.uk



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HILLY

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Fair Wear Foundation Members since 2012

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1. Summary and key activities 2023

2023 was OSC's eleventh year working with the Fair Wear Foundation (FW). This social report covers our work with our supply chain and FW from 1st January 2023 to 31st December 2023.

As a member of Fair Wear, we are committed to implementing the 8-point Fair Wear Code of Labour Practices, which are based on UN and ILO principles, in all production facilities and meet the highest standards for socially equitable working conditions. These include, among others, the payment of living wages, reasonable working hours, safe and healthy working conditions, and prevention of child labour.

Geopolitical events and an increase in the cost of living have affected our sourcing. The war in Ukraine and the military coup in Myanmar continue to bring uncertainty and have caused a number of challenges within our supply chain. We have maintained regular dialogue with all our affected factories, allowing our teams to evaluate and make judgements on each situation as required. This is further detailed in section 3 per country.

The Brand Performance Check (BPC) is an annual review of our work with our suppliers, carried out by a member of the Fair Wear team. In our Brand Performance Check for 2022 we were awarded Good status, with a score of 40. From 2022 onwards, Fair Wear implemented a new BPC with updated methodology aligned to the guidance from the OECD (Organisation for Economic Cooperation and Development) on Due Diligence for Responsible Business Conduct¹ and Responsible Supply Chains in the Garment and Footwear Sector².

We have worked on developing policy, preventative measures, and risk analysis throughout this year, developing our Responsible Business Conduct Policy and Human Rights Due Diligence (HRDD). Our risk analysis, with reference to the OECD Guidelines, has become core to our decision making, mitigation, improvement, and prevention measures. Country level risk is reviewed against ethical standards within the factory and assessed alongside audit information. From this, in 2023, we identified key areas for improvement or preventative measures, with a focus on gender equity and freedom of association.

In 2023 we audited three factories; two in China and one in Bulgaria. Our audit plan for 2023 was based on our risk assessments and

Hamish Dunn, Managing Director commented:-

OSC has been a member of Fair Wear since 2012. During this period, both the global landscape and our supply chains have experienced unprecedented upheaval and change. Right now, we are working to support our partner factories and their teams as they go through a multitude of problems.

Fair Wear has always been about improving the lives of people who make our gear but the way we do it has evolved. It used to be an audit-based process where problems were identified, goals were set, and progress measured. With Fair Wear's guidance we now have a risk-based focus where we try to identify and avoid problems before they occur. This comes under the banner of HRDD or Human Rights Due Diligence and is being led by guidelines from the OECD.

This has presented challenges for us as we adapt to this new way of working and involve everyone who works for us in the process. Our senior management team has far greater insight than before and HRDD is considered throughout our business.

With all the other problems the world is facing – Climate Disaster, Political breakdown, War – Fair Wear keep us on track on Human Rights.

¹ <http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

² https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en

identification of harms, both actual and potential. Corrective Action Plans (CAPs) are being worked through with all factories. Overall, in the last three years, 91% of our supply chain has been audited.

Our key activities in 2023:

- Worked with a third-party consultancy (The Reassurance Network) to develop our risk analysis at country and factory level;
- Developed our Supplier Code of Conduct;
- Strengthened the team with the recruitment of OSC's Supply Chain and Ethics Coordinator;
- Collected workforce demographic data, developing our understanding of gender equity and gender specific risks;
- Developed a grievance policy in collaboration with a factory, integrating this into their workplace procedures;
- Conducted a benchmark study of wages, with support from the third-party consultancy, across the countries we manufacture within, with a gap analysis to living wages;
- Organised training within seven factories to raise awareness of workers rights, Fair Wear's work and Code of Labour Practises.

Published: April 2024

2. Sourcing Strategy

2.1. Human Rights Due Diligence (HRDD)

We are guided by the six steps of the OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector³ and Fair Wear's Human Rights Due Diligence Policy:

1. **Responsible Business Conduct Policy** is core to our work and has been developed this year with consultation from Directors and Senior Management;
2. **Identify actual and potential harm** through our risk analysis at country and factory level, supported by FW's resources, audits and external resources;
3. **Cease, prevent and mitigate harm** through corrective actions plans from audits, both by Fair Wear and other auditors, implementing training where needed, through our improvement and prevention plans based on risk profiling, and working with our supply chain partners to demonstrate improvement to timelines. Findings are further discussed in section 3 per country;
4. **Track** implementation through continuous monitoring, ongoing communication with supply chain, seasonal review and monthly internal meetings;
5. **Communicate** to our supply chain, Fair Wear and externally. Further details in section 5.
6. **Provide for remediation** where harms do occur, working collaboratively with FW and our supply chain. Further details in section 4.

Our country level risk analysis has prompted adjustments in our sourcing strategy, influencing our decision to disengage from Myanmar, and review our reliance on manufacturing in China. From our review of risk, and improved procedures of information tracking we have been able to focus on action plans for improvement and prevention. We have also begun to review audits and actions with a gender lens.

2.2. Fair Wear Foundation

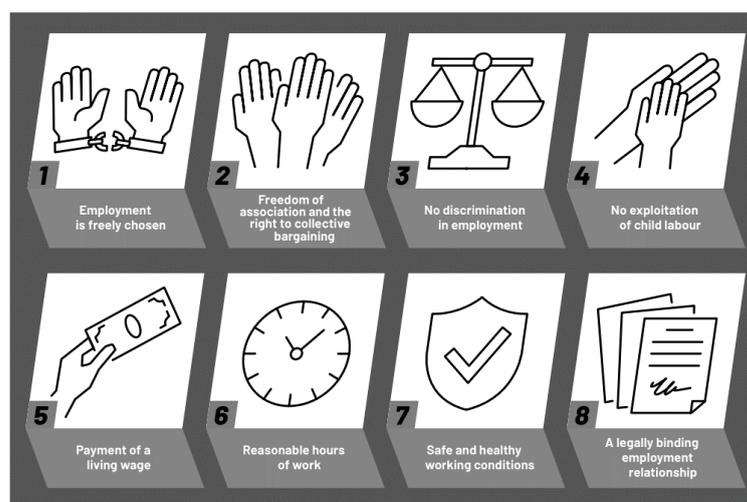
Our membership of Fair Wear is core to our work with factories and has been key to the development of our HRDD process. We maintain contact with Fair Wear throughout the year, using their country information, through complaints handling and audit review. We have close contact with numerous other Fair Wear brand members and collaboratively work with them where we share production facilities.

Our annual Brand Performance Check (BPC) by Fair Wear is a welcomed review of our procedures, and we work with Fair Wear on all comments received, whilst sharing our result both internally and externally.

As a member of Fair Wear, OSC is committed to implementing the Fair Wear's 8 Code of Labour Practises, based on the UN and ILO principles, in all production facilities.

1. Employment is freely chosen;
2. Freedom of association and the right to collective bargaining;
3. No discrimination in employment;
4. No exploitation of child labour;
5. Payment of a living wage;
6. Reasonable hours of work;
7. Safe and healthy working conditions;
8. A legally binding employment relationship.

The Fair Wear Code of Labour Practices



³ https://www.oecd-ilibrary.org/governance/oecd-due-diligence-guidance-for-responsible-supply-chains-in-the-garment-and-footwear-sector_9789264290587-en

2.3. Organisation and structure

We are a group of outdoor and sportswear brands: Mountain Equipment, Sprayway, Ronhill and Hilly. At the end of 2023 the OSC CSR Manager retired and there was a handover period to the Sustainability team. Our partnership with FW is led by the Sustainability Manager and Supply Chain and Ethics Coordinator, with support from the Buying Directors and team, and Brand Directors. Since 2003, OSC has been owned by the Bollin Group, a privately owned and family run UK-based business.



2.4. Sourcing strategy and pricing

In 2023, we sourced 57% of our products in China, 7% in Vietnam and the rest of the production in twelve other countries, including the UAE, Ukraine, Cambodia, India and Serbia (of 2023 FOB). The supplier relationship and performance are discussed and reviewed internally on a seasonal basis by Product and Buying teams, and reviewed internally on a monthly basis with Buying Directors and the Sustainability team.

We build long term relationships throughout our supply chain and recognise that we have a commitment to the staff and owners of the various businesses in it. This is reflected in 59% (of 2023 FOB) of our supply base working with the brands for more than ten years. We favour suppliers who have multiple Fair Wear members amongst their customer base. Our overall sourcing strategy continues to reduce the number of factories in our supplier base, understanding that a bigger leverage in our factories can improve the effect of managing change. It is the responsibility of the Buying Directors to find and recommend new suppliers. OSC have a formal sourcing process which includes reviewing risk and engaging with a factory on FW. We carry out a pricing programme with the factory to establish whether they are competitive and able to manufacture to the required quality.

We have a Quality Control team in China, who have worked with us for over twenty years. Their team includes one Merchandiser and three QC employees. This team visits our facilities during production for quality purposes.

This team works with the Sustainability team and Buying Directors to follow up on actions related to labour standards and rights, where appropriate.

2.5. Supplier relations

There is a monthly internal review on our supply chain with the Buying Directors, Managing Directors and Sustainability team, including a review of risk, audits, new supplier engagement and disengagement, where applicable.

- **Onboarding**

We require all new suppliers to complete onboarding documentation which includes information on working conditions, and an audit questionnaire based on the eight key Code of Labour Practises (CoLP) advocated by Fair Wear. We will visit the factory, where possible, to review the facility, discuss recent audits, working procedures, the potential capacity available and discuss financial terms. We have detailed discussions to see if both parties can work together. It is also important to us that we choose factories that we consider suitable to work with on long term basis. The completed documentation is reviewed by the Sustainability team and reviewed in the monthly meeting with Directors, alongside our risk analysis of the country and current factories. A meeting between the Buying team, Sustainability team and factory management is arranged and includes an introduction, discussion of working with Fair Wear and the CoLP, and we will work together. Our Supplier Code of Conduct will be integrated into this process.

- **Disengagement**

We have followed Fair Wear's guidance for any disengagement from a factory. In 2023, we formalised our procedure by writing our Responsible Exit strategy, detailing our internal process. The strategy differentiates between (1) disengaging due to labour rights violations and (2) due to other business reasons. Where a business relationship is ended because of reasons of labour rights violations we will only do this once we have exhausted all options to remediate the violation, and, through working with the supplier, prevention or mitigation of negative impacts is not feasible.

2.6. Production cycle

We have two production cycles per year, Spring/Summer and Autumn/Winter. Each brand has its own internal Product team who work approximately 12 to 18 months in advance and design the range to an agreed Range Plan. Salesman Samples are provided by the factories in time for our Sales Launches. Spring/Summer season sales launches take place in May. Autumn/Winter season sales launches take place in November.

Following on from the Sales Launch for each season there are road shows, trade fairs and individual presentations that take place with our customers where they are given information relating to cut off dates for buying meetings and product delivery dates.

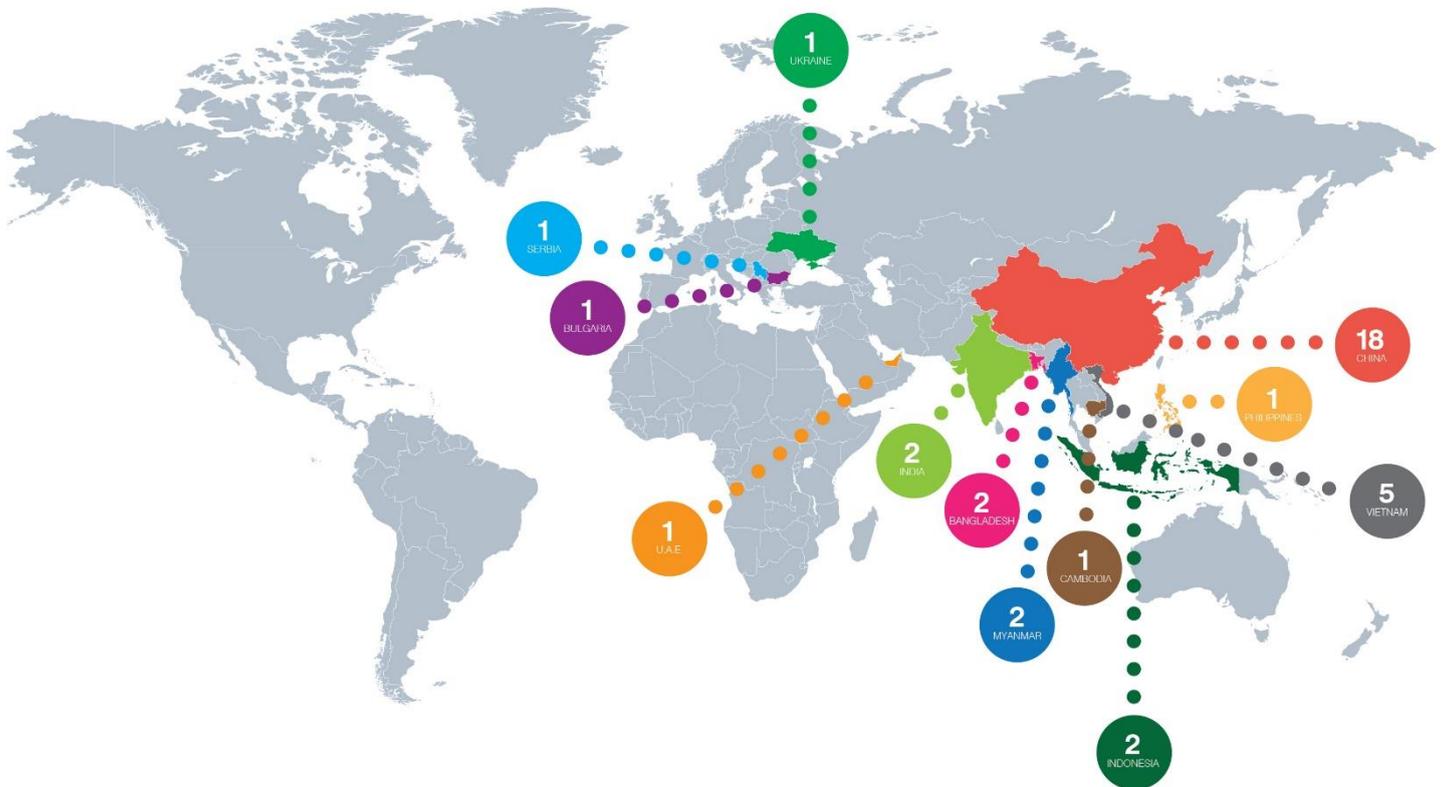
OSC Buying teams forecast fabric requirements with our nominated suppliers and forecast garment requirements with our manufacturers. The manufacturers are aware of our nominated fabric sources. We place bulk orders with our factories to an agreed lead time of approximately four to five months.

3. Monitoring and remediation

3.1. Overview

Based on the outcomes of our risk analysis we prioritise follow up plans including improvement and preventative steps. Freedom of association, gender equity, working hours and wage analysis were core to our work in 2023. 91% of our factories have been audited within the last three years, and this year we focused on workplace training as a preventative action for freedom of association. We developed a wage benchmark analysis and have conducted a gap analysis of wages compared to regional minimum wages and living wage benchmarks. We have set a plan to work with key partners going forward on documentation and improvements towards living wage.

Developing our understanding of workforce demographic data and gender relations, we gathered quantitative and qualitative data, supplemented with secondary sources from the UNDP Gender Inequality Index⁴ and World Economic Forum's Global Gender Gap Report 2023⁵. Gender is now included within our risk assessment, and we have prioritised our next steps with our partners on improving gender equity and ensuring there is no discrimination. Health and Safety issues are also a factor in the audits and to-date the factories have addressed any issues which are brought to their attention.



3.1.1. China

We worked with 18 factories in China during 2023, 57% of our production by FOB, 6 of which we share with other FW brands. Approximately 97% of these factories in China have been audited over the past three years. Common audit findings across our China suppliers are in working hours, health and safety, and factory communication; and our country risk assessment highlighted working hours and wage payments. We audited two factories in China during 2023 and are working through the corrective actions with both, one of which was received at the start of 2024 due to an audit in December 2023. Common findings were excessive overtime and wages being below living wage; we have applied a gender lens to the findings and discussed the root causes of findings with the factories.

⁴ <https://hdr.undp.org/data-center/thematic-composite-indices/gender-inequality-index#/indicies/GII>

⁵ https://www3.weforum.org/docs/WEF_GGGR_2023.pdf

In 2023, we continued collaboration with another FW brand on a factory audit in 2022. In 2023, 3 factories were visited by our UK team, and our QC team, based in China, were regularly visiting factories throughout production.

Our Buying teams work closely with our factories on production timings, to minimise overtime working, and OSC's contribution to it. Through our wage benchmark analysis, we have analysed wage levels across the majority of our factories in China. We also worked with one supplier on the FW FairPrice App, which began with a FW Induction training in September 2023. Our team then worked with the factory management on open costings, and we will continue this into 2024. We continue to verify the payment of minimum wages to workers by receiving wage records and data.

In 2023 we held workplace training in 5 factories, through the FW. This training was determined by our understanding of country risk, strategic partners and to advance social dialogue within the factories, through our improvement and prevention plans. Each training held a session for workers and a session for management, raising awareness on grievance mechanisms and the FW CoLP. These training sessions were held to mitigate and prevent potential harms and were core to our improvement and prevention plans for 2023. With our majority of production in China, this country was a focus in our improvements and prevention actions aligned with FW 8 CoLP. We made follow up plans for over 50% of our FOB in China.

We collected workforce demographics data across our partners in China, and, through our qualitative collection, the majority of these factories have a gender applicable policy either through anti-harassment and discrimination policies or specifically relating to gender rights.

We received two workers complaints from one factory in China. Further detail on these is given within section 4.

3.1.2. Indonesia

In Indonesia we work with two factories. The production of one factory moved from China to Indonesia in 2023; a decision taken by the supplier.

In Indonesia, whilst freedom of association, and representation of females in management were highlighted at country level risk, we have worked with both factories on monitoring and understanding of their practises which mitigate these. Both factories have operational grievance mechanisms or union committees, and we continue to gain further understanding on current mechanisms and policies, with the prospect of improving practises. In both factories, through workforce demographic data, there is female representation in management of 79% and 48%, supported with gender policies and equality protocols to support equality. We also rectified an issue, raised from shared audit information, on declaration of female health on employment. This discrimination was discussed, and the factory have ceased this practise. This is something we will continue to monitor to ensure the issue does not reoccur.

3.1.3. Ukraine, Hungary and Serbia

OSC works with one manufacturer whose Head Office is based in Hungary. The office manages workload, raw material purchasing and distribution for a factory in Ukraine and one in Serbia. We represent over 50% of their business in Ukraine. A member of our team, based in Hungary, visits the Hungary office on a weekly basis. In both factories, we work collaboratively with another FW brand.

The factory in Ukraine was last audited in 2021, and we have ongoing contact with the factory. The war in Ukraine continues to be of great concern and our country risk assessment reflects this complex landscape. The factory in Ukraine is located on the eastern border with Hungary and are not directly affected, but are affected by power shortages, for which a power generator has been provided, and some male workers have joined the war effort. Gender equality is highlighted in our country risk analysis. We have collected workforce demographics data and increased our understanding of gender equality within this factory. We will continue this into 2024 and support the development of equality. This factory has an internal trade union but the CAP, from 2021, raised a few areas of improvement on elections and regular communication. In collaboration with a FW brand, both have been rectified, and there are daily meetings within the factory. We received one complaint from a worker within the Ukraine factory which is detailed in section 4.

Our production within the Serbia factory decreased this year. The factory in Serbia was last audited in 2021. The CAP from the 2021 audit highlighted necessary improvements to be made on freedom of association. These were actioned with the factory and another FW brand. The minimum salary increased in Serbia from January 2023 and this has been reviewed with the factory.

3.1.4. Bangladesh

In 2023, we continued to work with two factories in Bangladesh, one of which where we are transitioning from their Myanmar production facility. In 2022, we audited both factories and have worked through CAPs. In February 2023 a Buying Director and Product Technologist visited both factories and discussed these actions, as well as key topics including CoLP implementation, gender equality, and health and safety.

The highlighted risks in our country assessment were gender-based discrimination, freedom of association, political stability, and informal employment. Through collection of workforce demographics data, and through the audits in 2022, all workers at both factories are permanent employees and there are operational freedom of association and grievance policies.

OSC works with FW on their Enhanced Human Rights Due Diligence, for fire, structural and electrical safety in Bangladesh. Both factories have been inspected in compliance with the RMG Sustainability Council (RSC).

In 2023 we conducted Violence and Harassment Prevention Training through Fair Wear. This was held as gender-based discrimination was highlighted on our country risk assessment and there is a high percentage of female workers within this site. Both workers and management have been trained through the first and second of three courses, and these have been well received.

In July, through our periodic review of wages of factory 2, we raised concerns about a reduction of wage due to late attendance. This was worked through with the factory management and corrected. The factory's procedure was changed, and communicated, to honour attendance, with late attendance being discussed on a case-by-case basis with HR.

In November 2023, there was unrest around the capital concerning minimum wages for the textile and apparel industry. During the time, we checked in weekly with both factories who were unaffected by this due to location, and we asked factory management to increase communication with workers on this during the time. The revised wage, set by the government, came into force from 1st Dec 2023. We review wage data to see that this has been implemented, and our Buying team are working with how we can further support through product costings.

3.1.5. Vietnam

In 2023 we worked with five factories in Vietnam. We work with a partner in China and have been developing a relationship with their Vietnamese facility for several years. This was impacted by Covid-19, and we worked with this supplier until they were comfortable with production in this facility. We share this facility with another FW brand member and continue discussion with them following the CAP and audit in 2022.

Our country level risk analysis identified freedom of association, informal employment and a lack of female representation in senior management. Through our collection of quantitative and qualitative workforce demographic data this year, we have established that there is female senior management in four of five factories, ranging from a representation of 33-77%, and these factories have established gender applicable policies. Into 2024, we will work with factory 5 to approach this. Common audit findings were fixed term employment, and we continue discussions with our factories on this.

From our review of freedom of association and operational grievance mechanism, we identified that one factory would benefit from workplace training. This was conducted by the FW in July 2023 to raise awareness of worker-management dialogue and grievance procedures through the FW; there was a session for management and a second session for workers.

Our risk assessment has highlighted improvements can be made in freedom of association within our Vietnamese factories, and we are working with two factories, where we have a greater leverage, to gain further understanding on current mechanisms and policies.

We received two complaints from one factory within Vietnam during 2023, which are detailed in section 4.

3.1.6. Myanmar

We worked with two suppliers in Myanmar during 2023. Since the military coup in 2021, we have monitored the situation closely, working with Fair Wear and other brands manufacturing within the country, but being able to conduct human rights due diligence (HRDD) has become impossible. In 2023 we therefore decided to disengage from production within Myanmar, this was supported by our country risk assessment.

This disengagement is over several seasons, and with one supplier we are moving production to their factory within Bangladesh. To both factories in Myanmar OSC is a small percentage of their customer base. We continue to work to FW guidelines and their advice on responsible disengagement. Our Myanmar Disengagement statement gives further detail and is available on our Brand websites. We are in regular contact with the factories and evaluate the situation on a monthly basis. We have an ongoing conversation with another FW brand member on heightened due diligence within one factory.

3.1.7. United Arab Emirates

We have one production partner in the UAE; this is a long-term relationship of 18 years. This facility was visited in September 2023 by a Buying Director.

Our country risk assessment highlighted a lack of social dialogue and freedom of association, gender inequality and no established minimum wage at country level. During 2023, we worked with the factory management to draft and establish a grievance procedure which is included within worker contracts and all workers were trained on in September. To date, there have been no grievances raised but we continue to check in with the factory every second month. We have collected workforce demographics data and increased our understanding of gender equality within this factory where 91% of workers are male. During 2024, we will continue our discussion on developing a gender equality policy with factory management. There is no minimum wage within the UAE, and we have had an open conversation with the factory on this.

3.1.8. Cambodia

In 2023 we worked with one factory in Cambodia. In our country risk assessment of Cambodia overtime, freedom of association and informal employment were highlighted. In 2023, we worked to understand the existing mechanisms for collective bargaining, freedom of association and grievances within this factory.

There is an operational trade union within the factory, in line with country law, and there is regular communication, training and information given on their policy on freedom of association. Into 2024, we will follow up with this factory to progress this area. Through audit data, the factory has no casual workers, or informal employment, and through sharing of data, there is reduction on monthly hours in 2023 compared to 2022. In October 2023, a Buying Director visited this factory and discussed social and ethical welfare directly including health and safety, and grievance mechanisms.

3.1.9. India

We have one manufacturing partner in India with a long-term relationship and have ongoing contact. We work collaboratively with other FW brand members sourcing within this factory.

Our country risk assessment of India highlighted gender equality and informal employment as critical risks, along with overtime, and lack of freedom of association. As monitoring of these risks, we have collected workforce and gender data within this factory and gained understanding of the existing policies within the factory. All workers are permanent employees and there is a Freedom of Association and Collective Bargaining Policy supporting the Workers Committee. This factory has implemented a breadth of policies including a Gender Equity Policy and a Sexual Harassment Prevention Policy. We will continue these discussions into 2024 with a focus on supporting gender equality and furthering our understanding of wages.

We started a partnership with another factory within India during 2023, and conducted, sampling. However, our production with this factory is delayed due to a facility incident and first production will be in 2024. The factory has been onboarded and we are collaboratively working in this factory with two other FW brands, connecting on follow-ups from a previous audit.

3.1.10. Bulgaria

We work with one factory in Bulgaria and held a FW audit in November 2023. Our assessment of country risk was determined as low with moderate areas in female management employment and freedom of association.

The audit highlighted requirements in social dialogue and freedom of association, record keeping, and health and safety actions. All workers are paid above minimum wage and working hours are strictly respected. A CAP from the audit, received in Jan 2024, is being worked upon by ourselves and the factory management. We continue our discussions on remediation and improvement on this.

In October 2023, we held workplace training, through the FW, within this factory, which was attended by all workers, with a second session for management. The sessions raised awareness of the FW Code of Labour Practises and grievance mechanisms.

3.1.11. Philippines

We manufacture a specific product range in the Philippines and have worked with this factory for six years. This factory was last visited in October 2019. In 2023, we collected workforce demographic data, worked to understand their current workplace policies and have conducted a risk analysis of both country and for factory.

3.1.12. United Kingdom

We manufacture a specific range in Northern Ireland where all employees are employed by, and the facility is owned, by our parent company Bollin. We do not assess risk as Fair Wear have acknowledged the UK to be of low risk and all employees are under the same Bollin policies, procedures and employment terms as our OSC employees. This site was awarded Investors in People Gold, there is a specific HR role connected to Bollin HR, and all Directors within Bollin meet weekly to discuss any concerns or topics, including those related to workers welfare.

3.1.13. External Producers



Sprayway Footwear:- Walking shoe manufacturers producing in one factory, China. This was independently audited in July 2023 and ongoing corrective action plans.

4. Complaints Handling

OSC places an emphasis on addressing workers' complaints, ensuring that they are resolved effectively. Our commitment to prioritising complaint resolution is reflected in our timely handling, aligned with the Fair Wear procedure, with the aim of satisfying the individual raising the concern.

Fair Wear's grievance system operates alongside the factories internal grievance mechanisms, which includes informal or formal discussion, written policies, and suggestion boxes. When a complaint is logged with Fair Wear, either through the FW hotline or email contact, OSC is promptly notified through Fair Wear's member hub. Complaints are treated anonymously unless the worker chooses to disclose their identity. OSC receives the details of the complaint, enabling collaboration with the manufacturing site to address and resolve the issue. Fair Wear is able to engage in direct discussion with the worker where needed. Following the resolution of a complaint, OSC continues its collaboration with the factory to address the root cause, with the aim of proactively preventing future occurrences. This information allows us to not only help the factory in which the complaint was made but also other factories as we can learn from the root causes and apply the same changes and improvements across all our factories.

All garment manufacturers partnering with OSC are informed about Fair Wear's Code of Labour Practices through locally provided posters and worker information cards, along with the FW helpline. In 2023, comprehensive training sessions were conducted in five factories, covering the complaints procedure and the support available through Fair Wear. Regular communication with our factories ensures that Code of Labour Practices posters continue to be prominently displayed.

In 2023, OSC received five complaints across three factories:

FW Complaint #	Country	Overview
1538 & 1358	Vietnam	The complainants claim the factory had not paid a severance allowance for resigned workers as required by labour laws. After discussion between OSC, the factory and Fair Wear, the complainants have received the severance allowance. All payments are to be made via bank transfer going forward. <i>Applicable FW Code of Labour Practise: Payment of a living wage</i>
1371	Ukraine	The complainant contacted Fair Wear to file a complaint on the following issues: Insufficient breaks, wages, excessive overtime, mandatory overtime, retaliation. The issues raised were shared with the supplier and discussed with the member brands. The complainant decided to drop the complaint therefore making it impossible to conclude. OSC has continued to monitor the factory on the issues raised and provided support where necessary. <i>Applicable FW Code of Labour Practise: Employment is freely chosen, Payment of a living wage, Reasonable hours of work</i>
1374	China	The complainant claimed the factory used subcontractors without the member brands approval. Management confirmed that work was subcontracted once in 2022, as a result of Covid-19, and have stopped using the subcontractors since. The case has been closed and OSC closely monitors use of subcontractors by all suppliers. <i>Applicable FW Code of Labour Practise: Reasonable hours of work, Legally binding employment relationship</i>
1363	China	The complainant claimed they did not receive pay for the days they worked at the start of the month before their resignation. This was resolved and the complainant was paid within 3 days of raising the complaint. <i>Applicable FW Code of Labour Practise: Payment of a living wage</i>

5. Training and Capacity Building

5.1. Informing our internal teams

Our teams are informed via monthly brand meetings and a Responsibility newsletter. In addition, there is a monthly Senior Management meeting, and an Executive Meeting with the Bollin CEO. The Sustainability team and Directors meet monthly to review and discuss our supply chain including risks, and project review to timelines. All new employees attend a Responsibility induction on social, ethical and environmental topics.

Our partnership with Fair Wear is on our relevant brand websites and marketing. Per brand, we hold two Sales Launches per year, with our global Sales Teams, and our Sustainability progress is presented across these. We have our FW affiliation posted on our relevant brand websites and product catalogues.

5.2. Informing our manufacturing partners

Informing our partners of Fair Wear is core to our onboarding approach and ongoing work across our supply chain. We continue to encourage our factories to inform their workers of the FW eight Code of Labour Practices through audit reviews and actions, discussions, internal training, and through distributing the CoLP workers information cards, produced by FW. We ensure that the FW CoLP poster is placed within every factory detailing the methods for workers to contact Fair Wear directly. Every supplier has completed the FW questionnaire.

During 2023, we, through the FW, held training sessions at seven factories to raise awareness of workers rights, Fair Wear's work and how to raise grievances. 60% of our production (by FOB) came from factories which have had this training over the last three years.

6. Information Management

Monitoring of risks, progress and actions is continuous through ongoing supplier communication, visits by our Buying Directors and Product teams, and regular meetings. In 2023, we developed an internal system to track actions and results and continue to develop this to track implemented measures. Our sourcing process ensures that all production facilities are known and cannot be set up without approval from Directors and the Sustainability team.

We are aware that embroidery or printing processes can be outsourced and in 2023 we have reviewed our supply chain on this. We review information against previous records and audits and ensure that information on the FW is shared. This has also been included as a topic for discussion during factory visits and during our QC team's visits.

7. Transparency and Communication

We communicate our membership of FW to retailers and consumers through social media channels, newsletters, on our websites and through product hangtag labelling. Our connection to FW is included in our Sales Launch assets and in 2023, we presented our partnership with FW at our Sales Launches, with in-depth, in person sessions at both the Mountain Equipment and Ronhill AW launches. Our annual social report and BPC report were made available on our brands websites.

With our decision to disengage from production in Myanmar, we have shared our Disengagement statement on the applicable brands websites.

8. Stakeholder engagement

OSC are engaged with the European Outdoor Group (EOG) and the Outdoor Industry Association. We use the Fair wear resources extensively for updates on countries, local labour laws and there learning resources. We held a meeting of FW brands at ISPO November 2023 and work with other brands, both FW and non FW, on a range of sustainability topics.

9. Corporate Social Responsibility



John Muir Trust

A charity supported by Mountain Equipment with an annual corporate membership subscription. The John Muir Trust is a leading UK charity dedicated to the protection of wild land for both nature and people. Inspired by the work, spirit and legacy of John Muir.

www.jmt.org



European Outdoor Conservation Association (EOCA)

A charity supported by Mountain Equipment with an annual corporate membership subscription. EOCA's Mission is to support valuable conservation work by raising funds from within the European Outdoor sector and promoting care and respect for wild places.

www.outdoorconservation.eu



Sport Scotland Avalanche Information Service (SAIS)

A not-for-profit organisation; supported by Mountain Equipment with annual large-scale supply of equipment. SAIS is funded by the Scottish Sports Council to publish daily forecasts of the avalanche, snow, and climbing conditions at 5 key climbing areas of Scotland during the season.

www.sais.gov.uk



Community Action Nepal (CAN)

A charity supported by Mountain Equipment with an annual cash donation. CAN helps to bring long term benefits to mountain peoples of Nepal. The charity has established more than 50 community projects focusing on health, water and sanitation, schools, education and cultural development.

www.canepal.org.uk



PLAS Y BRENNIN

Plas y Brenin

The National Mountain Centre
A not-for-profit organisation supported by Mountain Equipment with annual large-scale supply of equipment. Plas y Brenin is the National Mountain Centre for England and Wales, located at Capel Curig in Snowdonia. The Centre is operated by the Mountain Training Trust, which aims to provide the widest range of outdoor opportunities offering the best in value.

www.pyb.co.uk



British Mountaineering Council (BMC)

A membership organisation supported by Mountain Equipment with an annual corporate membership subscription.

The BMC is a national representative body that exists to protect the freedoms and promote the interests of climbers, hill walkers and mountaineers. The BMC also represents Britain on various international matters relating to climbing and mountaineering.

www.thebmc.co.uk



Ashton Youth Club

Since 2016 Sprayway have been partnered with Ashton Youth Club, based only 5 miles away from our head office in the ward of St Peter, Ashton (one of the most disadvantaged wards in the country). The AYC has a real focus on outdoor education and offers local teenagers of all backgrounds the opportunity to participate in a broad range of activities, from climbing to kayaking. The outdoor experiences give those involved the opportunity to build essential life skills: communication, team work and confidence.

Sprayway support Ashton Youth Club with clothing and equipment, but also welcome members to work with us at consumer events allowing them to further grow their skill set and put some of what they have learnt to the test.

www.ashtonyouthclub.org



Climbers Against Cancer (CAC)

A charity supported by Mountain Equipment with an annual supporter contribution. Through the worldwide climbing community, Climbers Against Cancer aim to increase awareness and raise funds for research in the continued fight against a disease that affects so many. CAC is a none profit organisation, with all proceeds donated directly to cancer research facilities throughout the world.

www.climbersagainstcancer.org



Trash Free Trails

TFT is a community-focused, non-profit organisation; a positive, inclusive call to arms for riders, runners and roamers alike. They exist to protect our trails and the wild places they take us, and they're starting with litter. Their mission is two-fold; both inextricably linked:

- To reduce plastic pollution on our trails and wild places by 75% by 2025.
- To (re)connect people everywhere with their 'wild selves' through purposeful adventure.

Sprayway are proud to support the TFT Trash Mob Academy project.

www.trashfreetrails.org



Small Woods

Small Woods are the UK organisation for woodland owners, workers, supporters, and social foresters. They stand for living, sustainable woodlands alive with wildlife, people and work. Managed and used well, small woodlands are vital to thriving local economies, wildlife, and the health and wellbeing of local communities, as well as hugely valuable in the fight against climate change. Sprayway work with Small Woods on several projects in the UK including consumer events planting and restoring woodland areas.

www.smallwoods.org.uk



Kenial e.V

Sprayway are proud to support KENIAL e.V. KENIAL e.V. supports children's charity projects in some of the most inaccessible mountainous regions of the world. By working with a network of athletes and suppliers like ourselves, KENIAL e.V. are able to get outdoor clothing and equipment to those needing it the most.

www.kenial.de



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