

MODERN SLAVERY STATEMENT

Mountain Warehouse operates a zero-tolerance policy to modern slavery and human trafficking and is committed to making every effort to eradicate the horrendous impact of this hidden crime from our business and supply chain. We define modern slavery in line with the United Nations Guiding Principles on Human Rights as *“One person depriving another of their liberty in order to exploit them for personal or commercial gain”*.

We recognise that modern slavery and human trafficking are a global and growing issue and no sector or industry can be considered immune. The following statement outlines the steps taken in the financial year ending 27th February 2018 to meet our obligations under section 54(1) of the Modern Slavery Act 2015.

OUR BUSINESS

Mountain Warehouse began in Swindon in 1997 with a single store and is now an international multi-channel retailer of clothing, footwear, accessories and equipment. We're proud to develop the very best outdoor gear for all the family.

Unlike other outdoor retailers we don't carry lots of different brands, almost all the products we sell are exclusive to us. We often work directly with factories simplifying the tiers in our supply chain.

>17,000,000 items sold

>2700 employees

291 stores worldwide

9 countries in which stores operate

9 dedicated E-Commerce sites

OUR WORKFORCE

Mountain Warehouse directly employs more than 2700 people across three head office sites in UK, Poland and Canada, the UK customer service centre and the worldwide store portfolio. More than 99% are directly employed by us with less than 1% of temporary agency workers, all temporary workers are employed at our London head office. We recognise that there could be a higher risk associated with temporary staff managed by a third party, to mitigate this we only work with reputable recruitment agencies that are leaders in their field.

Our two distribution centres in the UK are operated by third party partners. Both of which are well established in the industry and publish their own modern slavery policies and statements. We have two further third party operated sites – our Canadian distribution centre and our Nottingham Call Centre.

Our stores are owned and operated by Mountain Warehouse and most of our e-commerce platforms also fall into this bracket, except Amazon and E-Bay. We do not sell through franchise partners. All store staff and Mountain Warehouse operated e-commerce staff are directly employed by us.

OUR SUPPLY CHAIN

Mountain Warehouse have split our supply chain into two sectors:

- Goods for re-sale suppliers who provide the goods that we sell.
- Goods not for re-sale (GNFR) suppliers who provide goods that are not sold on.

We use 148 goods for re-sale factories in our tier one supply chain of which only 18% is sourced through a third party, the remaining 82% are direct relationships with the factories. 70% of these relationships are long term and have been fostered over many years. We source our product from 8 countries with c.>85k workers in our tier one supply chain. We recognise that there are higher risks associated with specific countries and types of workforce, for example: migrant and child labour.

We source the GNFR from >50 suppliers operating in a wide variety of sectors, for example: shop fittings, carrier bags, electricity supplier, cleaning contractors, etc.

OUR POLICIES

We recognise that imbedding anti-modern slavery practices into everything we do is a fundamental requirement that we must focus on in the coming years. We have several policies that support our commitment in this area.

Our Code of Conduct outlines our expectations of the supply chain and incorporates the following policies - employment is freely chosen, freedom of association and collective bargaining, working conditions, child labour, living wages, working hours and discrimination. All suppliers of good for re-sale hold copies of our Code of Conduct.

Our Employee Handbook policies set out our expectations in relation to equal opportunities and diversity, non-harassment and bullying, disciplinary procedure, whistle blowing and anti-bribery. All new starters receive the handbook as part of their offer pack and it is updated and re-circulated annually to ensure it is in line with most recent legislation.

This statement and all Mountain Warehouse policies are supported and sanctioned by the board.

STEPS TAKEN

Mountain Warehouse recognises that modern slavery is a hidden crime and that it is vital we evaluate and monitor our own business and supply chain to seek out and address risk. In the 2017 financial year we took the following steps towards this goal:

- Commitment from the board to foster a zero-tolerance approach to modern slavery.
- Implemented supplier audit scheme and engaged with our supply base to collate the data.
- Identified the tier one factories that produce our goods for re-sale.
- Re-circulated the code of conduct to all suppliers of goods for re-sale.
- Provided all employees with the annual update of the Employee Handbook including details of how to report concerns.
- Identified risks within our own business and supply chain and made commitments for the 2018 financial year.

COMMITMENTS

We are committed to making every effort to instil our values across our business and supply chain. To minimise the risk of any worker suffering the effects of this hidden crime we have committed to the following actions for the 2018 financial year ending 27th February 2019:

- Commission independent environmental, social and governance (ESG) audit.
- Recruit Corporate Social Responsibility (CSR) Manager and Assistant to deliver the ESG strategy.
- Recruit Head of HR to deliver the recruitment and people strategy.
- Set up CSR working group of key stakeholders within Mountain Warehouse.
- Update policies to incorporate specific reference to modern slavery and human trafficking.
- Ensure all internal staff receive training to understand modern slavery risks, identifiers and what to do if they have a concern.
- Ensure all good for re-sale supplier have signed up to our Code of Conduct.
- Implement an audit system to collate, verify, manage, report on audits to produce prioritised risk profiles.
- Verify tier one factory contact details and implement process to monitor and maintain accuracy.
- Identify all GNFR suppliers.

We look forward to updating our progress in the 2018 statement.

This modern slavery statement has been approved by the board of directors.

Shantelle Augier
Chief Commercial Officer
Mountain Warehouse Ltd