

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2021/2022 FY

Vivobarefoot is committed to confronting the issue of modern slavery and as a UK registered business, we are bound by legislation to comply with The UK's 2015 Modern slavery Act. The law directs that businesses of a certain size must report and take action to increase transparency across their business operations and encourage awareness and responsibility within their value chains. Additionally, they must also provide evidence of their efforts to ensure their business and value chains are free from Modern Slavery and Human Trafficking.

As a growing business, this is Vivobarefoot's second Modern Slavery Statement and while we have made progress from our first statement, we still have a lot more to achieve. We are striving to take full responsibility of our value chain, which means getting absolute transparency of our raw materials sources and processing partners, all the way through to the end of life of our products.

Founded in 2012 by two seventh-generation cobblers, Galahad and Asher Clark, Vivobarefoot is striving to become a regenerative business. For us, this means creating a net positive impact on people and the planet through every action our company takes, the products and services we create, and through the ambitions of our employees and value chain partners.

We run our direct business operations from the United Kingdom and directly employ over 100 people, source our footwear from China, Ethiopia, Portugal and Vietnam and sell internationally via ecommerce platforms and through a network of distribution partners, wholesale and marketplaces.

Much like the rest of the industry, we do not own the factories in which our products are made. However, together with our manufacturing partners, we bear the responsibility of providing a safe, fair, and ethical working environment for all the people involved in the manufacturing of Vivobarefoot products.

It is a requirement of contractual relationships with all Vivobarefoot partners to comply with our [Value Chain Code of Conduct](#). Our Code of Conduct sets out the minimum requirements for our value chain, and their values chains, for good working conditions and workplace rights, and is aligned to the [ETI \(Ethical Trading Initiative\) Base Code](#) and [ILO \(International Labour Organisation\) Labour Standards](#).

We seek to hold long-term partnerships with our manufacturing partners and work directly to support them in meeting our expectations on transparency and risk management. However, if we identify an area of risk, we will work together to assess any highlighted issues and set action plans for remediation and ongoing continuous improvement.

When completing our risk analysis of any new partner or factory, we work to understand if they are willing to commit to full transparency of their value chain and operations. However, if this is not the case, we would not progress the relationship further.



We continue to assess, identify, and mitigate risk across our value chain and direct operations and in review of the steps we have taken so far in monitoring our value chain for the risks of modern slavery and human trafficking, we have identified the below steps we will action over the next 12 months:

- Complete 'Tier 2' mapping and continue to build relationships with all partners and factories (Tier 1 – Tier 2), identify threats of modern slavery and human trafficking, and implement continuous improvement plans where necessary
- Continue quarterly visits of our Tier 1 value chain to carry out site visits, risk assessment and partner continuous improvement training where necessary.
- Bi-annual engagement with Tier 2 value chain partners- In person where possible, to review and discuss threats of modern slavery and human trafficking, and implement continuous improvement plans where necessary.
- Continue to map and assess disclosed 'Tier 3 to Tier 5' sites with the support of our partners, encompassing a risk assessment of modern slavery and human trafficking
- Further roll out across our value chain (as appropriate), training around the risk and identification of modern slavery and human trafficking, already delivered to Vivobarefoot direct operational teams.
- Work towards full key performance indicators and due diligence process reports, with the ambition of full disclosure on the Vivobarefoot website and annual integrated report

In the 2022/2023 financial year, we will also strengthen our legal Board with specialist experience in risk monitoring and reporting and oversight of Vivobarefoot's overarching governance structure.

For further information please see the link below to our 'Unfinished Business Report'

<https://www.vivobarefoot.com/uk/unfinished-business>

This statement covers the 2021/22 financial year, ending 26 June 2022, and was approved by the board of Vivobarefoot Ltd. and signed by company directors 31/03/2023

Galahad Clark
Founder

Asher Clark
Founder

