

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT 2023/2024 FY

Vivobarefoot is committed to confronting the issue of modern slavery and human trafficking as a UK registered business, we are bound by legislation to comply with The UK's 2015 Modern Slavery Act (aligned to new guidance published 8th August 2023). 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 supply chains (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.

This is Vivobarefoot's third Modern Slavery Statement and whilst we have made progress from our previous statements, we still have a lot more to achieve. We are striving to take full responsibility of our value chain operations, which means setting out a roadmap towards achieving 100% global transparency across Tiers 1-4.

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 Vietnam, Portugal, China, Mongolia and Namibia and sell internationally via ecommerce platforms and through a network of distribution partners, wholesale and marketplaces.

Vivobarefoot, in partnership with regional third-party experts, operates a resale and refurbishment platform, ReVivo, from the UK, The Netherlands and the USA.

Much like the rest of the industry, we do not own the factories in which our products are manufactured or repaired. However, together with our value chain partners, we bear the responsibility of providing a safe, fair, and ethical working environment for all the people involved in the manufacturing of Vivobarefoot footwear or co-branded 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 value 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 relationships with our value chain partners and work directly to support them in meeting our expectations around transparency, traceability and risk management. If any areas of risk are identified, we work together to assess and set action plans for remediation and ongoing continuous improvement. If however, remediation is not mutually agreed and/or is not achieved within agreed timelines, an exit plan may be required and agreed in full and in advance with the value chain partner.

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.

In our 2022/2023 Modern Slavery Statement we identified the following processes for assessment, implementation and monitoring of modern slavery and human trafficking across our value chain and direct operations. We have noted below any actions or changes we have taken within the year of this statement and further actions to be taken within the 2024/2025 financial year.

- 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
Progress Update: Full Tier 1 and 2 mapping is complete on existing value chain partners and risk assessments and monitoring are ongoing for new partners. All Tier 2 partners receive Vivobarefoot's Code of Conduct in local language and basic guidance has been provided at both in-person site visits and annual partner workshops.
- Continue quarterly visits of our Tier 1 value chain to carry out site visits, risk assessment and partner continuous improvement training where necessary.
Progress Update: Full time Vivobarefoot team based daily in high volume/risk Tier 1 partner sites (Vietnam). Quarterly site visits conducted, focused on transparency and social/environmental compliance of all Tier 1 sites and high volume/high-risk Tier 2 sites. During a Tier 1 site visit, multiple non-compliances were identified (unrelated to Modern Slavery & Human Trafficking). Immediate remediation was discussed and requested, however the partner were unable to commit to the necessary remediation steps, so a staged exit plan was mutually agreed.
- 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.
Progress Update: Site visit assessments rolled out across all high volume/high-risk Tier 2 sites (22 sites). During 2 Tier 2 site visits multiple non-compliances were identified (unrelated to Modern Slavery & Human Trafficking). Immediate remediation was discussed and requested and both partners implemented remediation steps promptly and ongoing support is being provided by Vivobarefoot and Tier 1 partners, with further follow up site visits planned.
- 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
Progress Update: We continue to map and assess disclosed Tier 3-5 sites and have updated our risk assessment methodology to enable better identification of high volume/high risk partners, processes and geographical locations.
- Further roll out across our value chain (as appropriate), training around the risk and identification of modern slavery and human trafficking, already delivered to



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Vivobarefoot direct operational teams.

Progress Update: Further training, site visits and workshops planned across Tier 1-3 value chain partners.

- 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

Progress Update: We haven't yet integrated full key performance indicators into our due diligence processes and will carry over this action into the financial year.

2024/2025 Actions

- Update Code of Conduct to include specific requirements around human trafficking, aligned to legislation.
- Further in-person training on Vivobarefoot's updated Code of Conduct and Modern Slavery and Human Trafficking programme to be rolled out across Tier 1 and 2 value chain partners.
- Continuous consolidation of material and process value chain partners, to maximise our impact across manufacturing, alignment to our regeneration strategy and to ensure an effective level of risk management.
- Integrating Modern Slavery and Human Trafficking into existing Vivobarefoot training programmes for ReVivo and co-branded product third party experts.
- Dedicated full-time resource in value chain transparency and engagement to be placed in Vietnam, to ensure value chain transparency key performance indicators are achieved.

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

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

This statement covers the 2023/24 financial year, ending 29th June 2024, and was approved by the board of Vivobarefoot Ltd. and signed by company directors 05th August 2024

Galahad Clark
Founder

Asher Clark
Founder



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