

MODERN SLAVERY STATEMENT

2021





Introduction

At Sea to Summit, our promise is to be your ally in every adventure. We're a company of innovators, driven to create exceptional outdoor gear that encourages exploration and self-reliance. Our relentless pursuit of design perfectionism means everyone from extreme athletes to NASA rely on our award-winning products in their pursuit of adventure.

We believe in approaching life with directness, candour and integrity, doing what we know is right in all aspects of our business. As such, any form of slavery or exploitation has no place within our company or supply chain.

This Modern Slavery Statement is a sign of our commitment to abolishing all forms of slavery and exploitation—and a future of relentlessly improving our business practices. .

We have a global team of over 200 employees operating predominantly from Perth, with smaller teams located in the United States, Germany and China.

Our passion for innovation has seen us grow into an award-winning global brand sold in more than 60 countries.



Quality
ISO 9001





SECTION 1

Reporting Entity



This Modern Slavery Statement has been prepared in keeping with the requirements of the Modern Slavery Act 2018 (“the Act”). The entities controlled by Sea to Summit are also covered by this Modern Slavery Statement, which is relevant for the financial period commencing 1 July 2019 and ending 30 June 2020.

Sea to Summit controls the following entities:

Sea to Summit North America LLC, which is responsible for the distribution of Sea to Summit branded products throughout North America.

Sea to Summit GmbH, which is responsible for the distribution of Sea to Summit branded products throughout Europe.

Sea to Summit (Zhong Shan) Outdoor Trading Company Ltd. which is responsible for sourcing and managing suppliers in Asia. The team in China are also primarily responsible for managing Sea to Summit’s procurement activities.

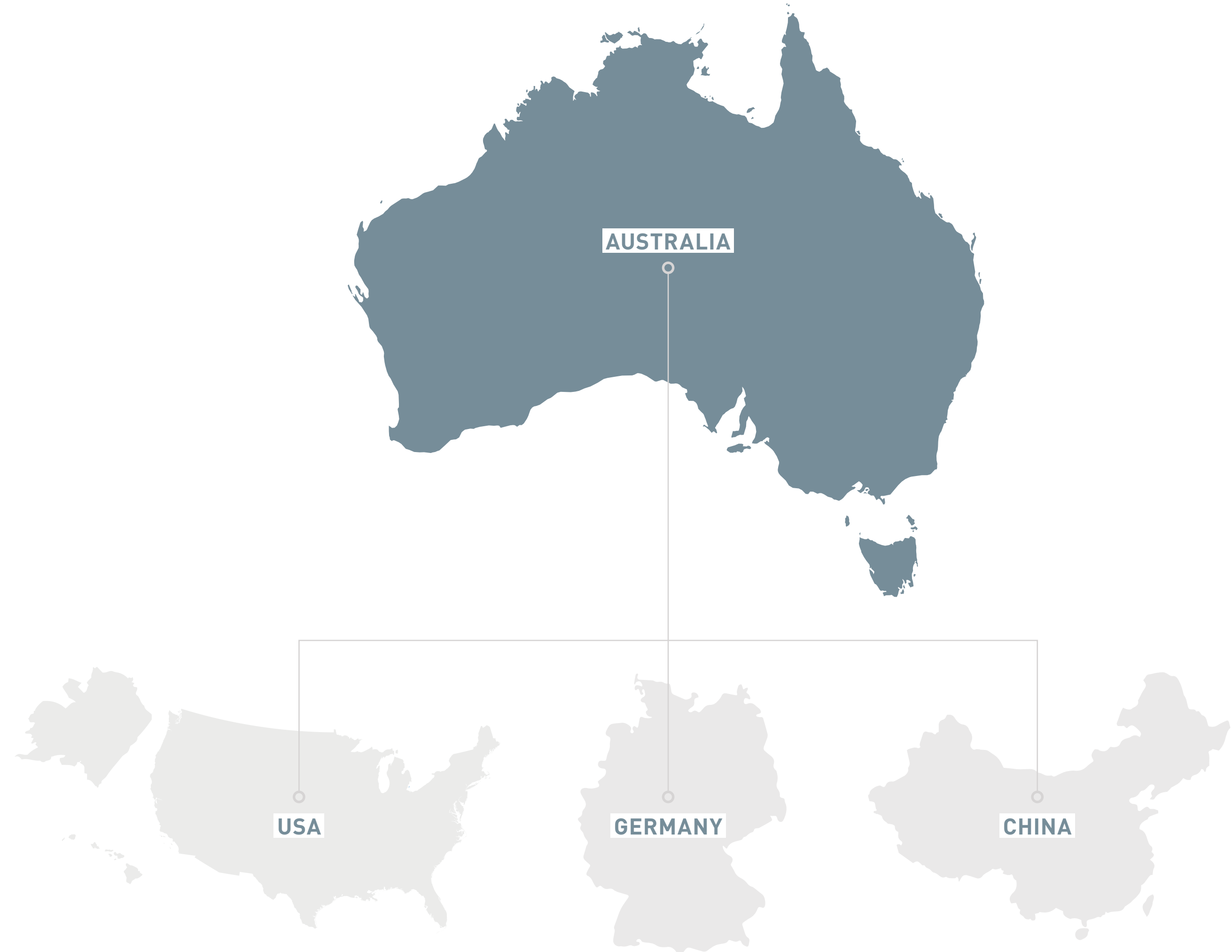
This statement is made by Sea to Summit and the entities identified above. A reference to “Sea to Summit”, “We” or “Us” is a reference to Sea to Summit as a collective group.

SECTION 2

General Overview of Our Operations

Sea to Summit employs over 100 people in Australia and over 90 people in offices located in China, Germany and the United States.

- Sea to Summit operates in Australia and owns or controls other entities that operate in China, Germany and the United States.
- Sea to Summit is compliant with ISO:9001 quality standards.



Our main business involves:

Designing and supplying outdoor adventure products to distributors and retailers globally.

Distribution of select outdoor brands to retailers in Australia.

Sea to Summit predominantly sells its products through its distributors and retailers, however, it also includes a digitally integrated sales channel with 6 e-commerce websites.

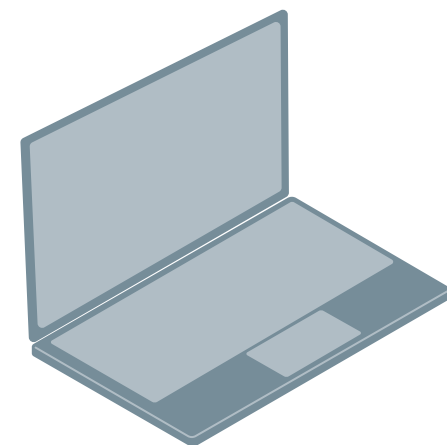
In Australia, Sea to Summit also distributes other market-leading outdoor, travel and water sports brands. Our swag of distributed brands continues to grow and provide Australian retailers and consumers with innovative, quality products; gear that supports the needs of outdoor enthusiasts to go lighter, faster and more comfortably.



Sea to Summit goods are sold to retailers and distributors on a wholesale basis worldwide.



Sea to Summit also sells distributed brands to Australian retailers.



Through its e-commerce websites, Sea to Summit also sells directly to consumers.

OUR SUPPLY CHAIN

The core business of Sea to Summit is to sell its branded products to retailers and distributors globally, as well as to sell products of its distributed brands to retailers in Australia.

Our supply chain can be broadly categorised as follows:

1. Suppliers of manufactured/fully assembled products

Sea to Summit sources finished products consisting of manufactured and fully assembled products. The finished products are badged with a Sea to Summit trademark.

2. Suppliers of goods for re-sale (distributed brands – Australia only)

In Australia, Sea to Summit acquires finished products from its distributed brands.

3. Suppliers of services/goods required for operations

In Australia, Sea to Summit engages service providers to provide a range of services including professional services, packaged materials, some IT services, equipment and logistics services.

4. Employees

Sea to Summit employs over 200 employees worldwide. It also operates its own distribution centre from Perth, Western Australia. Sea to Summit rarely engages a labour hire company, preferring to recruit employees directly where possible.

OUR SUPPLY CHAIN: AUSTRALIAN OPERATIONS

Head Office, Sydney Office and Warehousing

To service the Australian retail market, our team in Perth provides all administration, customer service, finance, sales, marketing, design, operational and logistics services. The Perth office is essentially the head office that oversees almost all matters concerning Sea to Summit products, from inception through to distribution and sales. We also have a small team based in Sydney to support the business operations on the East coast.

A part of Sea to Summit's business involves distributing brands to retailers Australia-wide. We do not distribute or represent brands in any other market other than Australia. For this reason, attached to our Perth head office is our purpose-built warehouse, which also functions as a distribution centre. The primary function of our warehouse operations in Perth is to service retailers and consumers located in Australia.

All warehouse operatives are employed by Sea to Summit and we very rarely engage the assistance of labour hire companies. Freight is the exception to our domestic operations and all freight services are provided by external third parties.

In the 2020 Financial Year, Sea to Summit engaged over 300 suppliers to support the Australian operations. Approximately 90% of our total spend was with 90 suppliers and our risk assessment focused on those suppliers.

To the right is a brief snapshot of the product manufacture supply chain.

Sea to Summit considers that there is a low risk of modern slavery within our domestic operations and this is largely due to our policies, procedures and operations.



OUR SUPPLY CHAIN: SEA TO SUMMIT BRANDED PRODUCTS

Sea to Summit products are designed by our design team based in Perth, Western Australia and manufactured by independently owned factories located outside of Australia.

The factories that we choose to support are typically small to medium sized, with specialised equipment or experience suited to Sea to Summit products. We have considerable long-term relationships with most of the suppliers that we work with and they are located in areas that is convenient to our team in China. Our products are then distributed and sold globally

through our distribution channel and through our controlled entities.

For the purposes of this Statement, below is a brief snapshot of the product manufacture supply chain. Our risk assessment focused on Tier 1 and Tier 2 suppliers that operate as a manufacturers or a component/parts supplier.





SECTION 3

Risks of Modern Slavery in the Supply Chain

Sea to Summit recognises that modern slavery risks can occur within its supply chain, particularly because of the industry in which it operates and the country where those suppliers are based. Whilst confident that modern slavery and exploitation of employees does not exist within Sea to Summit, it acknowledges that modern slavery risks can exist deeper in the supply chain.

OUR RISK ASSESSMENT APPROACH

It is important to Sea to Summit to understand and appreciate what modern slavery means and how it can be embedded within the supply chain. We put considerable research into modern slavery and how it exists in each country. We reviewed research and material published by various organisations (including governmental publications) such as the Global Slavery Index (GSI), Trafficking in Persons Report published by the US Department of

State and the Global Estimates of Modern Slavery published by the International Labour Organisation.

By understanding what modern slavery means in each significant country, we were able to assess our Tier 1 suppliers based on their country/geographical risk.



Ultimately, the risk assessment that was completed in preparing this Modern Slavery Statement focused on: (1) suppliers who provide manufacturing services and parts/components to Sea to Summit outside of Australia and (2) direct suppliers to Sea to Summit Pty Ltd where expenditure was greater than 90% of the total expenditure of Sea to Summit Pty Ltd in the reporting period and where those suppliers agreed to participate in our assessment.

The research undertaken enabled Sea to Summit to identify areas on which to focus its risk assessment with its Tier 1 suppliers.

For the purposes of this Modern Slavery Statement, we chose to focus on Tier 1 suppliers that operate in countries of moderate to high risk.

Although Sea to Summit does engage suppliers directly, there is also an extended supply chain outside of the control of Sea to Summit located in geographical locations and in industries with a risk of modern slavery. Through our risk assessment, Sea to Summit identified that the following risks could be present in the extended supply chain. In addition, Sea to Summit identified that improvements could be made to further ensure the protection of workers within the supply chain. The outcome of the risk assessment is broadly captured below.

| DISTRIBUTED BRANDS | | |
|--------------------|--|---|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| | <p>Most distributed brands that we work with are global brands that sell in markets including Australia. They are typically brands with an understanding of supply chain risks and with established due diligence and other procedures in place to manage those risks.</p> <p>Distributed brands will either engage the manufacturer or engage a supplier to source manufacturers or component suppliers.</p> <p>The inherent risk present in the manufacturing industry means there is a potentially medium risk of modern slavery present.</p> | <p>Medium risk.</p> <p>Further due diligence required over the next 12 to 24 months to more thoroughly assess the level of that risk.</p> |

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|---|------------|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| Australia | <p>Sea to Summit operates most of its business functions from Perth with a smaller team in Sydney.</p> <p>To support employees and contractors, Sea to Summit has various policies and procedures in place to prevent workplace bullying and discrimination, and to provide safe work practices. All employees and contractors have been engaged in accordance with all legal requirements.</p> | Low risk. |

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|--|--|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| China | <p>According to the Global Slavery Index, the most prevalent forms of modern slavery in China involves forced labour.</p> <p>Due diligence undertaken by Sea to Summit to date has not revealed any form of forced labour activity within the factories operating in China and engaged by Sea to Summit. Typically, Sea to Summit will visit factories, however, due to COVID-19, the frequency of visits have reduced. Past visits have not evidenced any form of modern slavery within the workplace.</p> <p>Most suppliers have, on our assessment, presented with a low risk of modern slavery.</p> <p>The few suppliers that have presented with a medium risk of modern slavery will be further reviewed and assessed over the next 12 to 24 months.</p> | Medium risk with more detailed due diligence work required with respect to suppliers with particular priority to be placed on suppliers who have presented with a medium risk score. |

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|--|------------|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| Hong Kong | <p>Hong Kong has presented the Modern Slavery Bill 2017 which, once enacted, will put in place steps to make modern slavery an offence. At the time of this Modern Slavery Statement, the Bill had not been enacted. Legislation such as this assists in reducing the risk of modern slavery. However, as Hong Kong is influenced by the Beijing backed government, the risk of forced labour, debt bondage and human trafficking will remain until, at least, the bill is enacted.</p> <p>Notwithstanding that the Bill has not yet passed as legislation, our due diligence shows that suppliers engaged by Sea to Summit, who operate in or from Hong Kong, have a level of policies and procedures in place to prevent modern slavery. On that basis, they present a low risk of modern slavery.</p> | Low risk. |

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|---|---|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| Japan | <p>Migrant workers and foreign international students are at an increased risk of modern slavery in Japan.¹ Our due diligence of our suppliers that operate in or from Japan largely shows that they do not recruit low skilled or foreign migrant workers. Only one supplier indicated that they recruited low skilled or foreign migrant workers, which warrants further due diligence of that supplier within the next 12 months.</p> <p>All other suppliers that operate in or from Japan demonstrated that they have appropriate policies and procedures in place to prevent risks of modern slavery.</p> | Low risk with one supplier requiring further due diligence within the next 12 months. |

¹ <https://www.globalslaveryindex.org/2018/findings/country-studies/japan/>

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|--|------------|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| South Korea | <p>According to the Global Slavery Index, the prevalence of modern slavery in South Korea is low. The South Korean government also conducts labour inspections to identify cases of modern slavery.² The industry at the greatest risk of modern slavery in South Korea is the agricultural industry (in which Sea to Summit does not operate).</p> <p>Our due diligence shows that those suppliers have a level of policies and procedures in place to prevent modern slavery. On that basis, we have assessed that our suppliers in South Korea present a low risk of modern slavery.</p> | Low risk. |

² Country Data – Global Slavery Index: <https://www.globallslaveryindex.org/2018/data/country-data/south-korea/>

| SEA TO SUMMIT BRANDED PRODUCTS | | |
|--------------------------------|---|------------|
| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
| Taiwan | <p>Taiwan presents with a low risk of modern slavery as a country according to the Global Slavery Index.³ Local laws in Taiwan criminalise human trafficking and slavery. The industry at the greatest risk of modern slavery in Taiwan is the fishing industry (in which Sea to Summit does not operate).⁴</p> | Low risk. |

³ Country Data – Global Slavery Index: <https://www.globallslaveryindex.org/2018/data/country-data/Taiwan/>

⁴ Report: 2020 List of Goods Produced by Child Labor or Forced Labor (page 26): https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/2020_TVPR_List_Online_Final.pdf

SEA TO SUMMIT BRANDED PRODUCTS

| SUPPLIER CATEGORY | RISK FACTOR | RISK LEVEL |
|-------------------|--|------------|
| Vietnam | <p>The recent 2020 List of Goods Produced by Child Labor or Forced Labor shows that child labor and forced labour is most prevalent in the garment industry in Vietnam.⁵ Most of the suppliers engaged by Sea to Summit who operate in or from Vietnam are in the manufacturing industry.</p> <p>More recently, the Vietnam government voted for the ratification of the Abolition of Forced Labour Convention, 1957 (No. 105).⁶ Such conduct by the Vietnamese Government provides a positive impact to mitigate modern slavery practices (including forced labour).</p> <p>The efforts by the Vietnamese government to put in place measures to prevent forms of modern slavery is helpful in mitigating such conduct. In addition, the due diligence conducted by Sea to Summit demonstrates that our suppliers in Vietnam have processes and procedures in place to prevent modern slavery and that they themselves do not engage in forced labour. On this basis, our assessment is that our suppliers in Vietnam present a low risk of modern slavery.</p> | Low risk. |

The risk scores were used (and continue to be used) to prioritise and manage risks identified. It also takes into account the geographical and industry risks and the outcome of the due diligence conducted with our suppliers.

⁵ Report: 2020 List of Goods Produced by Child Labor or Forced Labor (page 24): https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2019/2020_TVPRAList_Online_Final.pdf

⁶ Article: https://www.ilo.org/global/standards/subjects-covered-by-international-labour-standards/forced-labour/WCMS_747466/

SECTION 4

Actions taken to address Modern Slavery Risks



Many of the Tier 1 suppliers engaged by Sea to Summit have been working with Sea to Summit for many years.

We believe in engaging and investing in reliable, trustworthy and honest suppliers who share the same ethical principles as us. Some of the actions we have taken to identify and prevent modern slavery risks include the following:

CAREFUL SELECTION OF SUPPLIERS

When onboarding new suppliers, we take our time in understanding the supplier and the people that work there. To do this, we engage in numerous discussions as well as factory visits to view the working conditions in the factory.

After onboarding a new supplier, we continue to implement the following:

1. Visit factories at least once per year, however, we will visit most of our major factories between 2 to 6 times per year; and

2. Request for updated certification each year.

We also prefer to work with suppliers that are located in relatively close proximity to our office

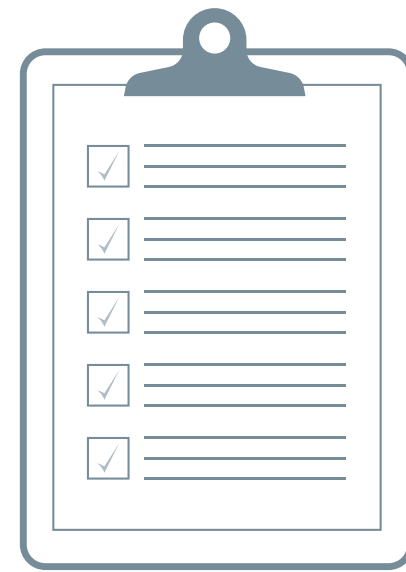
in China to enable our team in China to visit the factories as and when required. This also enables us to visit factories more conveniently and establish closer relationships with them. The additional benefit of working in close proximity with our suppliers is that we can visit their factories with little advance notice and this gives us a realistic understanding of the factory working conditions. In addition, the geographical convenience of being in China also enables the team to visit suppliers located in other parts of Asia.

In 2020, access to those suppliers were limited due to COVID-19 and the process of reviewing the suppliers for modern slavery was formalised through desktop surveys and due diligence. To every extent possible, our team in China continued to visit suppliers, but more infrequently due to COVID-19.



PAYMENT

We appreciate that timely payments are essential to a business and the livelihood of the people that work in that business. When we onboard a new supplier, we engage in discussions concerning payment expectations and will work with our supplier to reach a mutually workable position. In addition, we do not encourage delayed payments to our suppliers and have a reliable record of timely payments.



REVIEW OF EXISTING SUPPLIERS

In the reporting period, we conducted a review of Tier 1 and Tier 2 manufacturing and component suppliers that operate in moderate to high-risk countries. We approached 72 suppliers that made up 94% of the expenditure of Sea to Summit Pty Ltd. Of those 72 suppliers, 50% agreed to submit to our review. The outcome of the review, combined with the risk assessment, provided us with guidance on actions we can take to further deter and prevent modern slavery from occurring within our supply chain.

Moving forward, we will continue to work with our suppliers to bring them in line with our expectations.

CODE OF CONDUCT

Aside from engaging suppliers overseas, we also work with suppliers in Australia and, in the last year, have revised our Code of Conduct to set our zero tolerance for modern slavery practices. We also updated our Supply Agreement to require our suppliers to also implement its own due diligence procedures for its suppliers, subcontractors and other

participants to ensure that there is no slavery or human trafficking in the supply chain.

We plan to implement a new Supplier Code of Conduct with suppliers engaged outside of Australia and are working towards having this implemented by the next reporting period.





EDUCATION

All staff within Australia have been provided with education on what constitutes modern slavery. We believe that education and effective leadership are all required to execute, implement and drive positive change. Deterring modern slavery is a priority for us and we now incorporate this as a topic for discussion, deliberation and decisions at management meetings.

Language has been a barrier in educating teams based in countries where English is not the main language. In the following reporting period, we anticipate providing in depth training with all employees engaged in the procurement of suppliers.

REMEDIATION PROCESS

During the reporting period, there were no known instances or occurrences of modern slavery within the supply chain. However, where suppliers have been assessed as being of moderate to high risk, those suppliers will go through a process of engagement with Sea to Summit. The objective of the engagement is to clarify the circumstances that resulted in the supplier being assigned to that risk category. As most of our suppliers speak a language other than English, communication and clarification is key to understanding the supplier and its operations. If issues are identified that require remediation, Sea to Summit will work through those issues with the supplier and agree on a process and timeframe to resolve the issue/s.



SECTION 5

EFFECTIVENESS OF THE ACTIONS

We believe that our actions can be improved and will improve as we find new ways of working with our suppliers and educate them on how to identify modern slavery within their supply chains. Our actions taken during the reporting period were limited due to COVID-19, resource limitations as well geographical limitations which is further detailed below.

SECTION 6

CONSULTATION

The entities controlled by Sea to Summit share the same Board and executives. Sea to Summit has therefore engaged in a process of consultation with its controlled entities. The risks that have been identified in this Modern Slavery Statement, and the measures to mitigate the risk, have been considered by Sea to Summit and its controlled entities.

SECTION 7

OTHER RELEVANT INFORMATION

COVID – 19

The COVID-19 pandemic had not been previously considered in the context of modern slavery. Since the commencement of the pandemic, an organisation-wide ban on travel was implemented and staff in China reduced their frequency of visits to factories.

Although we engaged technology to continue our communications with suppliers overseas, it remained difficult to determine whether suppliers had engaged in, or were at risk of, being a part of some form of modern slavery. Our China team continued their efforts to engage with suppliers and we continued to pay our suppliers in a timely fashion. Sea to Summit also continued to place orders on the same terms and conditions to ease the pressure on our international suppliers, especially those in vulnerable geographic locations.

We acknowledge that more can be done to prevent modern slavery through communication, education and engagement. Sea to Summit remains committed to continuing with its effort to identify, reduce and prevent modern slavery through its supply chain.

Approval

This Modern Slavery Statement was approved by Roland Tyson as the Sole Director of Sea to Summit on 31 March 2021.



Roland Tyson



