

MODERN SLAVERY STATEMENT

1 July 2020 to
31 December 2021





Introduction

Sea to Summit Pty Ltd (Sea to Summit) was founded by Roland Tyson in 1991. The company started and continues to operate from Perth, Western Australia. Today, Sea to Summit has grown into an award-winning manufacturer of ingeniously designed omni-terrain outdoor gear ready to accompany you on your adventures.

Being driven by design perfectionism has allowed us to develop purposeful and functionally beautiful products with the perfect balance of weight, durability and packability. Our passion for innovation has seen us grow into a global brand sold in over 73 countries and our operations are supported by our teams in Australia, USA, Germany and China.

This statement has been prepared in accordance with the **Modern Slavery Act 2018** (Cth) and outlines Sea to Summit's structure, operations, supply chain risks and risk mitigation strategies. This is also Sea to Summit's second Modern Slavery Report for the reporting period starting 1 July 2020 to 31 December 2021. The reason for extending the reporting period beyond the end of the Australian Financial Year (i.e. 30 June 2021)

is because Sea to Summit has adjusted its Financial Year to a calendar year which will come into effect on 1 January 2022. This means that Sea to Summit will file its third Modern Slavery Report by 30 June 2023.

Sea to Summit values each and every individual involved in our business, from those who work in our teams globally, to the individuals that work in the factories that we engage with. As such, Sea to Summit does not tolerate any form of modern slavery, be it child labour, forced labour, deceptive recruitment, human trafficking or prison labour. Despite our position, we appreciate that some form of slavery can still exist within our supply chain.

Our supply chain and also those of the brands that we work with are complex. As such, we

have continued with our efforts to identify and address the risks of modern slavery occurring within the supply chain. Our priority focus remains on the factories that we work with, particularly in China, for the reasons set out in this report. We have plans to increase transparency and visibility within our supply chain to enable us to better map out our Tier 2 suppliers for future reporting periods.





SECTION 1

Structure, operations and supply chains of the reporting entity



Reporting Entity

This Modern Slavery Statement has been prepared in accordance 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. The reporting period for this statement is 1 July 2020 to 31 December 2021.

Sea to Summit controls the following entities:

Sea to Summit North America LLC,

Sea to Summit GmbH,

Sea to Summit (Zhong Shan) Outdoor Trading Company Ltd.

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.

Our Operations

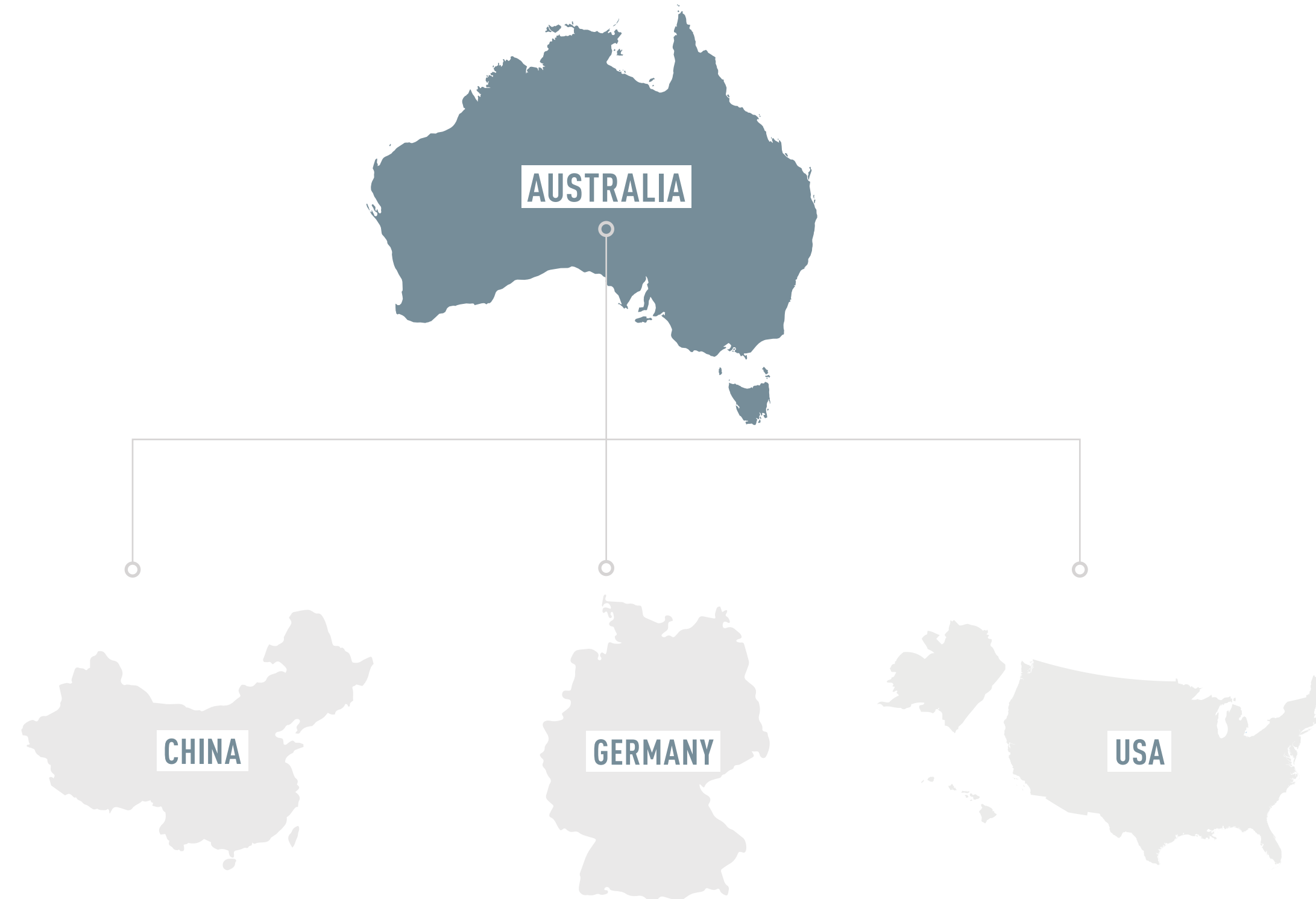
OUR BRANDS

We sell four private label brands:



OUR LOCATIONS

Sea to Summit operates in Australia, China, Germany and the United States.



OUR BUSINESS

Sea to Summit sells its products through a range of digital platforms and through independent distributors globally. In Australia and China, we also represent certain brands as the exclusive distributor in the respective country. Germany and the United States.

OUR DESIGNS

Every Sea to Summit product is thoughtfully designed by our team in Perth, Australia and starts from an idea and evolves into a finished design that is ready for production. Every element of each Sea to Summit product is carefully considered from functionality through to durability and, of course, experience in the great outdoors.



SEA TO SUMMIT PTY LTD – AUSTRALIA

- Sea to Summit’s head office and distribution centre is based in Perth, Australia where the team provide all the essential services including design, creative services, digital services, distribution, sales (domestic and international), customer support, warehousing, IT, finance and legal.
- In Australia, Sea to Summit is also the distributor of 24 other brands and we run a retail store from Sydney on behalf of one of its distributed brands. These products are sold by Sea to Summit to retailers throughout Australia and sold direct to consumer through various digital platforms.
- It is also a prime vendor to the Commonwealth Department of Defence for the supply of a range of field equipment including some Sea to Summit branded products.
- In Australia, Sea to Summit also sells Sea to Summit branded products to international distributors on a wholesale basis worldwide.
- All sourcing and procurement is managed from our head office in Perth, Western Australia. We work with approximately 179 factories/suppliers of fully assembled products or raw materials (with an aggregate workforce of 851 employees). All Sea to Summit branded products are manufactured in third party factories, and based on sourcing volumes, approximately 83% of our products were sourced or manufactured in China.



**SEA TO SUMMIT NORTH AMERICA, LLC
– BOULDER, COLORADO**

Our team in North America predominantly services the North American region and covers day to day business functions such as marketing, customer support, warranties, repairs through to sales to retailers of Sea to Summit branded products. We operate a distribution centre in Boulder, Colorado to support the sales to retailers located throughout North America.

SEA TO SUMMIT GMBH – GERMANY

In Germany, Sea to Summit GmbH sells only Sea to Summit branded products to retailers and consumers online. It contracts with an independent 3PL company to provide warehousing and distribution services to support Sea to Summit GmbH.

**SEA TO SUMMIT (ZHONG SHAN)
OUTDOOR TRADING COMPANY LTD
– CHINA**

Our operations in Australia are supported by our team in China who are responsible for overseeing product sourcing, product development, procurement support, quality management and sales of Sea to Summit branded and other international brands to retailers within China.

Our Supply Chain

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

Suppliers in our supply chain can be broadly placed in one of the following categories:

FACTORIES / SUPPLIERS OF FULLY ASSEMBLED PRODUCTS OR RAW MATERIALS:

Sea to Summit sources finished products that are manufactured for Sea to Summit (i.e. contract manufacturers) or comprise of a mixture of components that are fully assembled by a supplier. From time to time, Sea to Summit may also source raw materials from suppliers directly.

In the reporting period, Sea to Summit engaged with approximately 179 factories/suppliers of fully assembled products or raw materials (Factory Partners). Of that total, approximately 81 are first tier suppliers and 98 second tier suppliers. More than 83% of suppliers engaged by Sea to Summit to manufacture Sea to Summit branded products are based in China. The remaining suppliers are located in Vietnam, Taiwan or Thailand.

SUPPLIERS OF OTHER BRANDS – AUSTRALIA AND CHINA ONLY:

In Australia and to a smaller extent, in China, Sea to Summit acquires finished products from its distributed brands for re-sale to retailers. In this context, Sea to Summit is the distributor of certain branded products.

SUPPLIERS OF SERVICES/GOODS REQUIRED FOR OPERATIONS:

Sea to Summit Pty Ltd and its subsidiaries in China, Germany and North America share some shared services (such as product design, marketing, finance, procurement, legal and HR) which are provided from our head office in Perth, Western Australia. Across the whole business, we also engage services and goods from other independent third parties such as paper cartons, courier services, stationery, software and related support, consultants and so forth.

EMPLOYEES:

As at the date of this report, Sea to Summit employs 241 employees worldwide and we prefer to recruit employees directly where possible. Due to labour shortages for some positions, there has been a slight increase in recruiting individuals with the assistance of labour hire/recruitment companies however all recruitment has been carried out in accordance with all local laws.



SECTION 2

Risks of Modern Slavery in the Supply Chain



Sea to Summit's supply chain across its operations globally is extensive. In preparing for this report and as part of our overall strategy, we have chosen to primarily focus on suppliers involved in the manufacture of our products.

As a business, we value each and every individual that are involved in each step of the way in transforming our design into a reliable product that is ready to travel with you on your next adventure. For this reason, we chose to prioritise on our manufacturing supply chain to identify and mitigate any risk of modern slavery in the production of any Sea to Summit product.

For the purposes of this report, Tier 1 suppliers means any supplier/factory that manufactures or provides fully assembled products. Tier 2 suppliers means any supplier who directly supplies components

or raw materials to Sea to Summit. In this last reporting period, we focused on Tier 1 suppliers and some Tier 2 suppliers.

Approximately 83% of STS's Tier 1 suppliers predominantly conduct their business in China. The remaining 17% of STS's Tier 1 suppliers predominantly conduct their business in Australia, China, Taiwan, USA, Hong Kong, Vietnam or Thailand.

Our Risk Assessment Approach

In the reporting period starting 1 July 2020 to 31 December 2021, the risks identified in our last report remained consistent and relevant to this reporting period. However, we also identified the following additional risks:

COVID-19

The global pandemic continued to pose a risk in all countries due to country imposed lockdowns, work restrictions, consumer demand (and therefore pressure on the supply chain), port closures, increased commodity prices as well as the health and well being of all the individuals that contribute to the ongoing supply of product; and

ELECTRICITY SHUTDOWN IN CHINA

The electricity shortage/shutdown in China that occurred in October 2021 placed increased pressure on factories and suppliers throughout China and increased delays to production.

In the last reporting period, we assessed risk by taking into account:

1. Any relevant country risks having regard to a range of research including the Global Slavery Index; and

2. The responses to our due diligence questionnaire.

For this reporting period, we regularly sought to identify and mitigate country specific risks and, where appropriate, implemented measures to reduce the impact on our Factory Partners.

One of the consistent risks that our Factory Partners faced is the risk of COVID-19 in their respective region, particularly in China where approximately 83% of our Factory Partners are

based and which represents more than 70% of the total procurement value for Sea to Summit manufactured products. The challenges that were first experienced when the pandemic began continued through the second reporting period across all countries where our Factory Partners operated. Most countries where our Factory Partners operated were affected by lockdowns of varying degrees which had subsequent impacts on production capabilities thereby increasing pressure on the workforce to meet deadlines.

For our Factory Partners in China, they were also affected by the electricity shutdown that occurred in October 2021. During that period of time, Sea to Summit maintained open communications with its Factory Partners and where production timelines had to be postponed, we reached mutual extensions to ease the pressure.



Risk Identification

DISTRIBUTED BRANDS

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
Various	<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 including on site audits to confirm working conditions and compliance with the brand's own policies and procedures.</p> <p>A majority of our brands completed our due diligence questionnaire with almost all brands scoring a risk rating of "low risk with no perceived inherent risk" or "low risk with adequate risk mitigation" with two scoring a risk rating of "medium risk".</p> <p>In terms of risk mitigation, we intend to follow up with those brands to clarify the progress that they have made in the next reporting period to identify and mitigate risks of modern slavery in their supply chain.</p>	Low risk with further due diligence required.

STS OWN BRANDED PRODUCTS (broken down based on country/region)

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> <p>To the extent that contractors are engaged (such as courier services, stationery suppliers, auditors, lawyers and other services required for the day to day operations of the business) and who participated in our due diligence, those suppliers scored an overall low risk rating. A significant contribution to the low risk rating is due to the legal system in place in Australia which provides strict laws regarding workplace safety, workplace rights and remuneration.</p>	Low risk.

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
China	<p>The country risk rating for China remains unchanged since our last report. The impacts of COVID-19 is suspected to have potentially increased the prospects modern slavery occurring within China.</p> <p>On our assessment of the questionnaire completed by our suppliers in China, a majority presented with a 'low risk' rating.</p> <p>In addition, in the period between September to October 2021, Sea to Summit identified that the electricity shortage situation in China had potential to place pressure on our suppliers and therefore increase the risk of forced labour. However, from a risk management and mitigation perspective, during that period of time, Sea to Summit maintained open communications with its suppliers in China to assess the impact that the electricity shortage had on their production capabilities. Overall, most of our suppliers were not significantly impacted by the electricity shortage. To accommodate the effects of the electricity shortage, Sea to Summit worked with its suppliers to agree to new production dates.</p>	<p>Low risk overall with further due diligence work to be undertaken with respect to a small number of suppliers in China as a precautionary measure.</p>

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
Hong Kong	<p>Hong Kong was impacted by COVID-19 and also political discord in the previous reporting period. This continued into the current reporting period.</p> <p>The anti-slavery legislation referred to in our last reporting period has, from what we understand, been paused due to political changes. It remains uncertain as to if and when such changes will come into effect¹. Labour trafficking and exploitative behaviour is a risk in Hong Kong and the absence of legislation against human trafficking remains a risk in Hong Kong².</p> <p>We engage with one Factory Partner who predominantly conducts their business in Hong Kong.</p>	<p>Low risk with the need to monitor.</p>

¹ <https://www.reuters.com/article/us-hongkong-politics-rights-trfn-idUSKBN27T14V>

² <https://www.iias.asia/the-newsletter/article/hong-kongs-modern-slavery-journey-so-far-businesses-must-now-take-lead>

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
Taiwan	In the last reporting period, Taiwan was doing particularly well in managing COVID-19 however by the current reporting period, it experienced an increase in virus cases which triggered a lockdown. Its government meet minimum standards for the elimination of trafficking however it is also reported that Taiwan remains at risk of forced labour of domestic caregivers and slavery amongst those in the fishing industry ³ .	We have a small number of suppliers that predominantly operate in Taiwan. The responses from our Factory Partners indicate that they comply with local labour laws. Further monitoring of these Factory Partners will continue. Overall, we consider our Factory Partners in Taiwan to be of low risk.

³ <https://www.state.gov/reports/2021-trafficking-in-persons-report/taiwan/>

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
USA	Forced labour, human trafficking and forced sexual exploitation of adults and children continues to exist in the USA however its government continues to implement measures to eradicate such practices through laws that criminalise both trafficking and forced labour ⁴ .	We have one Factory Partner in the USA and given that it does not operate within industries where forced labour is prevalent, we consider this to be of low risk.

⁴ <https://www.globalslaveryindex.org/2018/findings/country-studies/united-states/>

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
Vietnam	Vietnam was largely impacted by the shortage of labour as a result of COVID-19. Vietnam imposed lockdowns and factory shut downs during the reporting period. Many factories were unable to reach full production capacity as a result. Measures implemented by the government had the potential to increase the risks of unsafe work practices and long hours of work. Most of the measures impacted apparel and shoe factories.	Medium risk. Sea to Summit continues to monitor this and to mitigate the risk, we have agreed to extending production time lines to ease the pressure off our Factory Partners.

STS OWN BRANDED PRODUCTS (broken down based on country/region)

SUPPLIER CATEGORY	RISK FACTOR	RISK LEVEL
Thailand	In the current reporting period, Thailand's government introduced various measures to reduce the impact of the pandemic including nationwide curfews and encouraging vaccination. COVID-19 remains a real threat in Thailand however it has also greatly reduced the number of human trafficking investigations.	Medium risk. Sea to Summit continues to work with its Factory Partners to address production pressures to mitigate the risk of poor work conditions and forced labour.



SECTION 3

Actions taken to address Modern Slavery Risks



A majority of Sea to Summit's Factory Partners have been on this journey with us for many years and as a result, we have established long standing and transparent relationships with them.

The relationships that have been formed have enabled and encouraged consistent and transparent communications. Despite those relationships of trust, we have continued with our efforts to address modern slavery as set out below.

CODE OF CONDUCT

In the reporting period, Sea to Summit introduced a new Code of Conduct to set our expectations.

The Code of Conduct addresses issues that are important to Sea to Summit including an agreement by the Supplier to:

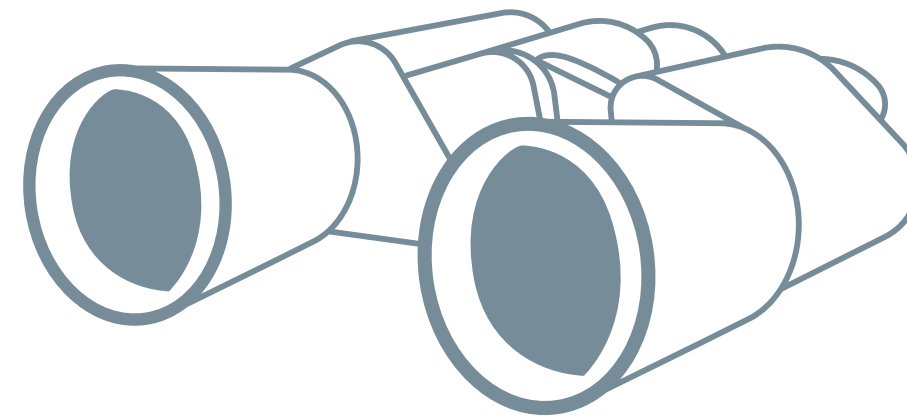
- Act ethically
- Not engage in anti-bribery or corrupt practices
- Not engage in forced labour, slavery, debt bondage, child labour or deceptive recruitment;
- Not engage in corporal punishment
- Respect the rights of workers and allow them to freely associate with unions

A total of 63 Factory Partners signed our Code of Conduct.



PAYMENT

We appreciate that timely payments are essential to a business and the livelihood of the people that work in that business. Sea to Summit continued to process payments to our Factory Partners in a timely manner.



IMPROVED PROCUREMENTS PROCESSES

In the reporting period, we re-structured our procurement team and introduced a new role, Director of Sourcing and Supply Chain, to lead the team with a priority in identifying and mitigating any risk of modern slavery in our supply chain, particularly with our Factory Partners. As part of this change, new processes were also established to give our Factory Partners more visibility over Sea to Summit's production needs including a 12 month forecast and a product lifecycle management (PLM) process to manage design, compliance and quality control. This gives our Factory Partners the ability to more accurately predict their production capacity and be better able to negotiate realistic targets rather than being placed under pressure to meet production timelines.

With travel restrictions in place, our team swapped factory visits with more ongoing communications to resolve any production timing issues.



REVIEW OF FACTORY PARTNER ARRANGEMENTS

For many of our Factory Partners, the relationship has been established for many, many years. As such, the arrangements in place did not specifically address modern slavery concerns and risks. We therefore commenced the process of reviewing and preparing new arrangements to increase transparency and put in place measures to address modern slavery, bribery and corruption. We hope to implement these new arrangements in the next reporting period.

SECTION 4

EFFECTIVENESS OF THE ACTIONS

While we are satisfied with the progress made since our last report, we acknowledge that our actions can be improved and will improve as we find new ways of working with our suppliers. In particular, we believe that a desktop due diligence and communication needs to be validated through onsite audits.

Our commitment to continuously improve is also demonstrated in the next section where we have mapped out our plans for the next reporting period.

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 5

OUR PLANS

Our efforts to identify, mitigate and eradicate all forms of modern slavery will continue through to the next reporting period.

In the next 12 months starting 1 January 2022, we plan to:

- Extend the Code of Conduct across other areas of the business, including with the brands that we distribute;
- Engage a third party auditor to perform on site audits focusing firstly on our top 10 Factory Partners that make up a majority of our manufacturing spend;
- Extend our due diligence to other suppliers in our supply chain globally, in particular, with those who have elected not to complete our questionnaire in the current reporting period;
- Communicate and monitor any corrective actions that arise out of the audit findings;
- Implement training across the business in all offices globally on modern slavery;
- Continue with our due diligence of our Factory Partners and other suppliers;
- Continue to encourage reporting on risks of modern slavery and ethical compliance; and
- Map and monitor high risk Tier 2 suppliers.

SECTION 6

ANY OTHER RELEVANT INFORMATION

Like others in the industry, COVID-19 continued to have a significant impact throughout the reporting period. Despite the lack of ability to travel due to lockdowns that prevented international and domestic travel, Sea to Summit are proud of its team for continuing to work through issues with its suppliers (including Factory Partners) to reduce the pressures and eliminate the risks of modern slavery during these unprecedented times.

We recognise that our efforts need to continue and improve year on year to build a more thorough approach to identifying, addressing and eliminating modern slavery in our supply chains. Sea to Summit is committed to continuing those efforts so that our customers can continue to enjoy our products that have been crafted with design precision for the ultimate adventure that they know were made responsibly and respectfully.

Approval

This Modern Slavery Statement for the reporting period starting 1 July 2020 to 31 December 2021 was approved by Roland Tyson as the Sole Director of Sea to Summit Pty Ltd on 31 December 2021.



Roland Tyson



