

## Modern Slavery Statement

At O’Neills Irish International Sports Co. Ltd (O’Neills), as both a manufacturer and supplier of sporting apparel, we recognise the responsibility that we share with our suppliers, to buy raw materials and sell our products in an ethical manner. We want our customers to be confident that our business partners treat their employees fairly, with respect for human rights and are not exposed to unsafe working conditions or in any way forced to work under slavery. We believe that when ethical standards are in place, this can improve worker well-being, productivity, and quality, which benefits both our suppliers and our customers.

### Policy

O’Neills will not work with any organisation that either has or is found to be knowingly involved within either human trafficking or modern slavery. Only suppliers who share our standards and values will be considered appropriate to trade with O’Neills and we seek to develop long-term trading relationships with suppliers based on the principle of fair, open and honest dealings always.

As part of this commitment, we acknowledge our responsibility towards the Modern Slavery Act 2015 and will ensure transparency within the organisation and with our suppliers of goods and services to O’Neills. The standards outlined are applicable across our entire business.

### Due diligence processes

As a part of our company’s due diligence process, we audit our suppliers on a regular basis and will only work with organisations who also commit to the eradication of slavery and human trafficking, and demand that our suppliers make the same demands of their own supply chains.

- The business will not forge commercial relationships with any business knowingly involved with slavery or human trafficking.
- We build long standing relationships with our suppliers and customers and make clear our expectations of business behaviour.
- Suppliers wishing to engage with O’Neills are expected to sign up to a framework agreement in which understanding of the Modern Slavery Act 2015 is mandatory.

As imported products sourced from outside Ireland, the UK or EC are potentially more at risk of slavery or human trafficking issues, we look to work in partnership with companies who possess certifications such as Social Accountability certification SA8000 or the IMO Fair for Life programme, which are independently assessed standards that reinforce their commitment to human rights, working conditions and the provision of a living wage.

### Assessing and Managing Risk

Our appraisal process will incorporate a review of the controls undertaken by our suppliers. As part of our initiative to identify and mitigate risk:

- A regular review of controls of our suppliers and an established process of supplier assessment and approval is undertaken.

- We endeavour to benchmark our supplier's HR policies against standards set by the Global Living Wage Coalition.
- We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.

## Key Performance Indicators

O'Neills recognise that carefully designed KPI's help our business to demonstrate where we are making progress over time, in preventing modern slavery both in our business and supply chains.

### Supplier KPI's

As part of our initial assessment of our suppliers, we will assess any risks in a company's operations or supply chain, with regards to modern slavery and human trafficking, and introduce a KPI to measure progress against that risk. These may include:

- Employee engagement activities
- Improvements to working and accommodation conditions
- Improvements to compensations and benefits

### Internal KPI's

We accept that focusing on KPI's to increase our own production or lead times may unintentionally increase pressure on our suppliers. However, it would be wholly unacceptable that any lapse in our supplier's corporate responsibility towards modern slavery or human trafficking resulted from this.

When setting KPI's for our own business we aim to assess the risk of making our supplier's businesses more vulnerable to modern slavery. These may include assessments to mitigate:

- Increasing working hours or shift patterns to an unacceptable level
- Expecting employees to work longer for the same pay
- A fall in HSE standards to improve a supplier's productivity

## Training

The Company Directors and Senior Management shall be responsible for the application of this policy and ensure all activity complies with the Modern Slavery Act 2015. O'Neills will provide adequate resources, training, and investment to ensure its successful application throughout the next financial year.



Paul Towell

Director

O'Neills Irish International Sports Co. Ltd.