



CREW CLOTHING COMPANY

# MODERN SLAVERY STATEMENT 2022

DECEMBER 2021 - OCTOBER 2022

The following statement is published in accordance with Section 54 (1) of the UK Modern Slavery Act (2015). It sets out how Crew Clothing Company approaches business and human rights and describes our commitments towards mitigating the risk of modern slavery in our supply chain.

## What is modern slavery?

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Crew Clothing Company has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

---

# CREW CLOTHING & OUR ORGANISATIONAL STRUCTURE

Crew Clothing is a British lifestyle brand, known for its timeless clothing inspired by the British coast.

Founded in 1993 in Salcombe, Devon, Crew Clothing Company is a UK-based multi-channel retailer, now operating over 100 retail stores within the UK and one in Ireland.

We also operate a considerable wholesale business in the United Kingdom, supplying around 90 retailers including Next, John Lewis and Very.

Crew Clothing collaborates with high profile sporting organisations, and in 2022 these included Henley Royal Regatta, The Lawn Tennis Association, Williams Racing and leading players in golf and rugby.

Crew Clothing employs around 169 people in our Head Office, and a further 667 employees across stores, and 67 in our Distribution Centre.

## Our Business Structure:

Crew Clothing Head Office is based in Earlsfield, Southwest London, with a Distribution Centre in Wigan which is operated by a third-party logistics provider.

We currently have around 173,859 Social Media followers.

## OUR SUPPLY CHAIN

Crew Clothing produces its own brand Menswear, Womenswear, Childrenswear, encompassing clothing, footwear and accessories.

Crew Clothing products are sold in our stores and e-commerce platform and through third party retailers. Our clothing, footwear and accessories are designed in-house and manufactured by third party manufacturers.

Our apparel, footwear and accessories manufacturing suppliers are based in Austria, Bangladesh, China, Spain, Hong Kong, India, Cambodia, Sri Lanka, Morocco, Pakistan and Turkey. The largest sourcing region by volume of product is Bangladesh, where the majority of Crew Clothing’s apparel product is produced.



Manufacturing and ethical standards are managed by the Head of Sourcing, implemented with support from the Head of Technical and Heads of Buying. The team is led by the Trading Director.

## OUR RISK ASSESSMENT PROCESS

Crew Clothing is in the process of developing a new ESG strategy. To inform our approach, in 2022 we commissioned a high level social and environmental risk assessment of our operations using the Sustainable Accountings Board Standards methodology. We assessed risks based on our industry sector and sourcing regions.

**We assessed the highest risks to be:**

- Labour conditions
- Child labour
- Materials sourcing

**We assessed the highest risk regions to be:**

- Cambodia
- Bangladesh
- Pakistan
- China
- India

We recognise the limitations of the above high level risk assessment in relation to Modern Slavery, which was limited to Tier 1 manufacturing locations and did not factor in the risks arising from specific raw materials or deeper supply chain tiers.

## How will we assess these risks moving forwards?

Deeper work is now necessary in order to identify and prevent forced labour risks including assessment of lower supply chain tiers, raw materials, logistics and warehousing. Our new ESG programme, to be published in 2023, will therefore include targets to extend the visibility of our value chains over time and include a programme to increase the robustness of our human rights due diligence programme.

## OUR POLICIES

Crew Clothing operates internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

**Recruitment:** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.

**Whistleblowing:** We operate a whistleblowing policy so that all Crew Clothing employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

**Business Ethics Code of Conduct:** This code explains the expectations of our organisation and how we expect our employees and suppliers to act.

**Supplier Manual:** contains Supplier Code of Conduct based on Ethical Trading Initiative Base Code.

The above policies are subject to review by the senior leadership team. In 2022 our focus has been on revising and expanding the existing Supplier Code of Conduct and increasing transparency by making more of our policies available on our website.

### The progress we've made in 2022:

Crew Clothing appointed a new Head of Sourcing to oversee the manufacturing supply base. The organisation has subsequently published the following updated sourcing policies which have been approved by the board:

[Crew Clothing Supplier Code of Conduct \[Revised 2022\]](#)

[Crew Clothing Cotton Sourcing Policy \[Revised 2022\]](#)

[Crew Clothing Unapproved Subcontracting Policy \[Revised 2022\]](#)

Crew Clothing also engaged a specialist consultancy in June 2022 to review its social and environmental policy and practice and support the company in developing a new ESG strategy, goals and commitments with associated governance and reporting structures. This work is currently underway and will be reported in our next Modern Slavery statement in 2023.

# OUR DUE DILIGENCE

Crew Clothing recognises the need to further develop and extend its supply chain due diligence programme in order to effectively manage human rights risks such as forced labour and modern slavery. This will form a key element of the company's new ESG Strategy.

## The progress we've made in 2022:

- Re-mapped 100% of Tier 1 manufacturers
- Desktop review of 100% of Tier 1 manufacturers: Suppliers completed a self-assessment onboarding questionnaire and supplied a current ethical audit [SMETA, BSCI audit methodologies accepted].
- Internal grading and risk mapping of all Tier 1 manufacturers
- Confirmed that all Bangladesh Factories have a Bangladesh Accord safety inspection with a progress rate of at least 90%
- Launched a new manufacturing supplier onboarding process

Visits to suppliers by Head Office personnel were not possible during the COVID-19 epidemic. The new Head of Sourcing will undertake supplier visits alongside Buying Team members in 2022/23.

# OUR COMMITMENTS FOR 2022-2023

- Map 100% Tier 2 suppliers and develop targets for deeper supply chain mapping
- Screen Tier 1 suppliers for labour and modern slavery risks
- Provide Modern Slavery refresher training for current Crew Clothing staff and new starters
- Review procurement of third-party service providers [logistics, freight, IT, customer care] on how they manage the risk of modern slavery in their own supply chains or recruitment
- Implement a governance and reporting structure to ensure our approach to upholding human rights is embedded across the business

# OUR EMPLOYEE TRAINING

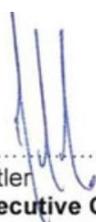
There has been a turnover of staff since our last Modern Slavery Statement, and Crew Clothing's leadership team recognises the need to provide updated training for colleagues across the business.

We therefore commit to providing training and awareness raising on Modern Slavery and human trafficking for all colleagues by October 2023.

Training will be provided at a level relevant to job role. Colleagues identified as having the highest exposure to Modern Slavery risk will be prioritised: Senior Leadership, Product teams (buying, design, sourcing), Operations teams (logistics, HR, quality, facilities, finance). Crew Clothing will also include a focus on Modern Slavery risk at company retail conferences planned for May and September 2023.

## APPROVAL

This statement was approved by the Crew Clothing Board  
on 14th December 2022.



.....  
David Butler  
Chief Executive Officer