



Barbour®

J. Barbour & Sons Ltd.

Simonside, South Shields, Tyne & Wear NE34 9PD

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4 March 2021

Rt. Hon Tom Tugendhat MP
Chair
Foreign Affairs Committee
House of Commons
London
SW1A 0AA

Dear Mr Tugendhat

Foreign Affairs Committee – J Barbour & Sons Ltd response

Thank you for your letter dated 19 February and we are pleased to respond as follows:

J Barbour & Sons Ltd is a 5th generation family owned British lifestyle company, established since 1894. The proud holder of three Royal warrants, our brands Barbour and Barbour International are sold in over 55 countries worldwide, including Europe, the US and Japan. We are a responsible and ethical manufacturer and retailer and we do not tolerate or condone any abuse of human rights within our business or supply chains, directly or indirectly. At J Barbour & Sons Ltd we have a commitment towards the welfare and interests of our employees and those of our suppliers. Our sourcing strategy exists to ensure people are treated fairly, with dignity and respect.

1. What is the nature and extent of your company's operation in Xinjiang?

J Barbour and Sons Ltd has no operations and does not work with any suppliers in the Xinjiang region.

2. What specific raw materials arriving in UK markets are sourced from Xinjiang?

None of our raw materials are supplied to the UK from the Xinjiang region. Barbour is a member of the Better Cotton Initiative (BCI) and since March 2020, BCI has suspended licensing and assurance activities in the Xinjiang Uyghur Autonomous Region (XUAR); as a result, there is no new licensed Better Cotton coming from the region. 100% of our waxed cotton is sourced through the BCI.

3. **Are any of your products assembled in factories deemed to be at risk of using forced labour?**

None of our products are assembled in factories deemed to be at risk. We always ensure that through the use of third parties, we comply with relevant, current legislation to ensure that labour standards and human rights in the workplace are met. This includes compliance with the Modern Slavery Act 2015 in the UK and the International Labour Office (ILO) to prevent forced and compulsory labour, discrimination in the workplace and child labour in all of the countries in which we operate which includes China.

All our suppliers are contracted to J Barbour & Sons Ltd and as part of their contract, they must declare conformance with our Base Code of Ethics as outlined in our Modern Slavery Statement (see appendix one). Contractually, our suppliers are not permitted to use unauthorised sub-contractors.

4. **Which Chinese companies are involved in your supply chains?**

J. Barbour & Sons works mainly with accessory and fabric suppliers in China. These are quite often UK companies who have set up sourcing operations in China. These suppliers have been carefully chosen and we ensure that the factories we use adhere to the very high standards that we demand of all our suppliers. As stated above, our suppliers must sign up to our Base Code of Ethics and are required to meet international labour standards and local laws. A list of these suppliers, as requested, is attached as appendix two.

5. **How do you ensure that companies at every stage of your supply chain meet their contractual obligations regarding anti-slavery and anti-human trafficking laws?**

Barbour will not tolerate or condone any abuse of human rights. We are a full member of SEDEX (Supplier Ethical Data Exchange). This is a not for profit organisation which enables transparent access to independent certified auditing reports on factories and suppliers. These are used to complement our own assessment of our supplier's ethical standards. Our factories undergo regular planned audits by third party auditors to ensure compliance with our Base Code of Ethics.

6. **What is Barbour's approach to assessing and scrutinising its supply chains to ensure that materials are ethically sourced?**

J Barbour & Sons Ltd uses international, reputable suppliers who are subject to an in-depth assessment of their operation including visits from our own UK staff before we proceed to manufacture. This can be a lengthy process to ensure that we are fully satisfied and can take around six months before the first trial. We ensure that only the factories we have authorised export our goods. In China, we do this by registering only factories that we have authorised with Chinese Customs thus ensuring that no Barbour goods can be exported by a non-declared company.

7. **Where materials from unethical sources are identified, how does your company respond and what steps are taken to mitigate the risk of future occurrences?**

Non-compliance is addressed by a CAPR (corrective action plan linked to a specific time frame) where we work closely with the factory to resolve any issues. We allow the partner a reasonable amount of time to correct any non-compliance issues to reduce the potential detrimental impact on workers livelihoods. There is then a follow up schedule to ensure that the issue does not reoccur. Should there be a major problem such as non-compliance to our Base Code, we would reserve the right to withdraw our products and terminate the factory's contract. However, it is worth stating that due to the nature of the factories we use and the premium standards we demand, this is not something that we have experienced to date.

8. **What is your information gathering process for your Modern Slavery statements and how do you verify this information. What is your process for acting on the findings of your Modern Slavery statements?**

J Barbour & Sons Ltd Modern Slavery Statement (please see appendix one) is reflective of our company values which we apply to our own business and throughout our supply chain. We employ industry experts and undertake frequent visits by Barbour staff to our manufacturing sites in order to check and monitor production plans. By doing this, we can quickly identify any irregularities. Our goal has always been to build up long term partnerships with our suppliers across the globe based on trust and respect resulting in a deeper understanding of each other's businesses and objectives.

I hope that our answers are of assistance to you.

Yours sincerely

On behalf of J Barbour & Sons Ltd

A handwritten signature in black ink, appearing to read 'S. Buck', with a long horizontal flourish extending to the right.

Steve Buck
Managing Director

Appendix One

J Barbour & Sons Ltd ('Barbour')

Modern Slavery Statement

Our Business

J Barbour & Sons Ltd is a fifth-generation family-owned business and has been trading for 127 years. We conduct our business through wholesale, retail and ecommerce channels.

Barbour has two trading subsidiaries, Barbour Inc (USA) and Barbour (Europe) Ltd (Germany). Barbour distributes through independent authorised dealers in the UK and abroad. As the parent company of the Group, J Barbour & Sons Ltd organises the manufacture of its products on behalf of Barbour Inc and Barbour (Europe) Ltd.

We continue to manufacture classic wax jackets in our South Shields factory and engage trusted suppliers to manufacture products in our global supply chains.

At Barbour we have a commitment towards the welfare and interests of our employees and those of our suppliers. Our sourcing strategy exists to ensure people are treated fairly, with dignity and respect.

Our Policy

We fully endorse the Modern Slavery Act 2015, promote ethical business and condemn any abuse of human rights. Accordingly, we are committed to working with suppliers who comply with the human rights standards set by the International Labour Office (ILO). These are the basis of our Code of Practice at Appendix 1.

The ILO is an agency set up by the United Nations and brings together government, employers and workers of 187 member states to set labour standards, develop policies and devise programmes promoting decent work for all women and men.

What Barbour has done in the last year

We have continued to monitor human welfare standards in our supply chain using the measures set out in this statement.

To further support this and to increase transparency of our factory base, we have joined the Human Rights Watch's globally recognised "Transparency Pledge" and the UK-based "Fast Forward" programme.

When we have identified minor corrective measures to be taken with certain suppliers and areas of the supply chain, we set in place corrective action plans working with suppliers to monitor improvement and ensure changes are made swiftly.

We acknowledge and are monitoring the ongoing situation of cotton suppliers in the Xinjiang region of China. We can confirm we have never sourced nor have any plans to source cotton from this region and will continue to monitor our supply chain accordingly.

Measuring the ILO Standards

For Barbour, the ILO standards are paramount. Any serious breach of the standards would likely lead to termination of the business relationship between Barbour and its supplier.

Minor incidents will be considered in their context and proportionate action will be taken. Barbour may decide to engage the relevant supplier or factory in corrective action and will support the supplier or factory in improving their standards. The supplier's standards will be closely measured and any minor incidents must be rectified within a specific timeframe. By setting targets, we measure the effectiveness of our enforcement methods and ensure the ILO standards are maintained.

If the supplier does not adequately address any non-compliance points despite being required to do so by Barbour, then this will likely result in Barbour discontinuing the relationship.

- **Inspecting Factories**

Barbour's staff personally visit each factory before manufacturing takes place to assess its ethical compliance. No factory is used by Barbour unless it has been approved for use by a Barbour employee. We are happy to commit resources to do this to ensure the ILO standards are met.

- **Independent Audits**

Barbour will follow up in the measures above by engaging independent audits from third party experts once production has started to ensure that the standards are applied consistently.

No unauthorised subcontracting is allowed so we can control where our goods are made and the standards which are used at the factory.

We also engage local, professional, independent auditors to conduct detailed audits which will look in depth at compliance with these standards in the factories.

- **Ethical Trading Champion**

On many occasions, we will send our Ethical Trading Champion to our suppliers' factories to undertake compliance audits or to supervise and check the independent audit. Barbour's Ethical Trading Champion continues to undertake extensive training in order to be as skilled as possible when auditing factories.

- **Supplier Ethical Data Exchange (SEDEX)**

Barbour is a full member of SEDEX which is a not-for-profit organisation enabling access to independent and comprehensive audit reports on factories and suppliers.

SEDEX is used to complement our assessment of our suppliers' ethical standards to ensure that ILO standards are always maintained.

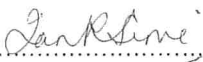
When factories are members of SEDEX, we can verify that SEDEX audits have been satisfactorily completed on the factories.

- **Legal Agreements**

When Barbour engages a new supplier, we will set in place a legal agreement which includes enforceable obligations to ensure compliance with the ILO standards. This will give Barbour

the ability to take legal action, if required, in respect of any non-compliance identified from audits.

This statement has been approved by the Board of Directors of J Barbour & Sons Ltd on 3 March 2021.

Signed..........

Ian Sime
Director of Supply Chain and Board Director
3 March 2021

Appendix One – Base Code of Ethics

It is Barbour's policy that its suppliers must comply with the following ethical standards:-

- *Not to use forced or compulsory labour*
- *To pay the national minimum wage in the country the factory is based*
- *Working conditions must be safe and hygienic according to local health and safety legislation and workers must receive regular and recorded health and safety training for their role (the responsibility for health and safety being assigned to a senior management representative)*
- *Workers must have access to clean toilet facilities, drinkable water and clean facilities for food storage and, where accommodation is provided, this must meet the basic needs of the workers*
- *Not to use child labour in contravention of the provisions of the International Labour Office (no worker is employed under the statutory minimum working age in the country in which the factory is based)*
- *Overtime is voluntary, not demanded on a regular basis, paid at a premium rate and compliant with local laws*
- *Workers are not forced to lodge or deposit their identity papers, passports or other formal documents required for work and are free to leave employment with reasonable notice given by the worker*
- *No discrimination is practised in any way including race, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation*
- *The workers' presence in the workplace is voluntary and not as the result of any direct or indirect coercion including force, bonded or prison labour*
- *No harsh or inhumane treatment is practised including mental cruelty, physical punishment, verbal abuse, sexual harassment or any other form of intimidation*
- *The worker's rights to freedom of association and collective bargaining are respected and there is no prohibition on joining a union which is not under the control of the management of the supplier*
- *Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace*
- *Workers must be provided with written and understandable information about their employment conditions in respect of wages and other conditions*
- *No deductions from pay are to be made which are not permitted by law without the consent of the worker*
- *Workplaces comply with all employment standards, regulations or other legal or statutory requirements including requirements relation to pay, working conditions, health, fire and safety regulations*

Appendix Two

J Barbour & Sons Ltd Suppliers – China – March 2021

Grant International Ltd.

Comeon Sports Bag Manufactory
Xingfeng Road, Fenghuangwei
Tangli, Fenggang, Dongguan
Guangdong, 523688

Grant Barnett and Company Ltd.

Zhangpu Mingxin Umbrella Ind Co Ltd
o.35 Jinpu Boulevard North
Sui'an Industrial Development Zone
Zhangpu Countty, Fujian Province,
China

Failsworth Hats Ltd.

Hangzhou Yukai Garments Co Ltd
Xujiabu, Hengcun Town
Tonglu County
Hangzhou City, Zhejiang Province
China

J R Tustings and Company Ltd.

Twinkle Leatherware Co Limited
Unit 6, 2/F Join-in-Hang Sing Ctr
71-75 Container Port Road
Kwai Chung NT
Hong Kong

Arnold Wills and Company Ltd.

Yihua Leather Co Ltd
No 5 Yangcheng Road, Nanyang Street
Xiaoshan District, Hangzhou City, Zhejiang Province
311227
China

Arnold Wills and Company Ltd.

Maverick Manufacturing Limited
Add: Rm O1, 11/F, Block B, Alexandra Ind Bldg
27 Wing Hong St, Lai Chi Kok,
Kowloon
Hong Kong

Ancol Pet Products Ltd.

Dongguan Accrual Pet Products Inc
6#ST. 5, Jin Qian Ling Industrial Estate
Ji Ti Gang, Huang Jiang Town, Dong Guan City
Guang Dong
China

Inner Mongolia Fengdini Cashmere Products Co., Ltd.

Jinhai Industrial Estate,
Xinhua Street West,
Huhhot,
Inner Mongolia,
China

Jiangsu Golden Empire

No.11, Changjiang Road,
Yancheng Economic Development Zone,
Yancheng,
Jiangsu,
China

Fenix Fashion Limited

4/F, 868 Cheung Sha Wan Road
Kowloon
Hong Kong

Li and Fung

4/F, phase 1,2,
Spinner Building,
800 Cheung Sha Wan Road,
Lai Chi Kok,
Kowloon
Hong Kong

Ningbo Ningshing Trading Group Inc.

Tianning Mansion No. 138 Zhongshan Road West,
Ningbo,
China

Union Apparel International Limited

25/F, New Treasure Centre,
10 Ng Fong Street,
San Po Kong,
Kowloon
Hong Kong

Priority Accessories Productions HK Limited

Unit C&D 18/F Kings Tower
111 King Lam Street, Cheung Sha Wan
Kowloon
Hong Kong

Triad Trade Textyles Ltd.

Shanghai Lianyi Handkerchief Factory
15 Team, Dingnan Village, Gangxi Town,
Chongming County
Shanghai
China

Concordia Advanced Fabrics

No 12 Linjiang Road
Weiting Town
Suzhou
215121
China

Devetex Soho (Suzhou) Co Ltd

Wuzhong District
Jiangsu
215104
China

Donglim

Yidong Jiazhouwan Industry Area
Qingdao
Shangdong Province
266300
China

Suntai

Nantong Sunze Textile Co Ltd
186 Hexing Road, Netda
Nantong City
China

Nice Gain

NO.9 South Liyan Rd
Nanjing
211100
China

True Alliance

Luthai Textile Co Ltd
No.81 East Songling Road
Zlichuan, Zibo City
Shandong
China



Foreign Affairs Committee

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From the Chair
Tom Tugendhat MP

Stephen Buck
Managing Director
J Barbour and Sons Ltd
Letter by email: Steve.Buck@barbour.com

19 February 2021

Dear Mr Buck,

We are writing to you following recent reports that parts of UK companies' supply chains include materials and/or labour sourced from the Xinjiang Uyghur Autonomous Region of China. As part of the Foreign Affairs and Business, Energy and Industrial Strategy Committees' inquiries into the Xinjiang detention camps, we are reaching out to a number of businesses to establish a clearer understanding of commercial activity in the region, and what private companies perceive their ethical responsibilities to be in this area.

We would be grateful if you could address the following questions:

1. What is the nature and extent of your company's operations in Xinjiang?
2. What specific raw materials arriving in UK markets are sourced from Xinjiang?
3. Are any of your products assembled in factories deemed to be at risk of using forced labour?
4. Which Chinese companies are involved in your supply chains?
5. How do you ensure that companies at every stage of your supply chain meet their contractual obligations regarding anti-slavery and anti-human trafficking laws?
6. What is Barbour's approach to assessing and scrutinising its supply chains to ensure that materials are ethically sourced?
7. Where materials from unethical sources are identified, how does your company respond and what steps are taken to mitigate the risk of future occurrences?
8. What is your information-gathering process for your Modern Slavery statements, and how do you verify this information? What is your process for acting on the findings of your Modern Slavery statements?

It would be helpful to have a response to this letter by 5 March 2021. We intend to place your response in the public domain.

Best wishes,

TOM TUGENDHAT MP
CHAIR, FOREIGN AFFAIRS COMMITTEE

A handwritten signature in blue ink that reads "N Ghani". The signature is written in a cursive style and is underlined with a single horizontal stroke.

NUSRAT GHANI MP
BUSINESS, ENERGY AND INDUSTRIAL STRATEGY COMMITTEE

A handwritten signature in black ink that reads "Darren Jones". The signature is written in a cursive style.

DARREN JONES MP
CHAIR, BUSINESS, ENERGY AND INDUSTRIAL STRATEGY COMMITTEE