

Tom Tugendhat MP

Chair

Foreign Affairs Committee

House of Commons

London SW1A 0AA

By email: [FAC@parliament.uk](mailto:FAC@parliament.uk)

11 March 2021

Dear Mr. Tugendhat,

**Xinjiang Uyghur Autonomous Region of China**

I refer to your letter of 1st March 2021.

Please find attached Mountain Warehouse's response to the questions you raise.

If you require any further information please do not hesitate to contact me.

Yours sincerely,



**Mark Neale**

**Founder & CEO**



## Xinjiang Uyghur Autonomous Region of China – Foreign Affairs Committee Questions

### Response from Mountain Warehouse – 11 March 2021

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

*We have mapped our tier 1 (direct suppliers) and tier 2 (manufacturing factories), none of which operate in this region. None of our cotton clothing products are sourced in China.*

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

*We are aware that Xinjiang is a large cotton growing region in China. None of our cotton clothing is sourced in China. Our cotton clothing products are sourced in Bangladesh and India, and 24% of our cotton casual range is organic certified cotton.*

*There are cotton components in certain products that we do source from China, including footwear and accessories. We are in the process of tracing our cotton supply chain down to the farm and aim to have completed this in the next 12 months. Presently we are not aware of any raw materials, cotton or otherwise, that are sourced from Xinjiang.*

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

*No, see answers to question 5/ 6/ 7/ 8 for details.*

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

*We source many of the products we sell from a large number of Chinese suppliers.*

*We foster long term supplier relationships and work directly with many of the factories making our products, continually working to drive transparency in our supply chain and minimise risk.*

**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?**

*We raise our purchase orders to approved factories, the purchase orders contain terms and conditions that link to our ethical manual and code of conduct. By accepting the purchase order our supplier and the assigned factory agree to these terms. We encourage transparency and cease working with suppliers that intentionally or repeatedly breach our terms and conditions.*

*Our ethical manual and code of conduct is shared with our supply base and our CSR team constantly engage and educate our suppliers to ensure our ethics are aligned, expectations clear and the standards disseminated through the supply chain.*

*We have a robust on-boarding process to ensure all new suppliers are vetted for ethical practices before we start to work with them. We use SEDEX\*, a world leading social data management platform, to map our supply chain, store audits, ethical data, and report on risk. We hold SMETA\*\* or BSCI\*\*\* ethical audits for all factories that make our goods and work with these suppliers to delivery timely corrective actions.*

*We score our suppliers on their ethical practices and share learnings with them to drive improvements. We encourage our suppliers to notify us of any breaches or risk and have partnered with a leading human rights body with international reach to support with any potential instances of modern slavery should they arise.*

*\* SEDEX (Supplier Data Ethical Exchange)*

*\*\* SMETA (Sedex members ethical trade audit)*

*\*\*\* BSCI (Business Social Compliance Initiative)*

*Both audit programmes are based on the International Labour Organisation standards and the United Nations Charter of Human Rights. They are recognised internationally as the industry best in class for ethical audits.*

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

*We only work with manufacturing factories that have a full ethical audit with an acceptable rating and that will work with us to deliver continuous improvements. These factories sign up to our terms and conditions and our CSR team constantly engages with our supply chain to build relationships and identify risk. We score our suppliers to assign a risk ranking and go beyond audit for the highest risk, conducting more detailed assessments and supporting with training and delivering corrective action plans.*

*We have introduced organic cotton where the supply chain of the cotton is certified down to the first processor of the cotton (point seeds removed from the cotton bolls). This certification can only be obtained by meeting strict environmental and social criteria. 24% of the cotton products in our casual clothing range are made from organic cotton fabric and we have plans to grow this percentage season on season.*

*Our staff complete modern slavery training to help identify and raise up risk.*

**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?**

*If we identify a breach of our code of conduct, we would immediately enact our remediation policy and engage our human rights specialist organisation in market to work with our supplier or company within our supply chain.*

- *Step 1: Support the affected worker/s.*
- *Step 2: Investigation.*
- *Step 3: Corrective Actions.*
- *Step 4: Monitoring.*
- *Step 5: Review and follow up.*

*If our supplier shows repeated poor ethical management and no willingness to change, we cease working with them. A supplier is immediately de-listed if they intentionally breach our ethical standards as outlined in our terms and conditions.*

**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?**

*We use SEDEX to map our supply chain and review audits. We use the reports in SEDEX to inform our risk profile. We also use internal databases and trackers for the various metrics and score our suppliers for risk bi-annually.*

*We cross reference the factory detail on our purchase orders with other sources of factory data to check accuracy, for example: QC inspection reports, compliance certificates, nominated supplier records, factory visits, shipping data and supplier engagement.*

*Our Modern Slavery report is a summary of actions completed in the previous year and commitments for the future. See Q.7 for steps that we take if we identify a modern slavery risk.*

*Our staff, supported by the board of Directors, are dedicated to upholding our fundamental business principles to ensure the rights of all workers in our business and supply chain are respected. Our dedicated Corporate Social Responsibility team works with business teams and suppliers to ensure continual improvement in working practices and risk mitigation.*



## Foreign Affairs Committee

House of Commons · London · SW1A 0AA  
+44 20 7219 6106 · [fac@parliament.uk](mailto:fac@parliament.uk)  
[www.parliament.uk](http://www.parliament.uk) · [@CommonsForeign](https://twitter.com/CommonsForeign)

**From the Chair**  
Tom Tugendhat MP

Mark Neale  
Founder & CEO  
Mountain Warehouse  
Letter by email: [Mark.Neale@mountainwarehouse.com](mailto:Mark.Neale@mountainwarehouse.com)

01 March 2021

Dear Mr Neale,

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 Mountain Warehouse'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 15 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**