

## **Modern Slavery Act Statement**

This statement sets out Boardriders UK's (as defined below) ongoing commitment as a responsible business to ensure that modern slavery and human trafficking is eradicated, in accordance with the Modern Slavery Act 2015.

### **Introduction**

The Boardriders Group is a retail sporting goods business and one of the world's largest manufacturers of surf wear and other board-sport related products. The Boardriders Group designs, develops and distributes a large range of branded clothing, footwear, accessories and other products under the Quiksilver, Roxy, DC Shoes, Billabong, Element, RVCA, and Von Zipper brands whose images and names are closely associated with boardriding sports and lifestyle.

The Boardriders Group has over 7,000 employees worldwide and operates in 90 countries. The global business is managed from three main regions: the "Americas" region managed from our group headquarters by the US parent company Boardriders Inc.; the "Europe, Middle East, Africa" (EMEA) region managed by the French subsidiary NA PALI SAS; and the "Asia-Pacific" (APAC) region managed by the Australian subsidiary UG Manufacturing Co. Pty. Ltd.

Boardriders Group EMEA business is organised into over 30 different corporate entities in 18 countries, including the United Kingdom. The Boardriders Group UK subsidiary of NA PALI SAS is LANAI Ltd., which is located in London and operates our commercial wholesale activity in the UK (NA PALI SAS and LANAI Ltd are together hereafter referred to as "Boardriders UK").

### **Our supply chains**

The Boardriders Group works with over 80 manufacturers in Asia, Europe and the Middle East, who supply our warehouses in the Americas, EMEA and APAC regions with surf wear and other board-sport related products for sale throughout over 90 countries.

We are conscious that imported products or services sourced from outside the UK or Europe are potentially more at risk of slavery or human trafficking issues. If products have to be sourced from such locations, we will look favourably on suppliers who can demonstrate a commitment to human rights and fair working conditions.

### **Our policies on slavery and human trafficking**

The Boardriders Group is committed to conducting business in an ethical manner and expects its manufacturing partners to share this same commitment. Accordingly, Boardriders Group established a global ethical program in 2004 titled "QUEST" (Quiksilver Ethical Standards of Trade, whose name was later changed to "BEST"), to prevent abusive, exploitive, or illegal conditions in the workplace and prevent human trafficking and slavery. BEST reflects our commitment to acting ethically and with integrity in all our business relationships. BEST includes a Supplier Code of Conduct, and all agents, vendors and factories are required to participate in the BEST program, including successful completion of

mandatory factory audits conducted by independent auditing companies, as a condition of doing business with our companies.

Boardriders Group also has in place a robust whistleblowing procedure for the submission of complaints or concerns, as well as a Code of Business Conduct and Ethics, both designed to encourage and to protect anyone who wishes to raise concerns about wrongdoing within our business.

### **Due diligence processes for slavery and human trafficking**

Boardriders Group recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

If we discover that any of our employees have been complicit in human trafficking or modern slavery, we will take the appropriate disciplinary action against them. Non-compliance with our BEST standards, falling short of modern slavery, can result in a Corrective Action Plan (CAP). Under CAP, our employees and contractors are expected to follow a series of steps to correct their non-compliance in order for them to remain an active employee or contractor. Otherwise, they face termination.

We have implemented a number of processes to ensure, as reasonably practicable, that our supply chains adhere to our expectations in respect of their workforce. Annually, we evaluate all of our direct manufacturing suppliers to verify that they are not at risk for violating anti-slavery and human trafficking laws. Our own internal BEST team spearheads that verification process, using an internally developed assessment tool. This tool helps us to categorize suppliers using a grading matrix system aligned to each clause of Boardriders' Supplier Code of Conduct. This is a risk-profiling process in order to grade suppliers and alert management if a violation is detected, so that immediate action can be taken including termination with the supplier to protect the supply chain. We also rely on input from our independent factory auditors, particularly in jurisdictions where there is a higher risk of modern slavery, to assess these risks and vulnerabilities.

All new suppliers need to be audited with acceptable audit results prior to cooperation with Boardriders Group. We continue to monitor all of our supplier behaviour and compliance with BEST, notably every year in high risk countries (as defined by World Bank's Worldwide Governance Indicators), through an independent external contractor who carries out audits and also by ongoing monitoring. This is the only way that suppliers can maintain their "active" status with Boardriders Group. We have committed to work only with organisations who share our values and who have pledged to assist in the eradication of slavery and human trafficking.

As with Employees and contractors, all suppliers are required to implement a Corrective Action Plan when an audit discloses that the supplier is not meeting our BEST standards. Our BEST team works with suppliers throughout the assessment process and factory management is educated and assisted on any non-compliance issue encountered during an applicable audit. If we do not see appropriate progress by a supplier in resolving non-compliance issues in the CAP, we may terminate the business relationship with the supplier.

To ensure that our suppliers respect and enforce our BEST standards, the commercial agreements governing our contractual relationship stipulate that our suppliers must abide by our BEST standards, or the contractual relationship is subject to termination. More specifically, we ask our suppliers to agree to provide workers with a safe and healthy work environment; allow workers freedom of association and collective bargaining; conduct business in compliance with applicable environmental, labour, and employment laws; refrain from corrupt practices; and protect against human trafficking and slavery. We also require our suppliers to certify that materials incorporated into our products comply with applicable laws, including those laws that relate to slavery and human trafficking in the country or countries in which they do business.

We take a zero-tolerance approach to human trafficking and modern slavery. We will not work or continue to work with any organisation that we find has been knowingly involved in either human trafficking or modern slavery.

### **Training**


As part of our efforts to ensure compliance with our BEST standards and prevent abusive, exploitive, or illegal conditions in the workplace, our BEST department conducts ongoing internal employee and management training regarding our code and human rights concerns, including human trafficking and slavery associated with our supply chains. The training specifically covers mitigating risks of human trafficking and slavery within our company's supply chains of products and is mandatory for those company employees and management who have direct responsibility for supply chain management.

### **Our effectiveness in combating slavery and human trafficking**

At Boardriders UK and within the Boardriders Group (via a specific group affiliate that takes responsibility for modern slavery matters), we shall take the responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

We will continue to monitor this policy and review BEST in relation to slavery and human trafficking. If we become aware of any breaches of BEST or any necessary update or additional to this policy, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending on **October 31<sup>st</sup>, 2022**

  
Nicolas FOULET  
Director of NA PALI SAS  
Boardriders Group EMEA

