

## **Modern Slavery and Human Trafficking Statement**

### **1. Introduction**

This statement sets out BTC Activewear Ltd.'s actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement and policy is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out our actions to understand all modern slavery and human trafficking risks related to our business, to what extent measures already exist and what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

This statement relates to actions taken during the previous financial year January to December 2021 and activities during the current financial year 1 January 2022 to 31 December 2022.

In previous years, our organisation has published its statement no later than 30 June. We recognise that we are publishing this statement later than expected. This is because of reduced staff capacity/increased difficulty in gathering the required information from our suppliers during the coronavirus pandemic and the ongoing impact of recruiting the necessary staff to support the business. We recognise that we have a responsibility to take a robust approach to slavery and human trafficking and we continued to take our responsibility very seriously during the coronavirus pandemic.

Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **2. Organisational structure and supply chains**

This statement covers the activities of BTC Activewear Limited:

#### **Organisation:**

Established in 1990, BTC Activewear features over 50 market-leading brands, all stocked within our UK Distribution Centre, based at Point 1, Opus 9, Axletree Way, Wednesbury, WS10 9QY in the West Midlands with a turnover of c£50 million. We continue to grow from strength to strength and recently became part of New Wave Group (based in Sweden). This will allow the Company to grow by giving access to new brands and products and

the capacity to attract a larger customer base in the key category areas of promotional, corporate, school and work wear products.

### **Our Supply Chain:**

Our supply chain includes a number of international brands operating mainly within Asia, Central America, Europe and China. These products are shipped from our supply chain into our warehouse for distribution out to our reseller customers. In the first quarter of each year, we request details from each of our suppliers in relation to their ethical use of labour and to determine that they operate on that basis within the law. Our supplier brands also display Ethical Trading Statements on their own websites.

### **3. Our Policies and Procedures:**

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** We are committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency Workers** We use only specified, reputable employment agencies to source labour and only work with agencies which share our commitment towards anti-slavery and the prevention of human trafficking. We look to ensure that they have those same values but carry out our own checks to ensure that all potential employees have the legal right to work in the UK and that we adhere to all relevant employment legislation.

### **4. Due Diligence**



We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence and reviews include mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking.

- undertake vetting of suppliers which includes compliance in general but evaluating modern slavery and human trafficking in particular
- we place particular reliance on the certifications and trade bodies such as SEDEX, WRAP, Fairwear Foundation and Fair Labor Association of which the brands we represent are members, reviewing on an annual basis all aspects of the supply chain based on the supply chain mapping;
- We ask each of our brands to provide us with an Ethical Trading Statement;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers where relevant and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship if deemed necessary.
- We have systems in place to encourage people to report any concerns and to protect whistle-blowers

## **5. Performance indicators**

We have reviewed our key performance indicators (KPIs). As a result, we are:-

- reviewing its existing supply chains and expect this to be completed by 30<sup>th</sup> June 2023 whereby we evaluate all existing suppliers.

## **6. Training**

We require all staff working within supply chain management and relevant roles to undertake training on how to assess the risk of slavery and human trafficking and what should be done if this activity is suspected. The training and awareness should ideally be completed by 30<sup>th</sup> June 2023;

### **Monitoring:**

As well as training staff, we have raised awareness of modern slavery issues by putting up posters across our premises.

The posters explain to staff :

- the basic principles of the Modern Slavery Act 2015;

- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and

In the last year, we have not received any specific complaints about our supply chain with regard to Modern Slavery and Ethical Sourcing.

Our other actions this year have included supporting a new Employee Assistance Programme and we have Mental Health First Aiders within the business.

### **Approval**

This statement was approved on 3<sup>rd</sup> November 2022 by our Managing Director, who will review and update it annually.

**Stephen Pope**

**Managing Directors signature:**

**Date:**

3<sup>rd</sup> November 2022.

