

## Modern Slavery and Human Trafficking

### 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 relates to actions and activities during the financial year ending 31 December 2019.

As part of the largest promotional clothing distributor within Europe, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation takes all reasonable steps in working towards preventing slavery and human trafficking in its corporate activities, and is absolutely committed to ensuring that its supply chains are free from slavery and human trafficking.

### Organisational structure and supply chains

Established in 1990, BTC activewear features over 50 market-leading brands all stocked within our UK distribution centre. We continue to grow from strength to strength into the UK's no 1 multi brand distributor of promotional, corporate, school and work wear.

### Our policies and practices on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to work towards preventing slavery and human trafficking in our supply chains.

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** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier code of conduct** The organisation is 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. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment/Agency workers policy** The organisation uses only specified, reputable employment agencies to source labour and works only with recruitment

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agencies which share our commitment towards anti-slavery and the prevention of human trafficking.

### Due diligence

The organisation or its agents undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains;
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditor and requiring them to implement action plans
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular;
- undertake vetting of suppliers which includes, labour standards, compliance in general, and modern 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.

### Training

The Company requires and expects all employees working within supply chain management and relevant roles to undertake training on how to assess the risk of slavery and human trafficking in relation to various aspects of the business, how employees can identify the signs of slavery and human trafficking and what should be done if this activity is suspected.

### BTC Activewear LTD's continued commitment

We recognise the importance of maintaining vigilance to identify and address any issues associated with slavery and human trafficking throughout our supply chains. We are committed to continuing to enhance our capacity to identify, prevent, and mitigate any actual or potential risks in these areas.

### Board approval

This statement has been approved by the organisation's members, who will review and update it annually.

### Director's signature:



**Stephen Pope**  
**Managing Director**

**Date:** 16 April 2019