

Modern Slavery and Human Trafficking Statement

1. Introduction

This statement sets out BTC Activewear Ltd.'s (hereby referred to as 'Organisation') 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 (the Act) 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 explains what steps we take to understand, reduce and remove the risk.

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:

Our organisation operates from our Distribution Centre, based at Point I, Opus 9, Axletree Way, Wednesbury, WS10 9QY in the West Midlands. We are part of New Wave Group AB (based in Sweden). This will allow the organisation 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 workwear 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. 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. Further details can be found in the Brand Hub on our web shop which we review on a regular basis. Our supplier brands also display Ethical Trading Statements on their own websites. We expect our suppliers to have a **zero tolerance** to slavery and human trafficking.

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 colleagues, 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 our colleagues to make disclosures, without fear of retaliation.
- **Employee code of conduct** Our code makes clear to colleagues 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 our 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, 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** The majority of employees are employed directly through our own HR department and hiring managers. We use only specified, reputable employment agencies to source labour should we need to and all interviewing, screening and assessing is carried out internally in the same way as direct recruitment. We 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 Process

We undertake due diligence when considering taking on new suppliers, and regularly review our existing suppliers. Our due diligence process 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; Details of certification and membership for our suppliers are included in our Brand Hub on our web shop.
- 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 whistleblowers

5. Performance indicators

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

- Continuing to review our existing supply chains.

6. Training

We require all colleagues 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 end of March 2024;

Monitoring:

As well as training our colleagues, we have raised awareness of modern slavery issues by putting up posters across our premises on notice boards that are accessible to all.

The posters explain to colleagues:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what colleagues 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.

We continue to provide support to all colleagues through our Employee Assistance Programme and we have Mental Health First Aiders within the business. Individuals are encouraged to raise concerns internally to their line manager or HR.

Approval

This statement was approved February 2024 by our Managing Director, who will review and support its update annually.

Stephen Pope

Managing Director:

S. Pope

Date: 14.02.24