

## Modern Slavery Act 2015: slavery and human trafficking statement

The Ballyclare Group comprising of Simon Jersey Ltd and Ballyclare Ltd are proud of the steps we have taken to combat slavery and human trafficking yet; we are committed to continuously improve our practices relating to these issues.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and we will strive to further implement and enforce effective systems and controls to prevent modern slavery from taking place anywhere in our own business or in our supply chain.

We are also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

### ORGANISATION OVERVIEW AND TURNOVER

Ballyclare Group is one of the world's leading work wear groups, providing uniforms for customers in each and every business sector worldwide. More specifically, we are an international designer, manufacturer and distributor of corporate fashion, work wear and protective clothing ranging from bespoke uniforms, catalogue uniforms to structural firefighting kit.

### OUR SUPPLY CHAINS

As a Group, we use a number of suppliers in a number of different regions and countries including Europe, Indonesia, Bangladesh, Dubai, Sri Lanka, Tunisia, India and China. The Group buys many products and services across its portfolio and given our international footprint and our wide array of bought in products and services, our supply chains are long and complex.

As a result, the Group applies a proportionate response whereby we concentrate on those products and services of the highest value, importance or risk (whether that risk is identified by product and/or service category or geographical location) (**Risk Based Approach**) when assessing the potential for modern slavery within our supply chains.

### OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

Each member of the Group employs its own policies and procedures, using the Risk Based Approach as the foundation, which have subtle nuances driven by the unique requirements of that individual member company based on its own activity streams. That said, the goal and approach is broadly consistent across the Group.

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. During 2019 we re-adopted our Group Anti-Slavery and Human Trafficking Policy which reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to strive to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition to our new Anti-Slavery and Human Trafficking Policy each Group member has a number of longstanding and complimentary policies which have dovetailed together to form a tapestry of compliance in this area. For example, certain of our subsidiaries 'Codes of Conduct, Whistleblowing Policies and Corporate Social Responsibility Framework all help underpin our efforts to mitigate the risk of modern slavery within our supply chains.

We expect the same high standards from all of our contractors' suppliers and other business partners, and as part of our processes when on-boarding new suppliers, where possible we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children and we expect our suppliers will hold their own suppliers to the same high standards.

### DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we utilised our Risk Based Approach to identify those suppliers of particular interest as far as modern slavery is concerned. Again, our approach varies between our Group companies, but representative actions are as follows:

- We conduct due diligence on our suppliers ranging from desk top analysis through to on site due diligence visits.
- On an ongoing basis we monitor our suppliers' adherence to the mandated policies and principles to ensure continued compliance with our ethics.
- We utilise third party audits and due diligence (such as the Fairwear Foundation) to confirm our suppliers' adherence with the law, policies, procedures and general compliance.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## SUPPLIER ADHERENCE TO OUR ETHICS

We wish to act ethically and with integrity in all our business dealings and relationships. To ensure all those in our supply chain and contractors and contractors comply with our ethics we have in place a supply chain compliance programme within our various subsidiaries, again with differences for each member of the Group to reflect the varying nature of their activities.

We have personnel on hand to assist with any risks arising out of modern slavery within each operating business, which cover and can involve the following departments and resources:

- Quality and compliance.
- Human resources.
- Procurement.
- Sales.
- Group General Counsel.

## TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training on our various policies to our staff on an ad hoc basis.

## OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

During the year, we identified several suppliers across the Group as potentially failing to meet our high standards. This was as a result of our on boarding process and ongoing monitoring activity. Accordingly, alternative suppliers were sourced and have either been substituted for the offending supplier or are in the process of being substituted at the time of writing this statement.

## IMPROVEMENT ACTIONS DURING THE NEXT FINANCIAL YEAR

As part of the process of preparing this statement, we have identified a number of areas that we feel might benefit from a review to ensure that we are as effective as can be across the group at combating slavery in our supply chains. Consequently, we have tasked our Group General Counsel to conduct an internally facilitated review to bring insights on the ways that the Group can improve its processes towards tackling slavery and human trafficking. As part that review, we shall:

1. Look at the ways that best practice can be shared internally within the Group. We have identified that certain Group companies are not as evolved as others in terms of processes and compliance on this issue and we shall look at ways in which we can be more consistent across the Group, particularly in overseas jurisdictions;
2. Evaluate our internal training and ascertain if it can be improved including awareness of our policies.
3. To assess our KPIs on monitoring and capturing any issues as regards slavery and human trafficking.
4. Review our whistleblowing policies to ensure that they are fully compatible with our new our Group Anti-Slavery and Human Trafficking Policy.
5. Identify any other general areas of improvement that may be made and to ensure steps are in place to continually monitor, evaluate and improve Group policies as a whole.

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 31 December 2020  
Date 1<sup>st</sup> January 2022