



Modern Slavery and Human Trafficking Statement 2021

INTRODUCTION

As a family-led business, we're absolutely committed to preventing slavery and human trafficking in our operations. This statement explains what steps we take to understand, reduce and remove the risks of these practices occurring.

It spells out what we do to:

- understand potential modern slavery risks related to our business
- tackle slavery and human trafficking in our business and its supply chains

This statement relates to actions taken during the previous financial year 2020 and during the current financial year (2021).

OUR ORGANISATION

We, PenCarrie Limited, the trading business and wholly owned subsidiary of PenCarrie Group Limited (which does not trade), are a leading B2B wholesale clothing and accessory distributor for decoration and resale.

We currently operate at the following location:

PenCarrie House
South View Estate
Willand
Devon EX15 2QW

Phone: 01884 829610

Freephone: 0800 252248

ROI Freephone: 1-800-771-625

Email: sales@pencarrie.com

Website: www.pencarrie.com

OUR SUPPLY CHAIN

Our supply chain includes a number of brands who source promotional and corporate clothing and accessories. These items are for distribution to garment decorators and other onsellors.

We expect our entire supply chain to have a zero-tolerance approach to slavery and human trafficking. Our suppliers have to demonstrate that they use labour ethically and within the law. Where they cannot demonstrate this standard, we will look to end the business relationship.

The Managing Director, Tony Lock and Director, Nicci Gratwicke, are ultimately responsible for compliance in our company departments and for their supplier relationships.

You can find each of our supplier brands' Ethical Trading Statements on the individual brand pages of our website.

OUR POLICIES & PROCEDURES

We have the following policies and procedures in place to identify modern slavery risks and prevent slavery and human trafficking in our operations:

- **Whistleblowing policy:** we encourage all of our workers, customers and other business partners to report any concerns they have about our activities and supply chains. This includes anything that may increase the risk of slavery or human trafficking. Our Whistleblowing Policy is designed to make it easy for individuals to make disclosures without fear of reprisal.
- **Business ethics:** We aim to uphold the highest standards of employee conduct and ethical behaviour. We also require our suppliers to do the same in managing their own employees and supply chains.
- **Recruitment and use of agency staff:** We only use specified, reputable employment agencies to source labour. We always verify the practices of any new agency we use before accepting workers from them. We ensure that all potential employees have the legal right to work in the UK and that we adhere to all relevant employment legislation.

OUR DUE DILIGENCE

We have the following due diligence processes in place to help make sure we are tackling slavery and human trafficking risks in our business and supply chains:

- We always make written enquiries when considering new suppliers. We also regularly review our existing suppliers' policies on modern slavery and other areas of their operations.
- We place particular reliance on the certifications and trade bodies such as SEDEX, WRAP and Fairwear Foundation of which the brands we represent are members. They are responsible for auditing the brands' supply chains.
- Each of our brands supplies us with an official Ethical Trading Statement, which can be found on the individual brand pages on our website.
- Where possible, we build long-standing relationships with our suppliers, and we make clear our expectations of business behaviour.
- We have systems in place to encourage people to report any concerns and to protect whistle-blowers.
- We expect each supplier in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. Unfortunately, it's not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain.
- We conduct reviews with direct suppliers to understand the level of communication and personal contact with the next link in the supply chain. We assess their understanding of, and compliance with, our expectations of business behaviour.
- We regularly review recruitment and payroll systems to ensure our recruitment and employment practices remain legally compliant.

OUR MONITORING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within our business, we provide regular training to relevant team members within our organisation. All Directors have been fully briefed on the subject.

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

However, we continue to regularly liaise with our key suppliers, in particular the brands who are responsible for the manufacture and supply of garments, on relevant topics and areas of potential concern. In the last 12 months, we specifically addressed:

- the sourcing of cotton produced in the Xinjiang region of China
- the production of garments where human rights of the workforce in particular Uyghur Muslims are not maintained or respected.

In the above respect, we obtained clear confirmation from our clothing suppliers that their supply chains were not dependent on or involving any products, raw materials or labour from this region.

Our other actions this year have included extending our mental health support for all team members affected by Coronavirus or furlough through our Employee Assistance Programme, Mental Health First Aiders and additional awareness events.

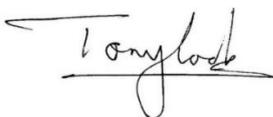
PLANS FOR PROGRESS

Over the coming year, we intend to:

- Continue and extend our regular training programme.
- Develop our Modern Slavery risk assessment processes further to incorporate:
 - Relevant risk assessments / areas where the business may be potentially exposed
 - Scheduling an action plan based on risk prioritisation and forming a working group to enable the Company to instigate targeted actions.
 - Extending the due diligence across our wider supply chain
- Formalise our collection of relevant information from our supply chain to reinforce the 'one-up' due diligence.
- Continue to support team members with settled status applications and maintain robust recruitment processes and checks.

BOARD APPROVAL

This statement has been approved by our Board of Directors, who will review and update it annually.



Tony Lock
Managing Director

Date: **30th March 2021**