



Modern Slavery and Human Trafficking Statement 2019

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 and activities during the current financial year (2019-20).

OUR ORGANISATION

We (PenCarrie Limited) are a leading B2B wholesale clothing and accessory distributor for decorators and resellers.

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.

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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 employees, 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 pay particular attention to the procedures and certifications under which their manufacturers operate.
- 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 always make clear our expectations of business behaviour.
- We have systems in place to encourage people to report any concerns and to protect whistleblowers.
- 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.

OUR RISK ASSESSMENT

We have the following risk assessment procedures in place to ensure we are aware of the risks of modern slavery and human trafficking in our business and supply chains:

- We regularly review recruitment and payroll systems to ensure our recruitment and employment practices remain legally compliant.

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- 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 are monitoring and will update the necessary documentation for employees in line with changing rules around the right to work that will arise from Britain leaving the European Union.

MEASURING EFFECTIVENESS

- Use of the Whistleblowing Policy in relation to modern slavery and human trafficking
 - Zero whistleblowing claims related to modern slavery and human trafficking
- Number of grievances raised related to modern slavery and human trafficking
 - Zero grievances raised related to modern slavery and human trafficking

OUR PROGRESS IN 2018

- We now list individual brands' ethical policies on our website
- We've developed new policies and procedures around recruitment, grievance and bullying and harassment
- We've conducted a full 'right-to-work' review of all employees

OUR PRIORITIES for 2019

- Launch to staff the updated grievance procedure, recruitment policy and bullying and harassment policy
- Refresh training on modern slavery across the business
- Support employees applying for settled status through Brexit and ensure records of right to work are kept updated through the change

OUR TRAINING

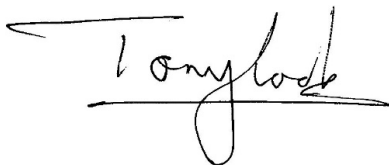
To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and within our business, we provide training to relevant team members within our organisation.

All Directors have been fully briefed on the subject.

BOARD APPROVAL

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

Managing Director's signature:



Tony Lock

Date: March 2019

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