

## **Modern Slavery and Human Trafficking Statement**

### **Introduction**

This statement sets out PenCarrie's actions to understand all potential modern slavery risks related to its business and to put in place steps 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 current financial year.

PenCarrie is absolutely committed to preventing slavery and human trafficking in its own activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Organisational structure and supply chains**

PenCarrie is a leading B2B supplier to the garment decoration industry.

The organisation currently operates at the following location:

PenCarrie House  
South View Estate  
Willand  
Devon  
EX15 2QW

### **Supply chains**

The PenCarrie supply chains include a number of brands who are responsible for the sourcing of promotional and corporate clothing and bags for distribution to garment decorators and other onsellors.

The organisation expects all those in the supply chain to comply with a zero-tolerance approach to slavery and human trafficking. Suppliers are required to demonstrate that they act ethically and within the law in their use of labour. Where suppliers are unable to demonstrate this standard, the organisation will look to terminate the business relationship.

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

### **Relevant Steps**

The organisation operates the following policies and procedures to identify modern slavery risks and prevent slavery and human trafficking in its operations:

- **Whistleblowing Policy:** the organisation encourages all of its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of PenCarrie. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's Whistleblowing Policy is designed to make it easy for individuals to make disclosures, without fear of retaliation.
- **Business Ethics:** PenCarrie strives to maintain the highest standards of employee conduct and ethical behaviour and requires its suppliers to do the same in managing their supply chain.
- **Recruitment and use of agency staff:** PenCarrie uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. PenCarrie ensures that all potential employees have the legal right to work in the UK and that relevant employment legislation is adhered to.

### **Due diligence**

The organisation undertakes written enquiries when considering taking on new suppliers, and regularly reviews its existing suppliers' policies on Modern Slavery and other areas of their operations, especially the procedures and certifications under which their manufacturers operate.

Where possible, PenCarrie builds long standing relationships with suppliers and makes clear its expectations of business behaviour.

The organisation has in place systems to encourage the reporting of concerns and the protection of whistle blowers.

The organisation expects each supplier in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for PenCarrie (and every other participant in the chain) to have a direct relationship with all links in the supply chain.

### **Performance indicators**

PenCarrie uses the following key performance indicators (KPIs) to measure how effective it is to ensure that slavery and human trafficking is not taking place in any part of its business or in its supply chains:

- Use of the Whistleblowing Policy in relation to Modern Slavery and Human Trafficking.
- Reviews of the recruitment and payroll systems to ensure recruitment and employment practices remain legally compliant.

- Reviews with direct suppliers to understand the level of communication and personal contact with the next link in the supply chain and the understanding of, and compliance with, the organisation's expectations.

**Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in the supply chains and within the business, PenCarrie provides training to relevant members of staff.

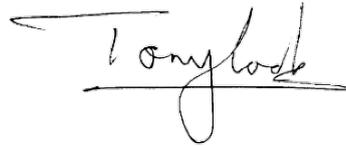
All Directors have been briefed on the subject.

**Board Approval**

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

**Managing Director's signature:**

Tony Lock



**Date: 31 August 2017**