



MODERN SLAVERY & TRAFFICKING POLICY

Corporate Trade Supplies UK Ltd believes that modern slavery is a crime and a violation of fundamental human rights. We are committed to acting honestly and ethically in all our business dealings and relationships to ensure modern slavery is not taking place anywhere in our own business, or in any link of our supply chains. We are committed to ensuring transparency in our own business and throughout our business relationships, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect high standards of behaviour from all our subcontractors, suppliers, and other business partners and have made this a contractual term in our agreements with significant suppliers where possible. This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This statement explains what steps we take to combat the risk of unjust practices occurring in our supply chain. It details:

- what we require of our suppliers.
- how we reduce the risk of unlawful labour in our operations.
- our procedures to identify and expose unlawful labour.
- how we develop relationships of accountability.
- our priorities moving forward.

Our Suppliers

CTS UK Ltd supports ethical companies throughout the developing world. We work to ensure our suppliers treat all workers fairly and are fully compliant with all relevant legislation. We expect our entire supply chain to have a zero-tolerance attitude towards slavery and human trafficking. Our suppliers are required to demonstrate that they use labour lawfully and ethically. To ensure consistent compliance, this is supplemented by regular audits by 3rd parties. Where the audit process identifies that improvements can be made to the quality of the supplier's operations, the issues, together with the proposed improvements, are recorded in a Corrective Action Plan Report (CAPR). Once the CAPR has been filed, we work with the supplier to provide support in making the required improvements recorded in the CAPR. Before the CAPR can be closed, the supplier is required to submit supporting evidence to the Purchasing team. Working with our suppliers to help them address issues within their operations is important to us. With our guidance, our suppliers implement gradual and sustainable change, improving operations for the entire garment manufacturing industry.

Our Requirements

CTS UK Ltd expects its suppliers to adhere to the following standards, in addition to our Code of Conduct for suppliers:

- Suppliers will not use forced or compulsory labour, i.e., any work or service that a worker performs involuntarily, under threat of penalty.
- Suppliers will ensure that the overall terms of employment are voluntary.
- Suppliers will comply with the minimum age requirements prescribed by applicable laws. • Suppliers will compensate workers with wages and benefits that meet or exceed the legally required minimum and will comply with overtime pay requirements.
- Suppliers will comply with applicable laws concerning the hours to be worked each day, and days worked each week. Manufacturers will provide at least one day off in every seven-day period. (Compliance will be with ETI 2018 Section 6)
- Suppliers will provide a safe and healthy working environment, including for any company provided accommodation. This environment must be free of harassment, abuse, or corporal punishment in any form.
- Suppliers will employ, pay, promote, and terminate workers on the basis of their ability to do the job, rather than on the basis of personal characteristics or beliefs.



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- Suppliers will recognize and respect the right of employees to exercise their lawful rights of free association and collective bargaining. CTS UK Ltd concur with these socially responsible global standards for manufacturing and will always try to ensure that our products are produced under lawful, humane, and ethical conditions

Our Policies and Procedures

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

- **Performing Due Diligence:** All new suppliers only become approved following satisfactory completion of our Supplier Questionnaire and confirmation that our code of conduct for suppliers will be followed.
- **Developing Relationships with Our Suppliers:** We only purchase from approved suppliers we are confident will maintain high ethical standards throughout our trading relationship. We strive to cultivate long-standing relationships with our suppliers, and we regularly communicate our expectation that they must behave legally and ethically.
- **Whistleblowing Policy:** We encourage all of our employees, customers, and other business partners to report any concerns they hold 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.
- **Recruitment and Employment of Agency Staff:** We commit to only using specified, reputable employment agencies to source our labour. We will always verify the practices of new agencies 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 Priorities in the Future We are committed to collaborating more closely with our suppliers to safeguard their operations from unjust labour practices. Building long-term relationships with ethical companies is the best way to guard against the possibility of modern slavery and human trafficking. We plan to develop further checks to ensure the transparency of our supply lines and have greater scrutiny of any use of subcontractors by our suppliers. We will train all new purchasing staff in the importance of sourcing all products ethically. Our purchasing team is committed to remaining vigilant of the risk of modern slavery and human trafficking and will be encouraged to increase their awareness of any legal or ethical concerns which affect the garment manufacturing industry in countries from which we source products.

The business will not support or deal with any business knowingly involved in Slavery or Human Trafficking.

This statement was approved in February 2022 by Corporate Trade Supplies board members who review & update it annually.

Signed:  Director

January 2023