BROOK TAVERNER

SINCE 1912

# MODERN SLAVERY STATEMENT

For our financial year ending December 2024

## 1. Organisation structure and supply chains

Brook Taverner Ltd is a privately owned, UK based, Limited company specialising in the design, sales and distribution of branded clothing and associated accessories. We have 219 employees based across our Head office/Warehouse in Keighley and our 14 stores across England and Scotland.

We are committed to running a business that prioritises the wellbeing of the people within our business and our supply chains, as such we aim to protect all workers from modern slavery and human trafficking.

Our branded products are manufactured at 39 sites located across 8 countries.

This Modern Slavery Statement has been published in accordance with the UK Modern Slavery Act 2015 and was approved by the Board of Directors of Brook Taverner Ltd.

## 2. Policies in relation to modern slavery and human trafficking

In early 2024 we updated the policies that detail our ethical trade expectations, these were shared with our suppliers back in January and now form part of our supplier onboarding process:

- Code of Conduct
- Ethical Sourcing Policy

These documents are reviewed, republished, and re-issued annually (or more frequently where required) and our suppliers are required to sign to acknowledge they have received, read, understood and commit to aligning with our policies.

## 3. Due diligence processes

As part of our onboarding process and prior to manufacturing sites being approved by Brook Taverner to receive orders, our compliance team collect site details, permits, certifications, completed environmental questionnaires and 3rd party ethical trade audit reports, this information is then stored in our supply chain mapping database.

An audit expiry calendar has been set up to help ensure we have the most current audit on file.

During manufacturing site visits, examples of records are taken for compliance checks.

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## 4. Risk assessment and management

Manufacturing site ethical audits are graded based on non conformities against the ETI base code and our Code of Conduct; we then actively work with our suppliers to close any non conformities.

- To incentivise best practice, we will consider extending the audit validity period for any sites with 2 consecutive green audits
- Sites receiving 2 consecutive amber audits will be graded as red if there is no evidence of improvement
- Sites receiving 2 consecutive red audits will be reviewed to see what progress has been made on critical issues
- Sites showing no progress or those receiving a third red audit will be escalated to the Director team with the recommendation that we cease the business relationship with this site

## 5. Key Performance Indicators to measure effectiveness of steps being taken

Quarterly supplier mapping reports are sent to our director team detailing performance against the following ethical audit KPIs:

- 100% of Tier 1 manufacturing sites to have a current 3rd party ethical audit
- When graded against our RAG rating (red, amber, green), a minimum of 95% (see note below) should be amber or green

  Note: The 95% target is based on our 2023 baseline figure and our aim is to work towards 100%

## 6. Performance against Key Performance Indicators

- 95% of Tier 1 manufacturing sites have a current ethical audit
- 100% of ethical audit grades are amber or green (32% amber, 68% green)

## 7. Training on modern slavery and human trafficking

During 2024 we have trained our employees on modern slavery and human trafficking using a mix of in person training and email communications. Modern Slavery posters have also been added to our notice boards.

## 8. Commitments for our financial year ending December 2025

a) Continue to conduct modern slavery and human trafficking training for all new employees
b) Continue to record modern slavery and human trafficking employee training within our personnel system
c) Re share the ETI base code and modern slavery posters with our supply chain



Signed:
Name: Andrew Booth
Position: Group Finance Director
Date: 23/12/2024

Note: The information contained in this report is correct as of the 23rd of December 2024