

Modern Slavery Statement 2021

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that H.P. Gibson and Sons Ltd has taken and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. H.P. Gibson and Sons Ltd has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and relationships, and to implementing and enforcing effective systems and controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

As a business, we want to ensure that working conditions in our organisation and our suppliers' businesses are safe and hygienic, child labour is not used, employment is freely chosen, a living wage is paid, working hours are controlled and that there is no discrimination or harsh or inhumane treatment.

The company

Gibsons is a family company established in 1919 producing some of the UK's best-loved jigsaw puzzles and games; an iconic brand now trading globally. With a long history and a unique culture, Gibsons is committed to the wellbeing and development of its staff. Currently there are 27 employees and 2 sales agents, covering UK & Ireland. Retail customers include major high street retailers, independent toy and gift stores, on-line retailers, garden centres and mail order customers.

Gibsons develops new puzzles and games with artists and inventors, controls printing and works with manufacturing partners in UK, Europe and the Far East. Finished stock is held by a 3rd party logistics provider in Nottingham, where all order fulfilment and dispatch is undertaken.

Due Diligence and Risk Assessment:

ETI Base Code:

As part of our initiative to identify and mitigate risk, we adhere to the Ethical Trading Initiative (ETI) Base Code and encourage suppliers to adhere.

Sedex:

Our key suppliers in the UK are members of Sedex, a global non-profit organisation dedicated to driving improvements in ethical and responsible business practices. The Sedex company reference numbers are ZC3957787 and ZC1035431. Through this membership, H.P. Gibson and Sons Ltd has access to the Sedex on-line platform where suppliers share self-assessment questionnaires, ethical audits and non-conformities with the applicable policies which occurred. In addition, Sedex provides a risk assessment tool to evaluate the risk profile of suppliers in sourcing.

ICTI:

H.P. Gibson and Sons Ltd is a member of ICTI Ethical Toy Program. ICTI (International Council of Toy Industries) Standard is a certificate specially developed for and internationally recognized in the toy industry. ICTI is the international umbrella organisation for the toy industry that, among others,

develops and promotes ethical and safe practices as well as a healthy work environment in the toy industry. These standards are formulated into the ICTI Code, a Code of Behaviour for companies.

H.P. Gibson and Sons Ltd requests its suppliers manufacturing facilities to be assessed and certified by ICTI. The Company retains the right, in its sole discretion, to terminate its relationship with a vendor, supplier or licensee facility in violation of the principles; however, the Company will endeavour to work with Facilities to promptly address any problems discovered during its review or ICTI audit. H.P. Gibson and Sons Ltd will require the implementation of an acceptable written corrective action plan for any non-compliances found during an audit. Failure to address items in the corrective action plan may result in a review in the business relationship.

GLAA:

We require all recruitment and employment agencies used by our suppliers to hold a GLAA (Gangmasters and Labour Abuse Authority) License.

Approval:

This Statement has been reviewed and approved by the Managing Director of H.P. Gibson and Sons Ltd on 23rd June 2021 and will be reviewed annually.

Kate Gibson - Managing Director

A handwritten signature in black ink that reads "Kate". The signature is written in a cursive, flowing style.