

Turner Bianca PLC commits to developing and adopting a proactive approach to tackling hidden labour exploitation.

Hidden labour is exploitation of job applicants or workers by third party individuals or gangs other than the employer or labour provider; including rogue individuals working within these businesses but without the knowledge of management.

It includes forced labour and human trafficking for labour exploitation; payment for work-finding services and work-related exploitation such as forced use of accommodation.

It is understood that it is often well hidden by the perpetrators; with victims, if they that perceive of themselves as such, reluctant to come forward.

#### TURNER BIANCA ORGANISATION

Turner Bianca has a UK head office which includes staff from various departments: Design, Sales, Technical, Supply Chain, Warehouse, and Finance.

We also currently hold and distribute stock from our warehousing facilities in the UK located in Oldham, Dukinfield and Middleton with over 300 staff in total.

Globally we have local offices in India, Pakistan and China who, together with our UK office, control worldwide production, quality control, sales, distribution and ethical monitoring.

Our supply chain includes the above countries and manufacturing in the UK and Turkey are overseen by our European and Pakistan offices.

This amounts to over fifty home textile production facilities worldwide across the business.

#### OUR ETHICAL POLICIES

Our compliance policies with respect to ethical sourcing and ethical practice procedures are based on minimum labour standards outlined by local law the ETI Base Code and its principles of implementation.

#### TURNER BIANCA PLC HUMAN RIGHTS POLICY

Respect for human rights is fundamental to the sustainability of Turner Bianca Plc and the communities in which we operate. In our Company and supply base, we are committed to ensuring that people are treated with dignity and respect.

The Turner Bianca Plc Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

The Human Rights Policy applies to Turner Bianca Plc and the facilities that it manages. Turner Bianca Plc is committed to working with, and encouraging our supply chain partners to uphold the principles in this Policy and to adopt similar policies within their businesses.

## Respect for Human Rights

Turner Bianca respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

## Community and Stakeholder Engagement

Turner Bianca Plc recognises its impact on the communities in which it operates. We are committed to engaging with stakeholders in those communities to ensure that we are listening to, learning from, and considering their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level. We are also committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives.

## Valuing Diversity

Turner Bianca Plc values the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment based on race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion, or any other status protected by applicable law. The basis for recruitment, hiring, placement, training, compensation, and advancement at Turner Bianca Plc is values, performance, skills and experience and qualifications.

Regardless of personal characteristics or status, Turner Bianca Plc does not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace. These principles apply not only to Company employees but also to the business partners and suppliers with whom we work.

Please refer to Turner Bianca's Employee Handbook and Harassment policy.

## Freedom of Association and Collective Bargaining

Turner Bianca Plc respects our employees' right to join, form or not to join a trades union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with employees freely chosen representatives. Turner Bianca Plc is committed to consulting in good faith with such representatives.

## Safe and Healthy Workplace

Turner Bianca Plc provides a safe and healthy workplace and complies with applicable health, safety and environmental laws, regulations, and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury, and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

Turner Bianca Plc has designated Health and Safety policies set out in its Employee Handbook and separate Health and Safety policy document and Drivers Handbook. Turner Bianca provides regular training to employees in safety critical roles and has designated Safety Representatives, to address health and safety concerns across the business.

## Workplace Security

Turner Bianca Plc is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity. Please see our Harassment policy for more details.

## Forced Labour and Human Trafficking.

Turner Bianca Plc prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.

Turner Bianca Plc complies with its obligations under the Modern Slavery Act 2015 and its Modern Slavery Statement is available to view on its website: [Modern Slavery Statement | Turner Bianca PLC | textiles for the home \(turner-bianca.com\)](#)

Turner Bianca Plc also has a Tackling Modern Slavery Policy in place which is set out in Company Policies (or upon request).

## Child Labour


Turner Bianca Plc prohibits the recruitment and employment of young people who are below the minimum school leaving age in any country in which it operates.

## Work Hours, Wages and Benefits

Turner Bianca Plc compensates direct employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws.

## Guidance and Reporting for Employees

Turner Bianca Plc creates workplaces in which open and honest communications among all employees are valued and respected. Turner Bianca is committed to following all applicable labour and employment laws wherever we operate. If you believe that a conflict arises between the language of the policy and the laws, customs and practices of the place where you work, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns (Turner Bianca Plc will make every effort to maintain confidentiality) or report potential violations to your Divisional Manager or a Company Director or in accordance with Turner Bianca's Whistleblowing Policy set out in Company Policies (or upon request). No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. Turner Bianca Plc is committed to investigating, addressing, and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.



26-9-23

Dan Bullbrook

Managing Director

## RESPONSIBLE RECRUITMENT

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It is understood that it is often well hidden by the perpetrators; with victims, if they that perceive of themselves as such, reluctant to come forward.

Our stance on modern slavery and human trafficking was communicated to our LP/s and guidance from Stronger Together and RRT literature has now been incorporated into our interview process.

## COMMUNICATION AND RISK MANAGEMENT

Communicating the modern Slavery Act was initiated at our head office and cascaded to the board, HR, technical department, and warehouse managers in the UK.

These communications were followed up with training sessions and Stronger Together posters are displayed on the notice boards at all sites.

The main points communicated to our LP are outlined below:

### Risk Assessment

Using data from such reporting bodies as the “The Global Slavery Index” we have identified several countries with a high estimated prevalence of modern slavery by the proportion of their population and with the highest absolute numbers of people in modern slavery. These countries are India, Pakistan, China, and Bangladesh.

We have communicated the details of the Modern Slavery Act 2015 to our global hubs and to each individual production unit in our supply chain.

Each mill is expected to sign and commit to a written declaration with respect to the Modern Slavery Act and is expected to follow this up with initiatives and training sessions like those we carried out in the UK.

All training literature presentations and posters have been forwarded to the mills.

## ENGAGEMENT

We attend the SEDEX AGM every year and take an active part in discussions, exchanging ideas with retailers, NGOs, auditor groups and the SEDEX team to look for ways improving our systems and procedures in relation to ethical practice, including compliance reporting; sustainability and the environment; anti-bribery; responsible sourcing initiatives and modern slavery and human trafficking.

In addition to this we have attended and continue to attend presentations and workshops given by our customers and NGOs such as Stronger Together, Fast Forward, The Gangmasters and Labour Abuse Authority, and Stop the Traffik.

#### DUE DILLIGENCE

We regularly carry out internal compliance audits at our overseas mills with our in-house country teams and now UK team since the COVID crisis subsided.

We will also continue to use third party and customer on the spot visits to detect any evidence of unethical practice until other independent measuring tools become available.