



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

**First published:** 31 August 2017

**Last updated:** 31 March 2022

This statement is made pursuant to the Modern Slavery Act 2015.

Gear4music Limited is the retailing subsidiary of Gear4music (Holdings) plc, which is listed on the AIM market of the London Stock Exchange.

### **Our Business**

We are an online retailer of musical instruments and music equipment, operating 21 websites in 15 languages and 9 currencies. We are the largest retailer in our market in the UK and one of the largest in Europe.

We supply musical instruments and equipment manufactured by many of the industry's best-known brands, and also a range of good value, high quality own-brand products.

Whilst over 95% of revenue comes direct from consumers, we also supply educational and governmental institutions. Our customers typically purchase direct from our websites but they can also buy certain products via other third-party sites such as eBay and Amazon.

More details of our business can be found at <https://www.gear4musicplc.com/>.

### **Our Policy**

We are committed to adopting and improving practices that ensure there is no slavery and human trafficking in our supply chains or any other part of our business.

The products we sell are manufactured in many different countries, and we aim to ensure that these values are upheld across our supply chain.

To achieve this, we are committed to identifying and assessing areas of our business where there could be potential risks of modern slavery, be that directly or indirectly within our supply chain. We seek to develop and implement effective systems and controls to review and monitor compliance with our policy.

### **Third-party brands**

We sell many well-known other-branded products including Yamaha, Fender, Gibson and Roland, and in the financial year ended 31 March 2022 third party brands accounted for 69% of our sales.

We purchase these products from European-based suppliers, many of whom are part of larger global organisations. These organisations acknowledge and typically publish their

commitment to anti-slavery practices. We review the Anti-slavery policies and statements of our major suppliers, and are committed to assessing all suppliers of third-party brands.

Our suppliers are familiar with our Anti-Slavery policy, and the expectation that their own policies and the policies of their own suppliers meet our same high standard.

We will assess any instances of non-compliance if and when they arise, and take the appropriate action to remedy such non-compliance.

### **Own-brands**

Our own-branded products are sourced from manufacturers in several countries around the globe and are often manufactured to our own specification and design. As at 31 March 2022 we had active relationships with over 120 manufacturers, predominantly in the Far East.

We operate a strict supplier code of conduct that all of our own-brand suppliers are signed up to, detailing our rigorous expectations and requirements in relation to:

- a. Labour
  - i. Child Labour
  - ii. Hours, Wages and Benefits
  - iii. Humane Treatment
  - iv. Slavery and Human-Trafficking
  - v. Discrimination
  - vi. Freedom of Association
- b. Health and Safety
- c. Environmental
- d. Anti-Corruption

Furthermore, we conduct our own independent inspections of third-party facilities involved in the manufacture of our products. Nominated members of our Own-brand Procurement Team are trained to complete the checks.

During these inspections we carry out extensive checks and produce written 'factory inspection' reports that are shared with the managers and/or owners of the facilities, and include formal recommendations to be actioned where appropriate.

We will stop using any factories that fail to meet the standards that we set.

Checks include:

- Working environment - Ventilation, lighting, cleanliness, temperature
- Working hours of factory employees
- Machinery & equipment standards and guards

- Safety equipment including firefighting equipment and first aid kits
- PPE & training
- Emergency exits & signage
- Staff facilities – WC, kitchen, etc.
- Factory certification - BSCI social responsibility certificate; OHSAS18001 Occupational Health & Safety

Between the first publication of our policy in September 2017 to Covid lockdowns in March 2020, we had conducted 40 factory inspections. Responses to our factory inspections to date have been positive.

In FY21 and FY22 Covid and the associated international travel restrictions impacted our ability to conduct inspections in person, and we responded by conducting virtual tours of new factories that we have started working with, and have been vigilant in gathering as much information on each new factory as possible, and given the first opportunity we will visit all new factories in person.

Andrew Wass  
Chief Executive Officer  
20 June 2022

Gareth Bevan  
Chief Commercial Officer  
20 June 2022

Chris Scott  
Chief Financial Officer  
20 June 2022