

## **4imprint Group plc**

# **Modern Slavery Statement**

### **Introduction**

This statement is made on behalf of 4imprint Group plc ("4imprint") pursuant to section 54 of the Modern Slavery Act 2015 and comprises our slavery and human trafficking statement in respect of the financial year ending 31 December 2022.

### **Our Business**

4imprint is a direct marketer of promotional merchandise in North America, the UK and Ireland. We supply custom imprinted products that are used with the aim of promoting an organisation, brand, product or event.

Our product range is comprised of around 60% hard goods, for example drinkware, writing instruments, stationery, office products and tech accessories, and 40% soft goods, including apparel, bags, towels and blankets.

At December 2022 4imprint had around 1,400 permanent staff, 1,355 of whom were based in Oshkosh, Wisconsin, in the USA. The remainder were located in either Manchester or London in the UK. In addition, temporary workers are used, to a seasonal peak of around 100.

Our staff, whether directly employed by a 4imprint Group entity or engaged through a long-term temporary agency partner, are not in any category that is generally seen to be vulnerable to modern slavery in the UK or in the USA. Our focus with regard to slavery and human trafficking is, therefore, primarily directed towards our supply chain.

### **Our Supply Chain**

We are acutely aware that our supply chain is long and often complex, extending far beyond our domestic supply base.

4imprint outsources all product manufacturing and most product decoration/imprinting. Our tier 1 suppliers are predominantly domestic, (USA, Canada, UK, EU, Mexico). These suppliers typically take care of overseeing the manufacture, importing, inventory management and imprinting of the product with our customer's logo, name or message, enabling 4imprint to ship thousands of individually customised orders on a daily basis.

Our domestic tier 1 suppliers, in turn, purchase most of their blank inventory from tier 2 manufacturers of the base product who may be located around the globe. China and the USA represent the dominant countries of tier 2 manufacture, together accounting for around 75% of our products. Products may also originate in Central America, South and East Asia, and a small amount from African markets.

Further down the supply chain are tier 3 suppliers who are generally raw material suppliers, component manufacturers or process specialists, e.g. dye houses.

## **Our Policies on Slavery and Human Trafficking**

Generally, our Social and Ethical Policy Statement reflects our over-riding commitment to acting ethically and with integrity in all of our business relationships.

Specifically, our aim is to guard against the occurrence of modern slavery or human trafficking in any part of our business or at any level in our supply chain through the communication of our expectations, the implementation of appropriate procedures and the other actions that we take.

Furthermore, our Whistleblowing Policy acts in tandem with our policies on slavery and human trafficking by encouraging staff to report concerns including any situations related to modern slavery, human trafficking and child or forced labour.

Despite our best intentions and the steps that we take, a possibility remains that without our knowledge and consent certain factors may compromise our ability to mitigate against the risk of slavery or human trafficking occurring at some level in our supply chain. When any such circumstances come to our attention, we will take prompt and decisive action with a view to remediating the situation as a first preference, whilst ultimately being prepared to terminate the offending supply relationship if necessary.

### **What are we doing?**

It is our view that the risks of modern slavery, human trafficking and related social issues increase the further that we go back in our supply chain. This view is based on the US State Department's Trafficking in Persons assessments and is backed up by our extensive supply chain experiences over the last decade and more.

We have implemented a Supply Chain Code of Conduct to address the risk of modern slavery, human trafficking and broader corporate and social responsibility perspectives. This Code of Conduct is in line with International Labour Organization principles and the Fair Labor Association's Code of Conduct. The signature of our tier 1 suppliers to this document affirms their acceptance.

Compliance is reviewed and verified through site visits/inspections by 4imprint's merchandising and vendor compliance specialists. These visits extend to tier 1 suppliers' domestic facilities, as well as the operations of their overseas (tier 2) manufacturers. A high level of trust and transparency is essential for our suppliers to allow us access into their supply chains.

The lingering impact of the COVID-19 pandemic has continued to present challenges in executing supplier audits in 2022. We have, however, carried out in-person audits in certain parts of the world as travel has become more practical. For the US market we have utilised both virtual and in-person audits.

Independent third-party audits continue to include worker interviews, review of recruitment processes, grievance mechanisms and other common potential indicators of modern slavery. Audit failures or material issues are addressed as a matter of priority.

### **Awareness**

We concentrate our awareness initiatives on those members of staff who are involved with the supply of products. Awareness of modern slavery, human trafficking and related issues tends to be

communicated to appropriate supply chain team members by senior merchandising and vendor relations/compliance managers who are active in visiting (where possible) and assessing our tier 1 and tier 2 suppliers and managing our programme.

We anticipate that our awareness and training programme regarding modern slavery and human trafficking will continue to be refined and expanded in 2023 and beyond.

### **Responsibility**

Responsibility for overseeing and implementing of the contents of this Statement rests with the Senior Vice President – Merchandising and Supply Chain (suppliers and supply chain), the Senior Vice President – Administration (4imprint internal operations), and ultimately the Chief Executive Officer.

### **Approval**

This statement has been formally approved by the Directors of 4imprint.

**Kevin Lyons-Tarr**  
**Chief Executive Officer**  
**18 January 2023**