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Modern Slavery Statement

Introduction

Brand Addition is committed to acting ethically and with integrity. Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks.
We ensure that effective systems and controls are in place and are enforced to combat modern slavery and to ensure that slavery and human trafficking is not taking place anywhere within our business or our supply chain.

Organisation structure and business

Brand Addition and its group of companies are subsidiaries of The Pebble Group plc (our ultimate parent company) which publishes its own Modern Slavery Statement and can be found at: https://www.thepebblegroup.com/.

Brand Addition focuses upon providing promotional products and related services under contract to some of the world's most recognisable brands. Its largest contracts are valued in the millions of pounds with the products and services supplied being used for brand building, customer engagement and employee rewards. Working in close collaboration with its clients, Brand Addition designs products and product ranges, hosts client-branded global web stores and provides international sourcing and distribution solutions. Brand Addition Limited has its own Anti-Slavery and Human Trafficking Policy and also publishes its own Modern Slavery Statement.

Our Supply Chains

Brand Addition sources its products through several different supply routes such as importers, along with 1st and 2nd tier suppliers in the UK, Europe, North America, and Asia. The core items sourced include apparel, electronic items, ceramics, stationery, packaging, gift items, umbrellas, and bags. Brand Addition also engages with facilities management supplies, such as building maintenance, office consumables and people services for the purposes of recruitment.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policies reflect our commitment to acting ethically and with integrity in all our business relationships. This promotes and supports the implementation and enforcement of effective systems and controls to ensure that slavery and human trafficking does not take place anywhere in our supply chains.

Due Diligence and onboarding process

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery issues throughout our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our agents, contractors, suppliers, and business partners.

During the financial year ending 31 December 2024, as part of the Brand Addition supplier contracting processes, we included specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children.

As part of our initiative to identify and mitigate risk of modern slavery:

- We communicate internally with our employees through our Anti-Slavery and Human Trafficking Policy, related training, and procedures, which are also available on our intranet.

- We issue an ethical code of code of conduct annually for signing to all suppliers which details our expectations to mitigate the risk of modern slavery, human trafficking, and our position on broader corporate and social responsibilities. We also have a strict cotton sourcing policy preventing the use of cotton, fabrics, and fibres within product or in the manufacture of products from the Xinjiang province in China, Uzbekistan, Tajikistan, Syria, and Turkmenistan.

- When we place orders with suppliers, each order is subject to supplier acceptance of the Brand Addition standard terms and conditions of purchase which includes the ethical code of conduct.

- Template third party partner supply agreements and supplier agreements contain compliance clauses on anti-slavery and human trafficking, with termination rights for non-compliance.

- We conduct on-site visits, inspections, and assessments of our suppliers using our own trained auditors or third-party auditors to review and verify compliance against our code of conduct.

- Audit resource and prioritisation of audits are based upon countries / geographical areas with the greatest risk of modern slavery and human trafficking. All product suppliers based in Asia are subject to 100% on-site assessment by Brand Addition trained auditors or through third-party assessment commissioned by Brand Addition. All suppliers are required to meet minimum criteria before they can be approved.

- Audits are conducted using a bespoke audit framework developed by Brand Addition which is based upon the principles outlined in the International Labour Organisation (ILO), Social Accountability 8000 (SA 8000) and the Ethical Trading Initiative (ETI). Each audit is conducted in two phases: an initial desktop and credentials assessment to ensure that the supplier meets a minimum standard; followed by an onsite assessment to evaluate the working practices, working conditions, factory management, ethical and environmental standards (which include the potential risk of modern slavery and human trafficking) and product quality. Audits are valid for two years after which time, suppliers are re-assessed to ensure they continue to meet the necessary requirements. Any supplier who fails to meet the minimum requirements is blacklisted and cannot be used.

- We have a confidential whistleblowing platform and procedure in place to encourage the reporting of any ethical concerns and the protection of whistleblowers. This is available internally and externally to our suppliers who are encouraged to use it to report any issues or concerns in connection with our business.

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Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking, and we expect all those in our supply chain and contractors to comply with our values and behave consistently with the provisions of our Policies. We have in place rigorous selection processes which help ensure our suppliers and their supply chains are slavery free. As part the assessment process and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are adhering to our values and the information held on file is kept up to date. The senior management teams across Brand Addition are responsible for compliance in their respective departments and for their supplier relationships.

Training

We last updated our modern slavery training in 2023. This is included in the induction programme of all new employees joining the business and it is also refreshed and rolled out across the business on a 2-year cycle to act as a refresher for existing employees. This training ensures that all employees are able to detect and recognise the signs of modern slavery and know how to act and prevent the potential risk of modern slavery exposure within the company or our supply chain.

Key Performance Indicators

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring and payroll systems within Brand Addition.
- Internal Brand Addition audits and third-party audits.
- Supplier Evaluation performance programme.
- Supplier assessments within the UK, Europe, Turkey, North America, and Asia throughout the supply chain, prioritising on-site assessments in countries and geographies with the greatest risk of modern slavery and human trafficking:
  - 100% of bespoke product suppliers based in Asia are audited every two years.
  - 80% of our top 45 suppliers by spend have been audited in the last two years.
  - Annual assessments of our full supply chain.
  - The selection of the suppliers is based upon risk, location, product type and supplier spend.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2024.

It was approved by the Board on 13 March 2025.

Karl Whiteside

Group Managing Director
Brand Addition Limited