Modern Slavery and Human Trafficking Statement

Background

This statement is made pursuant to section 54 (1) of the Modern Slavery Act 2015 (MSA) and is published on behalf of the Totally Wicked Group ('Totally Wicked') comprising Totally Wicked Bidco Limited, Totally Wicked Group Limited, Totally Wicked Limited, Pillbox38 (UK) Limited, UK Vapour Brands Limited and The Electronic Cigarette Company (UK) Ltd. It constitutes our slavery and human trafficking statement for the financial year ending March 2022

Totally Wicked is the UK's premier vaping wholesaler and distributor of e-cigarette kits and e-liquids, as well as manufacturing our own range of e-liquids in the UK. Our products are sold direct to the public through our owned retail stores, via our websites and through our dedicated and general convenience retail partners. Our company employs over 350 employees who ensure that all our operations work effectively together to achieve our goals of empowering smokers to transform their lives.

Our Effectiveness in combatting Slavery and Human Trafficking

As an organisation we are committed to acting ethically and with integrity in all our business relationships. We are committed to complying with the MSA and improving our practices to combat slavery and human trafficking.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common a deprivation of a person's liberty by another in order to explain them for personal or commercial gain. We take a zero-tolerance approve to such slavery and human trafficking in or around our organisation. We comply with all the applicable employment legislation relating to the employee terms and conditions and have the following internal policies to ensure that we conduct business in an ethical and transparent manner:

- Recruitment – Totally Wicked conducts employment checks on new employees including eligibility to work in the UK to safeguard against human trafficking or individuals being forced to work against their will.
- Modern Slavery Policy – Totally Wicked has a Modern Slavery policy which reflect our commitment to acting ethically and with integrity in all our business relationships, helping to ensure that slavery and human trafficking is not taking place anywhere in our business. We everyone in our business to comply with this approach as well as our business partners and those in our and their supply chains.

- Whistleblowing Policy – Totally Wicked has a whistleblowing policy so that employees can raise any concerns they may have without fear of reprisals.

We continue to focus on raising internal awareness to enable the relevant members of our business to understand the requirements of the Modern Slavery Act and to give them the tools to flag potential issues.

Our Supply Chains

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.

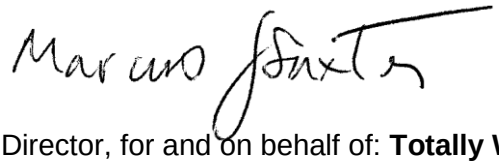
We expect all suppliers to comply with the Totally Wicked Supplier Code:

- Our suppliers must not use child labour or forced labour - slave, prison, indentured, bonded, or otherwise.
- Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary.
- Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees.
- Our suppliers must not require workers to surrender identification passports, or work permits as a condition of working save only to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.
- Suppliers must use reputable staffing or recruiting agencies who also comply with the principles of the Totally Wicked Supplier Code.
- Suppliers must remunerate fairly in line with local legislation or if better industry practice, paying workers for all hours worked.
- Supplier treats all employees with respect and dignity and complies with local legislation on disciplinary practices.

We expect our suppliers, and supply chains, to take all reasonable and practicable steps to comply with the MSA, to engage in good employment practices and to comply with all relevant legislation and regulations. We regularly undertake supplier factory visits to assess working conditions and understand potential compliance risks in relation to the MSA.

As an organisation, we consider the risk of modern slavery occurring within our business and its supply chains to be low. Totally Wicked has developed a risk-based approach to assess the likelihood of the existence of Modern Slavery without our supply chain. The criteria used for this approach includes factors such as the origin of manufacture and the nature of, and locations from which services are provided.

This statement is authorised and approved by MARCUS SAXTON



Director, for and on behalf of: **Totally Wicked Bidco Limited, Totally Wicked Group Limited, Totally Wicked Limited, Pillbox38 (UK) Limited, UK Vapour Brands Limited and The Electronic Cigarette Company (UK) Limited**

30 June 2022