



Modern Slavery Statement

Financial Year 3rd January 2022 – 1st January 2023 (FY2023)

As part of our continued commitment to ensuring ethical working conditions in our supply chain and operations, we fully support the legislation put in place for the prevention of modern slavery and human trafficking.

This statement has been published in accordance with Section 54 of the Modern Slavery Act (2015) on behalf of Baird Group, (trading as BMB Clothing Ltd)



Our FY2023 statement sets out Baird Group’s current activity and what plans we have in place to help tackle this issue both within our own supply chains and operations, and to support stakeholder and industry-level activity to eradicate modern slavery.

Baird Group acknowledges the complexity of modern slavery but remains dedicated to enhancing our practices to combat it, modern slavery is a long-term issue with no quick solutions. We recognise that our customers expect us to get this right so that they are confident when choosing Baird Group.

Our aim is for Baird Group to be a company people are proud to work for and customers can be confident to buy from, to achieve this we must continue to act responsibly and continually challenge the ethical and environmental standards within our supply chain

We are committed to continuously improving our practices to help support the abolition of modern slavery.

- **Mark Cotter, CEO of Baird Group**

What is modern slavery?

Modern slavery is when one person possesses or controls another person in such a way as to significantly deprive that person of their individual liberty, with the intention of exploiting that person through their use, profit, transfer or disposal.

Modern slavery is an overarching term used to describe its various forms:

- **Human trafficking** - a process of bringing a person into a situation of exploitation through a series of actions, including deceptive recruitment and coercion
- **Forced and compulsory labour** - any work or services which people are not doing voluntarily, and which is exacted under a threat of some form of punishment
- **Bonded labour** - any work or services demanded as a means of repayment of a debt or a loan
- **Slavery** - a situation where a person exercises (perceived) power of ownership over another person

War in Ukraine

In February 2022, Russia invaded Ukraine. While Baird Group does not work with any garment factories in Ukraine, at the time of the invasion we were working with trim suppliers located in countries that boarder Ukraine.

Due to the number of people fleeing the war zones the risk to human trafficking becomes a greater risk, this was and continues to be a potential risk to countries bordering Ukraine. We contacted those suppliers directly to understand their situation on the ground and at the time they were not experiencing any direct effects as a result of the war. We also join the relevant group calls that the ETI organized to gain insight from other businesses who were directly affected and continue to monitor the situation for our suppliers.

Earthquake in Turkey and Syria

Turkey suffered a devastating earthquake in the southeast of the country in February 2023. Baird Group has one supplier in Turkey located in Izmir. Fortunately, they were not directly affected.

We did however continue to attend the ETI briefings and participate in the working groups that were focused on members grouping together to agree what the most appropriate response would be at the time.

Contents

In accordance with The Home Office's statutory guidance, this Modern Slavery Statement covers the following six areas:

Our Company and Supply Chain

- Organisation structure and supply chains

Process, Policy and Due Diligence

- Policies in relation to slavery and human trafficking
- Due diligence processes

Assessing Risks

- Risk assessment and management

Monitoring

- Key performance indicators to measure effectiveness of steps being taken

Cascading Knowledge

- Training on modern slavery and trafficking



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Our Company

Baird Group's vision is to be the go-to destination for contemporary and inspiring menswear brands. Steeped in a rich history of more than 100 years across manufacturing; wholesale and retail, we remain one of the largest formalwear companies in the UK but over the last 10 years have added casualwear to our portfolio.

A part of the Arafa Group, Baird Group serves a diverse global audience, including top international brands and global retailers. The company's business activities are fully integrated, covering luxury wear, formalwear, and casual wear markets, as well as the full value chain from textiles to apparel and tailoring to retail and distribution.

Baird Group believe in fair workplaces, where the rights of our workers through our supply chain are protected and respected. We remain committed to reducing the effects of Modern Slavery throughout our global supply chain. Forced labour, slavery, servitude, bonded labour, and human trafficking are all forms of Modern Slavery which are of increasing concern on a global and economic platform.

OVER
46
SUIT DIRECT
STORES

Total number of
people employed
by Baird Group is
approximately
530

OVER
575
INDEPENDENT
WHOLESALE
RETAILERS

4.4M
SUIT DIRECT AND
BEN SHERMAN
CUSTOMERS

7.8M
SUIT DIRECT UK
WEBSITE SESSIONS
THIS YEAR

1.3M
BEN SHERMAN WEBSITE
SESSIONS THIS YEAR



TED BAKER



MARG DARDY



LISEHAUG



RADING GREEN



ANTIQUE FOGUE



PARAM



TED BAKER



MARG DARDY



LISEHAUG



RADING GREEN



ANTIQUE FOGUE



PARAM



TED BAKER



MARG DARDY

Our Supply chain

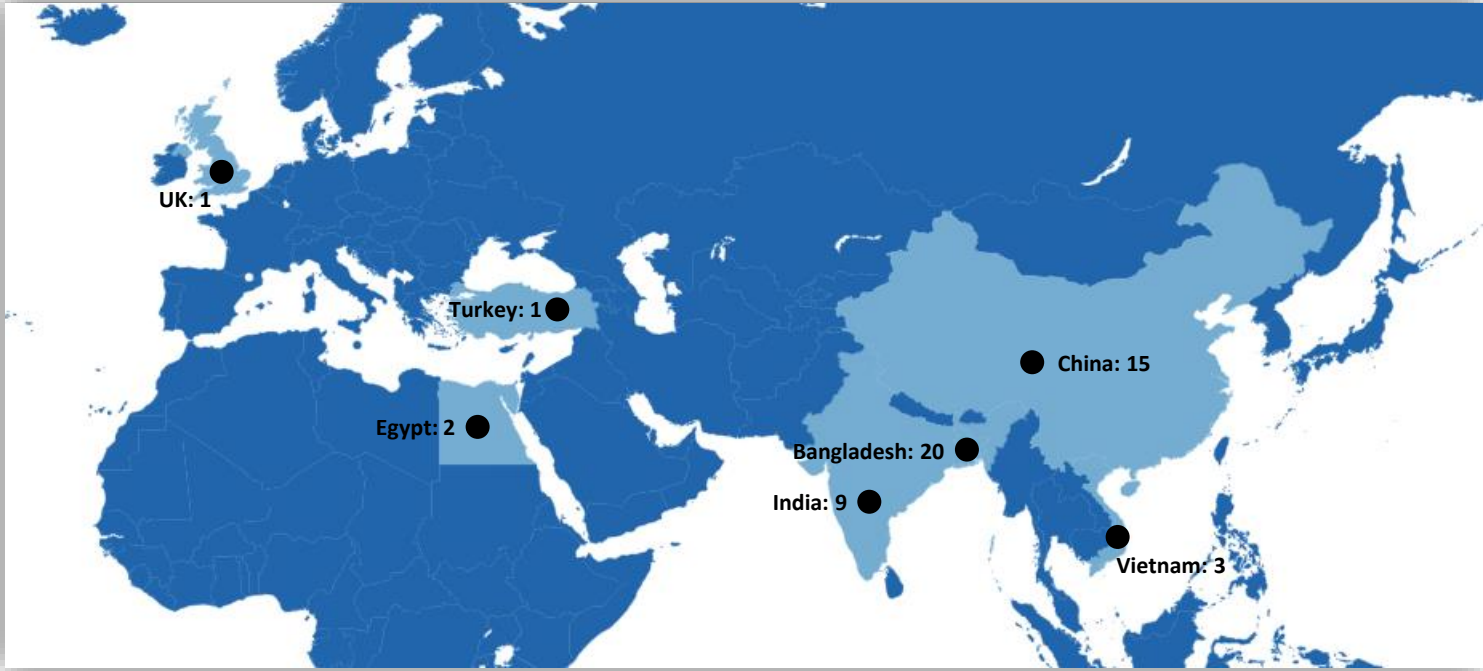
In total we work directly with 51 Tier 1 factories across apparel and accessories, some of these are through suppliers and agents, some direct with the factories themselves. Between them they make up over 48,000 workers within our supply chain.

We believe in building long term relationships with our supply base, 3% of our suppliers have been working with us for the last 18 years

34%
for over 10 years

67%
for over 5 years

This map below shows you which countries we source from and how many factories we have been working with:



Number of Workers	33287 Bangladesh	7420 India	2697 Egypt	2582 China	2445 Vietnam	275 Turkey	22 Pakistan
♀♂	♀ 57% ♂ 46%	♀ 58% ♂ 42%	♀ 54% ♂ 46%	♀ 66% ♂ 34%	♀ 75% ♂ 28%	♀ 56% ♂ 44%	♀ 0% ♂ 100%
	Bangladesh	India	Egypt	China	Vietnam	Turkey	Pakistan

Here is a link to our latest factory list: <https://www.baird-group.co.uk/m/factory-list-january-2023.docx>

Collaborations

Baird works with the following trusted partners in the prevention of modern slavery:



Ethical Trading Initiative (ETI)

The ETI is a leading alliance of companies, trade unions and non-governmental organisations (NGOs) that promotes respect for workers' rights around the globe.

ETI's vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.

Sedex

Sedex is a membership organisation that provides online platforms for companies to manage and improve working conditions in global supply chains. They provide practical tools, services and a community network to help companies improve their responsible and sustainable business practices, and source responsibly.

As a partner of **Cotton made in Africa**, we are making a valuable contribution to protecting nature and training African smallholder farmers in business, farming, and resource conservation. We are driving the change towards a more sustainable business environment.



To support us to meet our ethical obligations, Baird Group are working with **Verisio Ltd.**

Verisio are a trusted, experienced, and well-established social compliance organisation with significant expertise in this area. Please visit their website <http://www.verisio.com> if you wish to see more about them.



Ethical Trading Initiative (ETI) and our Responsible Sourcing Commitment

We continue to be on the Foundation program with the ETI (having joined at the end of 2021) in order to support the on-going development of our responsible sourcing programme and to have the opportunity to work collaboratively with external stakeholders with the intention of ensuring better working conditions for workers across international supply chains.

Modern slavery legislation takes the ETI base code provision on forced labour a step further to include the impacts of human trafficking. This base code is the foundation of our Ethical Code of Conduct and our new Responsible Sourcing Commitment, which we have created this year. Suppliers must commit to "meet and strive to exceed" Baird Group's Responsible Sourcing Commitment and all other applicable Baird Policies including our Supplier Manual.

Baird Group has a requirement for all suppliers to provide full and open access to all facilities within the product supply chain. This must be granted for both Baird staff and any third-party representative that we have engaged to work on our behalf. Suppliers should also conduct and submit a 3rd party audit using the SMETA ethical auditing protocol. Other audit methodologies will be reviewed on a case-by-case basis to help reduce audit fatigue.

Process, Policy and Due Diligence

Accountability and Governance

The responsibility for human rights due diligence, including modern slavery, sits with the Chief Executive (CEO). The work is supported by all Directors and teams, led by the Supply Chain Director and the Sourcing and Sustainability Manager. Baird Group's new Responsible Sourcing Strategy and this Modern Slavery Statement have full sign off by the CEO.

We have a formal Whistleblowing policy in place to report serious issues affecting working conditions within our own operations.

Baird Group Policies - Code of Conduct

We require all our suppliers and factories involved in the manufacture of goods bought by Baird Group to comply with our Code of Conduct. Baird Group's Code of Conduct is aligned to the principles of the ETI base code, detail behind each principle can be found here [ETI Base Code](#)

This policy defines the shared ethical responsibilities between suppliers and buyers for the protection and promotion of human rights.

Sub-Contracting

As stated in our manual all factories engaged in the production of Baird Group products must meet minimum standards in each of the following areas:

- Employment Ethics
- Health & Safety practices
- Technical Competence, relative to the product they will produce
- Quality Assurance systems
- Suppliers are reminded that all premises involved in manufacture are subject to these standards. This includes any subcontracted processes.
- Subcontracting must be declared at the time of order placement
- Manufacturing processes conducted from domestic premises are not acceptable to Baird Group.

(Exceptional cases must have written approval of the appropriate Baird Group Buying and Merchandising Director, prior to order placement). Unapproved sub-contracting Our Ethical Code of Conduct dictates that only audited, approved factories and sub-contractors are used. However, we recognise that we cannot be complacent to the risk of unapproved sub-contracting to units with ethical failings (including potential for Modern Slavery conditions and practices)



Process, Policy and Due Diligence

Baird Group conducts risk assessments of our supply chain by reviewing audits and researching emerging risks associated with indicators of concern in the countries where production is sourced, this is then shared with the buying teams. The next steps for us in 2023-2024 are to establish our own risk rating matrix that teams can use as a tool when making supply chain decisions.

Baird Group recognise that sustainable, long-term improvement in working conditions require collaborative efforts to address human rights issues and exploitative practices. We actively seek opportunities to collaborate with others through the ETI.

The Ethics and Sustainability team utilise various tools, such as internal knowledge, ETI community hub, guidance from Verisio industry peer groups, local expertise, along with publicly available websites such as;

- [UN- SDGs](#)
- [Oxfam](#)
- [Anti-Slavery International](#)
- [Walk Free](#)
- [UNIVERSAL HUMAN RIGHTS INDEX](#)
- [International Labour Organization](#)
- [Fair Labor Standards](#)
- [Responsible sourcing tool](#)

Modern slavery risk factor	Those at risk in Baird Group’s supply chain	Baird’s Groups work to protect workers’ rights
Migrant labour	Migrant workers who may face debt bondage for recruitment or travel costs	Baird Group collaborates with suppliers and external stakeholders to address concerns regarding migrant labour. We assess third- party ethical audits on our partner Verisio's platform.
Presence of refugees	Undocumented refugee labour in Romania and Hungary	Due to the war in Ukraine Baird recognises there is increased risk of this type of modern slavery in bordering countries. We have open communications with the factories we source from in these areas and through the focused working groups that ETI membership allow us access to we have guidance on how to approach the potential risks should they arise in our supply chain.
Outsourced recruitment processes and the use of contract/agency/ temporary employees	Workers in our UK Warehouse	Baird Group works with trusted labour agencies in recruiting temporary workers. Baird Group drives awareness of Modern Slavery with induction training at our warehouses.
Presence of young workers in regions of increased likelihood of child labour	Mill workers in the Tamil Nadu region of India being subject to Sumangali schemes	In line with our commitment to the ETI base code to keep workers safe we have a Child Labour policy which is circulated to our supply base. Where we learn that the risk of this is heightened (such as in the Tamil Nadu region) we have open communication with the factory to understand their own approach and policies to minimize this risk.
Gender-Based Violence	Workers in our value chain	There has been a rise in the reports of domestic abuse and workplace harassment in all our sourcing countries due to global events such as the COVID-19 pandemic. We are working with the ETI to build a network of contacts with experience 'on the ground' that will help us understand the signs/ trends we should be looking out for and the best internal reporting procedures we should be asking our suppliers to have in place.

Assessing Risks

We have been focusing on the following countries due to their level of Modern Slavery risk: Bangladesh, Egypt, China, India



BANGLADESH

Risks to workers that we have identified include excessive overtime, low wages, unsafe working conditions, verbal and sexual harassment, and forced labour. Insufficient enforcement of labour laws, and focus on low-cost production hinder brands' ability to identify and resolve problems within their supply networks

We recognise that we cannot address these in isolation, collaboration is key to managing these risks and drive a sustainable apparel manufacturing industry. By working with the ETI and following their framework we can link up with others who are also looking for ways to protect workers throughout global supply chains.



EGYPT

Strong abuse of vulnerability and deception, risk of excessive over time, management system failures and with-holding of wages.

Baird Group have close ties with Egypt, and we are currently working with our partners to promote the education of workers to understand their knowledge of human rights issues and worker representation.



CHINA

The prevalent risks of Modern Slavery we have noted within China include limitations on freely chosen employment, excessive overtime, child labour, and significant restrictions on worker ability to engage in collective bargaining and form trade unions.

Cotton is the largest % mix of the raw materials we use, the allegations of state-imposed forced labour highlighted by <https://www.antislavery.org/what-we-do/state-imposed-forced-labour/> are deeply concerning. We have a raw materials policy which we share with our supply base and are committed to on-going due diligence in this area. We request suppliers to share information on where the cotton used for our products is sourced from.

The risks related to forced labour in China are prevalent across the industry, and we understand that addressing these risks requires a collaborative approach to achieve meaningful impact. We are dedicated to working with transparency and now we are aware of the related risks we are actively looking for ways to help drive improvements.



INDIA

In 2011, Anti-Slavery International highlighted the presence of modern slavery issues related to Sumangali schemes in Southern Indian state of Tamil Nadu. These exploitative labour practices are predominantly found at the raw materials processing level of production, where brand influence can be limited, and monitoring can present challenges.

We have open communications with our garment manufacturing suppliers in these areas and should specific issue arise we discuss these with them directly to understand the direct effect and if there are ways we can support. To date we have not been required to take any direct action within our supply base.

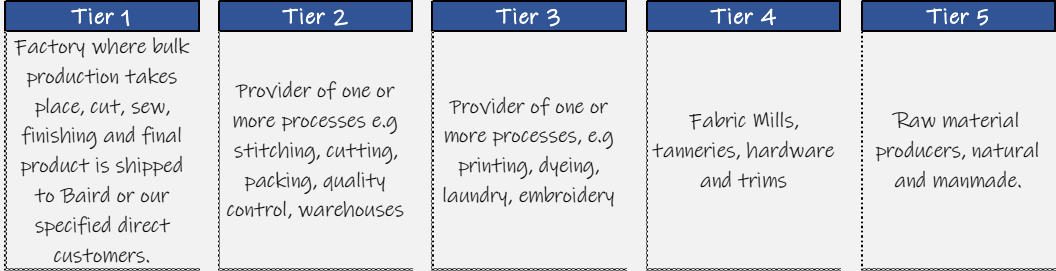
Assessing Risks

Transparency and Traceability

Baird Group are working towards transparency we have a full Tier 1 factory list which we review internally every 6 months. This is now available on our [website](#).

This year we have also begun to analyse our audit demographic data by gender, this is in acknowledgement of the heightened risk of modern slavery for women. Our next step is to learn how we can also analyse ethnicity with the increased risk to migrant workers.

Tier 1 represents only a very small portion of the overall supply chain. To understand the risk more broadly we need to understand the factory operations further down the supply chain. We have a lot of work to do to get where we need to be, but we have now mapped out our tier 2 suppliers on several of our key factories and plan to continue doing this until we have full visibility.



Monitoring

Tier 1 Suppliers

All factories producing products that are bought by Baird Group are required to submit ethical audits completed by an independent 3rd party. All audits must cover the ETI base code principles and local law requirements.

Our preferred audit types are Smeta, BSCI, SA8000 and WRAP all widely accepted throughout the industry.

Beyond Monitoring

Baird Group have always required 3rd party Ethical audits from our Tier 1 manufacturing sites but through the work we have done with the ETI we have recognised that to be a responsible retailer there is more we can do.

This year we have partnered with [Verisio](#), using their auditing expertise and online compliance platform they are supporting us and our factories to analyse the root cause of any issues that may arise. By addressing any issues in this way factories will be better placed to drive long term improvement in both our supply chain and the labour standards of those who work for them.

Third-Party Branded Supply Chain

While we do not currently have full visibility of all our 3rd Party Brand manufacturing sites, we do require that they sign up to our Sourcing Principles for Third Party Brands or provide a copy of their own standards if they offer a greater social or environmental protection.

Within this suppliers sign up to our Code of conduct on behalf of all the factories they are using to manufacture products sold to Baird Group.

Cascading Knowledge

Building Knowledge in our business

Our Ethics and Sustainability team build their knowledge in this area through external training, webinars, conferences and events (Including courses offered by both the ETI and Sedex)

We also have our own internal training programs that covers topics through out the business it is a requirement of all colleagues to complete.

Ethics and Sustainability at Baird: how we onboard new factories through to Responsible purchasing practices and Sustainability initiatives through the business.

All new starter meet with the Sourcing and Sustainability Manager as part of the induction process. It is at this point we share our responsible sourcing journey so far, key focuses for the business which includes responsible purchasing practices and discuss how their role can support the business with achieving these goals.

Building knowledge in our supply chain

We have begun working with a new document share platform which provides us with a central place for communication with all our Tier 1 supply base. We will be using this to share our update manual which now includes more detailed sections on Modern Slavery prevention and Vulnerable workers which we hope will support suppliers’ understanding of the topics. We also include a link to the resources shared by [Anti-Slavery International](#).

Monitoring our Progress

The ETI’s quarterly progression framework meetings for Foundation members.
Internal Monthly focus meetings
Regular progress meetings with Verisio

Our Cultural Framework

We believe that by creating a framework that underpins the core values of the business, together colleagues can create an environment that is supportive, collaborate, and productive.

Our Cultural Framework is made up of three categories, each with their own sub-categories. They are:
Behavior: Integrity, Courage, and Respect
Ethics: Safe, With Pride, and Accepting
Environment: Innovative, Commercial, and Owned

You can find out more about our values here: [Baird Values](#)

Cultural Guardians

Within Baird Group we have colleagues who have taken on the role of Cultural Guardians, one of the key roles of these Guardians is to promote our Cultural Framework and the values within it. They provide a confidential avenue for people to highlight and discuss anything they may see or experience in the workplace that they feel is not in line with the framework . Our Guardians receive specific training to provide support to individuals confidentially and help them to reach a conclusion on any action that may need to be taken.

Partners with The Retail Trust

We recognise that our own colleagues may sometimes need additional support with their own wellbeing, Baird Group are a partner with The Retail Trust who champion health in retail by lobbying for better standards in employee wellbeing. Their experience and expertise mean they are best placed to understand what people may be going through and how best to tailor support to their needs.