

Modern Slavery Statement

Hunter's Ethical Approach

Our Organisation

Hunter Apparel Solutions Limited (Hunter) are a manufacturer / supplier of corporate and PPE uniform solutions to private / public sector organisations.

Hunter is committed to driving out acts of modern-day slavery and human trafficking within its business and from within its supply chains, including subcontractors and partners.

Hunter acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

Hunter will not support or deal with any business knowingly involved in slavery or human trafficking.

As part of the company's due diligence processes into slavery and human trafficking our supplier approval process incorporates a review of the controls undertaken by suppliers in relation to their adherence to the Ethical Trading Initiative (ETI) Base Code.

1. **Employment is freely chosen**

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. **Freedom of association and the right to collective bargaining are respected**

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

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2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

- Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter

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employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:

1.
 - this is allowed by national law;
 - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the workers' health and safety; and
 - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

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8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home- working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Policies in relation to slavery and human trafficking

Hunter's core policies relating to tackling modern slavery and human trafficking are as follows:

Modern slavery and human trafficking policy

Hunter expects all of our suppliers and subcontractors to have effective systems & controls to ensure that slavery and human trafficking do not take place anywhere in our supply chains. Hunter works with suppliers to evaluate human trafficking risks and slavery risks in our supply chain, and our supplier vetting process covers health and safety, slavery / forced labour, child labour and other legal requirements.

Equality policy

Hunter is an equal opportunities employer and our equality policy which ensures we comply with legislation.

Hunter is committed to Equality Policy and employment practices and aims to ensure that no actual or potential job applicant or Staff Member is discriminated against, either directly or indirectly, on the grounds of gender, marital status, disability, race, community background or political persuasion, age, dependents, sexual orientation or Trade Union membership

Ethical Policy

Hunter expects all of our suppliers to:

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- Prevent unfair, unreasonable and unethical business practices.
- Prevent the use of any form of bribery or improper offers to or from employees or organisations.
- Respect confidentiality and protect confidential information.
- Acknowledge the interdependency between business and the communities in which they operate in order to minimise the negative impact of core business activities.

Whistleblowing Policy

Hunter is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by the Company, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Ethical and Sustainable Development Policy

Within and beyond the regulatory framework of the clothing industry, the aims of Hunter Apparel Solutions Ltd in advancing the Ethical and Sustainable Development Policy are:

- To ensure the continued supply of quality manufacturing in line with ethical and international safety standards.
- To ensure safe recycling of waste packaging to the environment.

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- To improve services by providing them in an ethical and sustainable cost-effective way.
- To influence our global business partners to continue working towards more ethical and sustainable futures.
- To educate, inform and update all employees of their responsibility in approaching a policy of ethical and sustainable development as 'a way of life'.

Due diligence processes and risk management

Hunter ensures that our suppliers are vetted as part of our due diligence processes in relation to their ethical standards and risk management.

Hunter maintains an ethical supply chain by only using suppliers that are independently audited and accredited by recognised ethical trading organisations, such as:

- Worldwide Responsible Accredited Production (WRAP)
- Supplier Ethical Data Exchange (SEDEX),
- Business Social Compliance Initiative (BSCI)
- Social Accountability International (SAI)

Independent supplier audits must meet as minimum, the standards and values of the Ethical Trading Initiative (ETI) Base Code. Suppliers must be able to provide evidence of these independent audits before being selected as a potential supplier. Only accredited audits from independent organisations will be accepted alongside Corrective Action Plans (CAP) resolving non compliances found during audit process. Subject to review and approval of the independent audits and CAP, suppliers are added to our approved supplier database. Hunter reduces the ongoing risks associated with ethical procurement with suppliers being required to submit annual audits and CAPs going forward to remain as an approved supplier to Hunter.

Key performance indicators to measure effectiveness of steps being taken

Hunter uses our supplier vetting process and independent annual audit / CAP submissions from suppliers to measure the effectiveness of steps taken by suppliers to ensure their compliance with ETI Base Code. Our supplier database is updated on ongoing basis with supplier compliance status. Suppliers must provide a compliant independent audit and action any of the corrective actions to attain / maintain their status as an approved supplier. Any supplier that has not met these measurements is approved status is paused until they can demonstrate their compliance.

It also allows us to access and benchmark our suppliers against all our other suppliers in our database.

Training

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Hunter are members of the Ethical Trading Initiative and use our membership to drive change within our business and supply chain. We have partnered with the ETI to deliver training to our staff and improve our knowledge and develop skillsets in working with offshore supply chains.

Hunter are committed to collaboration with the ETI to assist our business and its staff with the global impact decisions that customers have on our supply chain.

Responsibility

The company Directors and senior management shall take responsibility for implementing

this policy modern slavery statement and its objectives and shall provide adequate resources (training etc.)

and investment to ensure that slavery and human trafficking is not taking place within

the organisation and within its supply chains.

This Policy takes into account, and supports, the policies, procedures and requirements

documented in our Integrated Management System. The implementation and operation of

this management system underlines our commitment to this policy. Formal procedures

concerning slavery and human trafficking have been established, including disciplinary

procedures where they are breached. Additional procedures ensure that this policy is

understood and communicated to all levels of the company, and that it is regularly reviewed

by the Directors to ensure its continuing suitability and relevance to the company activities.

Our Global Supply Chain:

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Salient Risks

Hunter have focused on all the issues laid out in the ETI framework and have identified the below factors as salient risk issues that require further focus.

- Health and Safety
- Fair Wages
- Working Hours
- Forced Labour & Child Labour

Hunter conduct risk assessments on our suppliers to ensure that the chance of these issues occurring is significantly reduced.

Hunter carries out third party auditing and supplier vetting to ensure these Salient right issues are not compromised.

If a non-compliance is identified in any of these issues, Hunter will work directly with the factory to implement a remediation plan to ensure that these are corrected.

Health and Safety:

The Covid-19 pandemic brought to light several issues with PPE and social distancing being a key concern across manufacturing sites globally.

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Hunter worked directly with our factories to ensure that this issue was managed effectively to ensure all staff members had the required PPE they needed and to ensure that health and safety measures were implemented.

Hunter developed our relationships with our suppliers further within 2020-2022 through increased video conferencing and increased communication with the suppliers to ensure that any issues would be identified as soon as possible and remediated if necessary.

Fair Wages:

Hunter have identified Fair Wages as one of the main human rights issues that can be found in offshore manufacturing.

Hunter employs a strict vetting process and carry out regular third-party auditing to ensure that the wages provided to employees meet the legal requirements of the region the manufacturer is located in.

Forced Labour & Child Labour:

From risk assessments, forced labour and child labour remain serious issues across Asia and Hunter work directly with our suppliers to ensure that these issues are not present across our supply chains.

Hunter liaises with all our suppliers located globally to ensure that this was not an issue for us, and we continue to assess the ongoing situation globally to ensure this issue is reduced.

Should any instances of this be identified, Hunter will work with the supplier to immediately remediate the issue.

Working Hours:

Working hours have always been a major concern in countries such as China, Hunter work directly with the suppliers to ensure that all overtime and working hours fall within the legal limits.

After Covid-19 lockdowns, it is noted that there is a higher risk of increased working hours as factories try to make up for missed time during the lockdown.

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If a supplier is found to breach the legal working limit within their region, Hunter will work closely with that supplier to implement a plan to reduce the working hours to ensure they fall within legal requirements and monitor these issues closely to ensure that these are remediated.