

FORCED LABOUR STATEMENT

For our financial year ending December 2023

In accordance with Canada's BILL S-211 Forced labour in Canadian Supply Chains

1. Structure, activities and supply chains

Brook Taverner Ltd is a privately owned, UK based, Limited company specialising in the design, sales and distribution of branded clothing and associated accessories. We have 215 employees based across our Head office/Warehouse in Keighley (England) and our 12 stores across England and Scotland.

We are committed to running a business that prioritises the wellbeing of the people within its supply chain and as such we aim to protect all workers from Forced labour.

Our branded products are manufactured at 46 sites located across 9 countries.

This Forced labour statement has been published in accordance with the Canadian BILL S-211 and was approved by the Board of Directors of Brook Taverner Ltd.

2. Policies and due diligence processes

We have policies that detail our ethical trade expectations and these are shared with suppliers during the onboarding process:

- Code of Conduct
- Ethical Sourcing Policy

These documents are reviewed, republished and re-issued annually (or more frequently as required) and our suppliers are required to sign a declaration of conformity on receipt.

As part of our onboarding process and prior to the manufacturing sites being approved to receive orders, our compliance team collect manufacturing site details, licenses, permits and 3rd party ethical trade audit reports and all of the information is stored in our supply chain mapping database.

An audit expiry calendar has been set up to help ensure we have the most current audit on file.

During manufacturing site visits, examples of records are taken for compliance checks.

3. Forced labour and Child labour risks

Brook Taverner recognises that there are specific vulnerabilities within supply chains which have additional concerns that need to be monitored.

Migrant Workers:

- Are often linked with precarious recruitment processes (including the withholding of a passport and dubious contracts of employment)
- Contracts may indicate excessive fees payable by the employee
- Restrictions on freedom of movement and association
- Absence of labour law coverage and/or enforcement in the country of destination
- Language and cultural differences
- The absence of adapted assistance and protection mechanisms
- The social and cultural isolation they can face at the destination
- A lack of advance and accurate information on terms and conditions of employment

In conjunction with our suppliers, we will take all possible steps to prevent our manufacturing sites from entering into agreements with agencies recruiting both domestic and overseas migrants that may be subject to Forced labour.

If any of our partners in China have domestic migrants, we request the information of where they originate as we need assurances that the workers are not from the Xinjiang Uygur Autonomous Region (XUAR).

4. Remediation measures

Where critical non-conformities relating to Forced and/or Child labour are identified during a visit or a 3rd party ethical trade audit, the supplier will be expected to work with the production site to quickly and effectively to remediate the non-conformities.

A partial semi-announced or unannounced follow up audit must then be conducted within 90 days of the original audit to show effective closure of the critical non-conformities.

As Brook Taverner have not identified non-conformities relating to Forced and/or Child labour we do not have a specific remediation measures in place.

5. Remediation of loss of income

As Brook Taverner have not identified non-conformities relating to Forced and/or Child labour we do not have a specific loss of income measures in place.

6. Training

To date we have trained a selection of colleagues on Forced labour and Child labour and we intend to roll out mandatory training to all employees during 2024 using a mix of in person training and email communications. New employees will receive modern slavery and human trafficking training as part of their induction.

During 2024 we will roll out optional Ethical Trade training via email communications.

7. Assessing effectiveness

Quarterly supplier mapping reports are sent to the director team detailing performance against the following KPIs:

- 3rd party ethical audits – 100% of Tier 1 manufacturing sites to have a current ethical audit
- Supply base RAG rating (red, amber, green) – A minimum of 95% (see note below) of our manufacturing sites 3rd party annual audit grades to be amber or green

Note: The 95% target is based on our 2023 baseline figure and our aim is to work towards 100%

8. Our commitments for our financial year ending December 2024

- Roll out Forced labour and Child labour training to all employees
- New employees will receive Forced labour and Child labour training as part of their induction from January 2024
- Record Forced labour and Child labour employee training within our personnel system
- Share ETI base code and modern slavery posters with our supply chain

9. Reporting in multiple jurisdictions

Brook Taverner currently reports under the following supply chain legislation:

- United Kingdom's Modern Slavery Act 2015
- Canada's BILL S-211 Forced labour in Canadian Supply Chains

10. Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Andrew Booth

Title: Finance Director

Date: 1st March 2024

Signature:



I have the authority to bind Brook Taverner Ltd

Note: The information contained in this report is correct as of the 20th December 2023