

Modern Slavery Act 2015 Compliance Policy

Modern slavery, Servitude, Human Trafficking

Burlington Uniforms Limited is below the level of turnover whereby it would be obliged to produce a slavery and human trafficking statement for each financial year of the Company pursuant to section 54 of The Modern Slavery Act 2015 (the Act). However the Company wishes to state its commitment to compliance with the Act which by section 1 provides that an offence is committed if a person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude or a person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Burlington Uniform Ltd is committed to preventing slavery and human trafficking in its business activities. We have processes within our ISO 9001:2015 certified Integrated Management System (of which this policy is part) by which we aim to ensure that there is no slavery or human trafficking in our own business and supply chains.

Definition of Slavery and Servitude

Slavery is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Thus the key element of slavery is behaviour on the part of an offender as if he or she did own the person (even though ownership of a person is legally impossible), which deprives the victim of their freedom: see 1926 Slavery Convention.

Servitude is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a 'serf' to live on another's property and the impossibility of changing his or her condition.

Definition of Forced or Compulsory Labour

Work or service is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily: see ILO's Forced Labour Convention 29 and Protocol.

Definition of Human Trafficking

By section 2 of the Act it is an offence for a person to arrange or facilitate the travel of another person with a view to that other being exploited.

The Company's Commitment

This policy reinforces the company's commitment to the principles stated in its Ethical Trading Policy (POL 005) that in it and its supply chain employment is freely chosen and that there is no forced, bonded or involuntary labour or human trafficking. It re-states its commitment in the context of its understanding of the Act.

Our Corporate Social Responsibility Policy (POL 002) sets out our belief that, as a privately owned trading company operating in the public and private sectors, the long-term future of the company is best served by respecting the interest of all our stakeholders: that is to say shareholders, employees, customers, partners, suppliers, service providers and the wider community. We look actively for opportunities to improve the environment and to contribute to the well-being of the communities in which we trade. This policy expands upon the principles set out in our Corporate Social Responsibility insofar as they apply to conduct proscribed by the Modern Slavery Act.

Burlington Uniforms will comply with the Act and recognises its moral duty to influence its supply chain towards compliance. The company expect members of its supply chain to comply with the Act or, where a supply chain member is situated outside the jurisdiction of the courts of England and Wales, to refrain from conduct or practices (proscribed conduct or practices) that would be offences under the Act if it was within the jurisdiction. Where a supplier or members of its supply chain will not comply with the Act or refrain from proscribed conduct or practices or seek to achieve compliance or abstention from proscribed conduct or practices Burlington Uniforms will not do business with that supplier.

Due Diligence

The Company will risk assess all first tier suppliers or providers before placing them on its approved list. Risks to be assessed include risk of non-compliance with the Modern Slavery Act or non-compliance with the spirit of the Act if the Supplier or Provider is outside the jurisdiction.

The company's Provider Assessment Procedure contains a risk scoring matrix. Any provider that scores a "High" risk for any aspect of the assessment, including Modern Slavery Compliance, will be requested to complete our Provider Assessment Questionnaire FOR 017, which asks questions in respect of the various matters relating to ethical trading and good environmental management including Modern Slavery Act Compliance. Following this engagement the company takes a view as to whether to commission a local audit.

Suppliers supplying a high percentage value of the annual spend by designated clients are in any event required to complete the Supplier Assessment Questionnaire. Again a view is taken as to whether to commission a local audit.

By these assessment processes we seek to ensure that our suppliers and providers are aware of this Modern Slavery Act compliance policy and trained in best practice and standards. We seek to ensure that such awareness exists throughout the supply chain.

Responsibility

The responsibility for the formulation, implementation and review of this policy lies with the:

- Managing Director.
- General Manager.
- Systems and Quality Manager.

Policies are formulated and implemented so as to reflect law and best practice within the context of the company's objectives and operations. The company will be advised by counsel and by its expert advisor in health and safety, environmental science and analysis of assessments and audits.

We all have a duty to be alert to risks, however small, of Modern Slavery, Forced Labour or Human Trafficking in any area of our operation or within any organisation or by any person with whom we do business.

All members of staff are expected to report any concerns that they have relating to compliance with the Act and they should invoke the Whistleblowing Policy (POL 010). Management must act upon reports.

If a member of staff considers Extreme Circumstances exist they may invoke stage 3 of the whistleblowing policy and report direct to the authorities. Extreme circumstances will be deemed to exist where the internal reporting procedures do not bring a response or satisfactory response, where an employee believe that the Directors or Management are involved in wrongdoing or mounting a cover-up or they believe that they will be subject to a detriment if they instigate the internal procedures.

There is a helpline 08000 121 700 and a website <https://www.modernslaveryhelpline.org/>. The police may be called on 101 and in an emergency staff should call 999.

Areas of Operation Over Which Policy Extends

The provision of corporate workwear, uniforms and PPE to private and public sector organisations, as well as individuals. The Company currently operates in the United Kingdom. Our Tier 1 suppliers are all based in the UK or are represented by UK agencies. Some source supplies from outside of the UK.

Personnel

Directors, Senior Managers, Department Heads and Operational Staff make up the Company's payroll. With the exception of one Contract Manager who lives and works in Spain all employees operate in the UK. The company engages a number of self-employed contractors and professional practitioners.

Actions when Contravention of the Act is suspected

The Company will report to the Authorities (National Crime Agency, police, local authority, social services etc.) any organisation or individual that it reasonably believes is in breach of the Act. The company may use the helpline or website <https://www.modernslaveryhelpline.org/>. The police may be called on 101 the company is aware that in an emergency the police should be called on 999.

Actions in Support of the Policy

Previous actions

This policy was formulated following the passing of the Modern Slavery Act 2015. It has been reviewed annually as part of Management Review procedures. All staff were invited to input. It has been subject to internal audit and has been audited as part of its annual external audit by the body that certifies its Integrated Management System. Following internal and external audits and consultations we have made appropriate revisions to our policy and published revised versions on our website and circulated them to staff and to any interested party requesting them.

During last year all staff underwent e-learning training in order to increase awareness of the signs and risks related to modern slavery and the ability to identify where such cases might be occurring.



Continued Actions

This policy will continue to be reviewed annually as part of Management Review procedures. All staff are invited to input. It will continue to be subject to internal audit and external audit.

During the year all staff are required to complete a minimum number of training sessions consisting of live training and on-line modules. Training on modern slavery and related issues will be provided within the annual training program.

During the year ended 31st May 2025 and beyond we will continue to run our risk-based supplier assessments and re-assessments which will include the risk of modern slavery in the supply chain. Risks are given a tolerance score. There is zero tolerance for modern slavery.

This policy is overviewed by the Managing Director.

Signed:

Adrian Hewitt
Managing Director

Date: 19th July 2024
Review Date: 18th July 2025