

## **Modern Slavery Statement** **(2021 Statement)**

### **Introduction**

This Statement is made in accordance with Section 54, Part 6 of the **Modern Slavery Act 2015** (MSA).

The main purpose of Uneek Clothing Company Limited is to provide clothing manufacturing and distribution services to customers in the UK and worldwide. Uneek is committed to respect for human rights, in our own operations and in our supply chain.

### **To Whom this Policy Applies**

This policy applies to all persons working for Uneek or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, interns, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any employee's contract of employment and Uneek may amend it at any time.

### **Structure and Supply Chain**

Uneek is a UK-based company with its Head Office in London. We have a Distribution Centre in South Wales wherefrom all our products are dispatched worldwide. All our European operations are headquartered in Germany. Uneek's products are produced in various countries, with dedicated facilities in China, Pakistan and Bangladesh. We also have suppliers in Cambodia. Uneek's products are manufactured to our standards and then shipped directly to our Distribution Centre through various carriers.

### **Policies on Modern Slavery**

We are fully aware of unsavoury practices that occur in some of the countries we operate in. That is why, before we work with any manufacturer or supplier, we make sure they adhere to the International Labour Organisation Conventions on Slave labour, Forced Labour and Human Trafficking. To ensure that these practices do not take place in any factory supplying to us, we have put in place a mandatory reporting and monitoring system. We carry out random and spot checks (unannounced). Uneek pays and is committed to a Living Wage in the UK and pays the highest possible rates to their overseas suppliers. We adhere to the ideal of Global Human Rights Policy in that we recognise the right of all employees, whether in the UK or overseas, to have a safe and respectful workplace. All Uneek employees, manufacturers and suppliers are committed

to complying with all applicable laws regarding slavery and human trafficking whether in the UK or overseas countries where we conduct our business.

### **Due Diligence Processes**

Uneek is committed to and applies the OECD Due Diligence Guidance for Responsible Business Conduct (as of 31<sup>st</sup> May 2018). That includes Due Diligence for Processes for Slavery and Human Trafficking, and Due Diligence Guidelines for Responsible Supply Chains. In order to combat the risk of slavery and human trafficking, we take steps to identify those areas of our business where there is a risk of slavery and human trafficking taking place. Therefore, Uneek consults key external informational resources to identify where there could be a risk of slavery and human trafficking. We will continue to monitor the situation and, where necessary, implement corrective measures. Moreover, all employees (UK and Overseas) can contact the Director of Personnel directly and in strict confidence to voice any concerns they might have about the treatment they or their colleague(s) are receiving which might be less favourable; which might be an indication of slavery or human trafficking.

### **Risk Assessment**

We set out to identify the existence and the extent of any slavery and human trafficking in our supply chains by conducting checks (including spot checks) at all factories that supply us; interviewing workers without their managers or supervisors being present; collaborating with the suppliers in putting in place measures to prevent slavery and human trafficking. For example, we had heard that there were instances which could have been construed as slavery and human trafficking in that some under age children were being “employed” in one of our suppliers’ factory. We spoke to the supplier and made a visit to the factory. It turned out that this was incorrect. Nevertheless, it was explained to them that it was not an acceptable practice and, if at any time such practice was discovered to be taking place then our relationship with them would be terminated.

### **Measuring Effectiveness**

Even though this is our first statement, we are putting in place verifiable KPIs to measure progress which will be reported in the second and subsequent statements. This is achievable through collaboration with the suppliers, visits, independent social auditors and reports from NGOs.

### **Training Staff**

Our commitment to identifying and eradication any potential human rights breaches is shared by all Uneek’s employees. We will continue to identify ways to improve employee and supplier awareness of Uneek’s commitment to respect human rights and efforts to prevent modern slavery and human trafficking.

All senior staff have been trained in identifying and reporting all signs of potential forced labour or human trafficking.

### **Responsibility for Policy**

All Directors have overall responsibility for ensuring this policy with senior management; and managers/supervisors have day to day responsibility to ensure compliance with our legal and ethical obligation. The Legal and Compliance Director (Director of Personnel/HR) has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

### **Compliance with the Policy**

All Directors/Managers/Supervisors and employees must ensure that they read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your manager OR the Director of Personnel/HR and Compliance as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the Director of Personnel/HR and Compliance or you may report it in accordance with our Whistleblowing Policy as soon as possible. If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the Director of Personnel/HR and Compliance. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Uneek is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the Grievance Procedure which can be found in your Employee Handbook or from the HR department.

Signed by  
Raza Khan  
CEO

Signed by  
Karim P Tshibangu  
Director of Personnel/HR and Compliance