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## **Environmental Policy Statement**

"PROMOTIONAL GODS recognises that what we do as a business can impact both directly and indirectly on the environment. We recognise that there is a CLIMATE EMERGENCY which represents a CLEAR AND PRESENT DANGER to our way of life, the biodiversity of our planet on which we rely and the survival of a host of species including our own. We aim to protect and improve the environment through good management and by adopting best practice wherever possible. PROMOTIONAL GODS will endeavour to integrate environmental considerations into our business decisions and adopt greener alternatives wherever possible, throughout our operations."

We believe a positive attitude to environmental management is every business and individual's responsibility and makes sound business sense.

In all our activities we aspire to:

- Comply fully with all relevant legal requirements, codes of practice and regulations.
- Prevent pollution to land, air and water.
- Reduce water and energy use.
- Minimise waste and increase recycling within the framework of our waste management procedures.
- Identify and manage environmental risks and hazards.
- Promote environmentally responsible purchasing.
- Develop our employees' awareness of environmental issues including their responsibilities under this policy.

All employees are responsible for working towards the objectives contained within this policy.

# Sustainable Development Goals

We are committed to the UN global goals as follows and will endeavour to take account of these goals by these goals in our business strategy:

(1) No Poverty, (2) Zero Hunger, (3) Good Health and Well-being, (4) Quality Education, (5) Gender Equality, (6) Clean Water and Sanitation, (7) Affordable and Clean Energy, (8) Decent Work and Economic Growth, (9) Industry, Innovation and Infrastructure, (10) Reducing Inequality, (11) Sustainable Cities and Communities, (12) Responsible Consumption and Production, (13) Climate Action, (14) Life Below Water, (15) Life On Land, (16) Peace, Justice, and Strong Institutions, (17) Partnerships for the Goals.

Measures we have implemented to reduce our level of waste & carbon footprint:

## Recycling

The following materials are currently recycled or re-used:

- Waste paper
- Cardboard
- Envelopes
- Packaging materials
- Plastic bottles
- Glass bottles
- Metal cans
- Toner cartridges
- Ink cartridges
- Drum cartridges
- Fuser units
- Transfer application tape
- Jokes

## Update: All plastics are now reused or recycled

#### **Energy conservation**

- Presses, printers etc to be turned off when not in use for 1 hour
- All computers not performing operational tasks switched off after hours
- Use of energy-efficient neon lighting
- Loft insulation
- Double glazed windows & doors
- Energy efficient boiler, central heating & air conditioning

#### **Transportation**

- To save extra transport, outsourced goods are delivered direct from source where practical
- All staff currently cycle or walk to work. Shower facilities are available for cyclists.

## Litho printing

Preference towards use of vegetable based inks in litho printing

## Paper supply

We support and source from European Union FSC grade forests which ensure more trees are planted for the future than are felled each year.

We support Elemental Chlorine Free technology.

We buy in recycled paper but also support replanting of trees in a sustainable habitat. We support the collection of all paper waste and the recycling of that waste into <u>lower</u> grade waste (e.g. packaging). This is far more energy efficient and uses less water & chlorine than converting high grade waste paper back to high grade white paper but we do also see the benefits of recycled paper to mitigate the amount of virgin pulp required.

Update: Our generic 80gsm & 100gsm office paper is now recycled at no extra cost to the client

#### **Garments**

Update: We have introduced a number of new garments into our range which we are promoting. Notably recycled fleeces and items made from organic cotton

Our standard list garments (Gildan brand) have the following environmental credentials/memberships: Confidence in Textiles Oeko-Tex standard 100, Fairwear Foundation. Fair Labor Association, Worldwide Responsible Apparel Production. Other brands we supply also have one or more of these and/or Fairwear Association







#### **OEKO-TEX® Standard 100**

#### Explanation

The OEKO-TEX® Standard 100 is an independent testing and certification system for textile raw materials, intermediate and end products at all stages of production. Examples for items eligible for certification: Raw and dyed/finished yarns, raw and dyed/finished fabrics and knits, ready-made articles (all types of clothing, domestic and household textiles, bed linen, terry cloth items, textile toys and more).

#### Criteria

Testing for harmful substances includes:

- illegal substances
- legally regulated substances
- known harmful (but not legally regulated) chemicals
- as well as parameters for health care

In their entirety the requirements clearly exceed existing national legislation.

Laboratory tests and product classes

OEKO-TEX® testing for harmful substances always focus on the actual use of the textile. The more intensive the skin contact of a product, the stricter the human ecological requirements to be met.

Accordingly there are four product classes:

- Product class I:
  - Textile items for babies and toddlers up to 3 years (clothing, toys, bed linen, terry cloth items etc.)
- Product class II:
  - Textiles used close to the skin (underwear, bed linen, T-shirts etc.)
- Product class III:
  - Textiles used away from the skin (jackets, coats etc.)
- Product class IV:
  - Furnishing materials (curtains, table cloths, upholstery materials etc.)

#### Certification

The requirement for certification of textile products according to OEKO-TEX® Standard 100 is that all components of an item have to comply with the required criteria without exception – that means in addition to the outer material also sewing threads, linings, prints etc. as well as non-textile accessories such as buttons, zip fasteners, rivets etc.

#### **Fair Labor Association**

From coffee and electronics to apparel and footwear, most of the products we enjoy and use every day are made by men and women in factories and on farms around the world. These workers harvest the cotton used to make our shirts, sew buttons and zippers onto our jackets, grow the cocoa our children drink, and make high-tech soles for our running shoes. Unfortunately, many of them work in deplorable conditions.

FLA's Multi-Stakeholder Approach to Improving Workers' Lives

The products we buy should not come at the cost of workers' rights. The Fair Labor Association believes that all goods should be produced fairly and ethically, and brings together three key constituencies - universities, civil society organizations (CSOs) and companies - to find sustainable solutions to systemic labor issues. Since 1999, FLA has helped improve workers' lives by:

- Holding affiliated companies accountable for implementing FLA's Code of Conduct across their supply chains.
- Conducting external assessments so that consumers can be assured of the integrity of the products they buy.
- Creating a space for CSOs to engage with companies and other stakeholders to find viable solutions to labor concerns.

## **Worldwide Responsible Apparel Production**

Worldwide Responsible Accredited Production (WRAP) is an independent, global non-profit organization dedicated to the certification of facilities engaged in lawful, humane and ethical production. Headquartered in Arlington, Virginia, WRAP has offices in Hong Kong and Bangladesh with representation in India.

Based on reports of improper working conditions in sewing factories in developing countries, a task force composed of members from the American Apparel Manufacturers Association, consultants, NGOs and other stakeholders began an exhaustive, three-year study of the labor and environmental conditions in sewing factories around the world in late 1996. Based hundreds of meetings across the world with numerous governments, trade associations, retailers, brand manufacturers, suppliers, trade unions and NGOs, WRAP was established in January 2000 and is today the world's largest labor and environmental certification program for labor-intensive consumer products manufacturing and processing. WRAP enjoys the support of 25 international trade associations including the International Apparel Federation which represents 36 national associations and over 150,000 individual companies.

WRAP is a standards-setting and certification body. It has no members nor does it rely on government funding or foundation grants.

The WRAP Certification Program is based on 12 Principles focusing on local law and workplace regulations, generally accepted international workplace standards, and the environment. WRAP also includes evaluation of a facility's customs compliance and security standards in line with the Customs - Trade Partnership Against Terrorism (C-TPAT) Foreign Manufacturers Security Criteria of the U.S. Department of Homeland Security for facilities exporting to the US. Facilities that demonstrate proper adoption, deployment and monitoring of all 12 Principles receive certification for six months to two years. The certificate applies to the individual facility, not a parent company or brand.

As stated above, WRAP focuses on compliance with local law. It is an apolitical organization and does not lobby nor advocate for issues such as freedom of association outside of local law, nor the concept of a living wage, which has not been defined. WRAP understands and respects the unique culture of each country. Therefore it is the policy that WRAP has not and will not get involved in any political issue with any country.

Facilities benefit from WRAP certification by demonstrating compliance with buyer Corporate Social Responsibility (CSR) requirements. This certification clearly opens doors and creates business opportunities in today's highly

competitive global export markets. WRAP is well recognized and has been accepted by many international retailers, brand manufacturers and licensors. Manufacturers in many developing countries have treated WRAP as an "International Passport for Entry into Western Countries".

WRAP has incorporated a significant number of "best practices" to assist facilities in becoming more efficient, productive and profitable. Finally, the overall benefits are clear: better working conditions for employees, an environmental program designed to protect the environment, and a sustainable platform to provide for future generations.

#### **Fairwear Association**

Fair Wear Foundation (FWF) is an independent, non-profit organisation that works with companies and factories to improve labour conditions for garment workers.

FWF's 80 member companies represent over 120 brands, and are based in seven European countries; member products are sold in over 20,000 retail outlets in more than 80 countries around the world. FWF is active in 15 production countries in Asia, Europe and Africa.

FWF keeps track of the improvements made by the companies it works with. And through sharing expertise, social dialogue and strengthening industrial relations, FWF increases the effectiveness of the efforts made by companies.

Change requires a major joint effort. We therefore invite companies to join FWF and make a difference. If you're interested in how we can help you, send us an e-mail

Companies that produce and distribute products of which the main manufacturing process is sewing can join FWF and, depending on the direct influence they have with garment factories, become an FWF affiliate or FWF ambassador. Both affiliates and ambassadors of FWF work towards improving the labour conditions in factories and workshops where the 'cut-make-trim' stage takes place, all over the world. The basis of the collaboration between FWF and a member is the Code of Labour Practices. Eight labour standards form the core of the Code of Labour Practices. Members of FWF must comply with this Code of Labour Practices.

#### **Principles**

**Supply chain responsibility** = realising that the Code can only be fulfilled when sourcing companies, as well as factory management, actively pursue practices that support good working conditions.

Labour standards derived from ILO Conventions and the UN's Declaration on Human Rights = basing FWF's Code on internationally-recognised standards which have been set through tri-partite negotiation.

**Multi-stakeholder verification** = verification processes developed through multi-stakeholder negotiation, and involving experts from diverse disciplines and perspectives in FWF verification teams.

A process approach to implementation = paying special attention to the means (i.e. building functioning industrial relations systems over time) in order to achieve the end (i.e. sustainable workplace improvements). Involvement of stakeholders in production countries = engaging local partners in shaping FWF's approach in a given region or country.

**Transparency** = keeping relevant stakeholders informed of FWF policies, activities, and results; publicly reporting on member company efforts to fulfil FWF requirements.

FWF is governed by the following organisations:

- Modint (the trade association for fashion, interior design, carpets and textiles)
- CBW-MITEX (business association for retailers of interior design, fashion, shoes and sportswear)
- FGHS (business association for sporting goods suppliers)
- FNV Bondgenoten (federation of trade unions service industry)
- CNV dienstenbond (Christian trade union service industry)
- Clean Clothes Campaign (The Netherlands)
- Brot für alle (Switzerland)

#### **Green Products**

We always have a large range of eco-friendly alternatives on offer. These include:

Material: recycled paper

Example Items: carrier bags, stationery, booklets, pads, newsprint, pens, pencils

Material: assorted

Example Items: Re-usable carrier bags

Material: Recycled plastic (e.g. CD cases, vending cups PET bottles)

Example Items: pens, key fobs, mouse mats, mugs, fridge magnets, frisbees,

boomerangs, yo-yos

Material: corn starch

Example Items: pens

Material: sugar cane

Example Items: Carrier bags & films

Material: organic cotton

Example Items: T-shirts, hoodies

Material: Recycled Cardboard & sustainable wood

Example Items: pencil sharpeners, door wedges, USB sticks

Material: recycled packing film

Example Items: frisbees

Material: recycled polypropylene

Example Items: wallets, desk tidies, folders

Material: recycled leather

Example Items: portfolios

Material: recycled tyres

Example Items: pencil case, mouse mat, coaster, notebook, bookmark

Material: various, human powered

Example Items: wind-up torches, radios & phone chargers

Update: We have enhanced our website for eco-friendly items. Expanding the section and providing more search terms and indexing recycled / bamboo / wheat / organic / eco / eco-friendly. We have also provided preferential discount incentives on many of these items. They now comprise a large proportion of our home page offers.

## **Environmental Management System**

#### ISO 14001

We recognise the ISO 14001 certification system for environmental management. A good proportion of our suppliers hold this certification and it is one of our significant considerations when deciding upon supply. An estimated 35% of our sales by value comes from certificated companies.

Having reviewed our internal practices in relation to ISO 14001, we have found them to be satisfactory. For this reason, as a micro company, we shall continue to self audit for the time being. This may change if it is deemed by management that the company and its clients would benefit from external auditing in terms of both increased turnover and better quality service to its clients in relation to such matters.

However, we applaud the principles of ISO 14001 below and have aimed to incorporate them into our own procedures:

## Plan – establish objectives and processes required

Prior to implementing EMS, an initial review or gap analysis of our organisation's processes and products to assist in identifying all elements of the current operation and if possible future operations, that may interact with the environment - both direct, such as those used during manufacturing and indirect, such as raw materials. For the purpose of establishing our environmental objectives, goals and targets, which should ideally be measurable; help with the development of control and management procedures and processes and serve to highlight any relevant legal requirements, which could then be built into the policy.

#### Do – implement the processes

Identify the resources required and members of the organisation responsible for the EMS implementation and control. Establishing procedures and processes fostering better management control over elements such as documentation control, emergency preparedness and response, and the education of employees, to ensure they can competently implement the necessary processes and record results. Communication and participation across all levels of the organisation, especially top management is a vital part of the implementation phase, with the effectiveness of the EMS being dependent on active involvement from all employees.

#### Check – measure and monitor the processes and report results

During the check stage, performance is monitored and periodically measured to ensure that the organisation's environmental targets and objectives are being met. In addition, internal audits are conducted at planned intervals to ascertain whether the EMS meets the user's expectations and whether the processes and procedures are being adequately maintained and monitored.

#### Act – take action to improve performance of EMS based on results

After the checking stage, a management review is conducted to ensure that the objectives of the EMS are being met, the extent to which they are being met, that communications are being appropriately managed and to evaluate changing circumstances, such as legal requirements, in order to make recommendations for further improvement of the system. These recommendations are incorporated through continual improvement, plans are renewed or new plans are made, and the EMS moves forward.

# **Continual Improvement Process**

- Expansion: More and more business areas get covered by the implemented EMS.
- Enrichment: More and more activities, products, processes, emissions, resources etc. get managed by the implemented EMS.
- Upgrading: An improvement of the structural and organisational framework of the EMS, as well as an accumulation of know-how in dealing with business related environmental issues.

## Managing our legal requirements

We are firmly committed to operating within our legal requirements.

We have identified the following areas of legislation:

- Air
- Chemicals
- Conservation
- Energy
- Environmental permitting
- Land
- Noise and statutory nuisance
- Pesticides and biocides
- Radioactive substances
- Waste
- Water

### We comply with all the following:

- Clean Air Act 1993 (Local Authorities)
  Bans emission of dark smoke from chimneys and furnaces, sets minimum chimney heights, and creates smoke control
- The Climate Change Levy (General) (Amendment) (No. 2) Regulations 2012 SI 3049 (HMRC)
  These Regulations amend the Climate Change Levy (General) Regulations 2001 SI 838 and take account of the removal of the exemption for indirect supplies of electricity produced in a combined heat and power (CHP) station, with effect from 1st April 2013.
- The Greenhouse Gas Emissions Trading Scheme Regulations 2012 SI 3038 (Environment Agency)
  These Regulations implement Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the EU Community.
- The Greenhouse Gas Emissions Trading Scheme Regulations 2005 SI 925 (Environment Agency)
   Following revocation through the 2012 Regulations some parts of the savings and transitional provisions still have effect.
- The Air Quality Standards Regulations 2010 SI 1001 (Local Authorities, Environment Agency and Highways Agency)
  - Management of ambient air quality and compliance with air quality limit values, target values and objectives. The Air Quality Standards Regulations 2007 are revoked.
- Climate Change Act 2008 (DECC)
  - Sets 2050 as the target for reducing greenhouse gas emissions; outlines a carbon budgeting system, greenhouse gas emissions trading schemes, financial incentives for businesses to reduce waste and recycle more and powers to charge for single use bags.
- The Climate Change Agreements (Administration) Regulations 2012 SI 1976 (Environment Agency) Set out procedures for the administration of the climate change agreements scheme.
- The Climate Change Levy (General) (Amendment) Regulations 2012 SI 943 (Environment Agency)
   Amends SI 2001/838. Relevant amendments have also been made by SI 2003/604, 2005/1716, 2007/2903.
- The Climate Change Levy (General) Regulations 2001 SI 838 (DECC)
  Sets out who the climate change levy, which is charged on supplies of electricity, gas and solid fuel, applies to, what is taxable, who is exempt and procedures for registering, returns and tax credits.
- The Climate Change Agreements (Eligible Facilities) Regulations 2001 SI 662 (Environment Agency)
  Specifies that for an installation or site to be eligible for inclusion in a climate change agreement, it must be likely that at least 90% of the energy supplied to it will be used within the site.
- The Climate Change Agreements (Energy–intensive Installations) Regulations 2006 SI 59 (Environment Agency) Defines which energy-intensive installations are entitled to claim the reduced rate of climate change levy.
- The Climate Change Agreements (Energy-intensive Installations) Regulations 2001 SI 1139 (Environment Agency)
- The Greenhouse Gas Emissions Trading Scheme (Amendment) (Registries and Fees etc.) Regulations 2011 SI
   2911 (Environment Agency)
- Volatile Organic Compounds in Paints, Varnishes and Vehicle Refinishing Products (Amendment) Regulations 2010 SI 783 (Local Authorities)
  - Amends 2005/2773 by amending the definition of 'coating' (in the context of vehicle refinishing products) by substituting 'mixture' for 'preparation'.
- Volatile Organic Compounds in Paints, Varnishes & Vehicle Refinishing Products Regulations (Amendment)(England) Regulations 2009 SI 3145 (Local Authorities)

Amends 2005/2773 to allow an person authorised to enforce the Regulations on behalf of a local council to enter premises, take measurements, samples, and obtain information.

- Volatile Organic Compounds in Paints, Varnishes and Vehicle Refinishing Products Regulations 2005 SI 2773
  (Local Authorities)
  - Sets maximum levels of organic solvents that can be contained in paints, varnishes and vehicle refinishing products (such as cleaners, primers and fillers).
- EU Directive relating to aerosol dispensers (75/324/EEC) (Defra)

Requires aerosol dispensers to be marked to confirm they satisfy the safety measures laid down in the Annex to the Directive.

- The Aerosol Dispensers Regulations 2009 SI 2824 (Local Authorities)
  - Aims to protect public health by prohibiting the supply or possession of aerosols not marked as conforming to safety standards
- EU Regulation on Ozone Depleting Substances 1005/2009 amended by EU Regulation 744/2010 on ozone depleting substances

Amends 1005/2009 by banning the use of halons in fire fighting equipment except for military and aviation uses. Allows governments to impose new requirements on handling, use, import, export, recovery, recycling, reclaiming, destruction and trading of listed substances. Sets out plan to phase out production, trade and use of HCFCs.

- The Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2011 SI 1543 (Defra) Implements EC Regulation 1005/2009 on substances that deplete the ozone layer and amends 2009/216 specifying the minimum training and qualifications required by anyone working with ozone-depleting substances. Revokes the Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2002 and the Environmental Protection (Controls on Ozone-Depleting Substances) (Amendment) Regulations 2008 SI 528. Amends The Ozone-Depleting Substances (Qualifications) Regulations 2009.
- The Ozone-Depleting Substances (Qualifications) Regulations 2009 SI 216 (Environment Agency Local Authorities and the Port Authority)

Revokes and replaces, with amendments, the Ozone Depleting Substances (Qualifications) Regulations 2006 by the Ozone Depleting Substances (Qualifications) (Amendment) Regulations 2008. Sets out minimum qualifications for those working on the recovery, recycling, reclamation or destruction of controlled substances and the prevention and minimising of leakages of controlled substances.

- EU Regulation 842/2006 on certain fluorinated greenhouse gases (Defra)
  - Aims to reduce emissions of fluorinated greenhouse gases through measures for their containment, use, recovery and destruction.
- Fluorinated Greenhouse Gas Regulations 2009 SI 261 (Defra)

Revokes and amends Fluorinated Greenhouse Gas Regulations 2008. Creates offences and penalties for not complying with recovery of f-gases legislation, labelling, qualifications and certificates required to work with products or equipment containing them.

- The Renewable Transport Fuel Obligations (Amendment) Order 2011 SI 2937 (Department of Transport)
  Amends 2007/3072, which requires road transport fuel suppliers to produce certificates to show that a proportion of their fuel is renewable, by reducing the amount that this proportion increases every year until 2013.
- The Renewable Transport Fuel Obligations (Amendment) Order 2009 SI 843 (Department of Transport)
  Amends 2007/3072, which requires road transport fuel suppliers to produce certificates to show that a proportion of their fuel is renewable, by reducing the amount that this proportion increases every year until 2013.
- The Renewable Transport Fuel Obligations Order 2007 SI 3072 (Department of Transport)
  Requires road vehicle fuel suppliers to prove that a certain amount of renewable transport fuel (e.g. biodiesel, bio ethanol, etc) has been supplied in the UK.
- The Road Vehicles (Construction and Use) (Amendment) Regulations 2012 (Department of Transport, Vehicle Certification Agency (VCA))
   Further amends the 1986 Regulations.
- The Road Vehicles (Construction and Use) Regulations 1986 SI 1078 (Department of Transport, Vehicle Certification Agency (VCA))
  - Lays down requirements to reduce the environmental impact of constructing, maintaining and using road vehicles, particularly smoke, vapour and gas emissions.
- Notification of Cooling Towers and Evaporative Condensers Regulations 1992 SI 2225 (Local Authorities)
  Requires businesses to inform their local council before installing a cooling tower or evaporative condenser on their site.
- **Heather and Grass etc Burning (England) Regulations 2007 SI 2003** (Natural England) Provisions governing the burning of heather, rough grass, bracken, gorse and vaccinium.
- The Crop Residues (Burning) Regulations 1993 SI 1366 (Local Authorities)
   Bans the burning of crop residues on agricultural land (with exceptions), restricts the burning of linseed and other specified crops, and sets conditions for the size and timings of burning.
- EU Regulation 850/2004 on persistent Organic Chemicals
   Sets out controls on producing and using dangerous pesticides, industrial chemicals and chemical by-products.

We remain compliant with any new or revised legislation. We receive regular monthly bulletins from the FSB listing all new information to ensure we are up to date.

## **Modern Slavery Statement**

#### Introduction

Promotional Gods is a socially responsible business headquartered and based solely in the UK. Promotional Gods published its initial Modern Slavery Statement in response to Modern Slavery Act of 2015. This document provided a brief overview of business in the UK and the steps we took to manage the risks associated with modern slavery in the supply chain. The 2020 statement will show what we have learned and expand upon our aims for enabling continued transparency and vigilance in our employment and procurement practices.

We recognise that modern slavery, forced labour and child labour are real issues of global concern. We understand the affect this has on individuals and communities and are aware that being a European organisation does not insulate us from the effects of unethical practice directly, or indirectly through third parties in our supply chain.

## **Our Business and Supply Chains**

Being a micro business, we consider ourselves to be low risk but we are committed to working in partnership with our clients to ensure our supply chain vendors meet the high standards of social responsibility demanded by us as a business and by the end users of our products.

Our supply chain is complex and may consist of different tiers between our direct suppliers and the producers of raw materials. We source our requirements from highly regarded global suppliers who enable us to rely on the integrity of their supply chain, particularly in relation to suppliers of paper, inks and other constituent materials required for the manufacture of printed products.

#### **Our Controls and Procedures**

We have discovered that the areas of high risk are not large corporate suppliers, but more local and less publicly transparent service providers. We identified that seasonal peaks and troughs in product demand means that our supply chain uses contingent labour, which is a widely accepted area of risk prone to potential abuse.

In addition to areas of risk exposed within our business through internal audit, we continue to issue modern slavery compliance questionnaires to our suppliers, asking a range of questions including whether or not they are aware of the practice of modern slavery, do they have any company standards, policies or other statements relating to human slavery and trafficking, do they audit their own supply chain in relation to these issues, and have or do they intend to provide training for their workforce.

Thus far we have received a positive response from the majority of our suppliers and were able to identify, through lack of response, the areas of highest risk. This enabled us to focus on improving awareness within our business, providing a safe avenue for whistle blowing should any of our contingent workers be the victims of such practices or know of anyone affected.

#### **Future**

We are continually trying to improve our modern slavery processes and we are working towards modern slavery awareness in our business inductions & refreshers for all employees. A modern slavery section is now included in most of our tender documents.

We will continue to perform due diligence exercises when on boarding new suppliers and work to place similar contractual obligations in our contracts.

What is clear is that the purpose of the Act is to introduce a culture of transparency that can enable socially responsible businesses such as ours and those of our suppliers to continue to develop awareness, raise standards and deliver an excellent service from a position of ethical best practice, thus ensuring a viable and satisfactory experience for all stakeholders.