

STREAMLINE - MODERN SLAVERY STATEMENT

1. Introduction

Section 54 of the Modern Slavery Act 2015 requires large commercial organisations (with a total turnover of at least £36 million per year) to prepare a Slavery and Human Trafficking Statement for each financial year. Streamline is an ethical, family owned and run business, with a proud 45-year history. Our annual turnover is under £36 million and therefore we are not legally obliged to report on modern slavery. However, we are committed to ethical procurement, so this document is our Modern Slavery Statement and has been created in accordance with section 54(1) of the Modern Slavery Act 2015.

This statement sets out our actions to understand all potential modern slavery risks related to our business and implement steps which ensure that there are no slavery or human trafficking in our business and supply chain. This statement relates to actions and activities during the financial year 1 April 2023 to 31 March 2024. This statement is published on our company's website.

Our statement contains the following sections:

- Introduction
- Organisational Structure and Supply Chains
- Risk Assessment and Management
- Training
- Policies Relating to Modern Slavery
- Due Diligence Processes
- Performance Indicators

2. Organisational Structure and Supply Chains

Streamline is headquartered in Scotland, with two additional locations in England. We supply branded clothing, and merchandise to various private and public sector clients, in the UK and abroad. We have international, multi-tier supply chains, with suppliers based across the world.

As proud members of SEDEX we have a fully transparent supply chain, and we are fully committed to ethical and sustainable trading. We are members of the BSIF (British Safety Industry Federation) which has a Registered Safety Supplier (RSS) scheme. Member companies sign a binding declaration that the safety equipment they offer meets the appropriate standards, fully complies with the PPE regulations and is appropriately CE marked.

Streamline is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking. As an equal opportunities' employer, we are committed to creating and maintaining a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion. We do not enter into relationship with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

Responsibility for the organisation's anti-slavery initiatives is as follows:

Risk assessments: Michelle Costigan, Head of Global Supply Chain

Policies: Graeme Paterson, Director

Training: Louise Rooney, Talent Development Manager

Due diligence: Narelle Paterson, Purchasing Executive

3. Risk Assessment and Management

The table below contains our top modern slavery risks and mitigation strategies:

No.	Modern Slavery Risk	Mitigation Strategies
1	Complex multi-tiered supply chains for some materials and components, resulting in difficulty in tracing the origin or items and worker conditions.	Membership of Sedex, enabling Streamline personnel to access detailed information regarding potential suppliers. As advanced Sedex members we utilise the Sedex radar risk assessment tool which helps us to map and mitigate risk.
2.	Introduction of unethical working practices in an existing supplier.	Legal requirement for all suppliers to inform us of any changes to ethical working practices. Regular review meetings and audits undertaken by Sedex and uploaded to the Sedex platform.
3.	Prospective supplier lying about ethical working practices during the supplier assessment.	Background checks and factory inspection audits undertaken by Sedex and full report including corrective action plan produced. Regular audits undertaken by Sedex and uploaded to their platform.
4.	An agent supplying temporary workers who are subject to unethical working practices.	Engagement with a cross section of the factory staff on a confidential basis, regarding both them and other workers during the Sedex factory audit.

4. Training on Modern Slavery

Slavery and Human Trafficking forms part of induction training for new employees and refresher training for existing employees. In addition, information is displayed in all our premises and shared with all existing and prospective suppliers. Our training covers the following topics:

- Our business's procurement practices.
- Assessing the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- Identifying the signs of slavery and human trafficking.
- Initial steps to be taken if slavery or human trafficking is suspected.
- Escalating potential slavery or human trafficking issues.
- Business incentives or guidance to be given to suppliers and other business partners and contractors to implement anti-slavery policies.
- Steps to follow if suppliers or contractors do not implement anti-slavery policies, including their removal from the organisation's supply chains.
- External help available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative.

As well as formal training, we maintain awareness of modern slavery issues by displaying posters throughout our premises and regularly circulating emails to all staff.

The posters and emails remind staff of key considerations, such as:

- The basic principles of the Modern Slavery Act 2015.
- How to identify potential slavery and human trafficking.

- How to report potential slavery or human trafficking issues to the relevant director within Streamline.
- Sources of external help, for example through the Modern Slavery Helpline.

5. Policies Relating to Modern Slavery

This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere within our business.

Streamline operates the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations.

Supply Chain Management Policy: This describes the process we follow to assess a potential supplier's credentials and whether we should include them in our Approved Supplier Database. The Supply Chain Management Policy also describes the annual audits we undertake on our suppliers to confirm their business activities, and therefore their continuing credentials as a responsible supplier

Whistleblowing Policy: This policy encourages all workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, Streamline. This includes any circumstances that may give rise to an increased risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures.

Employee Code of Conduct: Our code makes clear to employees the actions and behaviour expected of them when representing Streamline. We strive to maintain the highest standards of employee conduct and ethical behaviour in all areas of operation and throughout our supply chain.

Supplier/Procurement Code of Conduct: Streamline is committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure they meet the standards of the code and provide safe and comfortable working conditions.

Recruitment/Agency workers] policy: Streamline only uses reputable employment agencies to source labour and always verifies the practices of any new agency before accepting workers from that agency. We always request a copy of their Modern Slavery Policy prior to commencing business with them.

6. Due Diligence Processes

Streamline's due diligence activities include:

- Mapping the supply chain broadly to assess geographical or products risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each new supplier.
- Reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping.
- Conducting supplier audits via the Sedex platform through which we have a greater degree of focus on slavery and human trafficking where risks are identified.

- Creating an annual risk profile for each supplier.
- Taking steps to improve substandard suppliers' practices, including providing advice to suppliers through and requiring them to implement corrective action plans.
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking.
- Invoking sanctions against suppliers that fail to improve their performance in line with a corrective action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Central to our due diligence, is our membership of SEDEX as this provides us with access to published information regarding our supplier's factories. To ensure that the Labour conditions of workers in our supply chain meet the ILO Conventions standards, we operate a robust vetting procedure, audited as part of our ISO9001 accreditation, to ensure suppliers are operating lawfully, ethically and providing safe working conditions.

As part of our supplier engagement process, we require commitment from all suppliers that they will maintain asset registers, detailing materials sources, which are available for Streamline to review at any point. Streamline also utilise a Supplier Questionnaire which audits the Suppliers for compliance with national standards, regulations, accreditations, and certification.

7. Key Performance Indicators

The Streamline key performance indicators relevant to modern slavery and trafficking are as follows:

- 100% audit of all potential new suppliers.
- 100% annual SEDEX check of all existing suppliers.
- 100% of new staff members receive familiarisation training regarding modern slavery and trafficking during their induction.
- 100% of existing staff members receive refresher training regarding modern slavery and trafficking during every calendar year.
- 100% of staff working in supply chain management and human resources receive detailed annual training regarding modern slavery and trafficking.

8. Ownership and Management of this Policy

This Slavery and Trafficking Statement is a key management document which forms part of the Streamline management information suite of policies and procedures. This document is owned by Roger Paterson, Managing Director. This statement is internally reviewed at least annually by the Streamline management team, and externally reviewed at least annually by our ISO9001 auditor as part of our yearly quality audits.

Signed: *Roger Paterson (signed on original)*

Roger Paterson
Managing Director
Streamline Corporate Ltd
Dated: 28th November 2023