



# Anti-Slavery and Human Trafficking Policy 2021

## **1.0 Introduction**

Premier Clothing Ltd hereby referred to as ‘the Company’ not only employs individuals directly, but also maintains relationships with many different organisations in its supply chain and customer base.

This statement and policy is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (‘the Act’) and sets out Premier Clothing’s actions to assess and manage all potential modern slavery and human trafficking risks related to our business, to exercise due diligence in implementing preventative measures, and to consider what further measures may be required to prevent slavery and human trafficking taking place in any part of our business or in our supply chains.

We all have a responsibility to be alert to the risks of slavery and human trafficking, however small, in our business and in the wider supply chain. As a leading UK brand of uniforms, Premier Clothing Ltd recognises that it has a responsibility to take a robust approach to combatting modern slavery and human trafficking, and is committed to preventing any such activity within the business or its supply chains.

Premier Clothing’s attitude to Modern Slavery is ZERO TOLERANCE. We are committed to opposing modern slavery in all its forms and taking steps to prevent it. Modern slavery encompasses (but is not limited to) slavery, servitude, human trafficking and forced or compulsory labour. We demand all who work for us plus all who have, or seek to have, a business relationship with the Company and/or any member of our group, to familiarise themselves with our Anti-Slavery and Human Trafficking Policy and to act at all times in a way which is consistent with our zero tolerance approach set out in this policy.

## **2.0 The Company**

Founded in 1999, Premier Clothing Ltd, now supplies to 14 distributors worldwide and focuses on corporate and hospitality uniforms. Premier Clothing imports its products into UK warehousing before shipping to its UK and EU distributors. Products imported are mostly produced in CMT units in China and Bangladesh from yarns and woven fabrics mainly manufactured in China, Indonesia & India

Our main categories of provision are:

Clothing, workwear and associated products

## **3.0 Purpose of this Policy**

Modern Slavery is a criminal offence under the Modern Slavery Act 2015. We will not tolerate the deprivation of a person’s being by another in order to exploit them for personal or commercial gain. As a leading brand we always work to the highest professional standards and comply with all laws, regulations, legislation, rules and best practice relevant to our business and operations.

We are committed to acting ethically and with integrity in all of our business operations and relationships, whether these be through direct employment, with suppliers, or with contractors.

We are committed to implementing and enforcing processes, measures and controls to ensure that modern slavery is not occurring anywhere in our own business or those of our suppliers or contractors.

This policy sets out our processes to identify potential risks, and the measures and controls which we are and will be taking to effectively implement our zero tolerance commitment.

#### **4.0 Processes for the Prevention of Modern Slavery**

##### **4.1 Recruitment**

All of our recruitment is done directly, by our own directors. We operate a robust recruitment process, including conducting thorough Right to Work checks for all employees to safeguard them against human trafficking or being forced to work against their will.

##### **4.2 Supply Chain**

Premier Clothing Ltd has now sourced clothing products in the Far East for over 15 years. During this time we have conducted audits of all of our CMT units. Now all Premier approved units are either WRAP (Worldwide Responsible Accredited Production) or BSCI approved. Premier has adopted the ETI base code (Ethical Trade Initiative) as the basis for its ethical policy. At present we are not aware of any of our current suppliers or contractors practicing or being involved in modern slavery.

Whilst we do not believe that at present we have any activities within the organisation which are considered to be at high risk of slavery or human trafficking, we are working to ensure that we have transparency within our supply chain, and are currently in the process of mapping our supply chain in order to minimise the possibility of modern slavery occurring within our supply chains/contractors.

We will be undertaking the following measures:-

Conduct risk assessments to establish the areas of our business and supply chains which are most at risk of modern slavery;

Communicate and ensure that all our suppliers and contractors understand and act consistently with our Anti-Slavery and Human Trafficking Policy.

Develop and implement specific screening processes for suppliers/contractors before commencing business relationships;

Develop contracts with suppliers and contractors which enable us to audit and scrutinise activities and their own supplier relationships in order to satisfy our commitment to anti-slavery.

##### **4.3 ETI Base Code**

## *The ETI Base Code*

*This document was amended 01 April 2014 with revisions to clause 6, Working hours are not excessive.*

### *1. Employment is freely chosen*

*1.1 There is no forced, bonded or involuntary prison labour.*

*1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.*

## **2. Freedom of association and the right to collective bargaining are respected**

*2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.*

*2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.*

*2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.*

*2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.*

## **3. Working conditions are safe and hygienic**

*3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of the work by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.*

*3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.*

*3.3 Access to clean toilet facilities and to potable water and, if appropriate, sanitary facilities for food storage shall be provided.*

*3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.*

*3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.*

## **4. Child labour shall not be used**

*4.1 There shall be no new recruitment of child labour.*

*4.2 Companies shall develop, or participate in and contribute to, policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.*

*4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.*

*4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.*

## **5. Living wages are paid**

*5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.*

*5.2 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.*

*5.3 Deductions from wages as a disciplinary measure shall not be permitted, nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.*

## **6. Working hours are not excessive**

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.\*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety and
- the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

\* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

## **7. No discrimination is practised**

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **8. Regular employment is provided**

8.1 To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

## **9. No harsh or inhumane treatment is allowed**

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited. The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this Base Code address the same subject, to apply that provision which affords the greater protection.

## **4.4 Employees**

The Company's Anti-Slavery and Human Trafficking Policy will be communicated across the organisation. The Policy will be included in the Employee Handbook issued to all new starters.

Key members of staff will be trained in all aspects of the Anti-Slavery and Human Trafficking Policy.

## **5.0 Responsibility for the Policy**

Ultimate responsibility for the commitment and prevention of modern slavery sits with the Board of Directors, who have overall responsibility for ensuring this policy and its implementation comply with legal and ethical obligations. This policy will be reviewed on an annual basis, at the end of the financial year.

## **6.0 Reporting Modern Slavery or Human Trafficking**

The Company has a Grievance Policy which is available within the Employee Handbook.

Individuals are encouraged to raise concerns internally to a director.