



# Modern Slavery Statement

Our statement has been written and published in accordance with the Modern Slavery Act 2015. It details our approach and strategy we have already taken in 2017 and outlines our commitments to mitigate the risk of modern slavery occurring in our business and supply chain for the following year.

# Contents

1. Introduction
2. Company Information
3. Supply Chain
4. Training
5. Key Focus Areas
6. UK Monitoring
7. Policies and Procedures
8. Remediation

## Introduction

This document details our approach and strategy to modern slavery to ensure that we implement the appropriate policies and take robust corrective action when required.

Our business is built on a solid foundation of long term partnerships and we continually work with our suppliers to identify slavery risks within our supply chain and address the risks accordingly. Should an issue of modern slavery occur, it is critical that we ensure the workers most affected are protected from further harm and exploitation.

To be successful in eradicating modern slavery, robust due diligence on core labour standards is critical; we adopt a risk based approach to identify human rights risk by country, industry and labour, prioritising the associated risks accordingly.



**Ethical  
Trading  
Initiative**

**Member**

Respect  
for workers  
worldwide

## Organisation Structure

Tailored Brands, formerly known as The Men's Wearhouse, Inc., a publicly traded American organisation, purchased Dimensions, Alexandra, and Yaffy in August 2010.

MWUK Limited comprises of Dimensions, Alexandra and Yaffy. Dimensions is one of the UK's leading suppliers of bespoke corporate clothing providing a fully managed service to clients; Alexandra is Britain's oldest and best-

known work wear provider and Yaffy is a specialist in technical garments to the UK Police Forces. The group turnover is c £140m, clothing over 4 million wearers and dispatching over 18 million garments every year.

More information on our businesses can be found on the following websites:

<https://www.dimensions.co.uk/>

<https://www.alexandra.co.uk/>

<https://www.yaffy.com/>

# Modern Slavery Responsibility



The structure tree details the level of responsibility our business takes in consideration with the Modern Slavery Act. Monthly meetings are held with the above area directors responsible to ensure progress is being made in areas of the business which can have an impact on modern slavery. KPI reporting is issued and discussed,

training plan and implementation results are reviewed and future initiatives are proposed. These meetings are followed by quarterly and bi-annual meetings where managing directors are present and our concerns and future initiatives are considered.

## 3. Supply chain

The nature of the apparel business means supply chains are labour intensive and can in some instances have a high labour turnover. We understand the importance of monitoring the level of worker turnover as this could indicate labour abuse issues in our supply chain.

Our sourcing regions are based in Bangladesh, Sri Lanka, Indonesia, Pakistan, Vietnam, China, Madagascar, Mauritius, Morocco, Romania, Poland, Lithuania and the UK. The main supply route for our production is from Bangladesh. Due to the high risk nature of Bangladesh as a sourcing country, we have an office based in Dhaka with 27 employees who have a constant presence in our factories.

Our products are designed in house and manufactured by our third party factories. We have a dedicated Ethical Compliance team who work closely with our Sourcing team ensuring new and existing suppliers are meeting our expectations.

# Supplier Monitoring

Our current process of mapping our suppliers and deciding what level of monitoring is required is determined by the tier in which the supplier falls into. We currently have 3 tiers which have a different form of monitoring and levels of transparency.

Tier 1	Manufacturers we have a direct trading relationship with	Contact with the supplier is held directly with MWUK employees	Fully mapped
Tier 2	Agents are the chain of communication between MWUK and the supplier	PO's are placed with the agent and they place orders in authorised factories	Fully mapped
Tier 3	Stockists	Provider of goods which are not made to order	Partially mapped

Tier 1 and tier 2 suppliers are required to provide the same level of transparency. Visits to the site are conducted regularly by members of the MWUK compliance, sourcing, purchasing or technical teams. Audits are conducted by our third party audit company on a minimum annual basis. We recognise the limitations that audits provide when monitoring for modern slavery, however we use this as a benchmark tool and work with suppliers to develop their management systems and training programmes to help raise awareness and eradicate the potential issue of modern slavery in our supply chain.

In 2017, we moved to a semi-announced audit with our third party audit company. We understand the limitations an unannounced audit can have on a supplier with regards to the correct people present during audit and all documentation being readily available for review therefore have decided semi-announced audits are what we should be implementing throughout our supply chain. By the end of 2018, all of our suppliers will have been audited to semi-announced standards.

Tier 3 suppliers are required to submit a Supplier Self Declaration form which details their processes and procedures relating to their supply chain monitoring. Since 2017 we have added questions on modern slavery to determine the stockists' stance and reporting requirements on modern slavery. Our tier 3 supply chain is the area we need to complete in terms of mapping.

We have identified that different supply chains require alternative monitoring compared to garment manufacturers. During 2018/2019 it is our intention to broaden the scope to 5 tiers. This is so our level of detail against each tier is strengthened when split out into extended category areas.

Tier 1	Garment manufacturers we have a direct trading relationship with	Contact with the supplier is held directly with MWUK employees	Fully mapped
Tier 2	Agents are the chain of communication between MWUK and the garment supplier	PO's are placed with the agent and they place orders in authorised factories	Fully mapped
Tier 3	Accessory suppliers	Trim and component suppliers who we buy from will now be included in their own tier	Partially mapped through tier 1 & 2
Tier 4	Fabric mills	Mills will now be split into their own tier to allow greater transparency and their own form of monitoring	Partially mapped
Tier 5	Stockists	Provider of goods which are not made to order	Partially mapped

## Transparency

On top of mapping our supply chain which is key to eliminating modern slavery, we have a robust approach to on boarding new suppliers.

Our terms and conditions are set out in our operating manual which details our sub-contracting policy. We have a zero-tolerance approach to unauthorised sub-contracting and require all suppliers to sign the policy. If we are not aware of the location where our products are manufactured, then this proposes our greatest risk in relation to modern slavery as we are unable to monitor working conditions and worker welfare.

All of our suppliers have access to an email address which is linked directly to the UK compliance team. This is detailed on a poster where workers are provided with the Ethical Trading Initiative Base Code and information on their rights. Any issues relating to modern slavery can be reported using this communication method.

## ETI Base Code

- Employment is freely chosen
- Freedom of association and the right to collective bargaining is respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

## Supplier On-Boarding

MWUK Ltd have developed our corporate wear with a conscience strategy over the past year to enhance our supplier on-boarding process to ensure suppliers are conforming to the UN Guiding Principles on business and human rights.

After identifying the areas of our business which pose the greatest risk, we have developed a robust supplier on-boarding process which works towards monitoring suppliers for modern slavery risks and protect workers' rights. Our movements towards eradicating modern slavery are set out in the below policies and processes:

- Vendor Starter Pack includes the sub-contracting declaration, supplier guidance documents, ETI Base Code and self-assessment questionnaire.
- Anti-Bribery & Corruption policy
- Supplier visits and evaluations

Without the completion of the above documentation and supplier visits, MWUK supply chain directors and management will not sign off the approval of a new supplier site

## 4. Training

As a business we recognise that to eradicate modern slavery from our business and supply chain requires involvement from all areas of the business that can have an impact on supply chain conditions.

We have been members of the Ethical Trading Initiative for over 10 years and use our membership to drive sustainable change within our business and supply chain. We have partnered with the ETI to deliver training to our staff on the requirements of the modern slavery legislation, the signs they should look out for in order to detect modern slavery in our supply chain and how their behaviour can impact working conditions in our supply chain.

Every 6 months we run the ETI Buying Ethically course for our staff who could affect conditions in the supply chain. We have expanded our scope for this training and invited our customers to join in with the sessions.

We commit to continue this training through collaboration with the ETI to assist in the understanding of the global impact decisions that customers and commercial leads can have on the supply chain.

Modern slavery and our business ethics is included in our inductions for new employees through the induction process. Here they are informed of their responsibility to ensure they are aware of modern slavery and any indicators they may find during their new role in working for MWUK Ltd.

## 5. Key Focus Areas for 2018/2019

- Broaden our scope of tiered suppliers to ensure our whole supply chain is captured and mapped.
- Continue our training in collaboration with the Ethical Trading Initiative to help drive understanding of modern slavery risks and developing our knowledge on buying ethically.
- Ensure all tier 1 and tier 2 suppliers have been audited to semi-announced standards, providing a transparent view on conditions in our supply chain.
- Audit Preferred Supplier's from our UK recruitment agency providers who turnover in excess of £36 million.



## 6. Policies & Procedures

### UK HR Policies

#### Recruitment

As part of a structured recruitment procedure, we complete Right to Work checks in accordance with the Immigration, Asylum and Nationality Act 2006 and the Immigration Act 1971 to ensure that all employees are granted the right to work in the UK for the duration of their employment, as well as being the correct legal minimum age to work in the UK. If an employee is under the age of 18, a Young Person's Risk Assessment is completed including all entry level Apprentices and any work experience students.

The business operates a Preferred Supplier List (PSL) for all recruitment agencies which commenced January 2017 and takes effect for three years. All agencies have provided information of their adherence to the principles of the Modern Slavery Act.

We aim to adopt a strategy to audit recruiters on the PSL who currently turnover more than £36m in accordance with the Act.

#### Remuneration

All employees and consultants are paid in accordance with the National Living Wage requirements and those undertaking a National Apprenticeship are paid in-line with pay legislation.

#### Working Hours

All employees are provided with Terms and Conditions of Employment which stipulate the number of contracted working hours. We do not have any zero-hours contracts. Contracted working hours are a maximum of 40 hours per week and employees are given the opportunity to opt out of working additional time, in accordance with the Working Time Directive. The Young Person's Risk Assessment highlights the minimum rest guidelines which must be adhered to. All of our employees are provided with two, paid, ten-minute breaks per day.

#### Equality

Our business adopts an equal opportunities and diversity policy which ensures that we comply with all obligations. We are opposed to all forms of unlawful and unfair discrimination or victimisation, and this extends to job applicants as well as employees. Decisions about recruitment and selection, promotion or training are made objectively and without discrimination. Our policy will help all of those who work for us to develop their full potential and to fully utilise resources. All complaints of discrimination will be dealt with by our Grievance Procedure.

#### Employee Voice

Workers committees are active within all parts of the business. Membership comprises employee representatives who have been elected by their colleagues. The forums are designed to allow for an employee voice within the organisation, to address a variety of issues including working environments, working practice improvements and day-to-day Health & Safety matters.

# Procurement Policy

## General

We expect suppliers to:

- Act in compliance with relevant laws and regulations.
- Adopt requirements similar to those contained in this Code for their own suppliers, where necessary.



Employment is freely chosen



Child labour shall not be used



Regular employment is provided



No discrimination is practiced



Living wages are paid



Working hours are not excessive



Working conditions are safe and hygienic



Freedom of association and the right to collective bargaining are respected



No harsh or inhumane treatment is allowed

## Ethical

We expect suppliers to:

- Prevent unfair, unreasonable and unethical business practices.
- Prevent the use of any form of bribery or improper offers to or from employees or organisations.
- Respect confidentiality and protect confidential information.
- Acknowledge the interdependency between business and the communities in which they operate in order to minimise the negative impact of core business activities.

## Diversity

Our business is committed to placing equality, diversity and fairness at the heart of our values, policies and everyday practices. We expect suppliers to support this by promoting fair participation and equality of opportunity for all their employees and job applicants, and by providing an environment in which all individuals are able to make best use of their skills, free from discrimination or harassment. Suppliers will be required to demonstrate their commitment to, and deployment of, appropriate policies and processes promoting equality, diversity and fairness as part of supplier selection and on-going supplier performance management.

## Modern Slavery

We expect our suppliers and subcontractors to implement and enforce effective systems & controls to ensure that slavery and human trafficking do not take place anywhere in our supply chains. We work with suppliers to evaluate human trafficking risks and slavery risks in our supply chain, and our risk based supplier audit process covers safety, slavery / forced labour, child labour and other legal requirements.

## 7. Remediation

If modern slavery is found in our supply chain or business it is important that we treat each case individually.

The first step would be to ensure the victim of modern slavery is removed and protected from the situation and taken out of harm's way. If instances of modern slavery are found in our business or operations in the UK we would report to the authorities via the National Referral Mechanism and support the government agencies carry out their investigations.

In our supply chain we would look to collaborate and get support from NGO's and other organisations who are experts in identifying and remediating modern slavery and forming remedial action plans. These experts who are working within the country modern slavery has been found ensure the victim has been safely removed from harm's way and a plan of action has been established to ensure the victim can return to life free from modern slavery.

The board of directors of MWUK Ltd delegated approval of this statement on its behalf to the Executive Chairman of the company.

Stuart Graham  
Executive Chairman  
MWUK Ltd  
July 2018