



Modern Slavery Act Statement

2022

1. Structure, business and supply chain

W Brown International is one of the leading manufacturers & importers of bags, luggage, leather goods and accessories, incorporating the JCB, Borderline, Bordlite, Ridgeback, Nicole and Nicole Brown.

As part of our commitment to corporate responsibility and ethical code of conduct, we have published our annual statement for slavery and human trafficking, made in compliance with section 54 of the Modern Slavery Act 2015, in which we explain how slavery and human trafficking can affect our business and the steps we are taking in the fight against it. This slavery and human trafficking statement also addresses the steps taken by our supply chain in Asia. This statement is intended to fulfil the legal requirement for a slavery and human trafficking statement on behalf of all companies within the Ashram Threads group, as relevant. Our efforts against slavery and human trafficking complement our broader CSR Policy and our adoption of the Ethical Trading Initiative.

W Brown International is headquartered in Northamptonshire, UK and sells its products globally. We have over 13 employees within our organisation in addition to approximately 3,200 workers who are engaged through our supply chain. We engage suppliers who have relationships with existing suppliers so that we can contain our supplier network and improve consistency in ethical practices throughout the supply chain.

Building on our existing CSR Policy and our commitment to the Ethical Trading Initiative, we have embraced the requirement to publish an annual slavery and human trafficking statement. This will allow us to share our efforts against slavery and human trafficking and improve and measure our success each year, we took the following key steps to ensure slavery and human trafficking did not occur within our organisation or supply chain.

2. Slavery and human trafficking policies

The anti-slavery policies adopted by W Brown International are listed as below:

- Relationships: Strengthening our supplier engagement process
- Feedback: Establishing grievance mechanisms and channels for individual worker feedback
- Knowledge: Improving our knowledge base by collecting relevant data and improving product traceability
- Third party engagement: Encouraging suppliers to build strategic alliances with independent social auditors and unions
- Supplier collaboration: Encouraging suppliers to collaborate to address slavery and human trafficking issues
- Incentivisation: Developing mechanisms to incentivise employees and suppliers to address slavery and human trafficking and improve labour standards
- Accountability: Establishing a framework for organisation accountability to allow for raising issues, making suggestions, voicing grievances and reporting slavery and human trafficking Due diligence procedures

We understand that our biggest exposure to Modern Slavery is in our product supply chains, where we have undertaken activity over the last decade to minimise the risk of Modern Slavery. Within these areas, new suppliers and factories/sites are subject to due diligence checks in the form of ethical/compliance audits. Such audits are also regularly conducted for existing suppliers and factories/sites.

These audits assess compliance with the Global Sourcing Principles and are, amongst other things, intended to identify any Modern Slavery practices. If issues are identified, appropriate investigative and remedial actions will be taken.

3. Identifying, assessing and managing risk

We set out to identify the extent of any slavery and human trafficking in our supply chains by:

- Conducting internal spot-checks at factories in China, Myanmar and India
- Engaging third party auditors to conduct social audits at 5 supplier sites
- Interviewing workers to discuss their conditions and their rights
- Collaborating with our suppliers to develop an improvement plan to address new and previously identified slavery and human trafficking issues.

Notes:

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Statement provided to all supply chain and third party organisations. Statement available to all employees involved in the supply and manufacture of all goods purchased on behalf of W Brown International.

