

## **Wilton Bradley Group Modern Day Slavery statement 2024**

Modern Slavery is a zero-tolerance issue at Wilton Bradley Group, and we are committed to preventing any aspect of modern slavery within our supply chain and business operations.

Wilton Bradley Group (consisting of Wilton Bradley Limited and TII Brands) is pleased to publish our Modern-Day Slavery Statement 2024, in accordance with the UK Modern Slavery Act 2015.

This statement sets out Wilton Bradley Group's actions to understand and identify all potential modern slavery risks related to our business, and to put in place actions that are aimed at ensuring there is no slavery or human trafficking within our business or our supply chains.

The statement has been produced in accordance with the Modern Slavery Act 2015 and takes into consideration the guidance provided by the UN Guiding Principles on Business and Human Rights as endorsed by the UN Human Rights Council and the Ethical Trade Initiative (ETI) Base Code, supporting good international labour practice and the principles and guidance in the Act.

This statement also considers our customer requirements including customer specific codes of conduct.

### **Who we are:**

Wilton Bradley Group specialise in the design, development, sourcing, and wholesale supply of quality consumer leisure goods, supplying our own branded goods to specialist retailers and sourcing a broad range of products for many of the world's leading retailers and third-party brand owners.

We also sell direct to customers via our online retail locations and 3<sup>rd</sup> party platforms our branded products.

Our mission is to inspire, facilitate and encourage more fun, enjoyment, and happiness in the world through the provision of quality leisure products that represent great value to the consumer.

We are passionate about active lifestyles, play time, toys and sports. Our vision is to be recognised around the world as one of the industry's leading suppliers and retailers of quality consumer, leisure, toy and sports products achieved through products that inspire more fun and activity in peoples' lives.

### **Organisation Structure:**

The Wilton Bradley Limited organisation structure consists of:

UK head office located in Newton Abbot

UK warehouse facilities located in the south West

Hong Kong office and showroom

European office

**Our Supply Chain:**

We have over 20 years of experience in sourcing goods from some of the best and most competitive factories around the world. We have time honoured values of fair and transparent dealings with our supply chain.

Our internal quality assurance, sourcing and buying teams work together to ensure that all factories are onboarded and assessed to meet all Wilton Bradley Group Ethical and Technical requirements prior to any orders and development taking place.

We expect all within our supply chain to respect the rights, the wellbeing, and the welfare of all their permanent and casual workforce and their working environment.

All suppliers must adhere to the requirements set out in our Wilton Bradley Limited supplier code of conduct, which prohibits child, forced and bonded labour, prohibits all manner of slavery and human trafficking, discrimination, harsh or inhumane treatment, allows the freedom to choose employment, requires hygienic and safe working environments, minimum living wage payment, does not accept excessive working hours, requires at least one day off in every seven, freedom of association and collective bargaining.

**Distribution:**

We offer our customers methods of supply that best suits their business using:

- FOB
- Direct Container
- Domestic Trade Supply
- Direct Dispatch

We also carry inventory of own brand products in our warehouse facilities based around Newton Abbot, in the UK:

**Recruitment:**

Our recruitment and people management processes are designed to ensure that all prospective team members are legally entitled to work in the UK and to safeguard team members from any abuse or coercion.

Through due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

We will continue to embed the principles by ensuring that team members involved in procurement activity are aware of and follow modern slavery procurement guidance, offering employment contracts on a guaranteed hours basis only, ensuring part-time and fixed-term team members provided with the same pro-rata contractual entitlements as full-time and permanent team members and refraining from entering into business, and/or will discontinue any current business with any other organisation which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

**Our Policies:**

We undertake all reasonable and practical steps to ensure that our expected standards are being implemented throughout the businesses of our suppliers.

These include requiring signed assurances around anti-slavery compliance at supplier onboarding stage. We also require our suppliers to submit to third-party ethical audits to confirm minimum factory standards with regard to health and safety, wages, working hours, working conditions and local labour laws. All audits are reviewed on an annual basis and improvements are made to the ways of working.

Our standard contractual documents include terms requiring suppliers to implement procedures to ensure that there is no slavery present in their business and to notify us on becoming aware of any actual or suspected slavery or human trafficking within their own supply chains.

Key stakeholders from Compliance, Buying, Product development and Logistics, periodically review our vendor status throughout the year, and discuss and agree on any actions needed.

**Our Progress through 2023:**

During 2023, Wilton Bradley has focussed on visiting key vendors, maintaining and reinforcing our relationships and support throughout our supply chain; as well as reiterating our policies, expectations and requirements in all areas in addition to social, ethical and environment requirements and the work that our 3<sup>rd</sup> party auditors conduct.

Our new intercompany SharePoint pages highlighting our policies has been completed and allows internal colleagues to easily contact our human resources team should they wish to raise any issue. The platform also includes our internal training and support documents.

**Next Steps:**

We will continue to ensure all our Suppliers and UK service providers confirm their compliance annually and visit as many as possible.

Our policies and manuals will continue to be reviewed and updated, with an internal review of our supply chain annually.

We will be looking into online training platforms for all vendors and employees.

**Board of Directors Approval:**

Wilton Bradley Group will never knowingly enter into a business relationship with any organisation involved with slavery, servitude or human trafficking.

The senior management of the Company accepts responsibility for the implementation of any policy in relation to this matter and for the provision of adequate resources to ensure that slavery, servitude, or human trafficking is not taking place in the Company or its supply chain.

This statement has been approved by the Board of Directors of Wilton Bradley Limited and signed by;



Antony Bradley  
Managing Director

July 2024