

MODERN SLAVERY ACT 2015



JOHN COTTON GROUP LIMITED STATEMENT – FEBRUARY 2019

John Cotton Group Limited (JCG) is committed to making meaningful and long-lasting improvements to workers employment and workplace conditions including, but not limited to, the prevention of forced, bonded and trafficked labour. This is upheld through the company's policies and governance and is supported by a committed organisation and leadership.

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps John Cotton Group Ltd are taking to eradicate and ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. It constitutes our slavery and trafficking statement for year ending.

Structure and Supply Chain

JCG has a Structure and supply chain network that exists to support the manufacture and supply of our products as well as the network of operations relating to its day to day business operations.

Raw Materials

In addition to the supply chain for finished goods, JCG is also aware of the importance of its raw material supply chain and the sustainability of raw material suppliers.

Respect of Human Rights

JCG believes that respect for human rights is integral to being a responsible company. The prevention of forced, bonded and trafficked labour are key elements in the John Cotton Ethical Trading Policy and the Ethical Trading Initiative Base Code.

Due Diligence – Risk Assessment – Measuring Effectiveness -Promoting Human Rights across the business

JCG has been a member of Sedex (Social Ethical Data Exchange) since 2005 to have our site(s) ethically audited by an independent 3rd Party to the 2 Pillar Smeta Standard which covers ETI Base Code (Ethical Trading Initiative), Management Systems, Employment is Freely Chosen, Freedom of Association, Health & Safety, Child Labour, Wages & Benefits, Working Hours and Discrimination. Audits can be Semi Announced or Unannounced. Only specifically trained and evaluated auditors can perform our audits.

For suppliers in other countries we have a program of the Smeta Ethical 2 pillar (plus extra customer requirements where required) since 2009. This is being expanded continuously. John Cotton Ltd also welcomes and submits to our specific customer's ethical audits, gradings and requirements on our and supplier sites.

From the above Due Diligence audits JCG can Risk Assess our own Companies and Suppliers within our Supply Chain on the Sedex database. JCG from these audits can measure the effectiveness of these actions.

Policies on Modern slavery

JCG is, and maintains being, a Business Partner in the Stronger Together Partnership. All employees are inducted into the Stronger Together Initiative.

JCG require all Labour Providers to become members of Sedex, a Business Partner in the Stronger Together Partnership and submit to an independent ALP (Association of Labour Providers) audit.

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Responsible Sourcing

JCG is committed to responsible and sustainable business principles throughout the supply chain including the sourcing of raw materials. This includes materials whose cultivation or production presents a specific sustainability risk. John Cotton Group specifically prohibits sourcing in regions where the risk of modern slavery and other labour issues is recognised, this includes the prohibition of cotton sourced from Uzbekistan. From 2016 JCG expanded the commitment and core values to all our suppliers providing raw materials.

John Cotton Group Limited Non-Compliance Policy

Where breaches of our standards and policies are identified JCG will collaborate to find solutions to address the non compliance. Where improvements are not made within the given time or there is an unwillingness to address the situation JCG will terminate the business relationship. However reasonable amount of time is given to rectify non compliance to minimise any potential and / or detrimental impact on workers lives.

John Cotton Group Limited Compliance Policy

Compliance with the JCG Ethical Trading Principles is a requirement of doing business with JCG. JCG works with its suppliers to support their compliance, and may take action against those that do not demonstrate sufficient commitment to the principles, or are in breach of them. In the event of a supplier being found to be involved in modern slavery JCG will take action to help safeguard the workers well being.

Training

From 2016 JCG has introduced training for Stronger Together for key employees. Stronger Together Training forms part of employees Induction in the company.

Looking Ahead

JCG will continue to develop employee and supplier training and target areas of the business where there is potential risk of labour rights abuses including incidences of Modern Slavery. JCG believes that training for employees and its supply chain, with an increased emphasis on transparency throughout the supply chain may help identify modern slavery risks.

Approved by the Board on 26th March 2019 and signed on its behalf by:

Mr Nicholas Manning