



Our Policy On
MODERN SLAVERY

OUR COMMITMENT

THIS MODERN SLAVERY STATEMENT RELATES TO ACTIONS AND ACTIVITIES FROM THE 1ST OCTOBER 2019 TO DATE (16TH JANUARY 2022). IT WAS ON THE 1ST OCTOBER 2019 WE FIRST PUBLICLY SHRED OUR COMMITMENT TO ERADICATING MODERN SLAVERY.

THE STATEMENT SETS DOWN PRICKLY THISTLE SCOTLAND LTD.'S COMMITMENT TO PREVENTING SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS ACTIVITIES AND THE STEPS WE HAVE PUT IN PLACE WITH THE AIM OF ENSURING THAT THERE IS NO SLAVERY OR HUMAN TRAFFICKING IN OUR OWN BUSINESS AND SUPPLY CHAINS. WE ALL HAVE A DUTY TO BE ALERT TO RISKS, HOWEVER SMALL. STAFF ARE EXPECTED TO REPORT THEIR CONCERNS AND MANAGEMENT TO ACT UPON THEM.

ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

THIS STATEMENT COVERS THE BUSINESS ACTIVITIES OF PRICKLY THISTLE SCOTLAND LTD. WHICH ARE AS FOLLOWS:

PRICKLY THISTLE SCOTLAND LIMITED WAS FOUNDED IN 2015 BY CLARE CAMPBELL. WE ARE A DESIGN-LED AND MARKET DISRUPTING TARTAN MANUFACTURING BRAND. FROM BESPOKE CLOTH DESIGNS, TO CLOTH WEAVING AND PRODUCT MANUFACTURING. WITH A SMALL TEAM OF PASSIONATE AND SKILLED “TARTAN REBELS” WE HAVE BROUGHT TARTAN WEAVING BACK TO ITS HIGHLAND HOME, THE NORTHERN REGION OF SCOTLAND. WE PRIDE OURSELVES ON A TRIPLE BOTTOM LINE APPROACH WHERE PEOPLE, THE ENVIRONMENT AND PROFIT ARE ALL CONSIDERED CAREFULLY AND EQUALLY IN ALL THAT WE DO. WE ARE COMMITTED TO THE SCOTTISH SUPPLY CHAIN AND KEEP EVERYTHING LOCAL, SCOTTISH, OR AT LEAST WITHIN THE UK AS MUCH AS POSSIBLE. OUR BUSINESS IS BASED IN THE HIGHLANDS OF SCOTLAND, ONE SITE AND WE EXPORT GLOBALLY VIA OUR ONLINE SHOP, OR COMMISSIONED PARTNERSHIPS ON A BUSINESS TO BUSINESS BASIS. WE WILL ALWAYS REMAIN IN THE HIGHLANDS OF SCOTLAND AND HAVE NO PLANS TO HAVE OFFICES ELSEWHERE. WE ASPIRE TO BE FULLY VERTICAL IN OUR OPERATIONS – FLOCK TO FROCK – AND BE DIVERSE, MULTI-DISCIPLINED AND SYNERGISED. WE WANT TO REMAIN ARTISAN AND NOT MASS PRODUCE IN ANY AREA OF THE BUSINESS, HAVING A DIVERSIFIED INCOME STREAM WILL ALSO ASSIST IN MANAGING THE SUSTAINABILITY RISK OF THE BUSINESS.

THE COMPANY CURRENTLY ONLY OPERATES IN SCOTLAND – WHERE WE HAVE ONE OPERATIONAL SITE, AND IT IS HERE WE DESIGN, MANUFACTURE, AND SELL NATURAL FIBER TEXTILE PRODUCTS.



ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

THE COMPANY WILL CONTINUE TO ENSURE THAT OUR SUPPLY CHAIN IS AS LOCAL AS IS AVAILABLE FOR OUR INDUSTRY, ACROSS SCOTLAND OR BRITISH AS MUCH AS POSSIBLE TO REDUCE THE RISK OF MODERN SLAVERY OR HUMAN TRAFFICKING IN ALL AREAS OF OUR BUSINESS. HOWEVER WE ARE AWARE THAT THAT OUR SUPPLIER'S SUPPLY CHAIN MAY INCLUDE ITEMS FROM SUPPLIERS IN OTHER COUNTRIES THAT WE HAVE NOT DIRECT CONTACT OR AWARENESS OF. TO REDUCE THE RISK OF OUR BUSINESS INDIRECTLY SUPPORTING ANY FORM OF MODERN SLAVERY WE, AND WILL CONTINUE TO, MONITOR AND ASSESS OUR ACTIVITIES ON A REGULAR BASIS AND ADHERE TO THE FOLLOWING PROCESS TO ASSESS WHETHER PARTICULAR ACTIVITIES OR COUNTRIES ARE HIGH RISK IN RELATION TO MODERN SLAVERY OR HUMAN TRAFFICKING:

- THE COMPANY WILL ASK ALL SUPPLIERS TO COMPLETE AND UPDATE A SUPPLY CHAIN QUESTIONNAIRE ON AN ANNUAL BASIS.
- A PRICKLY THISTLE SCOTLAND LIMITED STAFF REPRESENTATIVE WILL VISIT THE SITE OF OUR SUPPLIER TO PHYSICALLY OBSERVE THE WORKING CONDITIONS AND MEET THE PEOPLE WORKING THERE.
- WE WILL DO AN INTERNET SEARCH OF THE SUPPLIER USING CREDIBLE SOURCES, IN THE HOPE THAT ANY REPORTED OR INVESTIGATED MODERN SLAVERY CONCERNS WITH OUR SUPPLIER OR THEIR SUPPLY CHAIN ARE HIGHLIGHTED THEREIN.
- MANAGEMENT WILL ANALYSE THE QUESTIONNAIRE ANSWERS; VISIT FINDINGS; AND INTERNET SEARCHES AND ASSESS WHETHER OR NOT THERE IS A HIGH RISK OF MODERN SLAVERY OR HUMAN TRAFFICKING IN THE FOUR AREAS IDENTIFIED WITHIN THE UK – LABOUR EXPLOITATION, SEXUAL EXPLOITATION, CRIMINAL EXPLOITATION AND DOMESTIC SERVITUDE.



HIGH RISK ACTIVITIES

THE FOLLOWING ACTIVITIES ARE CONSIDERED TO BE AT HIGH RISK OF MODERN SLAVERY OR HUMAN TRAFFICKING:

WE BELIEVE THAT PURCHASING MAY BE A HIGH-RISK ACTIVITY FOR US. WHILE WE CAN ASK OUR FIRST-TIER SUPPLIERS FOR ACCURATE UP TO DATE INFORMATION ABOUT THEIR SUPPLY CHAIN, WE MAY NOT ALWAYS GET HONEST DETAILED ANSWERS IN RETURN.

RESPONSIBILITY FOR THE COMPANY'S ANTI-SLAVERY INITIATIVES ARE AS FOLLOWS:

- **POLICIES:** THE BOARD OF DIRECTORS ARE RESPONSIBLE FOR CREATING AND REVIEWING POLICIES. THE PROCESS BY WHICH POLICIES ARE DEVELOPED IS BY LOOKING AT BEST PRACTICE AND ADAPTING TO THE NEEDS OF THE COMPANY.
- **RISK ASSESSMENTS:** CLARE CAMPBELL, FOUNDER, IS RESPONSIBLE FOR RISK ASSESSMENTS IN RESPECT OF HUMAN RIGHTS AND MODERN SLAVERY BY A PROCESS OF OBTAINING COMPLETED SUPPLY CHAIN QUESTION RESPONSES FROM ALL SUPPLIERS, RECORDING AND SCRUTINISING THE INFORMATION GIVEN. IN CONJUNCTION WITH SITE VISITS IN PERSON.
- **DUE DILIGENCE:** THE BOARD OF DIRECTORS ARE RESPONSIBLE FOR DUE DILIGENCE IN RELATION TO KNOWN OR SUSPECTED INSTANCES OF MODERN SLAVERY AND HUMAN TRAFFICKING.

TRAINING & POLICIES

TRAINING

TO ENSURE A GOOD UNDERSTANDING OF THE RISKS OF MODERN SLAVERY AND HUMAN TRAFFICKING IN OUR BUSINESS AND SUPPLY CHAINS, THE COMPANY REQUIRES ALL STAFF TO WATCH AN AWARENESS VIDEO 'GLAA MODERN SLAVERY – DO THE RIGHT THING' AND READ 'MODERN SLAVERY HELP THEM' AS PART OF THEIR INDUCTION. LINKS BELOW;

- [HTTPS://WWW.GLA.GOV.UK/PUBLICATIONS/RESOURCES/GLAA-VIDEOS/GLAA-MODERN-DAY-SLAVERY/](https://www.gla.gov.uk/publications/resources/glaa-videos/glaa-modern-day-slavery/)
- [HTTPS://WWW.GLA.GOV.UK/MEDIA/3332/GANGMASTER-VICTIMS-LEAFLET-DIGITAL.PDF](https://www.gla.gov.uk/media/3332/gangmaster-victims-leaflet-digital.pdf)

POLICIES

THE COMPANY IS COMMITTED TO ENSURING THAT THERE IS NO MODERN SLAVERY OR HUMAN TRAFFICKING IN OUR BUSINESS OR OUR SUPPLY CHAINS. THIS STATEMENT AFFIRMS ITS INTENTION TO ACT ETHICALLY IN OUR BUSINESS RELATIONSHIPS.

THE FOLLOWING POLICIES SET DOWN OUR APPROACH TO THE IDENTIFICATION OF MODERN SLAVERY RISKS AND STEPS TO BE TAKEN TO PREVENT SLAVERY AND HUMAN TRAFFICKING IN OUR OPERATIONS:

TRAINING & POLICIES

- PTS WHISTLEBLOWING POLICY - THE COMPANY ENCOURAGES ALL ITS WORKERS, CUSTOMERS AND OTHER BUSINESS PARTNERS TO REPORT ANY CONCERNS RELATED TO ITS DIRECT ACTIVITIES OR ITS SUPPLY CHAINS.
- PTS CODE OF CONDUCT - THE CODE OF CONDUCT SETS DOWN THE ACTIONS AND BEHAVIOUR EXPECTED OF THE COMPANY, ITS EMPLOYEES, AND ITS SUPPLIERS.
- PTS CODE OF ETHICS POLICY - THE CODE OF ETHICS STATES THE ETHICAL AND MORAL STANDARDS EXPECTED IN RELATION TO HUMAN RIGHTS AND WORKERS' RIGHTS FOR THE COMPANY AND ITS EMPLOYEES AND THOSE OF ITS SUPPLIERS AND BUSINESS PARTNERS.
- PTS CORPORATE SOCIAL AND SUSTAINABILITY RESPONSIBILITY PROMISE (CSSR) - THE COMPANY'S CSSR PROMISE SUMMARISES HOW WE MANAGE OUR ENVIRONMENTAL IMPACTS AND HOW WE WORK RESPONSIBLY WITH SUPPLIERS AND LOCAL COMMUNITIES.
- PTS MIGRANT WORKER POLICY - DETAILS THE COMPANY'S POLICY ON RECRUITMENT AND REQUIRING EVIDENCE OF A SUCCESSFUL CANDIDATE'S ORIGINAL DOCUMENTS SHOWING HIS OR HER RIGHT TO WORK IN THE UK.
- PTS CHILD LABOUR & YOUNG WORKER POLICY - PRICKLY THISTLE SCOTLAND LTD. RECOGNISES THAT CHILD AND FORCED LABOUR IS A GLOBAL ISSUE, AND ONE THAT MUST BE ERADICATED. WE PROHIBIT ALL FORMS OF CHILD LABOUR IN OUR OWN OPERATIONS AND SUPPLY CHAIN AND WILL NOT DIRECTLY EMPLOY ANY CHILD OR YOUNG PERSON UNDER THE AGE OF 16 YEARS OLD.

WE DO HOWEVER ADVOCATE ENGAGEMENT WITH YOUNG PEOPLE IN LOCAL EDUCATION AUTHORITIES TO EDUCATE THEM ON OUR INDUSTRY, VALUES, AND RESPONSIBILITIES.

DUE DILIGENCE PROCESSES FOR SLAVERY & HUMAN TRAFFICKING

THE COMPANY UNDERTAKES DUE DILIGENCE WHEN CONSIDERING TAKING ON NEW SUPPLIERS, AND REGULARLY REVIEWS ITS EXISTING SUPPLIERS. THE COMPANY'S DUE DILIGENCE PROCESS INCLUDES BUILDING LONG-STANDING RELATIONSHIPS WITH SUPPLIERS AND MAKING CLEAR OUR EXPECTATIONS OF BUSINESS PARTNERS IN OUR CODE OF CONDUCT WHICH WE ASK OUR SUPPLIERS TO BECOME SIGNATORIES TO; EVALUATING THE MODERN SLAVERY AND HUMAN TRAFFICKING RISKS OF EACH NEW SUPPLIER FOLLOWING COMPLETION OF OUR SUPPLY CHAIN QUESTIONNAIRE; AND INVOKING SANCTIONS AGAINST SUPPLIERS THAT FAIL TO MEET OUR EXPECTATIONS AND STANDARDS, INCLUDING THE TERMINATION OF THE BUSINESS RELATIONSHIP.



PERFORMANCE INDICATORS

THE COMPANY USES THE FOLLOWING KEY PERFORMANCE INDICATORS (KPIs) TO MEASURE HOW EFFECTIVE WE ARE IN ENSURING SLAVERY AND HUMAN TRAFFICKING IS NOT TAKING PLACE IN ANY PART OF OUR BUSINESS OR SUPPLY CHAINS INCLUDING:

- THAT ANY SUCCESSFUL CANDIDATES IN OUR RECRUITMENT PROCESS HAVE SUPPLIED VALID IDENTIFICATION AND DOCUMENTATION OF THEIR STATUS AND RIGHT TO WORK IN THE UK.
- THAT ALL STAFF HAVE COMPLETED THE COMPANY'S TRAINING ON MODERN SLAVERY DURING THEIR INDUCTION AND KNOW WHAT TO DO IF THEY SUSPECT SLAVERY OR HUMAN TRAFFICKING WITHIN THE WORKPLACE OR THE COMPANY'S SUPPLY CHAIN.
- THAT AN ANNUAL REVIEW AND UPDATE OF THE COMPANY'S MODERN SLAVERY STATEMENT IS COMPLETED, POSTED ON OUR WEBSITE, AND PASSED ON TO ALL STAFF AS A REMINDER.
- THAT ALL SUPPLIERS HAVE BEEN VISITED; COMPLETED THEIR SUPPLY CHAIN QUESTIONNAIRE AND UPDATED ANNUALLY AS APPROPRIATE; AND THAT WE HAVE AN UP TO DATE RECORD OF EACH SUPPLIER WHO HAS BECOME A SIGNATORY TO OUR CODE OF CONDUCT.
- THAT THE NUMBER OF SUSPICIONS OR CASES OF MODERN SLAVERY REPORTED BY STAFF OR WITHIN OUR SUPPLY CHAIN IS ZERO.

THIS MODERN SLAVERY STATEMENT WILL BE REGULARLY REVIEWED AND UPDATED AS NECESSARY. THE BOARD OF DIRECTORS ENDORSES THIS POLICY STATEMENT AND IS FULLY COMMITTED TO ITS IMPLEMENTATION.



APPROVED AND AUTHORISED BY

NAME : CLARE CAMPBELL

POSITION : FOUNDING DIRECTOR

DATE : 16TH JANUARY 2022

SIGNED : *C Campbell x*



*"What will they say in
200 years...."*



PRICKLY
THISTLE

WWW.PRICKLYTHISTLESCOTLAND.COM