



## **MODERN SLAVERY ACT POLICY STATEMENT**

### **INTRODUCTION AND STATEMENT OF POLICY**

Ioma Clothing source quality products in the UK, EU and Asia using the assessment systems and good standing criteria set by the 2015 Modern Slavery Act, and the Public Contract Regulation Act. Additionally, we recognise our corporate responsibility to respect and uphold human rights and all ethical trading values.

Ioma Clothing is fully compliant with the Modern Slavery Act 2015 and this Policy sets out our procedures to vet our supply chain, have internal and external monitoring procedures as well as reporting duties to inform the Board of Directors of this compliance. Therefore, the aim and purpose of this Policy is to ensure we have the staff, systems and business culture to identify, report and prevent any breach of this statutory duty.

### **UNDERSTANDING OUR DUTIES AND RESPONSIBILITIES**

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. Modern slavery is defined as “a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain”.

This Policy applies to all persons working for Ioma Clothing or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants and any third-party representatives.

We expect the same exacting standards from all our contractors, suppliers and other parties as part of our contracting processes. We expect that our suppliers will hold their own suppliers and clothing manufacturers to the same exacting standards and provide evidence and verification of good standing and independent assessment of these anti-slavery prevention standards.

### **RESPONSIBILITY FOR THE POLICY**

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply. The Sales Director is the assigned responsible individual in consultation with the Procurement Manager for supply chain compliance and ethical trading. They have “day-to-day” responsibility for implementing this Policy monitoring its use and effectiveness, dealing with any queries and auditing EU and international procurement systems and procedures to ensure they are effective in countering modern slavery.



The Procurement Manager is responsible for maintaining records of inspection, reporting to the Board of Directors and issuing Supplier Assessment Questionnaires to validate the activities of our suppliers to satisfy these obligations. Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are given adequate and regular training on the duty and the issue and threat of modern slavery in our supply chains.

### **COMMUNICATION AND AWARENESS OF THE POLICY**

ioma Clothing communicates commitment to all ethical trading standards by including these duties within the Staff Handbook and this Policy Statement is displayed on our Staff Notice Board. Training on all Policy commitments, including our Anti-Slavery Policy is included as a specific duty within the Employee Induction process for all new staff. Our zero-tolerance approach to modern slavery is also communicated to all suppliers, contractors and manufactures at the outset of our business relationship with them and are stated in our sales contracts and our Supplier Assessment Questionnaire.

### **COMPLIANCE WITH THE DUTY AND OBLIGATION**

We have the systems and staff to ensure we are compliant with the Modern Slavery Act 2015 by-

- appointing Sedex to be our inspectors of suppliers and their manufacturing sites;
- assigning Senior Responsible Managers to monitor and report any suspicious activities by UK and overseas suppliers contravening the Modern Slavery Act 2015;
- ensuring that all staff read, understand, and sign to state they comply with this policy;
- verifying the trading credentials of our suppliers and reporting any concerns to the Board of Director recommending removal from our Approved Suppliers List and any reporting to the relevant police authorities.

Therefore, all employees are required to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier at the earliest stage. If staff believe or suspect a breach of this Policy has occurred or that it may occur staff must notify the Procurement Manager and/or Sales Director in accordance with our "Whistleblowing Policy" as soon as possible and referral to the relevant police authorities.

### **USING INDEPENDENT ASSESSMENT BODY AND AUDITORS TO RATE SUPPLIERS**

Our verification procedures are based upon the Base Code of the Ethical Trading Initiative and our Membership of the Sedex Global, a not for profit membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains.

We will embed in our garment and product supplier assessment practices and our Management Information System (Apparel) systems to validate and check the ethical trading credentials and the overall suitability of manufacturers and suppliers listed within our supply chain database.

### **BREACHES OF THIS POLICY**

Any employee who breaches this policy will face disciplinary action, which shall result in dismissal for gross misconduct. We will immediately terminate our relationship with any supplier,



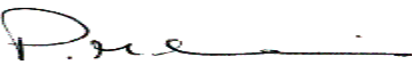
manufacturer and organisation working on our behalf, if they breach this policy and we will immediately report this matter and any suspicions to the policing authorities, as required.

## **REGULARLY REVIEWING AND REPORTING ON OUR POLICY COMMITMENT**

We regularly review our policies and procedures as part of our annual update of legal compliance, introduction of any new laws and regulations as well as our Quality Management System reviews. For these reasons, the Sales Director will ensure that the suppliers and manufacturers held on our Approved Supplier List and contained both within the Apparel and Sage Accounting software systems are assessed annually for compliance to ethical and modern slavery prevention requirements.

Any supplier not conforming to this Policy and/or our values will be removed from the Ioma Approved Supplier List, or until such time that they have submitted satisfactory evidence of compliance to national and international ethical trading standards. They will be required to submit evidence of compliance including the supply of their Modern Slavery Act Policy Statement and all other Policies that govern the supply of products under the public and private sector procurement regulations.

The Sales Director will also be responsible for co-ordinating and implementing improvements to any business process where required and making recommendations directly to the Managing Director as part of our continuous improvement on supplier evaluation, ethical trading and quality assurance procedures.

Signed: 

Name: **Paul Levinson**

Title: MANAGING DIRECTOR

Date: 3 July 2020 Author: Adrian Thomas: Sales Director

Next Review Date: July 2024