

ZEBRA MTD LTD GROUP

MODERN SLAVERY ACT 2015

Modern slavery and human trafficking policy & statement

Introduction

This document sets out Zebra MTD Ltd's (and its subsidiaries) policy and statement of actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 February 2019 to 31 January 2020.

As part of the publishing, distribution and retailing industries, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Zebra MTD Ltd and its subsidiaries (The Calendar Club Ltd, calendarclub.co.uk Ltd, Otter House Ltd, Vista Stationery & Print Ltd). Companies within the group publish, distribute and retail calendars, cards, stationery, Halloween products and other gift products, as well as providing products and services to the charity sector.

Countries of operation and supply

The group is based in Exeter, Devon, UK, and has direct operations in the United Kingdom and Republic of Ireland. Products are sourced both in the UK and overseas, as appropriate.

The assessment of whether or not particular activities or countries are high risk in relation to slavery or human trafficking is done by Group staff who are experienced in sourcing products from around the world, and supplement their existing knowledge with relevant webinars, regular (normally annual) visits and widespread research.

High-risk activities

The activities which are undertaken by the group that are considered to potentially be at high risk of slavery or human trafficking are the sourcing of products in certain less-developed areas of the world, such as the Far East and India, where historically more incidents have arisen.

Responsibility

Responsibility for the group's anti-slavery initiatives is as follows:

- **Policies:** The Directors are responsible for developing, putting in place and reviewing policies.
- **Risk assessments:** The Directors are responsible for ensuring suitable personnel carry out human rights and modern slavery risk analysis.

- Investigations/due diligence: Anthony Jervoise and Steve Plackett, who are directors of group companies, are responsible for overseeing due diligence (and any investigations) in respect of slavery and human trafficking.
- Training: In order to increase their knowledge in this area, relevant Group personnel have researched slavery and human trafficking risks, and have discussed and interacted with other organisations operating in the same product risk and geographical areas.

Relevant policies etc

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure, as set out in the Employee Handbook, is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Employee code of conduct** The organisation's Employee Handbook makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement standards** The organisation is committed to ensuring that its suppliers adhere to high standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet high standards and improve their worker's working conditions. However, serious violations will lead to the termination of the business relationship.
- **Recruitment/Agency workers** The organisation uses only specified, reputable employment agencies to source labour.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier. Our policy is to audit all major suppliers using SEDEX (SMETA two-pillar standards);
- reviewing on a regular basis all aspects of the supply chain based on supply chain mapping;
- conducting supplier audits or assessments through the organisation's own staff or third party auditors;
- creating a supplier database covering all major suppliers;

- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through third party auditors and requiring them to implement action plans;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation is:

- requiring relevant staff to have completed training on modern slavery; and
- maintaining a system for supply chain verification (in place since 2013), whereby the organisation evaluates potential suppliers before they enter the supply chain.

Training

The organisation requires relevant staff within the organisation to complete training on modern slavery.

The organisation's modern slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;
- what guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and
- what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by internal briefings (meetings and email communications).

This statement has been approved by the organisation's board of directors, who will review and update it regularly.

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Director's signature:

A handwritten signature in black ink, appearing to read 'Anthony Jervoise', written in a cursive style.

Director's name:

ANTHONY JERVOISE

Date:

4/4/19